

Safeguarding Policy

Author: Deborah Whelan
Checked by: Ruth Ryan

Date: 1st June 2017
Date of Board Approval

Statement of Intent

First Avenue Training is committed to safeguarding and promoting the welfare, both physical and emotional, of all staff and learners of First Avenue Training Ltd., and refers to staff and learners in an integrated manner wherever possible.

All contractors and visitors to First Avenue Training Ltd are expected to adhere to the ethos and standards of behaviour set by the company.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Identifying and making provision for any learner that has been subject to abuse.
- Ensuring that all staff members understand their responsibilities under safeguarding legislation and statutory guidance, and are alert to the signs of abuse and know to refer concerns to the designated safeguarding officer (DSO).
- Ensuring that any new staff members are only appointed when all the appropriate checks have been satisfactorily completed.

The Designated Safeguarding Officer (DSO) is: **Deborah Whelan**. In the absence of the DSO, safeguarding matters will be dealt with by **Ruth Ryan**.

NB

Considerations of confidentiality will not be allowed to override the rights of learners to be protected from harm.

Legal framework

This policy has consideration for, and is compliant with, the following legislation and statutory guidance:

Legislation:

The Children Act 2004
The Safeguarding Vulnerable Groups Act 2006
The Equality Act 2010
The Protection of Freedoms Act 2012
The Sexual Offences Act 2003
Counter Terrorism and Security Act 2015

Statutory guidance:

DfE (2015) 'Working together to safeguard children'
DfE (2016) 'Keeping children safe in education'
DfE (2015) 'Information sharing'
DfE (2015) 'The Prevent duty'
HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'

Roles and responsibilities

The Board of Directors has a duty to:

- Ensure that **First Avenue Training** complies with its duties under the above safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities are effective and comply with the law at all times.
- Guarantee that **First Avenue Training** contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children 2015 where appropriate.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements (**Ruth Ryan**).
- Appoint a member of staff to the role of **Designated Safeguarding Officer (Deborah Whelan)** as an explicit part of the role-holder's job description – there should always be cover for the DSL.
- Adhere to statutory responsibilities to check staff who work with learners, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff .
- Confirm that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.

The DSL has a duty to:

- Refer all cases of suspected abuse to the appropriate Social Care services, the LA designated officer (LADO) for safeguarding concerns, the DBS, and the police in cases where a crime has been committed.
- Refer cases of radicalisation to the Channel programme.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Be able to keep detailed, accurate and secure records of concerns and referrals.
- Obtain access to resources and attend any relevant training courses.
- Be available at all times during business hours to discuss any safeguarding concerns.

Other staff members have a responsibility to:

- Provide a safe environment in which learners can learn.
- Safeguard learner's wellbeing and maintain public trust as part of their professional duties.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- If at any point there is a risk of immediate serious harm to a learner, make a referral to Children/Adult Social Care and/or the police immediately.
- Be aware of and understand the procedure to follow in the event that a learner/staff member confides they are being abused or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.

Recognising Abuse

Abuse: A form of maltreatment of a person which involves inflicting harm or failing to act to prevent harm. First Avenue recognises that learners may be abused in a family, institutional or community setting by those known to them, or, more rarely, by others, e.g. via the internet.

What is Abuse?

First Avenue deems abuse to include:

Physical abuse: A form of abuse which may involve the intentional, non-accidental use of force and violence, resulting in hurting, injuring or destroying the person. This includes giving inappropriate drugs and alcohol and physical bullying.

Emotional abuse: A form of abuse which involves a person being persistently threatened, verbally attacked or taunted. This includes harassment and emotional bullying. [See appendix A.](#)

Sexual abuse: A form of abuse which includes the involvement of dependent developmentally immature adolescents in sexual activities that they do not fully comprehend, are unable to give informed consent to and that violate the social taboos of family roles. This includes sexual harassment. [See appendix A.](#)

Neglect: A form of abuse which involves the persistent failure to provide minimum standards of care to meet physical, emotional or psychological needs of a person.

Specific safeguarding issues are:

Female Genital Mutilation (FGM)

FGM is addressed as part of the procedures around '**Honour Based Violence**' which is defined as "crimes which have been committed to protect and defend the honour of the family and/or the community, including FGM, Forced Marriage and practices such as Breast Ironing"

For the purpose of this policy, "female genital mutilation", commonly referred to as FGM, is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care or the police.

First Avenue has due regard to the **mandatory reporting duty**, which came into force in October 2015,

which places a **statutory duty** on to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years. Staff at First Avenue will be vigilant and will report promptly any FGM or other HBV concerns to the Designated Safeguarding Lead.

Forced marriage

For the purpose of this policy, a “forced marriage” is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Forced marriage is classed as a crime in the UK.

If staff members have any concerns regarding a learner who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSO and local safeguarding procedures will be followed.

Prevent Duty

For this purpose of this policy **First Avenue Training** uses the following accepted Governmental definition of extremism which 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; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

Prevent is part of a government strategy which aims to stop people becoming terrorists or supporting terrorism. Preventing terrorism also means challenging extremist views and intervening to stop people moving from extremist ideas into terrorism. British values must be within the ethos and curriculum of all educational establishments.

Under the Counter Terrorism and Security Act 2015 First Avenue Training has a statutory duty to have due regard to the need to prevent people from being drawn into terrorism.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way. Young people can be exposed to extremist influences or prejudiced views from an early age which stem from a variety of sources and media, including via the internet, and at times learners may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of settings / work places, such as in their homes or community groups.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Parental or employers reports of changes in behaviour, friendship or actions and requests for assistance
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or ‘hate’ terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others

- Anti-Western or Anti-British views

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate dealt with in line with our Codes of Conduct and Discipline Policy for learners and staff.

Referring Concerns - where there are concerns of extremism or radicalisation learners, parents, employers and staff will be encouraged to make use of our internal systems to raise any issue in confidence with senior management. The lead person for Prevent is the Designated Safeguarding Officer (Deborah Whelan) who would normally be the first point of contact should there be concerns. If for any reason this creates a difficulty for the referrer, they can contact the Local Authority Prevent Co-ordinator, First Response Team, Education Safeguarding Advice Service or Ofsted depending on the level of concern. Staff should refer to the Whistle Blowing Policy under which they are entitled to employment protection for raising genuine concerns

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can occur through the use of technology.

CSE can occur in all communities and amongst all social and ethnic groups and can affect girls and boys. Children as young as 8 years have been identified, particularly in relation to online concerns. CSE is a complex form of abuse and it can be difficult for those working with children to identify and assess however, all those working in our school are made aware of the potential indicators of grooming and exploitation and how to refer concerns on appropriately.

Peer on Peer Abuse

Peer on peer abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child/young person perpetrator as well as the victim.

Key areas where peer on peer abuse occurs are:

- Bullying, including online/cyber bullying and prejudice-based bullying
- Racist, religious, disability and homophobic or transphobic abuse
- Gender based violence/violence against girls and young women
- Teenage relationship abuse
- Issues relating to gang activity and youth violence

Youth Produced Sexual Imagery - (Sexting)

Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat,

WhatsApp or Facebook Messenger. This can expose them to risks, particularly if the imagery/text is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. The production and sharing of sexual images of under 18s is also illegal.

Concerns about a learner

If a staff member has any concerns about a learner, they will raise this with the Designated Safeguarding Officer at First Avenue or, if necessary, refer to appropriate individual who is senior to the learner.

Concerns about staff members and safeguarding practices

If a staff member has concerns about another member of staff then this will be raised with the DSO.

Any concerns regarding the safeguarding practices at learner's setting will be raised with the SLT of the setting and the Designated Safeguarding Officer (DSO) at First Avenue. A decision will be made whether there are reasonable grounds for concerns and if so they will be acted on. If it is decided that there is no case to answer the person who raised the concern will be informed of this. If it is decided there is a case to answer the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

If a staff member feels unable to raise an issue with the Senior Leadership Team, they should access other whistleblowing channels such as Ofsted, police and NSPCC whistleblowing helpline (0800 028 0285).

The person involved will be appropriately supported whilst maintaining confidentiality.

Allegations Against Staff

Any allegations of abuse made against staff members will be dealt with in accordance with First Avenue's Allegations of Abuse Against Staff Policy.

During any investigation support should be given to the individual voicing the concern, the person to whom the behaviour is directed, as well as the person suspected of the behaviour. Possible outcomes could include no case to answer, further training, warnings, sanctions or referral to police or other safeguarding authorities.

The Designated Safeguarding Officer (DSO) at First Avenue Training is Deborah Whelan 07933 515318.
dwhelan@wce.imat.co.uk

The Local Authority Designated Officer (LADO) can be contacted within the safeguarding unit of the Local Authority.

For Education and School Allegations 01482 392139

For Agencies and Organisations Allegations 01483 396599

. Training

- Staff members and learners will undergo safeguarding training at induction, which will be regularly updated, and will be in line with advice from the LSCB.
- All staff members will also receive regular safeguarding updates as required, but at least annually.
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements at First Avenue.
- The DSO will undergo updated safeguarding training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up with any developments relevant to their role.

- The DSO will also undergo regular Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty, and equip them with the knowledge needed to advise staff.

Implementation

The management and staff are responsible for the implementation of this policy.

Disciplinary action will be taken against any learner or member of staff who has breached the **First Avenue Training Ltd's** Safeguarding Policy or who has harassed (in any aspect of harassment) a learner, member of staff or visitor. [See Appendix A](#) for definition of harassment

Monitoring and review

This policy is reviewed annually by the Designated Safeguarding Officer.

Any changes made to this policy will be communicated to all members of staff.

All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is ~~June 2018~~. **June 2019**

Appendix A – Definition of Harassment

Harassment at Work

Harassment may be defined as conduct that is unwanted and offensive and which affects the dignity of a person.

Harassment is often related to abuse of power and is defined as discriminatory treatment of a person based on specific characteristics such as sex, race, disability, sexuality, age or class.

Sexual Harassment

The most important point to note is that the key to deciding whether or not sexual harassment has occurred, lies in whether the action is welcomed by the person it is directed against. The following are forms of sexual harassment:

Unwelcome physical contact (ranging from touching and patting to sexual assault and rape)

Demands for sexual favours

Propositions or pressure for sexual activities

Suggestive remarks, innuendoes, or lewd comments

Display of offensive pictures, posters or written material

Unwanted comments on dress or appearance

Offensive conduct such as derogatory abuse and insults which are gender related.

Harassment based on race

The Commission for Racial Equality defines racial harassment as “unwanted conduct of a racial nature, or other conduct based on race affecting the dignity of women and men at work”.

According to the Race Relations Act it is illegal to treat a person less favourably than others based on race, colour, nationality and national or ethnic origin. Applying stereotypes to persons because of their membership of a racial group and hence treating them less favourably is discrimination based on racial grounds. An action against racial harassment may be taken to either criminal or civil courts.