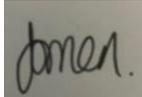




## Safeguarding Policy

Policy Owner	Kieran Smythe
Implementation Date	25/01/2021
Last Review Date	08.02.2022
Reviewer	Sue Gomer
Next Review Date	08.02.2023
Current Version Number	2

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Issued: 08.02.2022	Next review date: 08.02.2023
Signed by: (Name & role) S. Gomer: Head of Quality	Signature: 

## SECTION A

We all have a statutory duty to safeguard and promote the welfare of our learners and to maintain a professional attitude of **it could happen here** where safeguarding is concerned.

KS Training is committed to safeguarding learners and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to **act without delay** to protect learners by reporting anything that might suggest a child (or adult) is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. KS Training seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

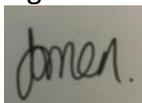
***'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.'*** (Keeping Children Safe in Education 2020)

All staff are encouraged to report any concerns that they have and **not see these as insignificant**. On occasions, a referral is justified by a **single incident** such as an injury or disclosure of abuse. More often however, **concerns accumulate over a period of time** and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, **it is crucial that staff record and pass on concerns** in accordance with this policy to allow the Designated Safeguarding Lead to build up a picture and access support for the child at the earliest opportunity.

We maintain a professional attitude of 'it could happen here' where safeguarding is concerned. When there are concerns about the welfare of a learner, staff members will always act in the best interests of the learner. This policy has been developed in-conjunction with our culture of prevention, protection and support and will be linked with all our policies e.g. anti-bullying, online safety, health and safety, anti-radicalisation. We will continue to maintain an ethos where learners feel secure, are encouraged to talk, are listened to and feel safe. Learners at KS Training are encouraged to talk freely with any staff member at KS Training if they are worried or concerned about something. This includes any learners we are responsible for under sub-contracting arrangements.

Additional online and e-safety guidance can also be found in the ICT Acceptable Use policy that is updated on an annual basis and shared with staff and learners via the relevant padlet, it is also available on the company CRM system for staff.

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Sub-contractors undergo annual due diligence to ensure they have the necessary policies in place and contractually are obliged to meet all the necessary requirements including staff training.

## **Introduction**

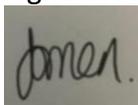
The aim of this policy is to clarify KS Training role in the safeguarding and protection of children and young people and adults at risk and to promote their welfare. The purpose is to bring about better outcomes for all learners by facilitating open communication channels and clear accountability in interagency working arrangements. By implementing the policy it will help all learners achieve the below outcomes:

- Are committed – developing a robust culture of vigilance
- Build resilience – raising awareness of safeguarding and child protection issues, and equipping children & young people (and adults) with the language and skills to keep themselves safe
- Establish a safe environment – in which children & young people (and adults) can work and learn and develop within an ethos of openness and are taught to treat each other with respect, to feel safe, to have a voice and are listened to
- Support vulnerable learners – supporting learners who have been abused, have witnessed violence towards others or may be vulnerable to abuse
- Prevent unsuitable people – from working with children & young people by ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with our children. And to maintain an active vigilance thereafter
- Make a positive contribution – know and understand how to ensure those around our learners and in their care are safeguarded and how to report if there are concerns

This policy applies to the entire KS TRAINING caseload including all young people aged 13-18 and vulnerable adults, who form part of our statutory responsibilities, specifically those young people who have a physical, sensory or learning disability. Throughout this document the generic phrase learners will be used where possible. Where the phrase “Child” or “Child Protection Procedure” applies these will also apply to Adults at risk. We recognise that any learner could potentially be a victim of abuse.

The aim is to follow the procedures set out by Staffordshire Safeguarding Children’s Board, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2018 by:

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- Knowing that safeguarding and promoting the welfare of learners is everyone's responsibility, and the voice of the learner is evident
- Protecting our learners from maltreatment
- Establishing a safe environment in which our learners can learn and develop within an ethos of openness
- Preventing impairment of our learner's health or development
- Ensuring young people at KS Training grow up in circumstances consistent with the provisions of safe and effective care.
- Offering learners a balanced curriculum including PHSE, healthy relationship education, online safety, sexting
- Offering learners a balanced curriculum through online activities, enabling them to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Understanding that no single professional can have the full picture of a learner's needs and circumstances. Everyone who comes into contact with children and their family has a role to play in identifying concerns, sharing information and taking prompt action.
- Undertaking the role so as to enable learners at KS Training to have best outcomes.
- Ensuring as a provider we have a clear understanding of our staff's knowledge and understanding, and embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our provision.

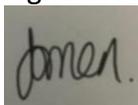
This policy provides guidance to all adults working within the business, whether paid or voluntary or directly employed by KS Training or a third party.

- This policy is available on our website & within the resources section on our eportfolio and is available on request from Sue Gomer, [sue.gomer@kstraininggroup.com](mailto:sue.gomer@kstraininggroup.com)
- We also inform learners about this policy when they enroll in learning.
- This policy will be reviewed in full by the Board on an annual basis or sooner should legislation/guidance change.
- This policy sets out how KS Training discharges its statutory responsibilities relating to safeguarding and promoting the welfare of learners. Our policy applies to all staff; paid and unpaid
- The policy is provided to all staff (including freelance, temporary staff and volunteers) at induction, alongside our Staff code of conduct. In addition, all staff are provided with Part One & Annex A of Keeping Children Safe in Education 2021.
- All new staff receive a safeguarding induction with the Safeguarding Lead and all staff have to complete the necessary mandatory training

The revised interagency guidance is based on:

Keeping Children Safe in Education – updated September 2021

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<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Inspecting Safeguarding in Early Years Education and Skills Settings – updated 23/07/2021  
<https://www.gov.uk/government/collections/education-inspection-framework>

Sexual violence and sexual harassment between children in schools and colleges – updated September 2021  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014224/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Prevent Duty Guidance – updated 01/04/2021  
<https://www.gov.uk/government/publications/prevent-duty-guidance>

CONTEST Strategy (Prevent)  
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

Counter-Terrorism and Security Act 2015  
<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill#related-documents>

Equality Act 2010 – updated 16/06/2015  
<https://www.gov.uk/guidance/equality-act-2010-guidance>

Protection of Freedoms Act 2012  
<http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

Vetting and Barring Scheme (VBS) revised guidance 2012  
<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Education Act 2011  
<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>

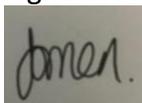
Children Act 2004  
<https://www.legislation.gov.uk/ukpga/2004/31/contents>

Working Together to Safeguard Children 2018 – updated 09/12/2020  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Human Rights Act 2010  
<https://www.legislation.gov.uk/ukpga/1998/42/contents>

GDPR Regulations 2018

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<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

All staff working with learners must be able to identify when someone may be likely to suffer significant harm through abuse or neglect and how to act upon concerns by referring them to Children's or adults Social Care. In addition all staff must ensure that learners are supported with e- safety and are aware of threats surrounding this.

For children or young people only:

We will work closely with Birmingham local safeguarding children's board who will help and support us in instances relating to abuse. For anyone wanting to contact the local safeguarding children's board, the contact details are: 0121 675 1669, this is the West Midlands Safeguarding board, it is worth noting that all regions will have their own local numbers.

<https://www.lscpbirmingham.org.uk/lado>

All agencies and their staff should be aware of internal arrangements consistent with the child and vulnerable adult's protection procedures (Section B), and the roles of key staff within the organisation.

## Roles, Responsibilities and Structure

All staff delivering services in children and young people have a responsibility under the Keeping Children Safe in Education – updated 17/06/2020

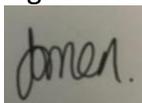
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>  
to safeguard and promote the welfare of children.

We also have an ethical and moral duty to protect those adults that could become vulnerable or who are vulnerable to abuse due to the nature of the sectors we deliver education within.

## Tutors

KS Training staff have a legal responsibility for the identification and reporting of individual abuse and for safeguarding the welfare of children, young people and adults at risk.

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Advice and support should be sought from the Line Manager, especially with regard to consent and referral issues. If the Line Manager is not available or is unable to provide the required information, staff should contact the designated person for support.

There are clear procedures for the recording of information which need to be followed.

### **Line Manager**

The Line Manager will be the first point of reference for staff in the team.

Line Managers need to be aware of procedures, and to ensure their staff are aware of procedures and ensure staff refer any concerns to the Designated Person.

Line Managers have the responsibility to ensure that the procedures are being followed in individual cases, cases are clearly and thoroughly recorded and staff are supported throughout the process.

Line Managers should offer the external counseling service to staff that have had a particularly disturbing disclosure (for information contact HR Department).

If the Line Manager feels the procedures have not covered a particular case, or feel that other changes need to be made then this should be passed on to the Managing Director (Lead DP) who have overall responsibility.

The Designated Person is responsible for keeping the confidential file containing written statements and copies of forms. You must ensure that this is only accessed by staff who “need to know” about a particular case.

Copies of statements and forms should be sent to the Managing Director (Lead DP) for inclusion in a central file.

### **Safeguarding Designated Person(s) (Sue Gomer & Maria Reason)**

Sue Gomer is the first contact, Maria Reason is second contact.

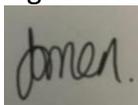
Overall responsibility for Individual Protection issues in KS Training, making sure they are maintained, monitored and evaluated.

Responsible for keeping central confidential files

Contactable out of hours in exceptional circumstances

Responsible for ensuring Safeguarding and Individual Protection procedures and policies are kept up to date

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Responsible for contributing to Serious Case Reviews and implementing any resulting action plans

Responsible for referrals to outside agencies.

### **Safeguarding & Prevent Lead (Sue Gomer)**

Should you have concerns in relation to radicalization they should immediately be referred to the Prevent Lead. The Prevent Lead is responsible for making any further referrals thereon (i.e. Channel).

### **Safeguarding & Prevent Deputy (Maria Reason)**

In the absence of the lead safeguarding & Prevent officer, the deputy will be the main point of contact.

### **Human Resource Manager (Courtney Dent in conjunction with Citation)**

The Human Resource Manager in relation to allegations made against staff, a member of the senior leadership team or a board member, this is also linked into the Whistleblowing Policy where the Human Resource Manager is the first point of contact for any Whistleblowing concerns raised from either members of staff, learners or employers.

Provide information on counselling if required for staff members affected by abuse or disclosure of abuse.

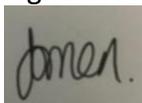
The Human Resource Manager is also responsible for ensuring Safer Recruitment training is updated on an annual basis for all managers who take part in the selection and recruitment process. Any applicants who identify previous convictions will be reviewed by the DSL / DDSL to ensure the correct procedures are followed in-line with safer recruitment requirements and Safeguarding of learners and staff.

Any low level concerns that are reported to the HR Manager or the DSL/DDSL are recorded on the central system (My Concern) and reviewed during the monthly Safeguarding meetings. Relevant action is identified where required and reported. This is also reported to the Board during the monthly Board meetings with the supporting follow up actions taken.

### **Key Definitions**

**Safeguarding and Promoting Welfare** is defined as:

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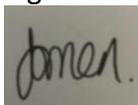
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- Protecting children, young people and adults at risk from maltreatment
- Preventing impairment of children's/adults at risk health or development
- Ensuring that children/adults at risk are growing up in circumstances consistent with
- The provision of safe and effective care
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully
- Be vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our learners are safe from harm.

All staff in KS Training have an awareness of safeguarding issues through regular training and briefings, some of which are listed below. We enable our staff to be aware that these behaviours put learners in danger. All staff are aware of the Designated Safeguarding Lead, who is the expert within our School and is there to support staff, sub-contractors, volunteers and the Board further.

- Abuse
- Bullying, including cyberbullying
- Children and the courts
- Children with family members in prison
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gambling Addiction
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Grooming for crime
- Homelessness
- Mental health
- Missing children and adults strategy
- Modern slavery \*

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- Online safety
- Peer on peer abuse
- Private fostering
- Preventing radicalisation
- Sexual violence and sexual harassment
- Sexting
- Trafficking

*\*Modern Slavery – whilst not in scope to be subject to the Modern Slavery Act, as organisation that delivers in a sector with high recruitment needs, the risk of learners being subject to potential slavery conditions is high and therefore staff are provided with training and information to understand how to recognise the possible signs a learner may be subject to this and that it is delivered to learners as part of safeguarding training.*

#### Specific Definitions

**E-safety** is electronic safety which can be associated with websites such as Facebook, Twitter, WhatsApp and any other social networking site. E-safety also applies to mobile phones also where learners should be aware of what to do should they be subject to Sexting. Learners should understand GDPR and how to protect their personal data.

**Child Protection** is part of safeguarding and promoting welfare. The term is used to refer to the activity that is undertaken to protect specific children who are suffering or are at risk of suffering significant harm.

**Physical Abuse** – may involve hitting, shaking, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an individual. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as factitious illness by proxy or Munchausen’s by proxy.

#### Indicators:

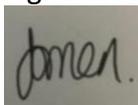
Torn Fraenum.

Blood in whites of eyes, small bruises on head, bruising on rib cage, maybe associated with shaking.

Burns and scolds on hands, feet, buttocks, groin.

Cigarette burns.

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Linear marks, weal marks.

Bruised eyes or ears.

Multiple bruising.

Grip/slap marks.

Bite Marks.

Injuries found to be at different stages.

Unconscious Individual.

Injuries/fractures in individuals who are not mobile.

NB This is not an exhaustive list

**Emotional Abuse/ Psychological abuse**

Emotional and psychological abuse is the persistent emotional ill treatment of an individual which causes severe and persistent side effects on the individual's emotional development. Most forms of abuse will generally include psychological or emotional signs and symptoms. It may involve conveying to the individual that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on individual. These may include interactions that are beyond the individual's development capability as well as overprotection and limitation of exploration and learning or preventing the individual participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing individuals to feel frightened or in danger, or the exploitation or corruption of individual. Some level of emotional abuse is present in all types of ill treatment of a individual, though it can still occur alone.

**Indicators:**

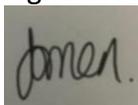
Lack of self-esteem.

Withdrawn, aggressive behavior, self harm, mutilation, substance abuse and suicide attempts.

Eating disorders.

Degrading or humiliating punishments.

Children who appear unused to praise or encouragement.

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Children who are rejected by parent/carer/sibling.

Bullying.

### **Neglect and acts of omission**

Neglect can also be a form of emotional abuse, many of the signs and symptoms will be the same as outlined above, Acts of omission are when knowingly someone could be putting a child, young person or vulnerable adults at risk or they are aware of the abuse but it is not reported. Such instances include, ignoring medical or physical care needs, failure to provide access to appropriate health and social care and with holding the necessities in life.

### **Indicators**

See all indicators of abuse

**Sexual Abuse** – involves forcing or enticing a child or young person or adults at risk to take part in sexual activities including prostitution, whether or not the individual is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may involve non-contact activities such as involving individuals in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging individuals to act in sexually inappropriate ways.

### **Indicators:**

Inappropriate sexual knowledge or behavior.

Excessive sexual play and masturbation.

Sexually transmitted diseases.

Pregnancy – especially concealed.

Children who witness intimate sex acts.

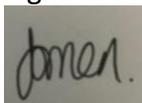
Self-harm/suicide attempts/substance abuse.

Eating disorders.

Nightmares/disturbed sleep patterns.

Wetting, soiling/smearing excreta.

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Significant changes in behavior/personality.

Persistent offending, non-school attendance.

### **Financial or material Abuse**

This may include theft, fraud, exploitation, pressure when dealing with wills or inheritance, financial transactions and claiming benefits that they are not entitled to.

Indicators:

Loss of money from wallet or purse

Lack of money to buy basic items

Bills not been paid when money has been entrusted to a third party

Inadequate clothing

Unexplained withdrawal of cash

### **Discriminatory abuse**

This could include bullying and harassment based on the age, sex, disability, race, religion, ethnicity and sexual orientation. The indicators are same as those identified in emotional abuse.

### **Protection of Children in Specific Circumstances**

Children have a right to be protected including in the following circumstances -

Sexual activity of young people under the age of 18.

Female genital mutilation.

Protecting children from forced marriages.

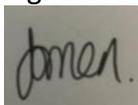
Protection from radicalisation

### **Radicalisation**

There are a number of behaviours that might indicate that an individual is at risk of being radicalised or exposed to extreme views. Such behaviours may include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centered on an extremist ideology, group or cause

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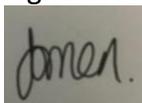
- Loss of interest in others and activities not associated with the extremist ideology, group or cause
- Possession of materials or symbols associated with an extremist cause;
- Attempts to introduce others to the group/cause
- Communications with others that suggests identification with a group, cause or ideology
- Using names/language ranging from insulting to derogatory for members of another group
- Increase in prejudice-related incidents committed by that person – these may include:
  - physical or verbal assault;
  - provocative behaviour;
  - damage to property;
  - derogatory name calling;
  - possession of prejudice-related materials;
  - prejudice related ridicule or name calling;
  - inappropriate forms of address;
  - refusal to co-operate;
  - attempts to recruit to prejudice-related organisations;
  - condoning or supporting violence towards others.

This list is in no sense intended either to be exhaustive or any more than a description of possible consistent behaviours – rather than proofs – of radicalisation.

### Peer on Peer Abuse

Peer-on-peer/child on child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences. It can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim. Children or young people who harm others may have additional or complex needs e.g. significant disruption in their own lives, exposure to domestic abuse or witnessing or suffering abuse, educational under-achievement, being involved in crime. It should be recognised that peer abuse is harmful to both the perpetrator (who is a child) and the victim.

This form of abuse occurs when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children both on and offline . It is essential that all staff understand the importance of challenging inappropriate behaviours between children/young people. Downplaying certain behaviours, for example dismissing sexual

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harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; or not recognising that emotional bullying can sometimes be more damaging than physical harm and should be taken equally seriously, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children/young people accepting it as normal and not coming forward to report it. Stopping harm and ensuring immediate safety is the first priority of a school / college or training provider.

### **Modern Slavery**

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

The Home Office estimates there are 13,000 victims and survivors of modern slavery in the UK; 55% of these are female and 35% of all victims are trafficked for sexual exploitation.

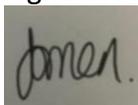
### **Recognising Abuse – General Considerations**

All staff should be alert to signs that an individual may be at risk of significant harm, regardless of age, sex, culture, religion, and social class, as individual abuse occurs regardless of these factors.

Identification of individual abuse may be difficult; it normally requires both medical and social assessment.

Different types of individual abuse could be present at the same time, e.g. an individual who is being sexually abused may be physically abused. Staff need to be alert to signs of other types of abuse.

Always listen carefully to the individual – pay particular attention to any spontaneous statement. In the case of an individual with limited language, pay attention to their signing or behavior or play. Be aware of body language and scribbling/doodling.

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Any delay in seeking medical assistance, or none being sought at all for an ill individual could be an indicator or abuse.

Beware if the explanation of an accident is vague, lacking in details, is inconsistent to the injury or varies with each telling.

Take note of the appropriateness of the response of parents/carers.

Observe a child's interaction with parent particularly wariness or fear or watchfulness.

Any history or unexplained illness/injuries requires the most careful scrutiny.

Beware if there are indicators of a history of domestic violence. Violence towards adults may also indicate violence towards children, and can itself be emotionally abusive.

Individuals who are being abused often do not disclose, for a variety of reasons, so in our professional capacity we have to be vigilant to possible signals.

Be aware at all time that KS Training is responsible for reporting incidents of suspected abuse and not investigating them.

### Significant Harm

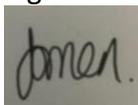
The term 'significant harm' is important as it is the point at which Children's Social Care have a statutory duty to put in motion Section 47 enquiries under the 1989 Children Act. **It is the duty of CHILDREN'S SOCIAL CARE to determine whether the child is at risk of significant harm, not KS TRAINING.** However we need to have an understanding of what it means to inform our referral procedures.

There are no absolute criteria for deciding what constitutes significant harm. It requires judgment based on the nature of the abuse, and the effects of that abuse on the individual.

In order to help us decide how severe the harm is the following factors should be considered:

- The degree and extent of the abuse and neglect.

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- The duration and frequency of the abuse and neglect
- The extent of pre-meditation
- The degree of threat or coercion

## Recording, Sharing of Information and Consent Issues

### Recording Information

In the climate of ‘working together’ with other agencies, young people, adults and families, information will have to be shared, so it is important that our records are kept up to date at all times.

It is important that the safeguarding log is updated as and when information is received, and with any action taken in following these procedures. As with other information recorded on the safeguarding log, we need to bear in mind that a young person or adult can request their records, so until official ‘consent’ has been sought we need to be sensitive as to what we record. It is the Designated Persons responsibility to maintain the log and keep all records.

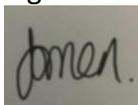
Any written records you make for yourself must be submitted to the Designated Person who will hold them centrally with all records in a secure place in case they are needed at a later date.

The Designated Person should keep a ‘confidential’ file containing all Individual Protection matters for the organisation.

### Sharing Information

Important statutory duties in relation to adults at risk and children in need cannot be met without **effective** and **appropriate** sharing of information. For agencies to work together to the benefit of individuals, they must be able to share relevant information.

This includes a referral to Children’s Social Care or CQC, but could simply be sharing information between supporting agencies regarding a young person or adult at risk, for example, before a referral is made.

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However, sharing of information should take place according to the principles of good practice and on a need to know basis. When a request for information is made we need to be clear about **why** the information is needed and the **way** it is going to be used.

The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a provider we **adhere to data protection** yet we **do not allow this to stand in our way** in the need to promote the welfare and protect the safety of our learners.

### Seeking Consent for Making a Referral or Sharing Information

Prior to information being shared with other agencies, or a referral being made, consent should normally be sought from the young person and/or from one parent/carer with agreed parental responsibility.

However, there are certain important circumstances where consent should not be sought. These are:

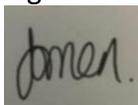
- If this would put the child or young person at greater risk of significant harm.
- Interfere with criminal enquiries.
- Raise concern about the safety of staff.
- Reasons not to seek consent have to be recorded on the records and written on the referral form.

As a 16-19 service we will come across the situation where a young person is sufficiently mature enough to understand choices and their consequences, and will not give consent for referral, especially if they believe it will make their situation worse. This is a particularly difficult situation. You will have to use your judgment as to whether it is appropriate and lawful to refer without consent. Advice must be sought from your team manager and Children's Social Care. You must inform the young person if you decide to refer.

A parent's or young person's lack of agreement should not prevent you from making a referral. If they do not agree, and you decide you need to refer, then you must inform them accordingly.

The Designated Person is responsible for making any referrals.

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## Support for Staff

Although staff should be aware of their responsibilities and procedures for individual protection issues, appropriate support should be sought to help throughout that process.

The senior designated person will help in more complex or serious cases.

Children's Social Care, or other designated 'contacts' can be contacted for advice as appropriate (see contact name and addresses)

## Training

Effective training is the key to carrying out our responsibilities of promoting and safeguarding children, young people and vulnerable adults. Staff need to be trained on how to identify an individual in need, and what subsequent action to take.

Training takes place on a variety of levels, and will depend upon the needs of the staff concerned.

KS Training support a zero tolerance approach to peer on peer abuse. All staff receive training for peer on peer abuse, this is embedded throughout the mandatory CPD training. This is also embedded within the curriculum so that learners have the opportunity to attend a taught workshop and develop their understanding of what peer on peer abuse is, who is likely to be at risk and what constitutes peer abuse.

All staff have monthly safeguarding training, delivered by the Safeguarding team, peer on peer abuse is a regular theme within planned training.

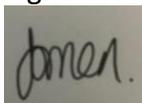
Front line staff/Line managers that have direct access to learners will hold at least Level 2 in safeguarding, prevent and equality & diversity.

The Designated Person(s) and HR Manager will hold a Level 3 qualification in safeguarding, prevent and equality and diversity.

All staff have a duty to update their CPD in relation to safeguarding on an annual basis. This is monitored through electronic staff training records.

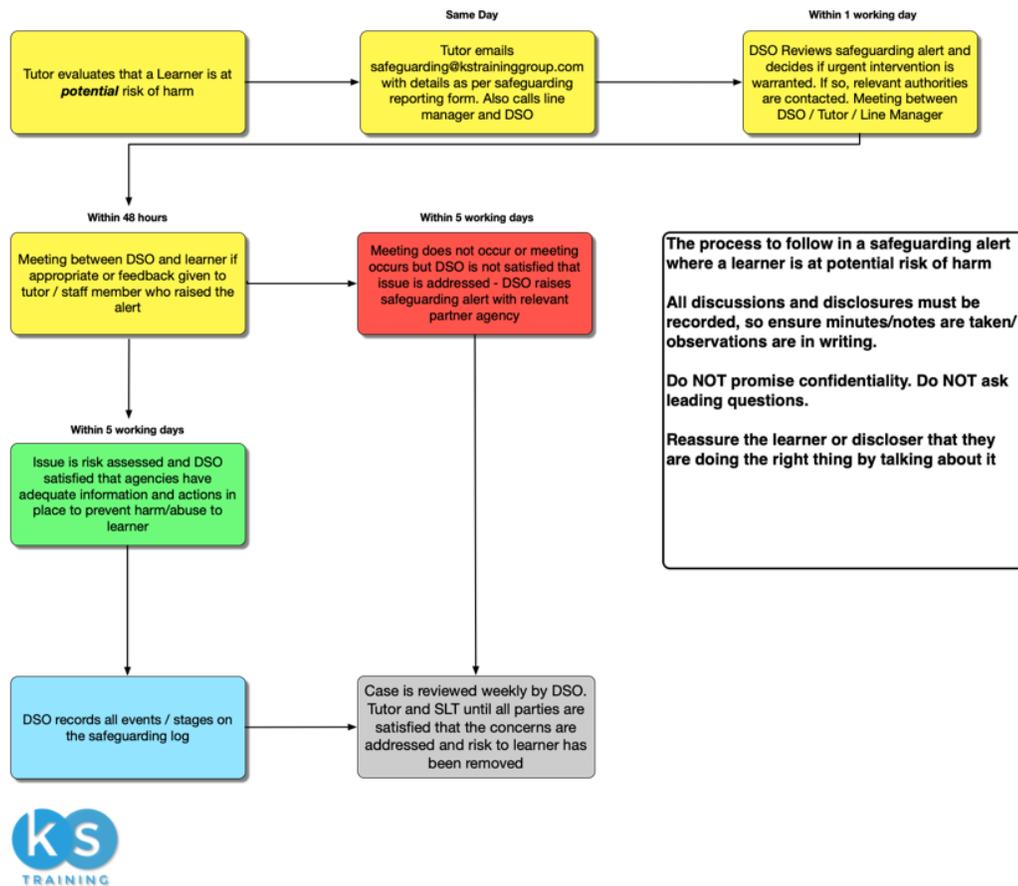
Safeguarding is addressed and updated at each assessor and staff member 1:1 meetings, which will inform and update staff CPD.

All staff receive internal training to support submitting safeguarding concerns and the timeframes adhered to by the safeguarding team to ensure a safeguarding concern is escalated

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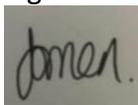
as quickly as possible, this includes the involvement of external agencies where required. All staff are advised to contact the DSL or DDSL as soon as a safeguarding concern is identified or disclosed, this is to be completed before staff log the concern onto the My Concern system so that immediate action can be taken from the DSL or DDSL.

### Quick Follow Guide - Potential Safeguarding Risk



### Governors / Board Members

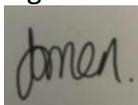
All Board members are trained to a level 3 in safeguarding, they regularly challenge safeguarding as part of the monthly board meetings and ensure peer on peer abuse is a key focus for the business. Board members ensure that the current processes and procedures

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ensure all children remain safe and are protected, including the responsibilities of other organisations using the premises to deliver services.

### Monitoring and Evaluation

The designated persons will conduct a monthly review of our Safeguarding and Child Protection systems and policies. This will include consideration of specific cases dealt with by staff in the last year. The resulting information – including feedback from staff, will be used by the designated person to inform any improvements. Feedback will also be obtained from the learners in relation to the policy and their understanding of safeguarding that we cover at induction. Feedback on the safeguarding policy and its implementation will be provided at management meetings where decisions can be made if specific items need to be addressed or policies amended.

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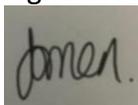
## SECTION B

### Dealing with a Disclosure of Abuse

**When a learner tells me about abuse they have suffered, what should I remember?**

- Stay calm
- Do not communicate shock, anger or embarrassment
- Reassure the learner. Tell her/him you are pleased that s/he is speaking to you
- Never agree or promise to keep it a secret. Assure her/him that you will try to help but let the learner know that you will have to tell other people in order to do this. State who this will be and why
- Tell her/him that you believe them, they may have tried to tell others and not been heard or believed
- Tell the learner that it is not her/his fault
- Encourage the learner to talk but do not ask "leading questions" or press for information
- Use the acronym **T.E.D: Tell me. Explain. Describe**
- Listen and remember
- Check that you have understood correctly what the learner is trying to tell you
- Communicate that s/he has a right to be safe and protected
- It is inappropriate to make any comments about the alleged offender
- Be aware that the learner may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the learner again who you are going to tell and why that person or those people need to know
- As soon as you can afterwards, make a detailed record of the conversation using the learner's own language. Include any questions you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded)
- Email the written information to the Safeguarding Designated person, titled "Urgent – Safeguarding" in the subject line to [sue.gomer@kstraininggroup.com](mailto:sue.gomer@kstraininggroup.com) and [safeguarding@kstraininggroup.com](mailto:safeguarding@kstraininggroup.com)
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible

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## PROCEDURE FOR DISCLOSURE OF ABUSE BY CLIENT

### ALL SITUATIONS

(1) The guidance process should normally be kept confidential, and the privacy of our clients respected. However, there are limitations to this confidentiality and clients need to be made aware of this. If a client reveals something which leads you to believe they were at risk of, or have already suffered significant harm, then you cannot keep this confidential, and the client needs to be aware of this.

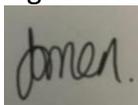
(2) If during any contact with a client it appears they may be about to disclose an issue in relation to Individual Protection, ensure you remind clients of the limits of confidentiality.

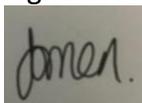
(3) If the client continues to disclose to you, use your training/experience to listen and note all significant detail of the discussion. Phone Sue Gomer on 07907 574407. If there is no answer and it is urgent email the details marked "Safeguarding – P&C" in the title and submit to Sue Gomer [sue.gomer@kstraininggroup.com](mailto:sue.gomer@kstraininggroup.com) Designated Person and [safeguarding@kstraininggroup.com](mailto:safeguarding@kstraininggroup.com) .

(4) If it is a child, enquire, sensitively, if there are other siblings in the household, as the living situation needs to be included when referring to Children's/adults Social Care.

(5) Confirm with the client that you will have to record this information, manually and on the safeguarding log and that you may have to share this with other colleagues and agencies, and will involve a referral to Children's/adults Social Care.

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**TRAINING PROVIDERS/CONSORTIA MEMBERS/SUB CONTRACTORS**

(i.e. where the agency concerned will have their own procedures)

- (1) KS Training's DP will discuss with the Designated Person for that agency. Sub-contracts are expected to have their own safeguarding processes in place, however they have to mirror those of KS Training when dealing with any learners under their contracts/care. ATL should be informed immediately of any safeguarding issues. This is a contractual requirement.
- (2) The designated person should then take this forward, and use their own procedures as regards referral and consent. Obtain copies of referral forms as for education.
- (3) If there isn't a designated person available, then you will need to decide whether to wait until they return, or refer using our procedures. This will depend upon timescales involved.
- (4) ATL will inform the designated person as soon as possible if we make the referral.
- (5) Records information of any referral or action taken.

## **PROCEDURE WHERE YOU HAVE CONCERNS ABOUT A CLIENT**

- (1) Take an informal approach initially and seek an explanation for concerns with the client without raising questions of abuse.
- (2) Gather as much information as possible from the individual, other colleagues who may have had some involvement with client and other agencies.
- (3) Investigate whether there are others that maybe at risk.
- (4) Discuss your concerns with your Line Manager and refer to your Designated Person if appropriate.
- (5) Phone Sue Gomer on 07907 574407. If there is no answer and it is urgent email the details marked "Safeguarding – P&C" in the title and submit to Sue Gomer [sue.gomer@kstraininggroup.com](mailto:sue.gomer@kstraininggroup.com) and [safeguarding@kstraininggroup.com](mailto:safeguarding@kstraininggroup.com) Designated Person and monitor the situation carefully.
- (6) Produce a written statement (if no email) and place in confidential file held by the Designated Person.
- (7) The Designated Person is then responsible for the case and will communicate with the relevant agencies and organisations as required.

**PROCEDURE FOR CONCERNS RAISED BY SOMEONE OTHER THAN  
INDIVIDUAL THEMSELVES AND YOU**

(1) If the person concerned is a colleague within KS Training refer them to these procedures and the Safeguarding DP, Sue Gomer.

(2) If the person concerned is a colleague within another institution refer them to their own line manager and their Protection procedures.

(3) If the person concerned is a parent/carer or member of the public refer them to CHILDREN'S SOCIAL CARE for advice.

**PROCEDURE TO BE FOLLOWED IF YOU RECEIVE AN ALLEGATION AGAINST A MEMBER OF KS TRAINING STAFF**

(1) From time to time children/adults at risk may make an allegation that they have been abused by a member of staff.

(2) The procedure for dealing with such allegations is contained in the Company's disciplinary procedures. Such an allegation will be treated as a potential case of gross misconduct.

(3) If you receive an allegation either by the young person or another person you must refer the matter to the appropriate Designated Person or the HR Manager.

(4) The member of staff may not be automatically suspended, but we have a duty to make preliminary enquiries before a referral to CHILDREN'S SOCIAL CARE (Children only) or the local LADO (Local Authority Designated Officer). These must not interfere with possible investigations and a referral should be made if there is any doubt.

(5) If another agency receives an allegation against a member of KS Training staff, they should contact the appropriate Designated Person or HR Manager direct.

(6) If a member of KS Training staff receives an allegation against a member of another agency, staff should in the first instance discuss this with your Line Manager.

(7) If an allegation is made against the Line Manager, then refer direct to either the HR Manager or the appropriate Designated Person.

(8) Follow guidelines in personal safety policy on lone working and good professional practice when working in a one-to-one situation. Apply your experience and judgment when dealing with interactions with clients, in order to minimise the possibility of allegations occurring.

## **SECTION C**

Details required where possible when reporting concerns to the designated person via email.

Name of learner, and employer (where there is an employer).

Where possible, the learners unique reference number is helpful to ensure learners are not confused with those of a similar name.

Date

Details of what has been disclosed and by whom

When the alleged incident/s have taken place

What action, if any, has been taken to date

What advice the learner has been given to date

### **Safeguarding policy Covid-19 annex**

There have been significant changes within our business in response the Coronavirus outbreak. Many of our learners are now continuing their learning at home and staffing is likely to be significantly affected through illness and self-isolation. Despite these changes KS Training Limited continues to be wholly committed to safeguarding and promoting the welfare of all staff and learners.

During this period the principles and practices of KS Training Limited's safeguarding policy will continue to apply. In order to ensure the safety and welfare of all staff and learners the company will adhere to the DfE coronavirus guidance: <http://safeguarding.info/covid19safeguarding> in practice, the following procedures will apply:

### **Designated Safeguarding Lead**

There will always be a nominated DSL or deputy DSL available, either on site or contactable by telephone, email or video calling. The name and contact details of the Lead DSL and deputy DSL are clearly identified within this policy and in surrounding areas around the building.

Learners or parents of learners (age dependent) should contact the Lead DSL or Deputy DSL.

### **Learners and staff on-site.**

KS Training Limited will continue to be a safe place for learners to attend.

All staff or learners attending site will be expected to adhere to the outlined Health & Safety procedures as identified via associated risk assessments which will be fully explained upon entry. All visitors entering on site will be recorded as part of track and trace protocol.

### **Working in partnership**

We continue to work closely with our local safeguarding partners and local agencies.

## **Useful Documents**

- <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>
- <https://www.gov.uk/coronavirus/education-and-childcare>

## **Linked Policies**

Anti-Radicalisation

Freedom of Information

Complaints

Equality & Diversity

Health & Safety

Prevent Action Plan

E&D Action Plan

Non-Attendance

Sharing Information

ICT Acceptable Use

Lone Worker

Recruitment & Retention

Disclosure and Barring

Domestic Abuse Pledge

Health & Wellbeing

## **Prevent and Anti-Radicalisation**

### **AIMS AND PRINCIPLES**

The main aims of this statement are to ensure that staff are fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our learners are safe from harm.

The principal objectives are that:

- All staff will have an understanding of what radicalisation, and extremism are and why we need to be vigilant.

- All staff will know what our policy is on anti-radicalisation and extremism and will follow the procedures when issues arise.
- All learners, employers (and parents where applicable) will know that KS Training Limited has policies in place to keep learners safe from harm and that we regularly review its systems to ensure they are appropriate and effective.

## **DEFINITIONS AND INDICATORS**

- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of British armed forces is also included.

There are several behaviours that might indicate that an individual is at risk of being radicalised or exposed to extreme views. Such behaviours may include:

- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Day-to-day behaviour becoming increasingly centered on an extremist ideology, group or cause;
- Loss of interest in others and activities not associated with the extremist ideology, group or cause.
- Possession of materials or symbols associated with an extremist cause.
- Attempts to introduce others to the group/cause.
- Communications with others that suggests identification with a group, cause, or ideology.
- Using names/language ranging from insulting to derogatory for members of another group.
- Increase in prejudice-related incidents committed by that person – these may include:

- physical or verbal assault.
- provocative behaviour.
- damage to property.
- derogatory name calling.
- possession of prejudice-related materials.
- prejudice related ridicule or name calling.
- inappropriate forms of address.
- refusal to co-operate.
- attempts to recruit to prejudice-related organisations.
- condoning or supporting violence towards others.

This list is in no sense intended either to be exhaustive or any more than a description of possible consistent behaviours – rather than proofs – of radicalisation.

## **PROCEDURES FOR CHANNEL REFERRALS**

This process provides support from an early stage to people who are identified as being vulnerable to being drawn into terrorism. Channel work with individuals of any age who are at risk of exploitation from extremist or terrorist ideologues.

The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or vulnerabilities.

Anyone can make a referral to channel and therefore if you believe that someone is vulnerable to being exploited or radicalised then you must use the appropriate procedures outlined below.

- Cause for concern identified.
- Concern reported to Safeguarding Lead (Sue Gomer) or in their absence the Designated Safeguarding Officer (Maria Reason)
- Safeguarding Lead to gather further information.
- Discussion with Local Prevent Police/Local Authority officer
- Outcome determined following a screening process, preliminary assessment, and multi-agency channel panel meeting to which will lead to providing a tailored support package.

### **BIS Prevent Co-Ordinator Details are:**

East Mids: Sam Slack

sam.slack@derby.gov.uk **or** sam.slack@derby.gov.uk.cjism.net

01332 643054/ 07812 301215

North West: Nigel Lund

n.lund@manchester.gov.uk

07507 269830/ 0161 8569304

South East: Jo Ferris

jo.ferris@thamesvalley.pnn.police.uk

07876 131411

South West: Salam Arabi-Katbi

salam.katbi@avonandsomerset.pnn.police.uk

0117 9455533/ 07824 083307

Wales: Barrie Phillips

barrie.phillips@cardiff.gov.uk

02920 873281/ 07800 711318

West Midlands: Hifsa Haroon-Iqbal

h.h.iqbal@staffs.ac.uk or hifsa.iqbal@birmingham.gov.uk

07825 400099/ 0121 303 3642

London:

- Alamgir Sheriyar, Alamgir.Sheriyar@camden.gov.uk 0207 974 5828
- Erin MacGalloway, Erin.MacGalloway@camden.gov.uk 020 7974 2662

Prevent Action Plan

<u>No.</u>	<u>Prevent Vulnerability/Risk Area</u>	<u>Risk Y/N</u>	<u>Action taken/already in place to mitigate/address risk</u>	<u>Owner</u>	<u>When</u>	<u>RAG</u>
1	<p><b><u>LEADERSHIP/Awareness</u></b>            Do the following people, if applicable, have an understanding of their own and institutional responsibilities in relation to the "Prevent Duty"?</p> <ul style="list-style-type: none"> <li>• Board</li> <li>• Staff</li> <li>• Safeguarding team</li> <li>• Associate Staff</li> <li>• Sub-Contractors</li> </ul>	good Y	<p>Board are fully aware of their obligations and have undertook appropriate annual training.</p> <p>Deputy Safeguarding Lead is a member of the board, other members are aware and again have undertaken relevant training.</p> <p>All staff/associates undertake annual training on Prevent/Safeguarding/Channel/E&amp;D. New staff complete this in the first 2 weeks of employment.</p> <p>Safeguarding lead meets with all new employees during induction</p> <p>All staff/associates are aware of the policy and is held on the company intranet (Zoho CRM).</p> <p>TLA observers feedback and action organisations who have missed opportunities to promote prevent.</p> <p>Committee meets quarterly &amp; Prevent is standard agenda item at SLT meetings.</p> <p>Geographical sharing of information.</p> <p>Aware of changes and increased risks due to Covid.</p>	SG MR	Ongoing	Low

2	<p><b><u>Partnership</u></b></p> <p>1) Is there active engagement from the institution's board, SLT, managers and leaders?</p> <p>2) Does the institution have an identified single point of contact (SPOC) in relation to Prevent?</p>	Y	<p>1) Yes, all managers aware of policy. Prevent/SG etc is mandatory management meeting agenda item (held monthly). CEO/Prevent lead is present at all meetings.</p> <p>2) Yes, the safeguarding lead Sue Gomer</p>	SG MR	Achieved	Low
3	<p><b><u>Staff Training</u></b></p> <p>Do all staff have sufficient knowledge and confidence to:</p> <p>1) exemplify Fundamental British Values in their management, teaching and through general behaviours in the institution</p> <p>2) understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism</p> <p>3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response</p>	Y	<p>1) Staff receive annual training. FBV is reinforced throughout the year at relevant team meetings, sharing of information from Prevent lead. relevant policies/procedures/COP in place to ensure staff exemplify FBV in their general behaviour. TLA strategy includes measuring of FBV/Prevent etc and is monitored via observation with relevant actions put in place.</p> <p>2) Staff understand via the training of factors that make people vulnerable and how/who to report to. This is reinforced on a regular basis at team meetings, updates from Prevent Lead.</p> <p>3) Staff are fully aware of who to report to and what action to take.</p>	SG MR	Achieved , ongoing	Med

4	<p><b><u>Welfare, pastoral and Chaplaincy support</u></b></p> <p>1) Are there adequate arrangements and resources in place provide pastoral care and support as required by the institution?  2) Does the institution have chaplaincy provision or is this support signposted locally or brought in? 3) Are their adequate monitoring arrangements to ensure that this support is effective and supports the institutions welfare and equality policies?  4) Does the chaplaincy support reflect the student demographic and need?</p>	N/A	Not applicable for our provider as we deliver in the workplace.	N/A	N/A	N/A
5	<p><b><u>Speakers and Events</u></b></p> <p>1) Is there an effective policy/framework for managing speaker requests?  2) Is it well communicated to staff/students and complied with?  3) Is there a policy/framework for managing on site events i.e. charity events?  4) Are off site events which are supported, endorsed, funded or organised through the institution (including Students' Union if applicable) subject to policy/framework?</p>	N/A	<p>Not applicable for our provider as we do not hold such events, however a policy is in place should we do so in the future.</p> <p>All managers are aware of the policies for Freedom of Speech, including guest speakers should the need arise. All managers are aware that a risk assessment has to be undertaken and authorised by the Prevent Lead.</p>	N/A	N/A	N/A
6	<p><b><u>Safety Online &amp; ICT Systems</u></b></p> <p>1) Does the institution have a policy relating to the use of IT and does it contain a specific reference and inclusion of the Prevent Duty?</p>	Yes	<p>1) Yes there is a clear policy in relation to ICT that includes Prevent</p> <p>2) Yes. We have an external provider, Fifteen Group, that manages all of our IT systems. Our firewall prevents</p>	KS	Ongoing	Low

	<p>2) Does the institution employ filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material?</p> <p>3) Does this also include the use of using their own devices via Wi-Fi?</p> <p>4) Does the system alert to serious and/or repeated breaches or attempted breaches of the policy?</p>		<p>access to sites and extremist material. Our site also prevents access to facebook other than those authorised for marketing purposes.</p> <p>3) Visitors to the premises would have to log into our system to use the wi-fi and are therefore covered by the above firewall.</p> <p>4) We are cyber essentials accredited</p>			
7	<p><b><u>Prayer and Faith Facilities</u></b></p> <p>1) Does the institution have prayer facilities?</p> <p>2) Are they good governance and management procedures in place in respect of activities and space in these facilities?</p>	N/A	Not applicable for our provider as we deliver in the workplace. However, if facilities were needed we would be able to accommodate an area for prayer.	N/A	N/A	N/A
8	<p><b><u>Site Security</u></b></p> <p>1) Are there effective arrangements in place to manage access to the site by visitors and non-students/staff?</p> <p>2) Is there a policy regarding the wearing of ID on site? Is it enforced?</p> <p>3) Are dangerous substances kept and stored on site?</p> <p>4) Is there a policy in place to manage the storage, transport, handling and audit of such substances?</p>	Yes	<p>1) There is a visitors book and all visitors are seen entering or leaving the building. Recently we have installed a finger print recognition system for staff.</p> <p>2) Yes all staff have ID badges and their pictures are on the staff notice board by the front door.</p> <p>3) No – only standard cleaning products which are stored in a locked cupboard in the kitchen in small quantities.</p>	MR SG	Ongoing	Low

	<p>5) Is there a policy covering the distribution (including electronic) of leaflets or other publicising material?</p> <p>6) Does the institution intervene where off site activities are identified or are likely to impact upon staff and/or students i.e. leafleting, protest etc?</p>		<p>4) N/A</p> <p>5) Yes, all material has to be approved by the relevant manager and/or CEO</p> <p>6) This has not occurred, but yes we would intervene</p>			
9	<p><b><u>Safeguarding</u></b></p> <p>1) Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies?</p> <p>2) Do Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism?</p> <p>3) Does the institution utilise Channel as a support mechanism in cases of radicalisation and extremism?</p> <p>4) Does the institution have a policy regarding referral to Channel identifying a recognised pathway and threshold for referral?</p>	Yes	<p>1) Yes there is anti-radicalisation policy in place and this links with the safeguarding policy. It also links with other key policies (E&amp;D, Complaints, ICT)</p> <p>2) Yes, annually</p> <p>3) Yes, we have links with our Prevent lead who is Hifsa Haroon-Iqbal, <a href="mailto:hifsa.iqbal@birmingham.co.uk">hifsa.iqbal@birmingham.co.uk</a> 0121 303 3642. We also have links with the local Safeguarding boards who provide clear information on their website in relation to Prevent leads in their area. The CEO holds a list of all the FE Prevent Leads.</p> <p>4) Yes, all referrals are assessed by the DSL and Deputy DSL and referred via the CEO. This is clearly communicated to staff and they understand that they should not refer directly to Channel themselves.</p>	SG MR	Achieved	Low

10	<b><u>Communications</u></b>  1) Is the institution Prevent Lead and their role widely known across the institution? 2) Are staff and students made aware of the Prevent Duty, current risks and appropriate activities in this area? 3) Are there information sharing protocols in place to facilitate information sharing with Prevent partners?	Yes	1) Yes, has been communicated to all staff and is regularly communicated. New staff meet the Prevent Lead during the first 2 weeks of their induction to ensure that they are clear on the processes and procedures.  2) Yes. Policies are communicated to learners and Prevent/BV is promoted throughout the teaching/learning with a clear focus on naturally occurring opportunities to discuss prevent alongside the embedded curriculum activities.  3) Yes, we work with partners and share information via SLACK (on which there is a group set up), email and regular partner events.	SG MR	Achieved	Low
11	<b><u>Staff and Volunteers</u></b>  1) Does awareness training extend to sub-contracted staff and volunteers? 2) Is the institution vigilant to the radicalisation of staff by sub-contracted staff and volunteers?	Yes	We don't have any subcontracted staff or volunteers, if our position changed then we would put relevant mandatory training in place.	NA	NA	NA
12	<b><u>Freedom of Expression</u></b>  1) Does the institution have a Freedom of Speech/Expression policy?	Yes	1) Yes there is a Freedom of Expression policy in place with a guest speaker risk assessment.	SG MR	Achieved	Low

	<p>2) Does this policy recognise and incorporate the risks associated with radicalisation and extremism?</p> <p>3) Is the need to protect vulnerable individuals covered within this policy?</p>		<p>2) Yes, the policy explicitly highlights the risks.</p> <p>3) Yes the need to protect vulnerable people is included in the policy.</p>			
13	<p><b><u>Literature/posters</u></b></p> <p>1) Does permission have to be granted for people to distribute leaflets?</p> <p>2) Do people know who to contact if they come across extremist literature?</p> <p>3) Do they know what extremist literature looks like?</p> <p>4) What happens if individuals are handing out leaflets outside the institution?</p>	Yes	<p>1) Yes, permission has to be granted by the Managing Director Maria Reason</p> <p>2) Yes, people are aware to inform the Prevent Lead if they have any concerns at all.</p> <p>3) Yes, this is covered in their annual training.</p> <p>4) This would be addressed directly if this occurred without permission.</p>	SG MR	Achieved	Low
14	<p><b><u>Funding &amp; resources</u></b></p> <p>1) Do you fund community/voluntary/student groups?</p> <p>2) How do you know that monies are not funding extremist activities?</p> <p>3) Do student/external groups book your rooms, how do you monitor if extremist activities are taking place?</p> <p>4) Do you have a booking form/policy that states extremist activities must not take place?</p>	Yes	<p>1) We draw down funds from the ESFA to fund learners on their programmes. We do not directly fund any community groups.</p> <p>2) N/A</p> <p>3) No, we do not have groups that book external rooms.</p> <p>4) We do not book our rooms out.</p>	SG MR	Achieved	Low
15	<p><b><u>Safe place to discuss terrorism and extremism</u></b></p>	Yes	<p>1) As part of TLA staff are trained on how to engage discussion in relation to terrorism/extremism and how to handle discussions should they cause</p>	SG MR	Achieved	Low

	<ol style="list-style-type: none"> <li>1) Are staff trained to facilitate discussions on terrorism and extremism?</li> <li>2) Are there opportunities available to do this i.e. do you run a programme of seminars?</li> <li>3) Can external speakers be invited to discuss Prevent?</li> </ol>		<p>debate of a negative nature. Managers are all fully aware on how to address discussions in relation to prevent.</p> <ol style="list-style-type: none"> <li>2) We run standardisation meetings throughout the year where staff can discuss prevent. We haven't invited any external speakers to discuss Prevent, but we may do if we so decide. This would be in line with the Freedom of Speech policy and associated external speaker risk assessment. All external speakers are subject to authorisation from the Prevent lead prior to any invitation.</li> </ol>			
16	<p><b><u>Policies and Procedures</u></b></p> <ol style="list-style-type: none"> <li>1) What policies need to change to incorporate Prevent (safeguarding, security &amp; estate management, disciplinary, behaviour, room booking, external speakers)</li> </ol>	Yes	<ol style="list-style-type: none"> <li>1) All policies have been updated where necessary to include Prevent, these are reviewed annually or on a needs basis should updates be required in-between times.</li> </ol>	SG MR	Achieved	Low
17	<p><b><u>Information Sharing</u></b></p> <ol style="list-style-type: none"> <li>1) Are there information sharing protocols in place with the Police and the council?</li> <li>2) Do the Police know who to contact for any issues?</li> <li>3) Does the provider know who to contact at the Police?</li> <li>4) Do other staff members know who the Prevent lead is at the provider?</li> </ol>	Yes	<ol style="list-style-type: none"> <li>1) Yes there is an Information Sharing policy and procedure in place, this can be found our intranet (Zoho CRM).</li> <li>2) The police are aware that they would need to contact the Prevent Lead Maria Reason who is also the MD.</li> <li>3) Yes, we have links with our local safeguarding boards at the local authorities who have the information in</li> </ol>	SG MR	Achieved	Low

			<p>relation to who to contact within the police.</p> <p>4) Yes all staff know who the Prevent Lead is, how to contact them, who to contact in their absence and this is reinforced on a regular basis as reminders are sent out, posters are around the building.</p>			
18	<p><b><u>Local Prevent Structures</u></b></p> <p>1) Are you linked in with the local Prevent Board or regional Prevent FE/HE group</p> <p>2) Do you know who your local authority Prevent Co-ordinator is?</p> <p>3) Awareness of key Police and regional HE/FE lead?</p>	Yes	<p>1) Yes, We are part of provider network groups such as SPA, AELP and GMLPN.</p> <p>2) Yes, Hifsa Haroon-Iqbal.</p> <p>3) Yes, this is checked through the relevant local authorities.</p>	SG MR	Achieved	Low
19	<p><b><u>Tensions</u></b></p> <p>1) Are you aware of tensions in your student body?</p> <p>2) How are you dealing with these tensions?</p> <p>3) Have these tensions been exploited by any group?</p> <p>4) What cohesion issues do you have?</p>	No	There are no issues identified within our student body.	N/A	N/A	N/A
20	<p><b><u>Prevent Messaging</u></b></p>	Yes	1) Communicated through learning, policy and regular updates on onefile	SG MR	Met	High

	<p>1) How can Prevent be communicated better?</p> <p>i.e. posters, newsletters, intranet, student and staff handbooks, staff induction, internal literature</p>					
21	<p><b><u>Dealing with an incident</u></b></p> <p>1) Does your critical management plan identify a lead person to deal with terrorist related issues?</p> <p>2) How will you communicate with and reassure local communities, staff and students?</p> <p>3) Who will deal with the Press?</p> <p>4) How will you communicate with other FE/HE institutions locally?</p> <p>5) How will you identify what partnership support you may require?</p>	Yes	<p>1) The Prevent Lead would deal with any terrorist related issues.</p> <p>2) We would communicate via the police.</p> <p>3) The press would be offered no comment.</p> <p>4) We would contact all local FE institutions who we believe it could affect.</p> <p>5) We would need support from the Police and Prevent Lead.</p>	<p>SG</p> <p>MR</p>	Met	Low