

HEATHERCROFT TRAINING ACADEMY

SAFEGUARDING POLICY FOR CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK

Statement of Policy

The government's aim is for every child, young person and vulnerable adult, regardless of their background and/or circumstances, has the support they need to:

- be healthy
- stay safe
- enjoy and achieve
- make a positive contribution
- achieve economic wealth and well being

Safeguarding is the term used to denote the duties that those providing a health, social or education service have to carry out/perform in order to protect individuals from harm. Unlike child and vulnerable adult protection processes it aims to prevent problems in a wide variety of areas as well as ensuring appropriate action in the event of concerns being suspected or reported.

As a Workbased Learning Provider Heathercroft Training Academy (HTA) has a responsibility to promote the welfare of all learners/apprentices by protecting them from physical, sexual or emotional harm and radicalisation. It has a particular responsibility in respect of learners/apprentices under the age of 18 years or those defined legally as "adults at risk".

HTA believe that all learners/apprentices have the right to study and work in an environment which is safe and free from abuse and are fully committed to creating a safer learning environment that promotes well being and security for all learners/apprentices and staff.

HTA has an inclusive and integrated approach to safeguarding. This is reflected in the values and culture of the organisation and in the robust policies, procedures and systems in place to protect learners/apprentices. Staff are required to work proactively to protect all learners/apprentices from harm and to prevent harm. Any accidents affecting learners/apprentices and any concerns involving suspected or actual harm will be taken extremely seriously.

HTA accept that it is their responsibility to ensure that staff who will come into contact with children and young people or adults at risk on our premises, are aware of the individual's rights and needs.

To ensure this strategy is met:

- All staff in Regulated Activity will be required to undergo the vetting procedure(s) required by law at the time of their appointment/ change of role. Currently this entails an Enhanced DBS check for adults working with adults at risk and for those working with children. This includes Employed Apprentices.
- Staff working in non-regulated activities will not require a DBS check.
- A comprehensive staff training programme is in place, commencing at induction, which covers health and safety, safeguarding of children, young persons and adults at risk and the Prevent Agenda, as well as related aspects of child protection. Staff are expected to comply with the Staff Code of Conduct
- All learners/apprentices have comprehensive training in respect of safeguarding and are familiarised with HTA's safeguarding policies and procedures plus the procedures for reporting concerns during their induction period. Children and vulnerable learners/apprentices receive a Learner Code of Conduct and contact card.
- All employers and partners are expected to comply with our policy and procedures for safeguarding learners/apprentices.

Health and Safety and Safeguarding procedures are widely promoted - on notice boards, on the internal network and through safeguarding leaflets and posters. All staff and learners/apprentices are expected to comply with the Codes of Conduct for staff/learners/apprentices.

A statement highlighting our commitment to safeguarding is displayed on the company website as well as on all advertisements for new staff and other recruitment material.

<p>2. Scope</p>	<p>This policy applies to all staff employed by the organisation, organisational partners, employers used for work based placements, contractors, visitors and the learners/apprentices themselves</p> <p>It covers aspects of health and safety, to prevent accidental injury or harm, as well as the key areas relating to protection and radicalisation Issues relating to safe use of electronic technology and cyberbullying are contained within the E Safety and IT policies.</p>
<p>3. Aims</p>	<p>The overall aim of this policy is to ensure that any child, young person or adult associated with HTA is protected in accordance with the requirements of the following acts and guidance documents; The Children Act 2004 The Police Act 1997, The Criminal Justice and Court Services Act 2000, The Care Standards Act 2000, The UN convention on the Rights of The Child, , The Human Rights Act 1998 , The Sexual Offences Act 2000., Every Child Matters 2004, Safeguarding Vulnerable Groups Act 2006, working together to Safeguard Children 2013, the Equality Act 2010, the Protection of Freedom Act 2012, The Sexual Offences Act 2003 and the Data Protection Act 1998 (GDPR 2018)</p> <p>6</p> <p>This also aims to ensure that the measures outlined in the Prevent Duty Guidance for England and Wales reflects the requirements of the Counter Terrorism and Security Act 2015.</p> <p>It is our intention that: all staff will know and understand their role and responsibilities in relation to</p> <ul style="list-style-type: none"> • promoting the health and wellbeing of learners/apprentices. • safeguarding learners/apprentices also preventing and minimising harm. • the actions required if inappropriate behaviour is witnessed or suspected. • understand how to safeguard themselves from allegations of abuse. • recognising and preventing extremist ideas. <p><u>All learners/apprentices will</u></p> <ul style="list-style-type: none"> • feel confident that we are concerned about their welfare. • be aware of their rights. • understand their role and responsibilities in relation to safeguarding themselves and other learners/apprentices. • know who to approach if they need support or guidance or wish to report any concerns. • be aware of the risks of their vulnerability to extremist ideas
<p>4. Why is the Safeguarding Policy Important?</p>	<p>HTA believes that it is always unacceptable for any learner/apprentices to suffer harm or experience abuse of any kind and recognises its responsibility to safeguard the welfare of all learners/apprentices by commitment to the practice that protects them. It is also important to protect learners/apprentices from radicalisation and the public at large from the terrorist risks arising out of this. It is the duty of all staff to comply with this policy.</p>
<p>5. Who are we Safeguarding?</p>	<p>Who are we Safeguarding?</p> <p>1) all learners/apprentices but particularly those:</p> <ul style="list-style-type: none"> • aged under 18 years: (legally still defined as a child) • over 18 years of age, regardless of gender, ethnicity, disability, sexuality or religion. Since 2013 the term ‘vulnerable’ is no longer used in the act as it is recognised that anyone may find themselves in a vulnerable position however the elderly, people suffering mental or other disability, age, illness; are at particular risk of harm or exploitation. <p>2) all staff working with learners/apprentices.</p>

	3) clients and the public at large.
<p>6 Safeguarding Against Accidents.</p> <p>6.1 Use and monitoring of ICT</p>	<p>HTA has an established Health and Safety Policy which can be accessed by staff both on the “Peninsula Business Safe” portal and in hard copy form at the centre. This is reviewed regularly. All staff are asked to contribute to an assessment of their working areas as part of their annual review.</p> <p>HTA premises are monitored and inspected regularly in accordance with the health and safety policy, to ensure that the environment for both staff and any learners/apprentices attending HTA is clean, safe, adequately heated, ventilated, and lit and that the overall environment is conducive to learning and working.</p> <p>Learners/apprentices will be encouraged to participate in maintaining communal areas such as the kitchen, toilets and classrooms/offices in a manner that is safe and compliant with Health and Safety and COSHH regulations.</p> <p>All electrical equipment is subject to annual testing to ensure it is safe to use and compliant with regulations.</p> <p>Premises where learners/apprentices are employed (or placed) are vetted prior to any learner/apprentice commencing training in accordance with the good practice guidelines issued by the SFA.</p> <p>IT equipment provided to both staff and learners/apprentices is subject to monitoring. In addition to monitoring filters are applied to Heathercroft’s systems which will restrict access to harmful content. This will be overseen by the General Director and DSO.</p> <p>Staff identifying inappropriate use will report this to the DSO to enable this to be investigated for safeguarding purposes</p>
<p>7. What constitutes abuse?</p>	<p>Abuse is defined as a violation of an individual’s human and civil rights by any other person or persons. It can be a single act, or repeated acts; it also includes acts of neglect or omission to act. Abuse can take many different forms and abusive situations rarely fit neatly into defined categories, but the following are the main forms of abuse identified:</p> <ul style="list-style-type: none"> • Physical abuse, including hitting, shaking, slapping, pushing, kicking, drowning, burning scalding, suffocating or inappropriate restraint. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child or vulnerable adult who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen’s syndrome by proxy' • Sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable person has not consented, or could not consent or was pressured into consenting to. • Psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. • Financial or material abuse, including theft, fraud, exploitation, or the misuse or misappropriation of property, possessions or benefits. • Neglect and acts of omission, including ignoring medical needs, failure to provide appropriate access to educational services, the withholding of the necessities of life, such as inadequate meal breaks, heating etc.

	<ul style="list-style-type: none"> • Discriminatory abuse, including racist or sexist remarks, comments based on a person’s disability, and other forms of harassment, slurs or similar treatment. • Institutional abuse, neglect and poor professional practice also need to be taken into account. This type of abuse may take the form of isolated incidents of poor or unsatisfactory institutional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. • modern slavery – human trafficking which can include forced labour, forced marriage, sexual exploitation, domestic servitude, drugs trade, benefit fraud and organ harvesting • domestic violence – an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is, or has been, an intimate partner or family member
<p>8. How might abuse take place in a workplace supported by our organisation?</p>	<p>Abuse within our organisation could take any of the forms described above. It could occur within HTA or in placement settings and could take place within/outside of normal working hours. Learners/apprentices travelling to and from work, especially at unsocial times of day, may also be vulnerable. Staff may be vulnerable if transporting individuals in their cars or providing tuition in closed rooms.</p> <p>Bullying and harassment are forms of abuse as is radicalisation.</p> <p>Cyber bullying (via internet or mobile phones) is becoming an increasing problem amongst young people as are problems with “grooming behaviour” over the internet. This danger is reflected in HTA’s IT policy.</p>
<p>9. Who are we safeguarding against</p>	<p>Abuse may take place within the family or community as well as within organisations by employees including those employed to promote the welfare of the child or vulnerable adult. Abuse can be perpetrated by anyone the child or vulnerable adult trusts. This may include:</p> <ul style="list-style-type: none"> • parents and family members • care staff /foster care staff • teaching & support staff • other learners/apprentices • employers or placement providers • colleagues and other professionals.
<p>10.</p>	<p>Preventing Abuse : Roles and Responsibilities</p>
<p>10.1 The Board</p>	<p>Organisationally HTA is committed to developing and maintaining a culture in which learner health and safety is promoted and safeguarding is embedded.</p> <p>The Board is committed to ensuring that it:</p> <ul style="list-style-type: none"> • raises awareness of issues relating to safeguarding and promoting the welfare of children, young people and adults at risk amongst the staff team, the learners/apprentices themselves, their friends and relatives and the learner’s employers. • provides a safe environment in which all individuals may learn • ensures staff receive appropriate training to enable them to identify children, young people and adults at risk who are suffering or at risk of suffering significant harm • has effective safeguarding policies, procedures and systems for minimising the risk of abuse and takes appropriate action to see that such individuals are kept safe.. • communicates the safeguarding approach to staff and learners/apprentices. • operates safer recruitment and selection procedures. • designates a member of staff with sufficient authority to take lead responsibility for child and adult

<p>10.2 The Designated Professional Leads</p>	<p>protection.</p> <ul style="list-style-type: none"> remedies any deficiencies or weaknesses in respect of the protection of children, young people and adults at risk which are drawn to the Board’s attention. approves and annually reviews the safeguarding policies and procedures. ensures that referrals are made to the DBS when there are concerns that a person has caused harm, or poses a future risk of harm to vulnerable groups, including children. Increase data protection by ensuring HTA meets the GDPR criteria <p>The role of the designated professional lead is primarily to support staff and to investigate, record and act on concerns raised by staff, learners, apprentices or other individuals and to use their expertise to inform all discussions pertaining to the promotion of learner’s welfare and the prevention of abuse.</p>
<p>10.3 The Directors</p>	<p>HTA have identified two Designated Persons to manage issues relating to safeguarding and radicalisation</p> <ul style="list-style-type: none"> - Joanne Cronin - Kirsty Halvey
<p>10.4 Managers and Team leaders</p>	<p>Issues relating to e-safety must be referred to the General Manager & Director Joanne Cronin</p> <p>The Directors are accountable for ensuring that safeguarding and anti-radicalisation policies, procedures and systems are in place, which accurately reflect current legislation and guidance from government bodies and other organisations. Policies must be monitored and updated regularly. They will ensure that safeguarding issues are reflected in all other related policies and procedures and will consult with staff and learners/apprentices when developing or reviewing policies.</p> <p>Managers and Team leaders are responsible for ensuring that:</p> <ul style="list-style-type: none"> policies, procedures and systems are implemented and followed by the staff team and that: all learners/apprentices, their relatives where appropriate, and staff receive appropriate information about internal and external safeguarding policies and procedures, British values and warning signs of radicalisation and understand how to seek help. learning partners, including employers and placements, placement agencies and schools are made aware of, and share our commitment to safeguarding learners/apprentices. the performance of each member of their staff/team, including their attitude and approach to safeguarding learners/apprentices is properly monitored and reviewed through the formal processes of appraisal and supervision.
<p>10.5 Staff</p>	<p>Staff personal training and development plans must demonstrate staff safeguarding training and development needs and how needs are being met. Managers and Team leaders will ensure that all staff receive safeguarding, abuse and radicalisation training commensurate with their role.</p> <p>Managers and Team leaders will foster an open and inclusive management style that encourages people to voice any concerns and will ensure people know that their concerns, however minor, will be taken seriously and acted upon.</p> <p>All staff within the organisation must take account of learner wellbeing, be aware of the risks to learners/apprentices and must be proactive in educating others. This includes employers and the learners/apprentices themselves, regarding behaviours and practices which promote learner well being and minimise the risk of abuse and/or radicalisation; also being watchful for any signs which might suggest problems. Individual staff have a duty to follow the safeguarding policies, procedures and, systems when</p>

<p>abuse be recognised?</p>	<p>ashamed to seek help and may try to deny that anything is wrong. The vulnerable individual may not always realise the perpetrators behaviour for what it is. Constant vigilance is therefore required to pick up behavioural clues, however minor, that might indicate abuse/radicalisation from either the learner or abuser. The Designated Safeguarding Leads will consult the Brighton and Hove Helping Children and Families Threshold Document for guidance in identifying which category of risk an individual is susceptible to. In work based learning these may include:</p> <ul style="list-style-type: none"> • Changes in the learner’s normal behaviour e.g. the learner becoming fearful, withdrawn, isolated, erratic in relation to timekeeping/attendance, failure to meet deadlines, deteriorating quality of work. • Inappropriate behaviour in others e.g. grooming/radicalising behaviours - favouritism, excessive attention, presents, favours and secrecy. • Inappropriate conduct - e.g. conversations, lifts, meetings, phone calls, texts, e-mails • Boundary violations – e.g. inappropriate touching and language • Unexplained weight loss <p>Abusive behaviours may include:</p> <ul style="list-style-type: none"> • physical emotional or sexual abuse • bullying due to race, faith, gender, sexuality and/or disability • cyberbullying and internet grooming • sexting (sending unwanted, sexually explicit messages or pictures) • self-harm • grooming • unsafe activities (NB this list is not exhaustive) <p>Modern slavery exists in the UK and can be perpetrated against men, women and children, UK nationals, and those from abroad. Modern slavery includes exploitation in the sex industry, forced labour, domestic servitude in the home and forced criminal activity. These types of crime are often called human trafficking. The true extent and nature of modern slavery in Sussex is not presently known as this crime remains largely invisible to the general public. It can include victims that have been brought from overseas, and vulnerable people in the UK, being forced to work illegally against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. Potential indicators of slavery Signs of slavery in the UK and elsewhere are often hidden, making it difficult to recognise victims. Whilst not exhaustive, these are some common signs of modern slavery:</p> <ul style="list-style-type: none"> ● Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn. ● Victims may rarely be allowed to travel on their own, seem under the control or influence of others, rarely interact or appear unfamiliar with their neighborhood or where they work. ● Victims may be living in dirty, cramped or overcrowded accommodation, and / or living and working at the same address. ● Victims may have no identification documents, have few personal possessions and always wear the same clothes day-in day-out. What clothes they do wear may not be suitable for their work. ● Victims may have little opportunity to move freely and may have had their travel documents retained, eg. passports. ● Victims may be dropped off or collected for work on a regular basis either very early or late at night. ● Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for
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	<p>many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.</p> <p>For further information see: www.gov.uk/government/collections/modern-slavery</p>
12.0	Procedure for responding to abuse/concerns re radicalisation.
12.1	<p>The aim of this section is to provide procedural guidance for HTA staff so that they know how to respond to suspected or actual incidents of abuse of learners/apprentices.</p> <p>HTA's primary concern is the protection of the children, young people and vulnerable learners/apprentices to whom we owe a duty of care. We must ensure that we discharge our legal and moral responsibilities equitably in the event of a suspected or actual incident of abuse.</p> <p>The Designated Person is responsible for ensuring that any suspected or actual incident of abuse is dealt with immediately and is reported to the local authority safeguarding team when necessary.</p>
12.2	<p>Responding to disclosures of abuse – all staff</p> <p>Any allegation or suspicion of abuse, however minor, must be taken seriously and reported immediately to a Designated Person (Joanne Cronin, Kirsty Harvey or Janet Matthews,) or in their absence, or if there are concerns about the individual, to Yvonne Schofield (Director.) However difficult a situation may seem it must never be ignored.</p> <p>Staff working in schools</p> <p>Staff working in schools should in the first instance ensure all child protection incidents are reported to the School Safeguarding Officer in accordance with the schools safeguarding policies and procedures and should subsequently inform the HTA Designated Person. Responsibility for further actions rests with the school.</p> <p>Disclosures of abuse by learners/apprentices</p> <p>Staff should listen quietly and non-judgementally to any concerns expressed or disclosures made by learners and make a written record, at the earliest opportunity, of what the learner says & does: this must be factual and objective. If the disclosure arose from a conversation details of the context in which this took place should be included. The date and time of the disclosure should be noted and the report should be signed by the author.</p> <p>No attempt should be made to investigate the complaint and care should be taken not to ask any direct questions.</p> <p>Staff must not promise confidentiality but should reassure the learner that only those individuals with a need to know will have access to the information disclosed.</p> <p>Staff should then explain what will happen next.</p> <p>The concerns must then be reported to a Designated Person or in their absence a Director. Once the concerns have been reported responsibility for any further action lies with the Designated Person.</p> <p>No further action must be taken by the person receiving the disclosure and no further conversation/discussion on the matter should take place with the learner as the evidence trail may become polluted.</p> <p>If the allegation is made against a member of staff the same procedure should be adopted as above but under no circumstances should the accused member of staff be informed about the allegation.</p>
12.3	<p>Staff witnessing or suspecting abuse:</p> <p>In situations where staff witness or suspect that abuse is taking place staff must ensure the immediate safety and welfare of the learner concerned and summon medical assistance if required. Paramedic staff and/or the examining doctor should be informed of the suspicion of abuse and informed that a written report may well be required.</p>

<p>12.4</p>	<p>In cases of serious abuse where there is evidence to suggest criminal activity, physical or financial, the police should also be summoned. Any incident involving alleged sexual abuse or involving alleged physical abuse which has resulted in injury should be reported immediately to the police.</p> <p>Staff must also consider whether there is an immediate risk to other learners/apprentices, and take steps to secure their safety.</p> <p>Where a serious incident has taken place it is essential that evidence that may be important to a police investigation is not disturbed.</p> <p>No attempt should be made to question the learner, but they should be allowed to give information if they wish or express distress or fears. Comfort and reassurance should be offered.</p> <p>If the alleged perpetrator is a child or other vulnerable adult, staff should ensure they too are safe and supported, possibly by allocating a member of staff to be with them.</p> <p>At the earliest opportunity a record should be made containing as much detailed information as possible. This should be signed and dated by the member of staff making the record and the matter reported to a Designated Person or Director.</p> <p>Immediate actions by the Designated Person.</p> <p>Any serious incident of abuse which is substantiated or witnessed should be referred to the appropriate local authority safeguarding team by the Designated Person at the first available opportunity and definitely within 24 hours. If in doubt about whether an incident should be referred, the Designated Person should consult with the appropriate local authority safeguarding team and if requested complete the relevant form</p> <p>If the police have not already been informed, the Designated Person should decide whether to do so or not. This will depend upon whether or not a crime appears to have been committed. If in doubt, the police should be consulted so they can determine whether or not their involvement is required. The Designated Person will need to follow instructions from the police to ensure that any police investigation is not hindered. Where the police are informed, the Designated Person must also refer the matter to the local authority safeguarding team.</p> <p>Unless instructed otherwise by the police, the Designated Person should immediately inform the family or next of kin about the incident. In serious situations, where the learner is injured or distressed, the Designated Person should communicate the information carefully and sensitively. The Designated Person should support family members to visit the learner.</p> <p>If a vulnerable person reports abuse happening at home or elsewhere the matter should be discussed with the police and/or the local authority safeguarding team before contacting any relatives or friends.</p> <p>If the alleged abuser is a child or vulnerable adult their family should be informed and supported in the same way.</p> <p>The local authority safeguarding team will decide whether there has been an incident of abuse that requires a safeguarding assessment and will advise the Designated Person what steps should be taken next. The Designated Person should provide as much information as possible to the local authority safeguarding team.</p>
<p>12.5</p>	<p>Additional Actions in respect of the alleged abuser:</p> <p><u>A member of staff</u></p> <p>If a serious allegation is made against a member of staff, the Designated Person must contact the Peninsula Business Advisory Service immediately so that appropriate action can be taken in line with the Disciplinary Policy and Procedure. This may involve the designated person suspending the member of staff from duty on full pay for a limited period whilst the matter is investigated. This is without prejudice to the outcome of any investigation and is based on the need to protect learners/apprentices and the member of staff, to ensure an unhindered investigation into the allegation. Another Senior Manager will undertake this role if the allegation is made against the Designated Person.</p>

<p>12.6</p> <p>12.7</p> <p>12.8</p> <p>12.9</p>	<p>Where the allegation is against a member of staff, any safeguarding investigation undertaken by the company must dovetail with the disciplinary process and all employment legislation. Peninsula Business Services will be asked for advice throughout the process.</p> <p><u>Another Learner</u></p> <p>If the allegations are made against another learner, the Designated Person should take immediate steps to separate the perpetrator from the Learner who is the victim of the abuse.</p> <p><u>The place of work or placement</u></p> <p>The employer or placement supervisor will be informed of the allegation made by the learner, unless circumstances suggest this is inadvisable, and will be expected to initiate appropriate action in respect of the allegation.</p> <p>Investigations</p> <p>Where the local authority safeguarding team are involved, they will decide whether to deal with the matter in the context of the multi-agency safeguarding procedures. If it is so decided, a safeguarding strategy meeting/discussion will be arranged by the local authority usually within five working days of the referral being made although timescales may vary. The safeguarding strategy meeting/discussion will determine who carries out the required investigations. If the police are involved, they will be part of any strategy meeting/discussion. HTA may or may not be invited to the initial meeting. HTA can offer their premises as a neutral venue for investigatory meetings, which some learners/apprentices have found useful and can support learners/apprentices to find an appropriate adult who can support them during meetings.</p> <p>HTA will need to carry out its own investigation, however the Designated Person must not embark on any investigations until advised by the safeguarding team to do so.</p> <p>In some cases the local authority will give permission for this to proceed straight away. If so, the Designated Person, will co-ordinate the investigation process.</p> <p>Providing support</p> <p>All affected individuals should be reassured and sensitively supported throughout the investigation process as they are likely to experience a wide range of emotions. No individuals should be interviewed without express instruction from the local authority safeguarding team and from the Designated Person.</p> <p>Staff witnessing and/or reporting an incident of abuse may themselves need considerable support. Others may be affected when learners/apprentices they know are victims of abuse and they may become distressed during and following a safeguarding investigation. The Designated Person may refer staff to external sources of support if required, in the first instance the confidential staff counselling service provided by Peninsula Business Services and/or their GP service.</p> <p>Dealing with outcomes</p> <p>Once investigations have been completed the local authority safeguarding team will usually prepare a safeguarding action plan ensuring that any risks are identified, managed and minimised. HTA will co-operate with any safeguarding action plan and will complete any actions required.</p> <p>Reviewing Actions</p> <p>The Designated Persons should ensure that the actions taken are reviewed as soon as possible after the event to see whether lessons can be learned and to ensure improvements are made wherever possible to prevent further or to deal more effectively with incidents of abuse.</p>
<p>13.</p>	<p>MULTI-AGENCY WORKING</p>
<p>13.1</p>	<p>Local authority social services departments are responsible for the development and co-ordination of local multi-</p>

<p>13.2</p> <p>13.3</p> <p>13.4</p> <p>13.5</p>	<p>agency codes of practice for safeguarding children and adults at risk.</p> <p>The arrangements for safeguarding children and adults at risk are complex. HTA will operate in accordance with the local multi-agency safeguarding policies, procedures and guidance, and will refer all incidents of abuse to the relevant local safeguarding team.</p> <p>HTA will work cooperatively with all relevant agencies where safeguarding issues arise. This includes the police as well as social services staff with responsibility for safeguarding issues.</p> <p>Learners/apprentices with special educational needs, protected by an Educational Health Care Plan (EHCP) or a Learning Disability Assessment (LDA) will continue to be supported. Plans are revised annually or more frequently as required and also when learner's/apprentice's progress. HTA may also request an assessment if a need is identified.</p> <p>HTA Managers must ensure that all relevant staff are required to comply with the local multi-agency code of practice, and know how to find, and the in house safeguarding policies and procedures that are in place.</p> <p>If an individual enrolling on a programme of study at HTA discloses that they are already under the supervision of the Children and Young Person or Adult Team, HTA will work in partnership with the relevant agency to ensure the individual's wellbeing is safeguarded.</p>
<p>14.</p>	<p>GOOD PRACTICE GUIDANCE</p>
<p>14.1</p> <p>14.2</p> <p>14.3</p>	<p>Confidentiality</p> <p>In principle, staff should respect confidentiality and should not divulge information given to them in confidence. However, where a member of staff suspects that a learner has been harmed, or is at risk of being harmed, they have a duty to pass on the information to the Designated Person. This means staff are not at liberty to keep concerns to themselves and must not promise to keep secrets.</p> <p>When an incident of actual or suspected abuse is reported, all staff involved have a duty to ensure that information is not shared with anyone unless they have a need to know. The Designated Person should pay particular attention to protecting the identities of alleged victims, perpetrators and witnesses from colleagues and others with whom they may have contact with.</p> <p>Any approach from the press or media must be referred to Joanne Cronin General Manager & Director</p> <p>.</p> <p>Equality and Diversity</p> <p>This policy and the way it is implemented by staff should take into account the diversity and individuality of learners/apprentices and should reflect HTA's Equality and Diversity policies.</p> <p>Staff should take account of individual communication needs and barriers, such as language, hearing or visual impairment, or cognitive dysfunction, and should find communication methods which enable individuals to express their views and give information.</p> <p>Staff should be sensitive to the fact that individuals may have different approaches and views about relationships and this may affect their understanding of what constitutes abuse. However, the principles and procedures within this policy should always prevail. Where a situation is considered to be abusive, but not necessarily considered so by the child/ vulnerable person concerned, staff should seek advice from people who can support the vulnerable person through any investigation.</p> <p>Record keeping</p> <p>All information should be accurately and clearly recorded and should include as much detail as possible. It is good practice for staff or witnesses to write statements immediately whilst it is fresh in their minds, unless directed not to by the police or by the local authority safeguarding team. Staff should not confer with each other when doing so. There may be a requirement to take further statements from staff at a later date, to support any safeguarding, police or disciplinary investigations into the allegation. Records will be stored securely.</p>

<p>14.4</p> <p>14.5</p> <p>14.6</p> <p>14.7</p> <p>14.8</p>	<p>As with all record keeping, staff must ensure that any records concerning actual or alleged incidents of abuse are sufficiently detailed, accurate, concise, up-to-date, legible, factual, dated and signed. Opinions should be kept to a minimum, recorded as such, and backed up by factual evidence.</p> <p>Records must be stored securely and separately in a manner that protects individual rights to privacy and security. Only people with a right to know will be allowed access to the records. Records concerning a Learner (not including third party information) are available to them on request and may also be used as evidence in civil or criminal proceedings, safeguarding investigations and proceedings, disciplinary proceedings or ISA referrals.</p> <p>Recruitment and selection To deter applications from unsuitable individuals all advertisements and documentation used in relation to recruitment and selection will clearly indicate that HTA is committed to safeguarding and promoting the welfare of learners/apprentices and expects all staff to share this commitment.</p> <p>Recruitment and Selection processes will be conducted in accordance with the requirements of the Safeguarding Vulnerable Groups Act and best practice guidelines as outlined in the HTA Safer Recruitment and Selection Policy,</p> <p>Training All staff will receive safeguarding training in house as part of induction, and as part of their ongoing professional development. Training will be updated annually in accordance with HTA’s Training and Development Plan.</p> <p>The Designated Person(s) will receive additional training to ensure they are competent and confident to respond quickly and appropriately in the event of an incident of abuse. Training should include the local multi-agency safeguarding arrangements and procedures and their role and responsibilities within it.</p> <p>Whistle-blowing (public interest disclosure) Staff are strongly encouraged to take action and report concerns if they suspect a child/vulnerable person is being abused, regardless of the setting or who the perpetrator is. HTA respects those who stand up for anyone who they suspect or know is being abused, and staff are assured that they will not be victimised or treated unfairly as a result of reporting malpractice.</p> <p>If a member of staff feels unable to report concerns to the Designated Person for whatever reason, they should still disclose their concerns to a member of the Management Team. The law (Public Interest Disclosure Act 1998) protects anyone making certain disclosures in the public interest. Staff should refer to HTA’s <u>Whistle Blowing Policy</u> in their employee handbook and on Zylab.</p> <p>Abusers who themselves are adults at risk In some cases, another learner who is themselves a child or who is considered a vulnerable person may be the suspected perpetrator of abuse. In essence the procedure for protecting the victim and for reporting and investigating the incident is the same, but special care will be needed when dealing with and supporting the alleged perpetrator.</p> <p>Prevent Agenda HTA will implement measures to prevent people being drawn into terrorism as advised in the Department of Education Prevent Duty in the Counter-Terrorism and Security Act 2015. (Publication ref: DFE-0174-2015) and HTA’s Information Technology Policy and annexes and ensure “Prevent” awareness training</p>
<p>15. Putting the Policy into Practice</p>	<p>HTA are committed to the principle of safeguarding and the importance of embedding safeguarding throughout the organisation and will communicate this commitment to all staff, learners, apprentices and partner organisations. The Board will ensure that:</p> <p><u>all staff:</u></p> <ul style="list-style-type: none"> • understand their roles and responsibilities in respect of safeguarding • have the time and resources to fulfil their safeguarding responsibilities

	<ul style="list-style-type: none"> • have the support that they need from the organisation to carry out their duties effectively • are appropriately inducted and trained • are involved in the creation and review of the organisations approach to safeguarding <p><u>all learners/apprentices (and where appropriate their relatives/carers)</u></p> <ul style="list-style-type: none"> • are aware of our commitment to our learners/apprentices welfare • understand their rights and responsibilities in respect of safeguarding • understand what constitutes abuse (including cyber bullying) • understand how, and feel safe, to report abuse occurring either to themselves or to other learners/apprentices • are involved in the formulation and review of the organisations approach to safeguarding. <p><u>our organisational partners are aware of</u></p> <ul style="list-style-type: none"> • our commitment to the health, safety and welfare of our learners/apprentices and share our values • our policies and procedures for safeguarding learners/apprentices in work placements in particular <ul style="list-style-type: none"> - whilst travelling to and from placements - whilst in the placement our procedures for reporting suspected or actual abuse occurring in placement settings • our Prevent Policy <p>HTA will continue to maintain a single central record showing the recruitment and vetting checks undertaken in relation to staff identity, qualifications and criminal records.</p> <p>This policy should be read alongside the document entitled Sussex Safeguarding Adults Policy and Procedure 2016 (http://pansussexscb.proceduresonline.com/chapters/contents.htm) The Policy sets out the safeguarding adult procedures that all staff must follow.</p>
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16	CURRENT SAFEGUARDING LEGISLATION
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	<p>The Safeguarding Vulnerable Groups Act 2006 remains the key piece of legislation for both children and adults and the following stipulations still apply.</p> <ul style="list-style-type: none"> • Any person who is barred from working with children or adults at risk will be breaking the law if they work or volunteer, or try to work or volunteer with those groups. • Any organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law. • Any organisation working with children or adults at risk which dismisses a member of staff or a volunteer because they have harmed a child or vulnerable adult, or believe they would have done so if they had not left, must inform the DBS of their suspicions. <p>The provisions of the Safeguarding Act have been modified by The Protection of Freedom Act 2012, designed to bring a more common-sense approach to safeguarding, and the Working together to Safeguard Children Guidance Document 2013 which led to the formation of the Disclosure and Barring service to:</p> <ol style="list-style-type: none"> a) process requests for criminal records checks at either basic, standard or enhanced level (which also includes children’s and/or adult’s barred list check(s) Only staff with close and unsupervised contact with children and adults at risk, i.e. those in regulated activity, need an Enhanced Check. b) investigate and make judgements in respect of individuals suspected of abusive behaviour referred to
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	<p>them</p> <p>c) place or remove people from the DBS children’s barred list and adults’ barred list for England, Wales and Northern Ireland</p> <p>d) provide an online update service for employers</p> <p>Staff DBS checks must be repeated every five years unless the individual has subscribed to the online updating service</p> <p>Care Act 2014 The Care Act 2014 and the Care Act guidance sets out the statutory requirement for local authority social services, health, police and other agencies to both develop and assess the effectiveness of their local safeguarding arrangements. This is founded on the six key principles:</p> <ul style="list-style-type: none"> • Empowerment People being supported and encouraged to make their own decisions and give informed consent. • Prevention It is better to take action before harm occurs. • Proportionality The least intrusive response appropriate to the risk presented. • Protection Support and representation for those in greatest need. • Partnership Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. • Accountability Accountability and transparency in delivering safeguarding. <p>The Mental Capacity Act 2005 sets out in law each person’s rights regarding making their own decisions and protects their rights regarding this in law. Where a person is unable to make a specific decision for themselves, the Act sets out a clear process that must be followed before a decision can be made on their behalf.</p>
<p>General Statement</p>	<p>Everyone referred to within the scope of this policy are required to adhere to its terms and conditions.</p> <p>Employees must understand that this policy is also incorporated into their contract of Employment and that they must undertake training on safeguarding children and adults at risk, which includes understanding, recognising and dealing with abuse.</p> <p>Queries about the application or interpretation of this policy should be discussed with Joanne Cronin</p>
<p>Insurance</p>	<p>Adequate and relevant insurance is in place.</p>
<p>COVID 19</p>	<p>A full risk assessment is in place to protect learners, apprentices and staff. The HTA building has been risk assessed, all the necessary guidelines have been adhered to and are updated as and when government advice and guidance changes. The BPM and Health and Safety representative are responsible for keeping the staff and learners/apprentices updated with any changes to working procedures.</p>
<p>Definitions</p>	<p>Abuse can include:</p> <ul style="list-style-type: none"> • physical – use of force, and any action which results in pain or injury • psychological – emotional abuse, threats of harm, intimidation or harassment

	<ul style="list-style-type: none"> • neglect – failure to provide access to appropriate care and support, or withholding care such as ignoring medical, physical or emotional needs • financial – unauthorised and improper use of funds such as stealing, defrauding or coercing money or property • sexual – direct or indirect involvement in sexual activity without consent • organisational – repeated instances of poor care from bad systems or practices • discriminatory – hate crime or any form of harassment because of race, gender, sexuality, age, disability, religion • modern slavery – human trafficking which can include forced labour, forced marriage, sexual exploitation, domestic servitude, drugs trade, benefit fraud and organ harvesting • domestic violence – an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is, or has been, an intimate partner or family member • self-neglect – a person who is unable to provide adequate care for themselves which has potentially serious consequences for their health and well-being
Cross reference	<p>The Safer Recruitment and Selection Policy Complaints Policy Confidentiality Policy Health and Safety Policy Equality and Diversity Policy Whistle Blowing Policy Training and Development Policy Induction Policy (Staff and Learners/Apprentices) Codes of Conduct (Staff and Learners/Apprentices) Anti-bullying, harassment and discrimination Policy Risk Management Policy Safe Travel and Transport Policy IT Policy Prevent Policy Freedom of interest policy The British Values Policy Every Child Matters Doc Sussex Safeguarding Adults Policy and Procedure June 2018 Brighton and Hove Threshold Guidance documents</p>
Monitoring and Review	<p>This policy will be audited every three years or sooner if there are changes in Law. Every effort will be made to involve learners, apprentices and staff in the review process.</p>

Date of Issue Oct 2018	Reviewed Feb 2021	Next review July 2022	Issue No. 11
Signed		General Manager/Director	Jo Cronin



HEATHERCROFT TRAINING ACADEMY

PREVENT POLICY

1 Statement of Policy	<p>The policy is designed to ensure our staff understand the Prevent strategy, published by the Government in 2011 to reduce the risks of terrorism and prevent people becoming terrorists or supporting terrorism or extremist ideas. The Prevent strategy has three specific strategic objectives: to</p> <ul style="list-style-type: none">• respond to the ideological challenge of terrorism and the threat we face from those who promote it• prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support• work with sectors and institutions where there are risks of radicalisation that we need to address. <p>The Prevent Strategy has four 4 key strands:</p> <ol style="list-style-type: none">1. Pursue – to disrupt and stop terrorist’s attacks, wherever possible by prosecuting those who have engaged in terrorist related activity. Active investigation stage and Intel gathering.2. Prevent – to stop people becoming terrorists or supporting terrorism.3. Protect – to strengthen the UK’s protection against a terrorist attack in the UK or against any of the UK’s overseas interests in order to reduce the UK’s vulnerability4. Prepare – to mitigate the impact of a terrorist attack where the attack cannot be stopped. <p>HTA staff have four key roles to play in relation to Prevent:</p> <ul style="list-style-type: none">• to increase learner’s/apprentice’s and employer’s knowledge and understanding of the prevent strategy,• to increase learner’s/apprentice’s and employer’s awareness of the individuals and groups who are at risk of radicalisation and signs which should look for• to increase learner’s/apprentice’s and employer’s understanding of their duty to report any concerns so that the Prevent Force Counter Terrorism Intelligence Unit can gather intelligence should they feel there is a security threat to the UK.• To ensure they know how to do so. <p>It fulfils this by discussing topics relating to radicalisation and terrorism with employers and learners/apprentices at the start of programmes and at all subsequent Learners/Apprentice Reviews and also by ensuring learners/apprentices complete a specific workbook on the topic at the start of their programme.</p> <p>All HTA staff receive training in respect of Prevent, radicalisation and terrorism and this is updated regularly. Staff are aware that there is no single profile of someone who may be at risk of being drawn into terrorism: people who are vulnerable can be of any age, from any group, faith, ethnicity or background.</p> <p>This policy is designed to ensure that HTA staff understand their responsibilities and the Company has security measures in place to reduce the risk of radicalisation of staff and learners/apprentices.</p>
2. Scope and Definitions	<p>This policy applies to all staff and learners/apprentices within the organisation</p> <p><u>Definition of Extremism</u></p> <p>Extremism as is defined in law as: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with 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 county or overseas (Counterterrorism and Security act 2015).</p>

	<p>Examples of Extremism;</p> <ul style="list-style-type: none"> • White Supremacists • Anti-Semitisms • Holocaust denial • Racial and Religious hatred • Homophobia <p><u>Definition of Radicalisation</u></p> <p>Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social or religious ideals and aspirations that reject undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice. Radicalisation can be both violent and non-violent, although most academic literature focuses on radicalisation into violent extremism.</p> <p><u>Definition of British Values</u></p> <p>British Values are defined as “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” HTA are expected to encourage students to respect other people regarding the Protected Characteristics set out in the Equality Act.</p> <p>Staff must exemplify British Values through their personal behaviour and interaction with others.</p>
<p>3 Aims</p>	<p>To ensure</p> <ol style="list-style-type: none"> 1. Staff can identify and report potential security risks 2. Staff have had training to understand their Prevent obligations 3. Promote fundamental British values by embedding throughout our training and resources 4. Security and IT monitoring is in place to ensure that risks are minimised.
<p>4 Responsibilities and Reporting lines</p>	<p>Staff and learners/Apprentices are expected to report any concerns to the designated Safeguarding/Prevent officers (Kirsty Halvey or Joanne Cronin) or in their absence to a member of staff they feel they can approach, who will contact them on their behalf.</p> <p>The Safeguarding Officers will assess the situation and if they feel there is a risk, seek advice/guidance from the local Prevent Coordinator and inform the off-site Safeguarding Lead (Janet Matthews, Director).</p> <p>Individuals do not need to give their consent for referral to the prevent team.</p> <p>If the local Prevent Coordinator decides that the individual is vulnerable, then they will make a referral to either the Sussex Prevent Lead or the Channel programme. NB Not every Prevent referral is a channel referral. Each case will be assessed individually.</p> <p>The Prevent coordinator will assess the case and either take:</p> <ul style="list-style-type: none"> • No further action • Report findings to the Sussex Prevent Lead • Refer the case to the Channel programme for discussion <p>The outcomes will be communicated to HTA by the prevent coordinator</p>
<p>Training</p>	<p>HTA will ensure all staff receive training during their induction period and subsequently in accordance with the Training Matrix to ensure staff are up to date at all times, Training will include a mixture of methods e.g. face to face teaching sessions provided by Prevent experts, the Prevent e-learning training package and webinars and</p>

	guided CPD. Mandatory annual refresher training for all staff is required.
Staff and Learner Commitment	To ensure full commitment to the policy, Heathercroft will provide each staff member with a copy policy on induction, provide appropriate training where needed and each staff member will be required to sign a declaration of compliance. Each learner/apprentice will be directed to the policy and developed in the policy areas, as well as formally agreeing to abide by said policy in their Commitment Statement.
ICT Security Measures	Mechanisms are in place to block access to sites considered to be unsuitable and the ICT security consultants (Uniserve) are automatically notified of any attempts to access the sites. Individuals attempting to access unauthorised sites can be identified through their individual passwords. Learner access is strictly limited to sites approved for use by learners/apprentices.
Source	Revised Prevent Duty Guidance: for England and Wales April 2021
Monitoring and Review	This policy will be audited and reviewed annually.

Date of Issue Jan 2020	Reviewed June 2021	Next review June 2022	Issue No. 76
Signed		General Manager/Director	Jo Cronin