

Safeguarding/Prevent Policy – Keeping Our Learners Safe

Statement

This policy has a dual purpose:

- (1) To clearly state the commitment of each member of Clifford College to the protection and safety of all learners including young people and vulnerable adults
- (2) Clifford College aims to raise awareness of radicalisation and extremism in all its forms in relation to the Counter Terrorism Act 2015
- (3) To describe how that commitment is undertaken

At Clifford College we have a firmly established culture of equal treatment for all, based on a belief that each of us is equal and different.

This Safeguarding policy is used in tandem with our Equality and Health and Safety policies.

Safeguarding

The statements made in this document are also, we believe, upheld in the companies with whom we have a business relationship and to whom we have pledged our support.

As a provider of learning and development to both young people and adults it is our duty to:

- Ensure a safe learning environment for all learners
- Keep our staff safe
- Ensure staff and learners have a clear understanding of their responsibilities under the Prevent Duty
- Recognise that some young people and adults are legally identified as vulnerable and be responsive to their needs
- Have in place policies and procedures for the reporting and monitoring of incidents
- To maintain a company-wide awareness of the need for this policy

We will ensure that all our learners use safe working practices.

We will do this by:

- Regularly observing learners in their workplace or in an off-site place of work
- Ensuring that employers are aware of their responsibilities and create a safe working and learning environment and demonstrate this in their behaviour and attitudes
- Ensuring that learners are safeguarded and protected
- Ensuring that all staff working with associated companies are trained to ensure the safety of learners and are regularly updated in good practice
- Safe recruitment processes for all staff
- Planned induction of all staff, internal and in associated companies to ensure their understanding and acceptance of the safeguarding policy, code of conduct and procedures
- Treating all learners with respect and protect their right to personal privacy
- Being mindful of how vulnerable a learner is, whether a young person or adult may be
- Ensuring that you are not alone with a learner, or you may need to ensure that you work within sight or sound of another

- Challenging all types of unacceptable behaviour, allegations or suspicions of abuse
- Challenging all signs of radicalisation and extremism including learners, staff, partners and stakeholders
- Avoiding taking young people or vulnerable adults on unaccompanied journeys
- Avoiding taking young people or vulnerable adults to your home

All Clifford College staff and relevant staff in associated/partnership companies are checked by the Disclosure and Barring Scheme. This involves an enhanced check and compliance with the independent Safeguarding Authority (ISA).

Safeguarding will remain in focus and will be monitored and reviewed.

We will do this by:

- Reviewing the Equality and Diversity and Health and Safety policies
- Training and updating all staff skills and raising awareness of safeguarding, radicalisation and extremism
- Regular training delivered by designated safeguarding officers
- Observation of quarterly reviews with learners
- Take action when signs of suspected abuse or radicalisation are recognised or reported
- Ensuring all staff are skilled in the use of the Incident Report form and are fully supported during an investigative process
- Combating fear and encouraging openness

We have a management structure which is capable of supporting a complaints procedure and which is able to intervene on behalf of young people, vulnerable adults and learners.

This policy is based on the beliefs of everyone associated with, and working for Clifford College training that:

- The welfare of young people and vulnerable adults is of primary concern
- All young people and vulnerable adults, regardless of their age, culture, ability, disabilities, gender identity, sexual identity, language and culture, socio-economic background, faith and methods of worship have the right to be safeguarded from abuse
- Learners, staff, partners and stakeholders have the right to have their awareness raised in relation to radicalisation and extremism in all its forms
- It is everyone's responsibility to be vigilant in observing signs of abuse and to be thorough in reporting instances to the designated representative
- Any reports of poor practice, misconduct or abuse are taken seriously with a swift and appropriate response
- All personal data will be processed in accordance with the requirements of the General Data Protection Regulation 2018.

Child Safeguarding Procedures

- All organisations are charged with statutory responsibilities which must be followed to ensure the safety of young people. To meet these requirements, at Clifford College we have:
 - Appointed two designated safeguarding officers
 - Instigated a formal and recognised reporting procedure
 - Heightened staff awareness and sensitivity in dealing with incidents
 - Broken down taboos that may discourage people from making a complaint

Adult Safeguarding Procedures

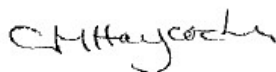
The same principles apply to vulnerable adults. At Clifford College we will:

- As far as possible, identify vulnerable adults and ensure that there are appropriate support measures in place
- Ensure all incidents of abuse, either reported directly by a third party, witnessed personally or suspected are reported to one of the designated officers

The Role of the Designated Safeguarding Officers

- To plan and co-ordinate any Clifford College training events that may involve young people and vulnerable adults to ensure that there is a strategy in place to ensure that they are safeguarded
- To receive and record information from staff, learners and employers who have safeguarding concerns
- To receive and record information from staff, learners and employers who have extremism and radicalisation concerns
- Assess the information promptly and carefully, clarify and obtain more information about the matter as appropriate
- Consult initially with a statutory child safeguarding board to explore any doubts or uncertainty
- Consult initially with the Counter Terrorism Unit
- Make a formal referral to a safeguarding agency or to the police
- To make further investigations in complex cases which need a more skilled approach

Signed:



Christine Haycocks



Richard Sands

Designated Safeguarding Officers

Date: February 2022

Appendix 1

Further Information and Guidance

Abuse: a definition

Any behaviour towards a person that deliberately or unknowingly causes harm to a group of individuals and single individual causing them psychological or physical harm, endangering life of violating their rights.

Forms of Abuse

- Physical
- Sexual
- Psychological
- Financial or material – stealing or denying access to money or possessions
- Neglect
- Discriminatory practices – abuse motivated by discriminatory attitudes towards race, religion, gender or cultural background

A Caring Environment is in which:

- The Health and Safety of all learners including young people and vulnerable adults has been considered and is catered for
- In which people are sensible to the possibility of abuse and take measures to prevent that possibility
- There is a sound, practical and fully known reporting system for any incident
- Where the behaviour and knowledge of all staff will ensure that each takes practical precautions to avoid any suspicions of abuse being brought against them

At Clifford College we have always considered the welfare of under-18s as part of our duty of care obligations. Whilst there are no specific directives for private training providers, there are a number of statutory and legal provisions which we uphold.

- Housing Act 1996
- Crime and Disorder Act 1998
- The Education Act (2002 Section 175)
- The Children Act (1989 and Amendments)
- The Children Act (2004)
- Childcare Act 2006
- Safeguarding of vulnerable Adults Guidance 2006
- Working together to Safeguard Children 2013
- Care Act 2014

Appendix 2

Types of Abuse – Child Abuse

Abuse and Neglect:

The following definitions are taken from Working Together to Safeguard Children 2006. Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children 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 or children.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning-or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. (Working Together to Safeguard Children 1999 acknowledged that, although the definition of a child included those under the age of 19, young people aged 16 and over have the right to make their own informed choices regarding sex and sexuality).

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Types of Abuse – Child Abuse

Significant Harm

The concept of significant harm

Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker, or a probation officer) in respect of a child if it is satisfied that:

- The child is suffering, or is likely to suffer, significant harm, (including impairment suffered from seeing or hearing the ill-treatment of another); and
- The harm or likelihood of harm is attributable to a lack of adequate parental care or control

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism, and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, eg a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and longstanding, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the family's strengths and supports.

Types of Abuse – The Abuse of Vulnerable Adults

Protection of Vulnerable Adults

Alongside Ofsted's responsibility to safeguarding children and young people, it has equal regard and concern for safeguarding vulnerable adults who are not covered by child protection legislation.

Ofsted inspectors, and other staff, should be aware of their responsibility towards vulnerable adults and to contribute to preventing further abuse if they are made aware of it.

The basis for the following is Department of Health guidance detailed in 'No Secrets'(2000) and the Protection of Vulnerable Adults (POVA) (2004).

A vulnerable adult is defined as someone:

- Who is or may be in need of community care services by reason of mental or other disability, age or illness; and
- Who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

As such Ofsted's inspectors and other staff may have contact with vulnerable adults in independent specialist colleges (ISCs) as well as in general further education, sixth form or other specialist colleges and, occasionally, in joint inspections of Adult and Community Education, work-based training and the secure estate.

Adults considered to be vulnerable in the above definition may have a range of learning difficulties and/or disabilities, including mental health difficulties, significant behavioural and emotional difficulties; cognitive learning difficulties, including severe and complex learning disability; sensory disability; speech and language disability and communication disorders, including autistic spectrum difficulties and Asperger's Syndrome.

This is not a complete list nor does it imply that all learners who have such learning difficulties and/or disabilities should be considered to be a vulnerable adult. However, such a decision should not be taken by the inspector or other member of staff in isolation. All incidents and concerns must be reported initially to the lead inspector, if the incident occurs during inspection, and then to Ofsted's relevant RSO. Concerns that arise away from an inspection, for example by contact with one of Ofsted's support offices, should be reported immediately to the respective RSO.

What is meant by Abuse in the Context of Vulnerable Adults?

In addition to definitions provided above, in the context of vulnerable adults the following outlines the main forms of abuse:

- Physical abuse, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
- Sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressure into consenting
- Psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, Isolation, or withdrawal from services or supportive networks

- Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- Neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating

Types of Abuse – The Abuse of Vulnerable Adults

- Discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment

Incidents of abuse may be multiple, either to one person in a continuing relationship or service context - or to more than one person at a time. Patterns of abuse and abusing vary and reflect very different circumstances.

These include:

- Serial abusing in which the perpetrator seeks out and 'grooms' vulnerable individuals. Sexual abuse usually falls into this pattern as do forms of financial abuse
- Long term abuse in the context of an ongoing family relationship such as domestic violence
- Opportunistic abuse such as theft
- Situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour
- Neglect of a person's needs because those around him or her are not able to be responsible for their care, for example, of the carer has difficulties attributable to such issues as debt, alcohol or mental health problems
- Institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and insufficient knowledge base within the provider or service
- Unacceptable 'treatments' or programmes with sanctions or punishments such as withholding food and drink, seclusion, unnecessary and unauthorised use of control and restraint, or over-medication
- Failure to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice
- Failure to access key services such as health care, dentistry
- Misappropriation of benefits and/or use of the person's money by other members of the household
- Fraud or intimidation in connection with wills, property or other assets

Some instances of abuse will constitute a criminal offence. In this respect vulnerable adults are entitled to the protection of the law in the same way as any other members of the public. In addition, statutory offences have been created which specifically protect those who may be incapacitated in various ways. Examples of actions which may constitute criminal offences are assault, whether physical or psychological, sexual assault and rape, theft, fraud, and other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.

Alleged criminal offences differ from all other non-criminal forms of abuse in that the responsibility for initiating action invariably rests with the state in the form of the police and Crown Prosecution Service. While private prosecution is theoretically possible, they are exceptional in practice. Accordingly, when complaints about alleged abuse suggest that a criminal offence may have been committed it is imperative that reference should be made to the police as a matter of urgency. Criminal investigation by the police takes priority over all other lines of enquiry.

Appendix 3

Clifford College Code of Good Practice for staff, learners and others

These guidelines form a common-sense approach which both reduces the opportunities for the abuse of young people, children and vulnerable adults and help to protect staff, learners and others from false allegations.

All staff of Clifford College are expected to:

- Treat all learners, including those who are classified as children, young people and vulnerable adults with care and respect, according them the right to personal privacy
- Ensure that wherever possible there is more than one adult present during activities; failing that, you are in sight or hearing of others.
- Be courteous in discussing sensitive issues.
- Not to initiate any physical contact with children, young people or vulnerable adults
- Challenge any inappropriate behaviour and report all allegations or suspicious of abuse
- Keep carers/parents informed of any action
- Wear Clifford College identity badge so that it can be clearly seen when out of the office

We will not:

- Spend excessive/unnecessary time alone with children, young people or vulnerable adults
- Take a young or vulnerable person alone on a car journey, however short
- Take a young or vulnerable person to our homes
- Engage in physically or sexually provocative games
- Allow or participate in inappropriate touching of any kind
- Make over-familiar or sexually provocative comments, even as a 'joke'
- Enter rooms that are assigned to the opposite sex unless there is an emergency
- Let allegations, over-familiar or sexually suggested comments made by a young or vulnerable person go unchallenged
- Do things of a personal nature that young or vulnerable people can do for themselves
- Take photographs, videos or other images of a young person without the express permission of their parent or guardian

Appendix 4 - Every Child Matters

Information Sharing and Assessment is part of the Government's strategy to improve outcomes for children and young people (Every Child Matters: Change for Children). As part of this, children and young people have told the Government that five outcomes are key to their well-being in life. These are:

Be Healthy

To help ensure babies, children and young people are physically healthy, mentally and emotionally healthy, sexually healthy, living healthy lifestyles, and choosing not to take illegal drugs. We also want to help parents, carers and families to promote healthy choices.

Stay Safe

To ensure babies, children and young people are safe from maltreatment, neglect, violence and sexual exploitation, safe from accidental injury and death, safe from bullying and discrimination, safe from crime and anti-social behaviour in and out of school, and have security, stability and are cared for. We also want to help parents, carers and families to provide safe homes and stability, to support learning and to develop independent living skills for their children.

Enjoy and Achieve

To help ensure young children are ready for school, school-age children attend and enjoy school, children achieve stretching national educational standards at primary school, children and young people achieve personal and social development and enjoy recreation, and children and young people achieve stretching national educational standards at secondary school. We also want to help parents, carers and families to support learning.

Make a Positive Contribution

To help ensure children and young people engage in decision making and support the community and environment, engage in law-abiding and positive behaviour in and out of school, develop positive relationships and choose not to bully or discriminate, develop self-confidence and successfully deal with significant life changes and challenges and develop enterprising behaviour. We also want parents, carers and families to promote positive behaviour.

Achieve Economic Well-being

To help ensure young people engage in further education, employment or training on leaving school, and are ready for employment; babies, children and young people live in decent homes and sustainable communities, have access to transport and material goods and live in households free from low income. We also want to help parents, carers and families to be economically active.

For a copy of the Children Act 2004 visit www.opsi.gov.uk/acts/acts2004/20040031.htm. For more information regarding Every Child Matters including guidance for the Children's Act 2004, visit: www.everychildmatters.gov.uk

Appendix 5

Suggested Good Practice when working with young people and vulnerable adults.

The following guidelines are intended to be a common-sense approach that both reduce opportunities for the abuse of young people and vulnerable adults and help to protect staff, learners and others from any false allegation.

You SHOULD

- Treat all young people and vulnerable adults with respect and respect their right to personal privacy
- Ensure that, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others
- Exercise caution when discussing sensitive issues with children or vulnerable adults
- Exercise caution in initiating any physical contact with a young person or vulnerable adult
- Operate within guidance offered by this Code
- Challenge all unacceptable behaviour and report all allegations or suspicions of abuse
- Keep parents fully informed of all anticipated activities
- Remind everyone to keep their valuables with them

You should NOT

- Spend excessive time alone with young people and vulnerable adults away from others
- Take young people or vulnerable adults alone in a car journey, however short
- Take young people or vulnerable adults to your home
- Engage in physical or sexually provocative games including horseplay
- Allow or engage in inappropriate touching of any form
- Make over-familiar or sexually suggestive comments or approaches to a young person or vulnerable adult even as a 'joke'
- Enter rooms that are assigned to the opposite sex unless there is an emergency
- Let allegations, over familiar or sexually suggestive comments or approaches made by a young person or vulnerable adult go unchallenged or recorded
- Do things in a personal nature that young people or vulnerable adults can do for themselves
- Take photographs, videos or other images of a young person without the express permission of their parents or guardian
- Leave valuables unattended

Appendix 6

The Prevent Duty - what does it involve?

The Prevent Duty involves:

- Assessing the risk of children being drawn into terrorism
- Protecting children and young people from being drawn into terrorism by having effective safeguarding policies
- Ensuring that safeguarding arrangements take into account the policies and procedures of the Local Authority and Local Safeguarding Board
- Making sure that staff have training that gives the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- Ensuring children are safe from terrorist and extremist material when accessing the internet
- Establish a single point of contact for Prevent - the DSL
- Training staff to recognise radicalisation and extremism
- Referring vulnerable people to CHANNEL
- Considering your approach to external speakers
- Having appropriate filtering systems to prevent access to extremist material

CHANNEL referrals:

- Channel assesses vulnerability using a consistently applied vulnerability assessment framework built around three criteria. The three criteria are:
 1. Engagement with a group, cause or ideology;
 2. Intent to cause harm; and
 3. Capability to cause harm
- The criteria are considered separately as experience has shown that it is possible to be engaged without intending to cause harm and that it is possible to intend to cause harm without being particularly engaged. Experience has also shown that it is possible to desist (stop intending to cause harm) without fully disengaging (remaining sympathetic to the cause); though losing sympathy with the cause (disengaging) will invariably result in desistance (loss of intent).

Example indicators that an individual is engaged with an extremist group, cause or ideology 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 centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology group or cause
- Possession of material or symbols associated with an extremist cause (e.g, the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause/ideology

Share a Concern

- Call the national police Prevent advice line between 9 am and 5 pm on 0800 0113764, in confidence, to share your concerns with specially trained officers.
- Emergency anti-terrorist hotline number is 0800 789321