



Safeguarding Policy
(incorporating Child Protection Procedures)

Author: Deborah Whelan
Checked by: Ruth Ryan

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Date of Board Approval:

Role	Name	Contact Details
Designated Safeguarding Officer	Deborah Whelan	0795 6659598 dwhelan@wce.jmat.org.uk
Deputy Designated Safeguarding Officer	Ruth Ryan	01405 720320 ruth@firstavenuetraining.com

Statement of Intent

First Avenue Training is committed to providing a safe environment for everyone in which to learn and promoting the welfare, both physical and emotional, of all staff and learners of First Avenue Training Ltd. This policy ensures a coherent framework of practice is in place for safeguarding (incorporating child protection) and refers to staff and learners in an integrated manner wherever possible.

All contractors and visitors to First Avenue Training 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.

In the context of working in Further Education where the majority of individuals are over the age of 16, whilst the law allows consensual sexual activity at the age of 16, if the young person requires help and support the lawful nature of the activity does not stop intervention. Examples of this may be children and young people:

- with care and support needs
- who may be at risk of sexual abuse or exploitation
- who are parents
- whose care and support needs mean they are unlikely to be able to protect themselves despite their legal age.

NB

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

Definitions

The terms “**child**”, “**children**”, “**young person**” and “**young people**” refer to anyone under the age of 18.

For the purposes of this policy, “safeguarding and protecting the welfare of children and young people” is defined as:

- Protecting learners from maltreatment.
- Preventing the impairment of learners’ health or development.
- Ensuring that learners grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all learners to have the best outcomes.

For the purposes of this policy, the term “**harmful sexual behaviour**” includes, but is not limited to, the following actions

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children and young people in schools and colleges’ (2018), and for the purposes of this policy, the term “sexual harassment” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a young person’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term “**sexual violence**” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

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
Data Protection Act 2018
General Data Protection Regulations 2018

Statutory guidance

DfE (July 2018) ‘Working together to safeguard children’
DfE (September 2018) ‘Keeping children safe in education’
DfE (2015) ‘The Prevent duty’
HM Government (2014) ‘Multi-agency practice guidelines: Handling cases of Forced Marriage’

Non-statutory guidance

DfE (2018) ‘Information sharing’
DfE (2017) ‘Child sexual exploitation’
DfE (2018) ‘Sexual violence and sexual harassment between children in schools and colleges’

Working in Partnership

Inter-agency and collaborative work is central to good practice in safeguarding. First Avenue Training and its staff will assist local authorities to exercise statutory functions. Where provision is provided by First Avenue Training within a partnership organisation (E.g. nursery or school) we will liaise with staff to ensure that local procedures and protocols are adhered to.

First Avenue will refer concerns that a child or young person might be at risk of significant harm to the Multi-Agency Safeguarding Hub, Channel or the Police and concerns for assessment of need and onward referral for other services if required.

The Board of Directors has a duty to:

- Ensure that **First Avenue Training** complies with its duties under the above safeguarding and child protection 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 2018 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 DSO.
- 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 DSO 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.

The Young Person's Wishes

Where there is a safeguarding concern the child or young person's wishes and feelings will be taken into account when determining what action to take and what services to provide. First Avenue and its staff have procedures in place for young people to express their views and give feedback. Ultimately, all systems and processes within First Avenue operate with the best interests of the young person at their core.

What is Abuse?

Abuse is behaviour towards a person that either deliberately or unknowingly causes a person harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated. Abuse may fall into a number of categories: - **physical abuse, sexual abuse, emotional abuse and neglect.**

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm or by failing to act to prevent harm. Children and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child/young person or children/young people. Abuse can be, but is not limited to:

- Physical
- Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition
- Sexual
- Financial
- Psychological/emotional (including the use of text, social networks and email)
- Violation of rights e.g. preventing an individual speaking his/her thoughts and opinions
- Institutional e.g. failure to provide a choice of meals or failure to ensure privacy or dignity
- Discriminatory in nature e.g. racial, sexual or religious harassment.

In the case of vulnerable adults it may also include:

- physical abuse such as pushing, shaking, inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment
- financial abuse such as exerting improper pressure to sign over money from pensions or savings etc
- exposure to extremist behaviours and attempts to radicalise

Specific safeguarding issues are:

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.

CSE is a complex form of abuse and it can be difficult for those working with young people 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 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
- Sexual harassment and sexual violence, including harmful sexual behaviour

Further information about peer on peer abuse is included in the section 'Allegations of Abuse against other learners'.

LGBTQ +

LGBTQ+ (lesbian, gay, and bisexual, transgender, queer or questioning +) students may face additional safeguarding challenges and potential peer on peer abuse. Training for staff and learners is provided to raise awareness and tolerance in line with both British Values and First Avenue values, through staff development and the embedding of equality and diversity within the curriculum and support. First Avenue has a zero tolerance policy on bullying and any reported cases of abuse are investigated in line with the whistle-blowing, disciplinary and grievance procedures.

Hate Crime

A hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by hostility or prejudice toward someone's actual or perceived race, religion, disability, sexual orientation, or identity. It includes crimes that are motivated by homophobia, biphobia and transphobia and can affect not only those who identify as LGBTQ, but also those who are perceived to identify as LGBTQ.

Reporting Hate Crime

Crimes committed against someone because of their disability, gender-identity, race, religion or belief, or sexual orientation are hate crimes and should be reported to the police. Hate crimes can include (but are not limited to):

- Threatening behaviour
- Assault
- Robbery
- Damage to property
- Inciting others to commit hate crimes
- Harassment

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"

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

First Avenue has due regard to the **mandatory reporting duty**, which came into force in October 2015, of the FGM Act 2003, which places a **statutory duty** on teachers (along with social workers and healthcare professionals) to personally 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 Officer.

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

First Avenue Training is fully committed to safeguarding and promoting the welfare of all its staff and learners. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

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. Further details of Prevent are contained in the Prevent Duty Policy and Procedures document.

Homelessness

The DSO and deputy will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears

- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

Children or Young People Missing in Education

First Avenue will work closely with employers to address concerns regarding a learner’s attendance. Learners missing work/education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation and becoming NEET (not in education, employment or training) later in life.

Knowing where learners are during working hours is an extremely important aspect of safeguarding. To this end, First Avenue holds a contact number for each learner, along with an emergency/next of kin contact. Missing learning can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues. First Avenue will endeavour to act swiftly in conjunction with employers to address poor or irregular attendance, and refer to other agencies for support when required.

Child Criminal Exploitation/County lines criminal activity

For the purpose of this policy, “**County lines criminal activity**” refers to drug networks or gangs grooming and exploiting young people to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

Staff will be made aware of learners with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a learner may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSO.

The DSO will consider referral to the National Referral Mechanism on a case-by-case basis. Indicators that a learner may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

Learners with family members in prison

Learners with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘Are you a young person with a family member in prison’ from Action for Prisoners’ Families where appropriate for pupil’s age and allowed the opportunity to discuss questions and concerns.

Learners required to give evidence in court

Learners required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Learners will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

Contextual safeguarding

Safeguarding incidents can occur outside of working hours and can be associated with outside factors. First Avenue staff, particularly the DSO and the deputy, will always consider the context of incidents – this is known as contextual safeguarding.

Assessment of learner's behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

First Avenue operates in a wide range of areas, from those with a high Asian demographic, where there may be an increased risk of forced marriage and honour-based violence, to isolated rural areas with a heavy white British demographic, which can present the risk of white right radicalisation.

First Avenue will provide as much contextual information as possible when making referrals to Children's Social Care.

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.

Children with Special Educational Needs and Disabilities (SEND)

First Avenue understands that young children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of young people. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
- Young people with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

Where there are any concerns raised about the safety and welfare of a young people with SEND in one of the educational settings we will ensure that these will be treated in the same way as with any other young person, with careful consideration of any additional needs.

Looked after Children and Previously Looked After Children

A Looked after Child (LAC) is one which is looked after by a local authority (as defined in section 22 of the Children Act 1989) and who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. The most common reason for children becoming looked after is as a result of abuse and/or neglect.

First Avenue ensures that staff have the skills, knowledge and understanding necessary to keep LAC students and previously LAC students safe. First Avenue has a named designated teacher for this group of

students (depending on the locality) who works closely with the Local Authority. It is important that all agencies work together and prompt action is taken when necessary to safeguard these children and young people, who are a particularly vulnerable group.

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.

Procedures for Managing Concerns

It is the duty by law that any member of First Avenue staff who receives a disclosure of abuse, or suspects that abuse may have occurred, should report it to the DSO or Deputy DSO.

Written disclosures need to be recorded on a 'Safeguarding Incident Record Form (**see Appendix B**). This form can be emailed to the DSO as soon as possible.

If appropriate, the DSO will refer cases of suspected abuse or allegations by telephone in accordance with the Local Safeguarding Partner's Procedures. This telephone referral will be confirmed in writing using the DSO referral form. In some cases it may be appropriate for the Police to also be contacted.

It is not the responsibility of First Avenue staff to investigate allegations; this is the responsibility of the Authorities. However, essential information may help these investigations and details such as learner's name, address, and date of birth, family composition, and reason for referral should be recorded. The name of the person who initially received the disclosure and whether or not the parents/carers of the learner are aware of the referral should also be included.

For learners who are in immediate danger or risk of harm a referral should be made to social care and/or the police immediately. Anyone can make a referral but in situations where referrals are not made by the DSO they should be informed as soon as possible afterwards that a referral has been made by someone else. All referrals will be in line with local safeguarding partner's procedures.

Support from the Designated Safeguarding Officer and Deputy will be made available for staff dealing with safeguarding issues.

Any member of staff who does not feel that concerns have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Directors of the Board. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact the local authority directly with their concerns.

Where there are concerns about the way that safeguarding is carried out within First Avenue, staff should refer to the Whistleblowing Policy.

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 0795 6659598. dwhelan@wce.jmat.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

Allegations of abuse against other learners (peer on peer abuse)

All staff will be aware that learners are capable of abusing their peers, and will never tolerate abuse as "banter" or "part of growing up".

First Avenue and its staff are aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence, which aims to cause physical, emotional or psychological harm. It can also include:

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. It includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence refers to the three following offences: rape, assault by penetration and sexual assault.

The term "**harmful sexual behaviour**" is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

Awareness

All staff will be aware that learners of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

All staff will be made aware of the heightened vulnerability of learners with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the young person’s SEND and will always explore indicators further.

First Avenue’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

Managing allegations

The DSO will be informed of any allegations of abuse against other learners, who will record the incident in writing and decide what course of action is necessary, with the best interests of the learner in mind at all times.

If appropriate, a referral may be made to children’s social services and, depending on the nature of the incident, the police.

In conjunction with key staff, the DSO will decide which safeguards, if any, are necessary for the learner, e.g. counselling support or immediate protection.

In all cases, parents/carers (of those under the age of 18) will be informed of the incident and how it is being managed, unless doing so would put the young person at further risk of harm.

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 local safeguarding partners (formerly LSCBs).
- 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.

Records & Monitoring

First Avenue maintains up to date and accurate records of all learners cause for concerns including an indication of the status of each individual case and when it is deemed appropriate to pass this information to other agencies. Members of staff receiving a disclosure of, or noticing signs of abuse, should use First Avenue's safeguarding incident form (**see Appendix B**) to record these concerns as accurately and as quickly as possible.

These forms should be passed to the DSO and will be kept securely in a confidential cabinet in the room used by the safeguarding officer.

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 **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 the 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 **July 2020**.

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.

First Avenue Training



Safeguarding Incident Record Form Part 1

Person of Concern's Details:	
Name:	Address:
Date of Birth:	Placement:
Date and Time of Incident:	
Location of Incident:	
Record of Incident: (What are you worried about? Who? What? (if recording a verbal disclosure use exact words) Where? Any witnesses?)	
Professional opinion: (where relevant)	
Any other relevant information: (distinguish between fact and fiction), previous concerns etc.	
What needs to happen now? (Note actions, including names of whom this information was passed to and when)	
Name of person recording the incident:	Job Title:
Signature:	Date and time of recording: