

Safeguarding & Prevent policy

Including safer recruitment

Policy Statement

We are committed to providing a safe and secure environment in which young people, vulnerable adults and adults can learn, develop and succeed and where all aspects of their welfare will be protected. We have due regard to the need to prevent people from being drawn into radicalisation (Prevent Duty).

We believe it is unacceptable for anyone to experience abuse of any kind and recognise our responsibility to safeguarding by a commitment to practices which protect them. Our duty of care also extends to staff and volunteers and we endeavour to ensure their wellbeing and health and safety are a priority at all times.

We recognise that

- the welfare, safety and security of our learners' radicalisation, where engaged, is paramount.
- all learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse including being drawn into radicalisation.
- working in partnership with children, young people, vulnerable adults their parents, carers and their agencies is essential in promoting their welfare and addressing issues that may arise.

The purpose of this policy is to provide

- protection for young people and vulnerable adults who use the services delivered by Penguin Training Ltd.
- staff with guidance on procedures they should adopt in the event that they suspect a young person or vulnerable adult may be experiencing, or be at risk of, harm including risk of being drawn into radicalisation.
- awareness of the vulnerability of Young Carers: a young person under 18 who provides regular or ongoing care and emotional support to a family member who is physically or mentally ill, disabled or misuses substances.
- Awareness of Penguin Training Ltd' whistle-blowing policy.

This policy

- outlines Penguin Training Ltd' policy on identifying and responding to concerns regarding the safeguarding and protection of young people and protection of vulnerable adults
- provides guidance for all staff in workplace learning settings working for TAS and everyone else working for or on behalf of TAS who may come across concerns.

Expectations of staff

- everyone must be aware of what to do in the event of having concerns about the safeguarding, welfare or protection of a learner or receiving allegations of a safeguarding or extremist nature.
- to provide a safe environment where young people and vulnerable adults can learn and develop.
- leaders and managers to create a culture of vigilance where learners' welfare is promoted and where timely and appropriate safeguarding action is taken for learners who need extra help or who may be suffering, or likely to suffer, significant harm.

Safeguarding

Safeguarding action may be needed to protect learners from:

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- the impact of new technologies on sexual behaviour, for example sexting
- teenage relationship abuse
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic violence
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting
- other issues not listed here but that pose a risk to young people and vulnerable adults.

Safeguarding is not just about protecting learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- learners' health and safety and well-being
- the use of reasonable force
- meeting the needs of learners with medical conditions
- providing first aid
- educational visits
- emotional well-being
- online safety and associated issues

Any risks associated with learners offending, misusing drugs or alcohol, self-harming, going missing, being vulnerable to radicalisation or being sexually exploited that are known by staff are reported, as required, to the Designated Officer.

Strategies are in place to keep learners safe when using technology and the risks posed including the internet, to bully, groom, radicalise or abuse children or learners are understood.

Emergency contact details are obtained for parents of young people and vulnerable adults.

Safeguarding young people

In relation to young people, Ofsted adopts the definition used in the Children Act 2004 and the Department for Education (DfE) guidance document: Working Together to Safeguard Children 2013 (paragraph 2), which define safeguarding and promoting young people's welfare.

The staff must have a safer recruitment checks (including DBS) and have completed safeguarding training within the past three years.

Young carers

A young carer becomes vulnerable when the level of caregiving and responsibility to the person in need of care becomes excessive or inappropriate for that child, risking impacting on his or her emotional or physical well-being or educational achievement and life chances. In this instance we would contact the appropriate service for support and guidance: ADASS, ADCS and The Children's Society (2012), Working together to support Young Carers and their families

Safeguarding vulnerable adults

The legal and policy basis for responding to concerns regarding the safeguarding and welfare of vulnerable adults is different from that of young people under 18. Working Together to Safeguard Children 2015 only applies to young people until they reach the age of 18. Any incidents or concerns relating to a young person of 18 years and over, even if still at school, are not covered by Local Safeguarding Children Boards or their procedures.

The term vulnerable adult is used for any person over the age of 18 who meets the statutory definition. Following amendments to the Safeguarding Vulnerable Groups Act 2006, by the Protection of Freedoms Act 2012, adults are no longer deemed vulnerable because of their personal attributes, characteristics or abilities. An adult is considered vulnerable if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing.

The definition of abuse of adults is contained in 'No Secrets' (para 2.5): 'Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it'.

Within this context abuse can take the form of:

- physical abuse – including hitting, pushing, kicking, misuse of restraint or inappropriate sanctions
- sexual abuse – including sexual assault or acts to which the adult did not, or could not, consent
- psychological abuse – including emotional abuse, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse, isolation or withdrawal from services
- financial or material abuse – including exploitation and pressure in connection to wills, property, inheritance or financial transactions
- neglect or acts of omission – including ignoring medical or physical care needs, withholding of medication or adequate nutrition and failure to provide access to appropriate health, social care or educational services discriminatory abuse – including racist, sexist and other forms of harassment.

We seek to fulfil our commitment to safeguarding and keeping learners safe from the dangers of radicalisation and extremism through:

Effective communication with learners

- valuing, listening to and respecting our learners
- seeking to create a safe environment for learners
- ensuring information for learners about their safety and wellbeing is readily available to them and sufficiently clear in learner information.

Effective communication and support with staff

- providing staff with appropriate guidance so they know how to deal with and report any concerns
- providing effective management for staff and volunteers through supervision, support and training
- access to policies and procedures for whistle-blowing and complaints.

Whistleblowing

Concerns raised under the Whistleblowing Policy should be about something that is in the public interest and is or may be:

- unlawful or a criminal offence
- a breach of a legal obligation (but not a personal contractual breach unless such breach involves a matter of public interest)
- a miscarriage of justice
- mistreatment or abuse of a member of staff or a learner
- in disregard of legislation governing health and safety at work

Naming designated officer

There is a designated senior member of Penguin Training Ltd staff in charge of safeguarding arrangements and a deputy, at management level, who have been trained to the appropriate level and understands their responsibilities with respect to the protection of young people and vulnerable adults and the safeguarding of all learners.

Their role is to:

- keep up-to date on 'best practice' in safeguarding
- work with external agencies, whilst always placing the welfare of the individual at the centre of any action take
- regularly review the safeguarding and prevent duty policy and procedures
- receive any concerns, make decisions on how to proceed and ensuring the procedure is followed on such matters as making a referral, confidentiality and recording
- share information about concerns with agencies who need to know, and involving others as appropriate
- receive outcomes of any safeguarding or prevent duty investigations where there are issues relevant to Penguin Training Ltd.

Staff recruitment

Staff are carefully selected and vetted according to statutory requirements. There is monitoring to prevent unsuitable people from being recruited and having the opportunity to harm learners or place them at risk.

Penguin Training Ltd follows procedures to ensure the safe recruitment of staff ensuring all necessary checks are made.

Penguin Training Ltd ensure that all teaching staff have been checked by the DBS (Disclosure and Barring Service) and that a status check on the DBS Update Service has been carried out. This is because these staff could and do work with children aged 14-18 and vulnerable adults. All DBS records are kept in a single central record. The information recorded on individuals is whether or

not the following checks have been carried out or certificates obtained and the date on which the checks were completed:

- an identity check
- barred list check
- an enhanced DBS check/certificate
- an Employers Status Check with the DBS Update Service
- a prohibition from teaching check
- further checks on people living or working outside the UK
- a check of professional qualifications
- a check to establish the person's right to work in the UK.

If there are concerns about an existing staff member's suitability to work with children or learners, all relevant checks will be carried out as if the person were a new member of staff. Similarly, if a member of staff working for Penguin Training Ltd moves from a post that did not require vetting activity into work that requires it.

Secure record keeping

Secure records of safeguarding and cause for concern reports are kept centrally summarising the issue, the action taken and outcome (where known) Safeguarding Spreadsheet (restricted access).

Records provide evidence that staff have an understanding of when to make referrals when there are issues concerning sexual exploitation, radicalisation and/or extremism or that they have sought additional advice and support.

Risk assessing venues

Using appropriately insured venues and risk assessing all venues, checking for compliance with health and safety regulations and safeguarding, with specific checks if the premises are to be used by children or vulnerable adults. Organisers of children's groups already using the premises will be made aware that an adult group will be sharing some facilities at the same time. Reference should be made to the Penguin Training Ltd Health and Safety Policy including guidance and risk assessments on lone working.

Staff training

There are clear and effective arrangements for in respect of the protection and care of learners ensuring (Appendix 1)

- staff understand the factors that make people vulnerable to being drawn into radicalisation and what action to take in response:
- staff receive the appropriate awareness raising training in safeguarding refreshed every 2 years.

Appendix 1- staff safeguarding training

Type of training	Delivered by	Delivered to	When and at what frequency
Prevent	Department of Education Education and Training Foundation (ETF) Online training courses.	All staff	All staff to complete training on Induction to TAS Repeated for all staff every 2 years. All Department for Education Newsletters and updates shared with all staff.
Safer recruitment training	Education and Training Foundation (ETF) Online training courses.	All SMT	Refresh every 2 years
Safeguarding training	Education and Training Foundation (ETF) Online training courses.	All staff	All staff to complete training on Induction to TAS Refreshed every 2 years
Female genital mutilation training	Online - Home Office via the Virtual College Network.	All staff	Once

Radicalisation & Extremism

‘PREVENT’

Prevent duty

Prevent is part of the Government’s counter-radicalisation strategy. Penguin Training Ltd have a responsibility to have due regard to the need to prevent people from being drawn into radicalisation.

An individual exposed to extremist viewpoints may, over time, be encouraged to carry out an act of violent extremism or radicalisation. Strong evidence shows that an intervention can stop someone supporting violent extremism. Extremism is not illegal. Anyone who is identified through Prevent is not automatically criminalised. We all have a role to ensure that our communities remain safe.

Radicalisation can occur anywhere in the world. However, radicalisation can be motivated by a range of ideologies or other factors, including religious or political beliefs and racial prejudice.

The following signs might indicate that someone is being radicalised:

- a change in behaviour, their circle of friends, the way that they interact with others and spend their time.
- accessing extremist material online
- use of extremist or hate terms to exclude others or incite violence
- writing or artwork promoting violent extremist messages.

These possible indicators should not be viewed in isolation; judgement will be required to determine the significance of any behaviour. If you believe that someone may be at risk of radicalisation you should raise your concerns.

Aims and principles

Penguin Training Ltd tackling extremism and radicalisation policy is intended to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. We recognise that we are well placed to be able to identify safeguarding issues and this policy clearly sets out how Penguin Training Ltd will deal with such issues and underpins how company ethos underpins our actions.

The objectives are that:

- All staff will have an understanding of what radicalisation and extremism is and why we need to be vigilant
- All staff will know what company policy is on tackling extremism and radicalisation and will follow policy guidance swiftly when issues arise
- All learners will understand the dangers of radicalisation and exposure to extremist views; building resilience against these and knowing what to do if they experience them
- All learners and their carers (where appropriate) will know that the company has policies in place to keep them safe from harm and that the company regularly reviews its systems to ensure they are appropriate and effective

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

Definitions and indicators

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views.

There are a number of behaviours which may indicate that a learner is at risk of being radicalised or exposed to extreme views. These 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 on an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology or cause
- Possession of materials or symbols associated with an extremist cause

- Attempts to recruit others to the group/ cause
- Communications with others that suggests identification with a group, cause or ideology
- Using insulting or derogatory names for another group
- Increase in prejudice related incidents committed by that person-these may include:
- Physical or verbal assault behaviour
- Damage to property
- Derogatory name calling
- Possession of prejudice-related materials
- Prejudice related ridicule or name calling
- Inappropriate forms of address
- Refusal to cooperate
- Attempts to recruit prejudice-related organisations
- Condoning or supporting violence towards others

Procedures for referrals

Although serious incidents involving radicalisation have not occurred at Penguin Training Ltd to date, it is important for us to be constantly vigilant and remain fully informed about the issues which affect the various areas, cities and society in which we provide support for learners. Staff are reminded to suspend any `professional disbelief` that instances of radicalisation `could not happen here` and to be `professionally inquisitive` where concerns arise, referring any concerns through appropriate channels. (See appendix 1- dealing with referrals)

We believe that it is possible to intervene to protect people who are vulnerable. Early intervention is vital and staff must be aware of the established processes for front line professionals to refer concerns about individuals and/ or groups. We must have the confidence to challenge, the confidence to intervene and ensure that we have strong safeguarding processes based on the most up to date guidance and best practice.

All members of staff are trained in safeguarding and PREVENT and will deal swiftly with any referrals made by staff or with concerns reported by staff. A designated member of staff trained accordingly, deals with specific referrals as specified in the safeguarding procedures.

The designated member of staff and SMT discuss the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed. (See appendix 1- dealing with referrals)

As with any safeguarding referral, staff must be made aware that if they do not agree with a decision not to refer, they can make the referral themselves and will be given the contact details to do this via the safeguarding policy.

Leaders and staff

Members of the SMT are the leaders for referrals relating to extremism and radicalisation. In the unlikely event that no SMT members are available, all staff know the channels by which to make referrals. Penguin Training Ltd has a designated welfare & safeguarding officer who is trained in following the necessary procedures.

Staff will be fully briefed about what to do if they are concerned about the possibility of radicalisation relating to a learner or if they need to discuss specific learners whom they consider

vulnerable to radicalisation or extremist views. Training has been provided and the course of action clearly documented.

The designated welfare & safeguarding officer will work in conjunction with external agencies to decide the best course of action to address concerns which arise. Learners will be supported to stay safe when using the internet and about e-safety generally which includes social media

No member of SMT or the CEO is or has ever been a member of an extremist group. Penguin Training Ltd takes all reasonable measures to ensure that no staff member holds any views contrary to this policy and will take all necessary steps to ensure this is upheld

Staff Training

Penguin Training Ltd will ensure that staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; we are aware of the process of radicalisation and how this might be identified early on and are aware of how we can provide support as a training provider to ensure that learners are resilient and able to resist involvement in radical or extreme activities (see appendix 2-staff training)

Additional materials

See appendix 3 for further reading

Policy review

Penguin Training Ltd -PREVENT policy will be reviewed annually as part of the overall safeguarding policy review

Appendix 1 – dealing with referrals

We are aware of the potential factors that a learner is vulnerable to being radicalised or exposed to extreme views, including peer pressure, influence from other people or the internet, bullying, crime and antisocial behaviour, family tensions, race/hate crime, lack of self-esteem or identity, prejudicial behaviour and personal or political grievances.

In the event of prejudicial behaviour the following system will be followed:

- All incidents of prejudicial behaviour will be reported directly to the Safeguarding Officer
- All incidents will be fully investigated and recorded in line with safeguarding policies and records kept in line with procedures for any other safeguarding incident
- When learners are between the ages of 16-18 years old, parents and carers will be contacted and the incident discussed in detail, aiming to identify motivating factors, any change in circumstances at home, parental views of the incident and to assess whether the incident is serious enough to warrant a further referral. A note of the meeting will be kept with the initial referral in the safeguarding file.
- The SO follow up any referrals for a period of 4 weeks after the incident to assess whether there is any change in behaviour and/or attitude. A further meeting will be held with parents of young learners if there is not a significant change in behaviour or attitude
- If deemed necessary, serious incidents will be referred to the appropriate local authority where the learner resides

- In the event of a referral being made relating to serious concerns about potential radicalisation or extremism, SO will contact the appropriate police counter terrorism unit in the area where the learner resides

Appendix 2- staff safeguarding training

Type of training	Delivered by	Delivered to	When and at what frequency
Prevent	Department of Education Education and Training Foundation (ETF) Online training courses.	All staff	All staff to complete training on Induction to TAS Repeated for all staff every 2 years. All Department for Education Newsletters and updates shared with all staff.
Safer recruitment training	Education and Training Foundation (ETF) Online training courses.	All SMT	Refresh every 2 years
Safeguarding training	Education and Training Foundation (ETF) Online training courses.	All staff	All staff to complete training on Induction to TAS Refreshed every 2 years
Female genital mutilation training	Online - Home Office via the Virtual College Network.	All staff	Once

Appendix 3- additional materials

The prevent strategy. Gov.uk- home office

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Keeping children safe in education- DfE 2014

Working together to safeguard children- HM GOV 2013

Learning together to be safe 2008