



## The People Development Academy

### Safeguarding Adults including Prevent Duty

**This Policy is for staff and learners within the Academy and not for intended use outside of this remit. Safeguarding is everybody's responsibility.**

Safeguarding is intended to promote the welfare of our learners, especially those who are most vulnerable, by helping to protect them from bullying, harassment, abuse of any kind, discrimination or victimisation.

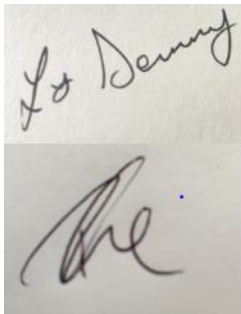
Under the Prevent Duty this also includes supporting any learners who are at risk or being radicalised or drawn into terrorism by challenging the spread of terrorist ideology and providing early intervention designed to divert people away from terrorist activity. This does not mean we discourage our learners from having political or religious view and concerns but rather it is about supporting learners to act upon concerns in non-extremist ways.

The Academy will ensure:

- The attitudes “it could happen here” and that “safeguarding is everyone’s business “are maintained.
- A “zero tolerance” approach to any type of abuse including sexual harassment and sexual violence is maintained.
- A culture of safeguarding is promoted. Staff and volunteers are continually vigilant and maintain professional curiosity. Appreciating that not all learners may feel ready or comfortable to disclose abuse, staff and volunteers will contact one of the safeguarding team if they have a concern.
- A safe learning environment is created so learners can thrive and achieve; staff, volunteers and learners feel safe, and everyone knows that their wellbeing is a high priority.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in the safeguarding management or process knowing that their concerns will be taken seriously.
- Our approach to safeguarding is learner-centred; staff and volunteers consider at all times what is in the best interests of the learner.

- Safer recruitment is practised in checking the suitability of staff and volunteers including verification of their identity, teaching qualifications (where applicable), a satisfactory DBS check and references; a single central record is kept for audit purposes.
- Awareness of safeguarding issues and possible indicators, including Prevent, is raised amongst all staff, volunteers, sub-contractors and visitors.
- Staff, volunteers and sub-contractors promote British values and the Prevent agenda.
- Procedures for reporting all cases of reported or suspected radicalisation, abuse or neglect are in place and all staff, volunteers and learners are aware of the process.

These policies and guidance notes have been written with reference to the Royal Devon University Healthcare NHS foundation Safeguarding Adult Protection policy and Devon Safeguarding Adults Board’s Guidance on producing adult safeguarding policy and procedures. This policy considers relevant legislation and statutory guidance including the Care Act 2014, the Counter Terrorism and Security Act 2015, ‘Keeping Children Safe in Education’ 2023 and staff policies including Whistleblowing, Domestic Abuse, Disciplinary, Grievance, Code of Conduct and Safer Employment and DBS policies. It is for all staff and volunteers working in the Academy. Providing the framework needed to keep learners safe and secure. They are also for use by any sub-contractor or partner organisation.

Position		Signature	Date
Associate Director of People Development	Lisa Denning		14/02/24
Head of Apprenticeships	Rachel Glover-Dare		14/02/24
Author	Rachel Glover-Dare		

**Details of policy updates- version control**

Date	Details
02/05/21	Version 1 Reviewed 02/05/22 added ESFA contact details – added signature box for associate Director – added Commerce to digital training Version 2 updated KCSIE 23
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<b>Contacts for Safeguarding Concerns</b>
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<b>Caroline Holt</b>	Head of Safeguarding	<a href="mailto:caroline.holt@nhs.net">caroline.holt@nhs.net</a> ; 01392 406430 Mob: 07912778406 rde-tr.safeguarding@nhs.net;
Health IDVA (Independent Domestic Violence Advisor) is here to support staff and patients with domestic abuse	Please complete the Health IDVA referral form on the HUB - you will need consent from the patient or member of staff for this:	rde-tr.safeguarding@nhs.net or ring Health IDVA on number above (Monday - Friday 09.00-16.30)  Northern Services: Celine Townsend. Tel: 07940 145 589 or 07792 338 280 or email: celine.townsend@nhs.net  Eastern Services: Christina Carey. Tel: 07436 355718 Email rduh.health.idva@nhs.net
<b>Gaye Callaghan</b>	Apprentice safeguarding lead/ Health and Wellbeing champion	<a href="mailto:gaye.callachan@nhs.net">gaye.callachan@nhs.net</a>
<b>Karoline Callard</b>	Safeguarding lead and Pastoral care	<a href="mailto:karolinecallard@nhs.net">karolinecallard@nhs.net</a>
	Administer for Apprenticeships People development admin	rde.tr-apprenticeships.nhs.net 07770 151443
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<b>ESFA Service desk contact information</b> Telephone: 0370 2670001 Email: <a href="mailto:SDE.servicedesk@education.gov.uk">SDE.servicedesk@education.gov.uk</a>		

[Link for ESFA contact form](#)

### Safeguarding Policies held at the Royal Devon

Safeguarding Adult Policy  
Management of Allegations Policy  
Domestic Abuse Affecting Patients Policy  
Assessing Mental Capacity Policy  
Deprivation of Liberties Safeguards Policy  
Domestic Abuse Affecting Staff (Perpetrators and Victims) Policy  
Prevent Policy  
Safeguarding Children Policy

### Links to other Policies

Complaints and appeals  
Learner Charter  
Guidance for safer working practice for those working within the Academy with younger people  
Guidelines for death of a student  
Missing in education policy  
Visiting speaker policy

### Additional learning/toolkits

The Safeguarding Association provide bitesize training sessions that you may find useful. [Details can be found here.](#) They are five minute masterclasses on all safeguarding children.

#### FGM eLearning for Healthcare Professionals

<https://www.e-lfh.org.uk/programmes/female-genital-mutilation/>

#### Child Sexual Exploitation

<https://www.youtube.com/watch?v=Wm1bEWvDHCg&feature=youtu.be>

**Modern Slavery** [https://www.youtube.com/watch?v=Jv1H\\_fAoOG4](https://www.youtube.com/watch?v=Jv1H_fAoOG4)

#### Survivors experience of sexual abuse BAFTA winning film Chosen

<https://www.youtube.com/watch?v=WoOzgebOU1k>

#### Understanding Prevent

<https://www.youtube.com/watch?v=5wS9Ne0a5MM&feature=youtu.be>

**County Lines** <https://www.youtube.com/watch?v=pLhGpS1f-F0>

**Was Not Brought** <https://www.youtube.com/watch?v=dAdNL6d4lpk>

- '3 Girls' Drama on BBC iPlayer about sexual exploitation of 100s of girls in Rotherham
- Watch or read news articles about child safeguarding issues e.g. mother convicted of FGM recently, knife crime, county lines
- Read Professional articles in journals about safeguarding

**Preventing Exploitation tool kit**

<https://beta.devon.gov.uk/preventingexploitationtoolkit/>

## Policy

### Adult Safeguarding

Safeguarding adults at risk means protecting their right to live in safety and free from abuse and neglect.

An Adult at risk is defined as a person aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing, or is at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

An adult at risk of abuse may:

- have an illness affecting their mental or physical health,
- have a learning disability,
- suffer from drug or alcohol problems,
- be frail.

### Introduction

At The People Development Academy (The Academy) safeguarding and promoting adults at risk is everyone's responsibility. Everyone who comes into contact with vulnerable adults and their families and carers has a role to play in safeguarding adults at risk. In order to fulfil this responsibility effectively, all professionals should make sure their approach is person centred-centred. This means that they should consider, at all times, what is in the best interests of the adult. Everyone who comes into contact with adults at risk has a role to play in identifying concerns, sharing information and taking prompt action (KCSIE 2020).

The Academy is committed to safeguarding and promoting the welfare of all learners through:

The provision of a safe environment in which adults can learn;

Fulfilling our statutory (legal) responsibilities to identify learners who may be in need extra help or who are suffering, or are likely to suffer, significant harm. Working effectively with key partners to ensure learner safety.

All action taken by The Academy will be in accordance with:

- NHS Trust policies
- Current legislation

- Statutory guidance

**The Care Act 2014** statutory guidance drawing together a number of pre-existing pieces of legislation to outline how support for adults is provided

***Key documentation, procedures and guidelines are detailed in Appendix A.***

- All staff at The Academy have a duty and responsibility to safeguard learners attending our provision, irrespective of their role:
- Identifying concerns early and providing help for children, young people and adults, to prevent concerns from escalating to a point where intervention would be needed via adult services.
- All staff should be aware of the process and principles for sharing information within the organisation which supports safeguarding.
- All staff should be aware of their local early help process and understand their role within it.

The most important consideration is whether sharing information is likely to safeguard and protect an adult. Any staff member who has a concern about a learner's welfare should follow the referral processes set out by the Trust Senior Safeguarding Team.

**This policy should be read in conjunction with the following Trust policies:**

Safeguarding Adult Policy

Management of Allegations Policy

Domestic Abuse Affecting Patients Policy

Assessing Mental Capacity Policy

Deprivation of Liberties Safeguards Policy

Domestic Abuse Affecting Staff (Perpetrators and Victims) Policy

Prevent Policy

Safeguarding Children Policy

**Equalities Statement**

We are committed to anti-discriminatory practice and recognise the diverse family circumstances of our learners. We ensure that all children, young people and adults have the same protection, regardless of any barriers they may face. With regards to safeguarding we will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

**Overall Aims**

This policy will contribute to the safeguarding of learners at The Academy by;

- Clarifying standards of behaviour for staff and learners;

- Contributing to the establishment of a safe, resilient and robust safeguarding ethos in the organisation, built on mutual respect, and shared values;
- Teaching learners about safeguarding, including online safety, through teaching and learning opportunities;
- Alerting staff to the signs and indicators of safeguarding issues including abuse and neglect;
- Developing staff awareness of the causes and consequences of abuse and neglect;
- Developing staff awareness of the risks and vulnerabilities their learners face by addressing concerns at the earliest possible stage;
- Reducing the potential risks learners face of being exposed to violence, extremism, exploitation or victimisation;
- Working in partnership with learners, parents and agencies.

This policy will contribute to supporting the learners at The Academy by;

- Identifying and protecting the most vulnerable;
- Assessing individual needs where possible; and
- Designing plans to meet those needs.

### Expectations

All staff and visitors will:

- Be familiar with Safeguarding and our policy (where applicable);
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc;
- Be involved, where appropriate, in the implementation of individual education programmes, integrated support plans,
- Be alert to signs and indicators of possible abuse and neglect;
- Record concerns and give the record to the DSL.

**If a person is in immediate danger or is at risk of harm, a referral should be made to adult's/children's social care and/or the police immediately.** Anyone can make a referral. Where referrals are not made by the DSL, they should be informed, as soon as possible, that a referral has been made.

### Training

- All staff members will receive appropriate safeguarding training including the Prevent strategy, which is regularly updated. In addition, all staff will receive safeguarding and protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively (KCSIE, 2023).



- Whistle blowing procedures will be covered in training/induction so that staff know what to do if they have concerns relating to safeguarding practice within The Academy.
- All training will be effective and comply with the law at all times.
- The DSL and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated annually.
- The Associate Director will ensure that all staff members undergo safeguarding training at induction. The training will be regularly updated. Induction and training will be in line with advice from the local safeguarding partners.
- The Academy will ensure that at least one person on any appointment panel will have undertaken safer recruitment training.
- The DSL will undertake relevant Prevent awareness training and in turn will provide advice and support to staff on protecting children from the risk of radicalisation.
- Online safety training for staff will be integrated, aligned and considered as part of the overarching safeguarding approach.
- Training log will be updated and maintained by Senior Management

### Role of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) undertakes lead responsibility for safeguarding and child protection within TPDA

Trust Safeguarding Lead; Caroline Holt

Academy Designated Safeguarding Lead; Rachel Glover-Dare

Academy Deputy Designated Safeguarding Lead: Gaye Callaghan

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding child remains with the DSL and the Trust Safeguarding lead.

The broad areas of responsibility for the DSL are:

- **Managing referrals** to the Trust Lead who will the work with other agencies as appropriate including: the local authority adults social care in cases of suspected abuse; Police South West Counter Terrorism Unit (for Somerset) or Devon and Cornwall police (Devon and Cornwall) where there is a radicalisation concern; the Disclosure and Barring Service and the LADO in cases where a person is dismissed or left due to risk/harm to a child and the Police in cases where a crime may have been committed in relation to safeguarding.
- **Work with others** to fulfil statutory responsibilities in relation to vulnerable adults and liaise with the Trust Safeguarding lead as required. DSL/deputy

DSL should also liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral.

- Undertake Training to ensure the DSL and Deputy have the knowledge and skills required to carry out the role (updated every 2 years). Further knowledge and skills should be updated at regular intervals and shared with relevant parties as appropriate
- Raise Awareness to ensure safeguarding policies are known, understood and used appropriately. The DSL will also provide an annual safeguarding audit to the Apprenticeship Advisory committee on safeguarding activity within the organisation.
- **Manage safeguarding information** through the collection, monitoring, reviewing, safe storage and transfer of safeguarding files in line with Trust safeguarding advice.

### The Management Committee

The Chair of the Management Committee (The Associate Director) will ensure that:  
They comply with their duties under legislation;

The organisation has a safeguarding policy in accordance with;

NHS Trust policies

Current legislation

Statutory guidance has Code of Conduct (Behaviour) in place

Where possible, more than one emergency contact telephone number is recorded for each learner.

The Trust operates “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers;

The Trust will maintain a Single Central Record of relevant pre-employment checks as per Regulations detailed in KCSIE 2023);

A member of the senior leadership team is appointed as the DSL;

All academy staff who undertake regular safeguarding training;

Temporary staff and volunteers are made aware of the arrangements for safeguarding and their responsibilities; and a proportionate risk-based approach is used regarding the level of information provided to them.

The Academy

- remedies any deficiencies or weaknesses brought to its attention without delay.
- has procedures for dealing with allegations of abuse against staff/volunteers;
- The Management committee reviews its safeguarding policies/procedures annually or as required due to changes in statutory guidance.

- The Academy will remedy any deficiencies or weaknesses brought to its attention without delay and has procedures for dealing with allegations of abuse against staff/volunteers.

The Management committee reviews its safeguarding policies/procedures annually or as required due to changes in statutory guidance.

Appropriate monitoring systems are in place to support work online, but these should not act as an unreasonable restriction.

## 9. Creating a Culture of Safeguarding

### Safer Recruitment and Selection

The Academy pays full regard to the safer recruitment practices including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks, dependent on the role and duties performed, including regulated and non-regulated activity (see KCSIE 2023). All recruitment materials will include reference to commitment to safeguarding and promoting the wellbeing of learners.

### Staff Support

It is recognised the stressful and traumatic nature of safeguarding work. The Academy will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support, as appropriate. Further, will endeavour to create a robust safeguarding culture and environment, so that staff feel comfortable to discuss matters outside the workplace, which may have implications on their practice to safeguarding in the organisation.

### Learner Support

Opportunities will be provided for learners to develop skills, concepts, attitudes and knowledge that promote their safety and wellbeing. Relevant issues will be supported through the curriculum including: Personal, Social, Health and Economic education, to explore key areas such as self-esteem, emotional literacy, assertiveness, power, building resilience to radicalisation, e-safety and bullying.

### Whole Organisation Approach

All policies which address issues of power and potential harm, for example anti-bullying, equalities, positive behaviour, will be linked to ensure a whole organisation approach

The safeguarding policy will not be separated from the general ethos of the organisation, which should ensure that learners are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Staff members working with learners are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of an adult, staff members should always act in the best interests of the person for whom they are concerned.

### **Identification of those at Increased Risk, or have Additional Safeguarding Needs**

Certain groups of learners are more likely to be identified as requiring extra support to meet their safeguarding needs; these could include: children in care, care leavers, young carers, those living in households where there is domestic abuse, and/or substance misuse, etc. It is therefore important that those at greater risk are identified, regularly monitored and appropriate measures put in place to support their needs.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside of the education setting. All staff should be considering the context within which incidents and or behaviours occur, this is known as Contextual Safeguarding.

## **10. What Staff Need to Know**

All staff need to be aware of the systems within The Academy which support safeguarding – this forms part of the induction process but also on-going training which is regularly updated.

All staff should:

Know the DSL and any deputies and how to contact them

Read and understand this policy and revisit it annually or when significantly amended;

Attend safeguarding training;

Be aware of The Academy safeguarding procedures in order to identify those learners in need of early intervention/help and take appropriate and timely action where there are concerns for the welfare of vulnerable adults, particularly concerning referrals of cases of suspected abuse and neglect;

Adhere to the Code of Conduct (Behaviour) policy;

Know what to do if a learner tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and adults/children's social care. Staff should never promise that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the person.

Report concerns about an adult immediately or as soon as it is practicable to the DSL. If the DSL, deputy DSL or member of Senior Safeguarding Team is not available, and a child is in immediate danger or is at risk of harm, a referral should

be made to adult/children's social care or the police immediately. The DSL should be informed as soon as possible after the incident is reported.

Be aware of signs of abuse or neglect and the additional barriers to recognising abuse and neglect in those with Special Educational Needs and Disabilities (SEND)

Be aware of whistleblowing procedures to the senior leadership team if they have concerns about safeguarding practices within the organisation. Where a staff member feels unable to raise an issue with the senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them

Undertake regular briefing and discussion of safeguarding issues.

General guidance can be found at:

Advice on whistleblowing <https://www.gov.uk/whistleblowing>

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about Female Genital Mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police (KCSIE 2023).

Regulated professionals have a mandatory reporting duty to report cases of known FGM. Teachers are considered regulated professionals. The duty requires that they themselves report known incidents to the police via 101. This cannot be delegated to the Designated Safeguarding Lead. For further information about preventing and responding to incidents of FGM.

Report their concerns to the DSL if they think a Learner may be at risk of radicalisation or involvement in terrorism;

Report any potential safeguarding concerns about an individual's behaviour and actions towards children and young people immediately.

Allegations or concerns about colleagues and visitors must be reported directly to the DSL who will inform the Safeguarding Lead. If the concern relates to the DSL the report should be made to the Associate Director and/or the Safeguarding Lead. If the concerns is about the Associate Director, it should be reported to the Trust

Safeguarding lead who will liaise with the Local Authority Designated Officer (LADO) and they will decide on any action required, following guidance in **KCSIE 2023 - Part four: Allegations of abuse made against teachers and other staff.**

Reasonable Force refers to the physical contact to restrain and control children, 'using no more force than is needed'. The use of reasonable force is down to the professional judgement of the staff member concerned and will be determined by individual circumstances, the vulnerability of the person and any Special Educational Needs or Disability (SEND) will be taken into account. The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation, and will follow government guidance (Use of Reasonable Force in Schools 2013).

### 11. Key Safeguarding Areas

In addition to the above there are other areas of safeguarding that the organisation has a responsibility to address and these include (please see KCSIE 2023 for details):

<b>Attendance</b>	The Academy must monitor learner's attendance through their daily register. Providers should monitor attendance and address it when it is poor. There is safeguarding duties under section 175 of the Education Act 2002 in respect of their learners, and as part of this should investigate any unexplained absences.
<b>Domestic violence and abuse, Gender-based violence and teenage relationship abuse</b>	Involves any incident or pattern of incidents of controlling, coercive, threatening behavior, violence or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality, and is applicable to teenagers engaged in abusive relationships.
<b>Drugs</b>	As part of providers duty to promote learners wellbeing, we have a role to play in preventing drug misuse as part of our responsibilities (health and wellbeing) and to support the Government's drug strategy (2010) to provide information, advice and support to learners via the curriculum.
<b>Homelessness</b>	Being homeless or being at risk of becoming homeless presents a real risk to welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

**Mental Health**

The legacy of traumatic events is often reflected in a life-long impact on mental health and potential barriers to learning, both academic and social. Poor mental health as a result of trauma can often manifest in a person's behaviour, both outward and inward.

Trauma can arise from abuse, exploitation and neglect, even when there is no obvious cause. When considering behaviour, particularly that which some staff may regard as 'challenging', consideration should be given to a potential safeguarding issue, either currently or in the past. Keeping Children Safe in Education (2023) + update January 2021 (Post EU Exit) says that educational establishments should 'ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.'



Identifying potential symptoms of mental ill-health;

Mental ill-health can be complex and difficult to identify as there are often several symptoms which worsen slowly over time.

In general, as a sense of positive well-being declines, more serious mental health disorders disrupt the enjoyment of everyday life and impact on an ability to function well. Some apparent disorders are perfectly normal in some circumstances, for example, bereavement will lead to a period of sadness and anger.

Although the perceived stigma of mental health is lessening as time goes on, it can still discourage people to seek support.

Warnings of a period of mental-ill health include:

- Persistent sadness.
- Withdrawing from or avoiding social interactions.
- Self-harming.
- Talking about death or suicide.
- Outbursts or extreme irritability.
- Out-of-control behaviour that can be harmful.
- Drastic changes in mood, behaviour or personality.
- Changes in eating habits.

Loss of weight.

Difficulty sleeping.

Frequent headaches or stomach aches.

Difficulty concentrating.

	<p>Changes in academic performance. Avoiding or missing education.</p>
<p><b>Online (Digital) Safety</b></p>	<p>The breadth of issues classified within online safety is considerable and can be linked to issues such as child sexual exploitation and radicalisation. Issues can be categorised into three areas of risk:</p> <p><b>Content:</b> Being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;</p> <p><b>Contact:</b> Being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and</p> <p><b>Conduct:</b> Personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.</p> <p><b>Commerce;</b> Commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams’ (KCSIE 2023).</p> <p>The Academy will ensure it is proactive in addressing online safety through:</p> <p><b>Education</b> of learners through the curriculum, awareness talks or notifications;</p> <p><b>Reviewing online safety practices</b> as part of an approach to online safety;</p> <p><b>Filtering and monitoring</b> to protect users but not leading to unreasonable restrictions;</p> <p><b>Staff training</b> which is integrated and considered as part of the overarching safeguarding approach.</p>
<p><b>Online Sexual Abuse</b></p>	<p>The use of technology to manipulate, exploit, coerce or intimidate (but not limited to): engage in sexual activity; produce sexual material/content;</p>
<p><b>Peer on Peer Abuse including: Bullying, Cyber Bullying, Sexual Harassment, Sexting, Initiation and Hazing type violence.</b></p>	<p>All education providers are required to have due regard to the need to eliminate discrimination, harassment and victimisation, and other conduct that is prohibited under the Equality Act 2010. Providers should tackle prejudice and promote understanding between those who share a protected characteristic and those who do not, as set out in the Equality Act 2010. The definition that has been adopted by the government and should be used when considering prejudice related incidents ‘A prejudice related</p>



	<p>incident is any incident which is perceived to be prejudice by the victim or any other person’.</p>
<p><b>Radicalisation</b></p>	<p>The organisation is aware of its responsibilities under the Prevent Statutory Duty through the Counter Terrorism and Security Act 2015. The duty requires schools to consider the need to safeguard learners from being drawn into terrorism. The duty is designed to help ensure that vulnerable individuals who are at risk of radicalisation are supported as they would be under other safeguarding. We provide a safe environment for our learners, and educate to understand and discuss sensitive topics, including terrorism and extremist ideology, and to enable them to challenge ideas and build their resilience to radicalisation. Staff are aware of the risk posed by other learners and adults who may have been radicalised, and the impact of radicalisation via social media. Staff have received appropriate training, and have the knowledge and confidence to identify learners at risk of being drawn into supporting terrorism and extremism, and challenge extremist ideals. Our IT filters are regularly reviewed and monitored in order to prevent and identify access to terrorist and extremist materials online.</p>
<p><b>Sexual Violence and Sexual Harassment between children and young people in education settings</b></p>	<p>Sexual violence and sexual harassment can occur between people of any sex. They can also occur through a group of learners sexually assaulting or sexually harassing a single child/young person or group of children/young people. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal), and are never acceptable. It is important that <b>all</b> involved are taken seriously and offered appropriate support.</p>
<p><b>So-Called Honour-based Violence</b></p>	<p>So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.</p>

## Part 2: Procedures

### 1. Reporting Concerns

The procedure to respond to a concern is:

**RECOGNISE** the signs.

**RESPOND** effectively.

**LISTEN** be clear about what action you are going to take (unless this is likely to escalate risk), offer support.

**RECORD** what you know.

Make a clear written, factual record using the MY CONCERN Safeguarding concern form

**REFER** appropriately

Contact the DSL or Deputy as soon as possible (except in an emergency where doing so could cause unjustifiable delays). The DSL/Deputy will discuss concerns with you and refer to the Trust safeguarding team or externally where appropriate in line with local procedures (available from the appropriate local authority website).

## **2. Managing Allegations against Staff**

An allegation is any information which indicates that a member of staff/volunteer may have:

Behaved in a way that has harmed a learner or may have harmed a learner

Possibly committed a criminal offence against or related to a learner; or

Behaved towards a learner(s) in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with a learner;

Behaved or may have behaved in a way that indicates they may not be suitable to work with children (incident that does not necessarily involve a child, for example, domestic abuse).

This applies to any learner the member of staff/volunteer has contact with in their personal, professional or community life.

When an allegation is received:

- Take the matter seriously and keep an open mind.
- Do not investigate.
- Do not promise confidentiality to the informant.

- Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present; sign and date).
- If the concerns are about the Centre Manager, then the Associate Director should be contacted.
- The Designated Safeguarding Officer or Centre Manager must immediately contact the Safeguarding lead who will follow local procedures and contact Local Authority Designated Officer(s) (LADO).
- Decisions must not be made without a discussion with the LADO.
- Make a written record of discussions with LADO and others.
- Make sure LADO has full details of the person against whom a concern has been raised and the person who is the subject of the concern.

### 3. Dealing with Allegations of Abuse against Teachers and Other Staff

All staff should be aware of who they should take their concerns to.

- Safeguarding or child protection allegations about members of staff must be reported immediately to the Manager.
- Allegations against the Manager should be taken to the Associate Director.
- These concerns must be discussed immediately with the LADO.
- Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

Key issues to note:

- Priority should be given to resolving the matter as soon possible (usually within one month).
- Staff should not be automatically suspended.
- Allegations found to be unfounded or malicious should be removed from personnel records.
- Learners making malicious allegations should face appropriate sanctions.
- The Academy will also ensure that they liaise with the LADO about any allegations about visitors. The centre should not simply cease using the person without ensuring that they have established all the facts.

To be considered under these guidelines, the allegation must meet the following criteria.

The person must have:

- Behaved in a way that has harmed a learner or may have harmed a learner;
- Possibly committed a criminal offence against or related to a learner; or
- Behaved towards a learner(s) in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with a learner;

- Behaved or may have behaved in a way that indicates they may not be suitable to work at the centre.
- Cases which do not meet the above criteria should be dealt with using 'local arrangements'.
- Learners are at risk of serious harm. Where the concern is so serious that it would result in immediate dismissal. The reason for suspension must be communicated to the person in writing within one day. Alternative to suspension might include alternative work, the deployment of another adult to work alongside the accused person, moving the learner or reallocating the groups involved

### Prevent Duty

- Our approach to supporting the national 'Prevent' Agenda is linked to the safeguarding of our learners and staff. This is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities, including schools, in the exercise of their functions must have "due regard to the need to prevent people from being drawn into terrorism".
- To develop and reinforce awareness of 'Prevent' in The People Development Academy.
- To recognise current practice that contributes to the 'Prevent' agenda.
- To outline the process of risk assessment in the Academy in order to identify areas for improvement in meeting the Prevent Duty.
- To clearly identify the processes involved in making a Prevent Agenda referral.

### Awareness of the Prevent Agenda

- Prevent is 1 of the 4 elements of 'CONTEST', the government's counter-terrorism strategy.
- The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people becoming involved in violent extremism.
- The Prevent strategy responds to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

- It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.
- The Prevent Duty incorporates the responsibility to promote Fundamental British Values through our practices and the formal and informal curriculum. These values are defined as; democracy, the rule of law, individual liberty and mutual respect and tolerance of those of different faiths and beliefs.
- The Prevent Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism.

Source: <https://www.gov.uk/government/publications/prevent-duty-guidance>.

### Current Practice which Contributes to Prevent and Protects Apprentices and Employees from Radicalising Influences

- The Prevent agenda forms part of the academy's safeguarding policy to ensure it is within the protective work we do to safeguard our learners, visitors and members of staff.
- Training sessions on specific and wider Prevent Agenda issues maximise the opportunities for expert input to develop staff awareness.
- Our work to promote Equality and Diversity within TPDA, through the enrichment incorporate British Values, contribute to good community relations and reduces the risk of radicalisation.
- All staff are DBS checked and details held on a central record, with all recruitment processes in line with "Safer Recruitment" guidance
- We have appointed a Designated Safeguarding Lead and risk assessments are in place and checked annually

### Ensuring Apprentices and Employees are resilient to Extreme Narratives

- The Academy will work with employers to ensure learners are not exposed to risks associated with extreme narratives and have an awareness of Prevent and British Values.
- Staff must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally & internationally. The team are expected to understand & embed British Values into the apprenticeship delivery to ensure learners are aware of them, can evidence, exemplify and understand.
- Learners through training provided will be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying & staying safe online.

### Identifying Changes in Behaviour of Apprentices and Employees

- All employees/apprentices receive training radicalisation or extremism which includes: Showing sympathy for extremist causes; Glorifying violence, especially to other faiths or cultures; Making remarks or comments about being at extremist events or rallies; Evidence of possessing illegal or extremist literature; Advocating messages similar to illegal organisations or other extremist groups; Out of character changes in dress, behaviour and peer relationships and secretive behaviour.

### Prevent Risk Assessment

- The Prevent Duty Guidance requires all relevant institutions to conduct a regularly reviewed Prevent Risk Assessment and associated Action Plan.
- The Academy's Risk Assessment will be constructed and reviewed by the Management team drawing in commentary and responsibility for actions from other members of staff as appropriate.
- A summary of the Risk Assessment and Action Plan will be reported annually to the Apprenticeship quality and compliance advisory group.
- Activities and events which may pose a risk of radicalisation, including the presence of visiting speakers will be risk assessed.

### Prevent Referrals

- A Prevent referral is a supportive activity which initially involves identification of any student or member of staff at risk of radicalisation.
- A referral should be made via a member of the Safeguarding Team, Should be read in conjunction with policy on external speakers and Prevent risk assessment.

## Appendix 1 -Glossary of terms from the Prevent Duty Guidance

'Having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they

consider all the other factors relevant to how they carry out their usual functions.

'Extremism' is defined in the 2011

Prevent strategy as 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

'Interventions' are projects intended to divert people who are being drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).

'Non-violent extremism' is extremism, as defined above, which is not accompanied by violence.

'Prevention' in the context of this document means reducing or eliminating the risk of individuals becoming involved in terrorism.

Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.

'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

'Safeguarding' is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in the context of this document) from being drawn into terrorist-related activity.

The current UK definition of 'terrorism' is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

'Terrorist-related offences' are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.

'Vulnerability' describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

## **Prevent Referrals**

Member of staff identifies concern.

Concern reported to Safeguarding Lead.

Safeguarding Lead gathers more information where possible and identifies what further action is required.

If there is an immediate risk call 999

If there is no immediate risk...

Speak to the Trust Safeguarding lead and follow local procedures for alerting police and authorities as required.

## **Code of Behaviour for Adults at Risk**

The People Development Academy (The Academy) recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff come into contact with adults at risk and to guarantee the protection of learners and staff.

However, below are the standards of behaviour required of staff (employed, self-employed or contracted) in order to fulfil their roles at The Academy. This code should assist in the protection of adults at risk and members of staff.

These guidelines also apply to volunteers who work in an unpaid capacity on behalf of The Academy.

Staff must:

- Implement the Adults at Risk Policy and Procedures at all times.

Staff must never:

- Engage in inappropriate rough, physical games including horseplay with learners.
- Allow or engage in inappropriate touching of any kind. The main principles of touch are:

1. Touch should always be in response to the learners need.



2. Touch should always be with a person's permission.

- Do things of a personal nature for a learner that they can do for themselves or that their parent can do for them.
- Physically restrain a learner unless the restraint is to prevent physical injury of the learners/visitors or staff/yourself. In all circumstances, physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault. Any situation where physical restraint is used should be reported to the DSL/Deputy DSL.
- Make sexually suggestive comments to, or within earshot of, a learner.
- Have learners who are under the age of 18 or are adults at risk on their own in a vehicle. Where circumstances require the transportation of such learners in their vehicle, another member of staff/volunteer must travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting learners as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a learner on their own, it is essential that another leader and the parent/carer is notified immediately.
- Spend time alone with a learner on their own, outside the purposes of their work.
- Seek to make contact with learners outside of the purposes of their work (eg: via social media, telephone, email etc).
- Engage in a personal relationship with a learner beyond that appropriate for a normal teacher/learner relationship. Staff who breach any of the above may be subject to the Disciplinary Procedure

<b>Prevent Duty (DfE 2015)</b>	
All staff should understand what the Prevent duty means for their role.	
All staff should understand what to do to demonstrate compliance with the duty.	
All staff should understand where to find further information, advice and support.	
All staff should be able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified.	
All staff should understand the Academy's arrangements to promote pupils' welfare and prevent radicalisation and extremism.	
All staff should be able to identify people who may be vulnerable to radicalisation, and know what to do when they are identified.	
All staff should be able to demonstrate a general understanding of the risks affecting people in the area.	
All staff should be able to demonstrate a specific understanding of how to identify individual people who may be at risk of radicalisation.	
All staff should understand the online risks of radicalisation.	
All staff should understand how to refer concerns to the designated safeguarding lead.	
All staff should understand when it is appropriate to make a referral to the Channel programme.	
<b>Procedures</b>	
All staff should know how to report concerns about an adult.	
All staff should know how to report concerns about the Manager	
All staff should know how to report concerns about the Associate Director (where relevant).	