

Safeguarding and Prevent Policy

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Introduction

The safeguarding of learners is paramount. All people, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from harm and abuse.

This policy details our approach for promoting and ensuring that all learners are protected from harm and abuse both at home and at work.

We adhere to the 6Rs strategy as detailed in our Safeguarding Code of Conduct. In our approach to safeguarding, we will work together with our learners and employers to identify their individual needs, ensuring that their safety, wellbeing and differences are always given prominence. We will ensure designated staff are suitably qualified to deal with any issues relating to safeguarding and will ensure that any action required, will be dealt with in line with legislative requirements and government recommendations.

Complete Skills Solutions is committed to the values and practises of safeguarding, including those associated with radicalisation and extremism. The welfare and safety of all learners and staff is paramount. We expect all those involved with Complete Skills Solutions to share this commitment.

The policy extends to:

- All learners: both adult (19+) and 16–18-year-olds; apprentices, employees, employers
- Arrangements for placement, work experience, subcontracting and work-based training
- Arrangements when working within the secure estate
- The processes, actions, reporting arrangements, documentation and recordkeeping within related procedures
- Training, updating and other continual professional development related to safeguarding, equality and diversity
- Management and leadership arrangements
- Arrangements for engaging learners; seeking and acting upon feedback regarding safeguarding from all involved.

For adult learners we will refer, when required, to local Adult Safeguarding Board or Adult Social Services, HMPPS Safer Custody Teams or other adult support agencies. For 16–18-year-olds we will refer to Local Child Safeguarding Boards and Child and Family Social Services.

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In addition, the policy commits Complete Skills Solutions to being proactive in promoting learner safety, including safeguarding and health and wellbeing.

All staff will continue to be supported and be suitably trained so that they can operate effectively in this area. This will effectively contribute to an excellent experience and support for learners.

In addition, we will continue to work in partnership with our employers, peer mentors and legislative framework to establish and uphold best practice.

Policy statement

Complete Skills Solutions is fully committed to the values and practices of safeguarding. As an organisation, Complete Skills Solutions recognises the contribution it makes to safeguarding learners, including those who may be a vulnerable adult.

In accordance with legislation (pg 9), the aim of this policy is to establish a company approach to safeguarding to:

- Provide a safe learning environment
- Identify vulnerable adults and children who are suffering or suspected to be suffering from harm
- Identify appropriate action to preserve their safety both at home and at work.

At Complete Skills Solutions, we have a duty of care to safeguard all young people who work, learn and complete work experience placements both on and away from their premises.

It is, therefore, the responsibility of everyone involved in the learner journey to ensure their safety and wellbeing is always met. This includes protecting them from incidents of bullying, harassment and any form of abuse as detailed within the policy.

Equality and diversity

Our ethos is intended to ensure that no-one is treated in any way less favourably on the grounds of race, colour, nationality, ethnic or social origin, race, disability, gender, sexual orientation, gender reassignment, marriage & civil partnership, pregnancy & maternity, age, religion/ belief or political/ other personal beliefs.

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Our commitment

Through our commitment we:

- Have a Designated Safeguarding Lead (DSL) and a Safeguarding team who are on hand to support with any issues you may experience
- Ensure every individual is treated with respect in an environment that is free from, harm and discrimination, radicalisation and extremism
- Conduct Health and Safety assessments on the premises of all delivery locations, including employers' premises, to ensure they are demonstrating safe working practices and providing a safe learning environment.
- Ensure that our Health and Safety vetting forms are checked in-house and reviewed annually to ensure we have the most up to date information
- Work with learners, employers and other agencies to promote a safe and healthy culture
- Work with learners, employers and other agencies to enhance the welfare of learners
- Ensure we prevent modern slavery and human trafficking in our corporate activities, and that our supply chains are free from slavery and human trafficking (see Slavery and Human Trafficking policy)
- Develop partnerships to proactively protect vulnerable adults from harm, abuse and radicalisation
- Train staff to the appropriate level to ensure they have a clear understanding of personal safety and good safeguarding practices
- Work with learners to promote their own personal health, wellbeing and safety, including their safety on the internet
- Assist learners in developing the confidence and knowledge to challenge extreme views
- Provide learners with confidential advice, guidance and support for a range of issues that they may face
- Conduct DBS checks on all members of the management team and employees engaging with learners. These records will be held in accordance with the General Data Protection Regulation and reviewed in accordance with government recommendations

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- Always adhere to the General Data Protection Regulation, ensuring careful management of data; storing, processing and retaining data that is necessary for the requirements of abiding by regulatory bodies and supplying the highest possible qualifications

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Learner entitlement

Learners are entitled to:

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with appropriately by DSL in line with our policies and procedures
- The right to process an allegation against any Complete Skills Solutions representative following the allegation procedure
- Learn in an environment free from bullying or harassment
- Be made aware of some of the basic principles of safer learning and safeguarding relevant to the programme they are completing
- Be made aware of how to access support on personal issues from within Complete Skills Solutions or from outside agencies to receive the right help at the right time to address risks and prevent issues from escalating
- Be provided with up-to-date information for issues relating to Health and Safety, safeguarding and equality and diversity
- The opportunity to provide feedback on how they feel Complete Skills Solutions promotes and maintains wellbeing and personal safety
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment
- Have access to additional support if they are vulnerable. A series of questions on enrolment help to determine the wellbeing of learners. This information can be used to identify vulnerability factors. The DSL tracks this information throughout the learner's journey, frequently liaising with the trainer
- Be offered [free online training](#) covering radicalisation and extremism, British Values, and e-safety.

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Key principles

Several key principles underpin the requirements of Child protection (as encompassed in this policy). These include:

- Best interests of any child or young person are paramount and will be the primary concern in our decision making
- **Equality of opportunity:** Ensure that young people can enjoy learning and employment safely regardless of their gender, ability, race, ethnicity, circumstances or age
- **Responsibility:** To meet our moral and legal obligations regarding our duty of care towards children and young people. We will act where we believe that this group of individuals is at risk or is harmed
- **Recognition:** Acknowledging that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact
- **Honesty and transparency:** Keep all staff, employers and learners informed about our child protection policies and procedures, to ensure they know we have the appropriate controls in place to try and protect children and young people from harm, abuse and exploitation
- **Confidentiality and protection of all personal data:** Information must only be shared and handled on a need-to-know basis, by the appropriate person(s); only individuals who have legitimate reasons to access this data will be able to do so
- **Support and training:** provide all staff with the appropriate level of training to recognise and respond to child protection risks and incidents
- **Partnership working** this includes involving the police, local safeguarding boards and other agencies where necessary.

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- **Monitoring and review:** the Safeguarding policy (encompassing child protection) will be reviewed in accordance with legal requirements by the DSL. All parties will be informed about any amendments made to the policy
- **Missing from Education:** children and young people and vulnerable adults who go missing from education are at greater risk of all forms of harm. In line with section 10 of the Children's Act 2004, Complete Skills Solutions must take reasonable steps to monitor attendance. Staff are appropriately trained to identify and report irregular attendance and Complete Skills Solutions will work with employers to identify missing apprentices, reducing the level of risk to the individual.

Teaching, learning and assessment

Complete Skills Solutions promotes respect, tolerance and diversity. Learners and employees are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

Our assessment and review process recognises that learners with low aspirations are more vulnerable to radicalisation and therefore we strive to equip them with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Employees and learners are informed about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are. Our E-safety policy provides appropriate information and guidance on who to contact if they are subjected to inappropriate behaviours online.

Training, supervision and support

Once an individual has been recruited, they need to be adequately trained and supervised to ensure that any risks to learners are minimised. This aim will be achieved by:

- All staff undertaking basic safeguarding training and continuously updating their awareness of social issues via a robust CPD programme
- All staff are informed about the Safeguarding policy (encompassing child protection), and given the opportunity to discuss its implications for them with both their line manager and/or the Safeguarding team as part of their induction

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- Not allowing staff to work alone with a young person somewhere which is isolated or where they cannot be observed. It is acceptable for staff to work alone with a young person where there are visibility panels/ windows in doors
- Supervising all learner activities. All learning activities will be completed by a qualified and eligible member of staff. They should always be trained with the necessary skills and qualifications for the work/ role undertaken. All checks must be cleared before any work with young people is approved
- Where Complete Skills Solutions arranges a placement for a young person they should never be left unsupervised throughout the duration
- No training or placement is undertaken with young people without written permission of their parents/ carers
- Staff should be informed about all policies in relation to the use of technology (such as computers and mobile phones) and understand that they must not use this technology for the purpose of accessing, producing, or distributing any information or violent or sexual images that are harmful to children. This includes adult pornography
- If Complete Skills Solutions may work with a subcontractor, information will be requested as part of pre-delivery due diligence checks on how the organisation works to protect young people (such as their policy on child protection)
- Through organisational team meetings, and ongoing resources, we will ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; that they are aware of the process of radicalisation and how this might be identified and are aware of how we can provide support as both an employer and training provider to ensure that our learners and employees are resilient and able to resist involvement in radical or extreme activities.

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Safer recruitment processes

We provide adequate and appropriate staffing resources and training to meet the needs of learners.

All staff, volunteers and learners are informed that their job falls under the DBS requirements for an enhanced check under section 128 of the Education Skills Act 2008; those in management roles need to have an additional check to ensure they are not prohibited from teaching. This is in addition to the DBS check.

There are 3 types of check:

- Standard - these checks for spent and unspent convictions, cautions, reprimands and final warnings
- Enhanced - this includes the same as the standard check, plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (adult, child or other workforce)
- Enhanced with list checks - this is like the enhanced check but includes a check of the DBS barred lists.

All staff with basic checks are renewed every three years; however, each year a declaration is obtained to confirm that there have been no updates.

All staff have access to a copy of Keeping Children Safe in Education September 2023, which is stored on Teams for all staff to access.

Information sharing

There may be circumstances where the welfare or safety of an individual may take precedence over confidentiality. Complete Skills Solutions are dedicated to following the 6 Rs framework and have built this around General Data Protection Regulation requirements. Staff understand the framework and understand that data protection is not a barrier to sharing information.

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Legal requirements

[Prevent](#)

[Vulnerable groups act 2006](#)

[Keeping Children Safe in Education September 2023](#)

[Government adult safeguarding](#)

[Working together to safeguard children](#)

Definitions

Abuse: Abuse is a violation of an individual's human and civil rights by any other person or persons: *No Secrets* (DH/Home Office 2000).

It includes:

- **Physical:** The non-accidental use of force that results in bodily injury, pain, or impairment
- **Emotional or psychological:** The intended act of mental or emotional anguish by threat, humiliation, intimidation or other abusive conduct. It may involve serious bullying (including cyberbullying)
- **Domestic:** Violence or other abuse by one person against another in a domestic setting, such as in marriage or cohabitation
- **Neglect:** Includes withholding the necessities of life, such as: food, drink and love and shelter, and exposing them to unacceptable risk
- **Self-neglect:** A wide range of behaviour; neglecting to care for one's personal hygiene, health or surroundings and includes behaviour, such as: hoarding. This could also be an indication into a developing mental health condition
- **Sexual abuse:** Any form of non-consensual sexual contact. Sexual abuse can happen to men or women of any age

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- **Exploitation:** The action or fact of treating someone unfairly to benefit from their work. Also, the action of making use of and benefiting from resources
- **Organisational:** Neglect or poor care practice within an institution or specific care setting, such as a hospital or care home
- **Financial and material:** Improper use of an individual's funds, property, or resources by another individual
- **Radicalisation:** The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups
- **Extremism:** 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 (*HM Government Prevent Strategy 2011*)
- **Discriminatory:** Forms of harassment, slurs or similar treatment because of race, gender, gender identity, age, disability, sexual orientation or religion
- **Child on Child:** This is most likely to include but may not be limited to: bullying (including cyberbullying); physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence, sexual harassment and harmful sexualised behaviour; sexting (also known as youth produced sexual imagery); and initiation/violence and rituals.
- **Sexual Harassment:** 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a learner's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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Harm refers to:

- Ill-treatment (including sexual abuse and forms of ill-treatment that are not physical)
- The impairment of or an avoidable deterioration in physical or mental health.

Learner: The term 'learner' refers to all individuals participating in a work-based learning programme with Complete Skills Solutions regardless of age and includes apprentices.

Learning difficulty and/ or disability: Individuals with a learning difficulty and/ or disability may be especially vulnerable to abuse and/or radicalisation and may have difficulties raising concerns. Complete Skills Solutions do their utmost to identify vulnerabilities, of all learners, at an early stage and staff are appropriately trained in recognising potential signs of abuse and the steps they need to take to report it.

Risk to self and/ or others: This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others. Complete Skills Solutions are committed to supporting individuals through intense monitoring of their welfare.

This also includes individuals who participate in apprenticeships, classroom and individuals who participate from schools on a work experience placement.

Vulnerable adult: Someone aged 18 or over who is, or may be:

- in need of community services due to age, illness or a mental/physical disability
- unable to take care of themselves, or unable to protect himself/herself against significant harm or exploitation.

This can include:

- Older people
- People with mental health problems
- Disabled people
- People with learning difficulties
- People with acquired brain damage
- People who misuse substances.

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Child, children and young people: As defined by The Children Act 1989 “child, children and young people” mean any individual under the age of 18.

Welfare: Welfare is defined as any individual in need of universal help from those already involved or from alternative agencies.

Bully: A person who habitually seeks to harm or intimidate those whom they perceive as vulnerable. So not to label victims of bullying as ‘weak’, the Oxford, Cambridge and Collins dictionaries will no longer define bullies as strong and their targets as weak.

County Lines: County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The ‘County Line’ is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend.

Online Abuse: Online abuse is any type of abuse that happens on the internet. It can happen across any device that’s connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including social media text messages and messaging apps emails online chats online gaming live-streaming sites.

Sexual Harassment: Unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a learner’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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Responsibilities

All staff have a responsibility to provide a safe environment in which learners can progress and develop.

Designated Safeguarding Lead (DSL)

It is the responsibility of the DSL to ensure that all policies relating to safeguarding are adhered to at Complete Skills Solutions.

It is the responsibility of all staff, to adhere to the Safeguarding policy, and for all learners to behave and act in accordance with the guidance issued. The designated person(s) are responsible for appropriate communication, cooperation and contact with third parties in relation to referrals and other matters.

Complete Skills Solutions is not an investigative authority. It is therefore essential that all referrals be made, in accordance with the reporting procedure, as set by Local Safeguarding Children Board. DSL will make referrals.

Management team

- Ensure that the principles and standards referred to in this document are followed in all aspects of their employment
- Be responsible for ensuring the procedures for complaints and whistleblowing are clearly understood and easily accessible, by learners, employers and employees.

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Safeguarding team

Complete Skills Solutions have appointed a DSL for safeguarding. Within the role they provide support to staff, learners and parents, including those deemed vulnerable and/or require pastoral support. All records of this nature are held securely on the company's internal system. In the absence of the Company's DSL, safeguarding concerns will be directed to a designated safeguarding officer.

The Safeguarding team (comprised of one DSL and a deputy DSL) have regular safeguarding meetings and a quarterly safeguarding review. This gives an overview of and sets recommendations and required updates. A monthly update is sent to the CEO and shared with the board.

The DSL is responsible for:

- Reporting child protection issues to the Local Authority Designated Officer (LADO) within 24 hours of the disclosure being made (see contact and referral flowchart)
- For contacting the relevant enforcement agencies such as the police if immediate action should be required for any child protection issues
- Keeping individuals informed about outcomes in the investigation process.

Staff

It is not the responsibility of staff to decide whether child abuse has taken place. All staff, however, have a responsibility to act on any concerns by reporting them to the DSL or to a designated safeguarding officer in their absence.

All staff must report any of the following situations to the DSL:

- Any concern about actual or suspected staff misconduct and/ or criminal activity involving the abuse of a child/ children, young person or vulnerable adult whether they are known to Complete Skills Solutions must be reported to DSL as per allegations procedure
- No employee must agree to keep information regarding actual or suspected abuse 'confidential'. We will seek to discuss our concern with the young person in a way that is appropriate to their age and understanding and seek their agreement and that of their parent or carer agreement if making a

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referral to the relevant agency. However, in situations where this may place the young person in immediate danger, the DSL may decide to refer to the relevant agency without informing the young person and without obtaining the consent of their parents/ carer.

Learner support

Complete Skills Solutions have appointed

a DSL. The DSL shall ensure that:

- Every member of staff, learner and employer knows the names of the designated persons and their roles
- Every member of staff knows where to locate the safeguarding and pastoral support guidance and procedures
- Policies are properly followed, using the correct documentation and reporting arrangements
- Clear and detailed records of any concerns about learners are produced. Such records are produced in a timely manner, and kept secure in line with relevant legislation
- Additionally, the DSL will take ownership following roles/responsibilities:
 - Equality and diversity
 - Pastoral support.

Allegations

We endeavour to ensure that this policy is properly implemented, so the likelihood of an actual situation of abuse occurring from within the organisation will be reduced. Unfortunately, incidents may still arise, or information be brought to our attention about the behaviour of another employee which creates cause for concern. We may also become aware of situations of actual or suspected abuse from outside the organisation.

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. This includes all cases where a person is alleged to have:

- Behaved in a way that has harmed, or may have harmed a child
- Possibly committed a criminal offence against, or related to, a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

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All allegations and concerns of abuse must be taken seriously, irrespective of the identity of the alleged perpetrator and victims, and severity of abuse.

Where allegations are made about an employee, the Chief Executive Officer should be consulted and involved in all processes concerning staff to ensure that employees' rights are not violated. An allegation made about a member of staff will be taken seriously and will also be dealt with in line with our reporting procedure.

If judged appropriate during the initial contact with the LADO, an Allegations Referral Form must be completed by a senior manager in full and forwarded to the LADO via email within 24 hours. More information on the LADO procedures can be found here:

<https://liverpoolscp.org.uk/scp/professionals-volunteers/managing-allegations-against-staff>

A written record of all child protection reports, including any decisions made, must be kept up to date by the DSL.

This will be recorded on LADO paperwork, within the recommended time scales as stated in the reporting procedure. This should include details of any referrals made to the Local Safeguarding Children Board.

Full details can be found at:

<https://liverpoolscp.org.uk/scp/professionals-volunteers/managing-allegations-against-staff>

Referrals must be made to the LADO when sufficient evidence exists that an allegation or concern is a serious welfare and/ or criminal matter, in accordance with the reporting procedure. Apart from referrals to child welfare and law enforcement agencies, no details regarding the circumstances of children and their families will be passed to other individuals or organisations without the express permission of the young person and their parents/ carers.

Names of those who are alleged to be a risk to children will also be passed on to law enforcement agencies where it is suspected that a crime may have been committed, for investigation in accordance with relevant legislation. This will normally be the local police.

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Child protection specifics

Child Protection Statement

At Complete Skills Solutions, all suspicions, allegations of abuse and poor practice will be taken seriously and responded to promptly and appropriately, in line with early help protocol.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Early help: Providing support as soon as a problem emerges at any point in a child's life, from the foundation years to the teenage years.

When considering child protection, it is important that everyone involved have a shared understanding of what it really means. It is unlikely that we will be successful in our efforts, if we do not fully understand what we are protecting children and young people from.

Aim

The aim of child protection is to ensure children and young people are protected from abuse and exploitation by:

- Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children have the best outcomes
- Providing young people with the appropriate level of safety and protection whilst undertaking training, employment or work experience
- Ensuring staff are suitably trained to identify signs and symptoms of abuse, and staff understand the importance of early help
- Ensuring staff are fully aware of our safeguarding policies and procedures

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- Allowing all staff to make informed and confident responses to specific childprotection issues
- Ensuring the DSL can respond appropriately to allegations made against an adult who works with children or young people or referring to the local children's safeguarding board.

Parental impacts

It is fundamental that wherever a concern is held for a child or vulnerable adult that confidentiality is respected however if the concern must involve the parent/ carer for safeguarding reasons then it is good practise to work together. Local safeguarding boards will inform when unsure of involvement.

Safeguarding Children Boards

Local Safeguarding Children Boards (LSCB) have been set up by the local authority and all have strategic roles to play in protecting children.

The role of the LSCB is to: coordinate what is done by everyone on the LSCB to safeguard and promote the welfare of children in the area and make sure that each organisation acts effectively when they are doing this.

Procedures for dealing with child abuse may be different in different local authority areas and Complete Skills Solutions will work with each board accordingly.

In adherence with "Keeping children safe in education, September 2022" Complete Skills Solutions will obey to all four parts of the legislation. They are:

- Part 1: Safeguarding information for all staff
- Part 2: The management of safeguarding
- Part 3: Safer recruitment
- Part 4: Allegations of abuse made against teachers and other staff.

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Local Authority Designated Officer (LADO)

Section 11 of the Children Act 2004 places duties on a range of organisations, agencies and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

Chapter 2 of "Working Together 2018" provides that county level and unitary local authorities should have a Local Authority Designated Officer (LADO) to be involved in the management and oversight of individual cases. The LADO should provide advice and guidance to Complete Skills Solutions, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO should be informed within one working day of all allegations that come to Complete Skills Solutions attention or that are made directly to the police.

The LADO is located within the Local Safeguarding Children Board and should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against children, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The LADO role applies to any person who works with children in a paid or unpaid capacity, this can be employees, volunteers, casual or agency staff, or anyone self-employed.

The LADO is responsible for considering concerns, allegations or offences emanating from within or outside of work.

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Prison delivery specifics

Prison Delivery Statement

CSS's policy statement for safeguarding (Pg.4) applies in its entirety to our work within the secure estate. However, it is imperative to recognise that the reporting mechanisms are different and that ultimate responsibility for ensuring that all prisoners are protected from abuse and neglect rests with the governing Governor of each prison and the functional head with lead responsibility for safeguarding. Each prison has a Safer Custody team generally led by the Designated Safeguarding Lead for the prison. To maintain prisoner safety, IA staff must comply with local procedures & policies and communicate concerns effectively with the designated team.

To provide greater oversight and opportunities for delivering best practice, a safeguarding representative from CSS's prison team works closely with the Safeguarding Team proper and a log of staff and learner concerns (anonymised) is maintained.

Key Principles

- Empowerment – Presumption of person led decisions and informed consent.
- Prevention – It is better to act before harm occurs.
- Proportionality – Proportionate and 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 adult safeguarding

Safer Recruitment Processes

In addition to CSS's safer recruitment process (Pg.8) and in line with MOJ requirements, all IA staff working within prisons undergo Enhanced Level 1 Security Vetting conducted by SSCL on behalf of the MOJ. In addition, staff are aware that checks can be carried out at any time in the form of enhanced gate security, spot checks and randomised drug tests.

In accordance with PSI-04-2012, IA staff undertake an induction process at each prison during which they receive security awareness training from local security teams and a key talk before key issue and use. This Security Awareness training ensures that provider staff are aware of their responsibilities in relation to maintaining the security of the prison, particularly the methods and routes through which to report potential breaches of security or threats to the good order and discipline of the prison.

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The nature of our work in prisons often involves being the only member of IA staff on the premises. To ensure support and supervision, each prison must nominate a local point of contact who will have responsibility for liaising with providers and provider staff to develop positive working relationship. This is generally the Learning & Skills Manager. In addition, regular welfare calls are key to providing robust support to IA staff. and regular site visits are vital for management to understand the nature of the challenges and opportunities that exist and maintain strong, supportive relationships.

Risks to Prisoner Safety

Abuse is any act, or failure to act, which results in a significant breach of a prisoner's human rights, civil liberties, bodily integrity, dignity or general wellbeing, whether intended or inadvertent; including sexual relationships or financial transactions to which a person has not or cannot validly consent, or which are deliberately exploitative.

This may include:

- **physical abuse** – including any form of assault; misuse of restraint or inappropriate physical sanctions; withholding food or drink; force-feeding; wrongly administering medicine; failing to provide physical care and aids to living
- **emotional or psychological abuse** - including verbal abuse; threatening abandonment or harm; isolating; taking away privacy or other rights; harassment or intimidation; blaming; controlling or humiliation
- **financial or material abuse** - including withholding money or possessions; theft of money or property; fraud; intentionally mismanaging finances; borrowing money and not repaying; discriminatory abuse - including verbal harassment or other maltreatment due to a prisoner's protected characteristics
- **institutional abuse** - including the use of systems and routines which lead to neglect of a prisoner
- **sexual abuse** - including sexual assault, rape, inappropriate touching, molesting; pressurising a prisoner into sexual acts and non-contact sexual abuse such as indecent exposure, inappropriate looking, harassment, teasing, innuendo and simulation.

Neglect is a failure to identify and meet the needs of a prisoner, for example by ignoring medical, emotional or physical care needs, failing to provide access to appropriate health, care and support or educational services or withholding of the necessities of life, such as medication, adequate nutrition and heating. In the prison context, neglect by others is principally relevant to the behaviour of staff, because of their duty of care for prisoners.

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Neglect also includes self-neglect, which covers a wide range of behaviour such as neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding.

Reporting Mechanisms

To ensure that prisoners are safe from abuse and neglect, IA staff must be aware of the risks to prisoner welfare, vigilant to the signs of risk and aware of the reporting mechanisms.

All concerns should be reported to the designated POC at the prison (generally the LSM) and to CSS's prison management team. The POC may escalate the matter to the Safer Custody team who may require additional information.

If the POC advises a specific course of action, this must be carried out. Support will be provided by both the local prison staff and CSS's prison management team.

Intelligence reports

Any matters pertaining to the safety and security of the prison must also be reported using the MOJ Intelligence Report (IR) system. All information gathered in this way is collated and analysed to develop a bigger picture of the prison dynamics and risks.

Confidentiality

Any information pertaining to learners within the secure estate must remain within the secure estate unless specifically mentioned in the Data Sharing Agreement. You **MUST NOT** email information about learners (other than through the secure MOJ server), discuss learners over the phone or in person or disclose any information might allow your learners (or anyone else you encounter) to be identified.

Suicide or self-harm

Any member of staff who receives information or observes behaviour that indicates a risk of suicide or self-harm must open an ACCT (Assessment, Care in Custody and Teamwork) plan.

Safer Custody teams provide training and support for all staff who have contact with prisoners and might need to open an ACCT plan due to concerns about suicide or self-harm. It is also imperative that IA staff support the maintenance and implementation of ACCT plans. An up-to-date list of all prisoners on an ACCT plan is available and IA staff must be pro-active in ensuring they are aware if any of their learners are being monitored and supported in this way.

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Communication and cooperation is vital in creating a safe and decent environment for all prisoners.

The Prevent Duty

Prevent

Section 6 (1) of the Counter-Terrorism and Security Act 2015 imposes a statutory duty on 'specified authorities' when exercising their functions, "to have due regard to the need to prevent people from being drawn into terrorism". Complete Skills Solutions are a specified authority.

The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are "To safeguard vulnerable people to stop them becoming terrorists or supporting terrorism".

Complete Skills Solutions is fully committed to safeguarding and promoting the welfare of all its employees and learners. Every employee recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability individuals may face.

The objectives are that:

- All board members, managers and employees understand what radicalisation and extremism are and why we need to be vigilant
- All governors, managers and employees will know about our policy on tackling extremism and radicalisation and will follow the guidance promptly when issues arise, such as, extremist views; helping learners build resilience against these and ensuring they know how to protect themselves
- All learners will be taught, if they do not know already, the broad types of extremism that exist in modern Britain
- All parents/ carers (where applicable), learners and employees will know about our policies and will be informed about changes through the review process, this will ensure they are appropriate and effective.

Aims and objectives

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

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This policy aims to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. We recognise that our employees are trained to be able to identify safeguarding issues and this policy clearly sets out how we will deal with such incidents and how our ethos underpins our actions.

Responsibilities

All employees must be aware of the processes for reporting concerns about individuals and/ or groups. They must have the confidence to challenge, intervene and ensure that they maintain strong safeguarding practices based on the most up-to-date guidance and best practice.

The DSL (or a member of the Safeguarding team in their absence) will deal promptly with any referrals made by staff or with concerns reported by staff.

The DSL will ensure the Prevent risk register is up to date and fit for purpose.

They will agree the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed.

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

Delivery staff will be fully briefed about what to do if they are concerned about the possibility of radicalisation relating to a learner, or if they need to discuss specific learners whom they consider to be vulnerable to radicalisation or extremist views.

Senior managers will work together with the Safeguarding team and external agencies to decide the best course of action to address concerns which arise.

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Indicators

There are several behaviours which may indicate an individual, particular a young person is at risk of being radicalised or exposed to extreme views. These include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to conform to the group
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of materials or symbols associated with an extremist cause
- Attempts to recruit others to the group/ cause
- Communications with others that suggests identification with a group, cause or ideology
- Using insulting to derogatory names for another group. Increase in prejudice-related incidents committed by that person – these may include:
 - Physical or verbal assault
 - Provocative behaviour
 - Damage to property
 - Derogatory name calling
 - Possession of prejudice-related materials
 - Prejudice related ridicule or name calling
 - Inappropriate forms of address
 - Refusal to co-operate
 - Attempts to recruit to prejudice-related organisations
 - Condoning or supporting violence towards others.

Reporting procedures

It is important for us to be constantly vigilant and remain fully informed about the issues which affect the areas, cities, and society in which we deliver work-based learning. All employees are reminded to suspend any 'professional disbelief' that radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns to the appropriate external agencies. We believe that it is possible to intervene to protect people who are vulnerable.

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Dealing with referrals

We are aware of the potential indicating factors that a learner or employee is vulnerable to being radicalised or exposed to extreme views, including peer pressure, influence from other people or the internet, bullying, crime and anti-social behaviour, homelessness vulnerability, family tensions, race/hate crime, lack of self-esteem or identity, prejudicial behaviour and personal or political grievances the following system will be followed:

- All incidents of prejudicial behaviour will be reported directly to the DSL or a representative of the Safeguarding team
- All incidents will be fully investigated and recorded in accordance with our safeguarding reporting procedure
- Parents/ carers (where applicable) will be contacted, and the incident discussed in detail, aiming to identify motivating factors, including any changes in circumstances at home, parental views of the incident and to assess whether the incident is serious enough to warrant a further referral. All records of the meeting will be kept alongside the initial referral form
- The DSL (or a member of the Safeguarding team in their absence) will follow-up four weeks after the incident to assess whether there is a change in behaviour and/ or attitude. A further meeting with parents would be held if there is not a significant positive change in behaviour
- All referrals will be handled with due care; stored and processed in line with the General Data Protection Regulation.

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If deemed necessary, serious incidents involving children will be discussed and referred to their local children's safeguarding board via the Integrated Front Doorsystem.

In the event of a referral relating to serious concerns about potential radicalisation or extremism, Complete Skills Solutions will also contact a regional Prevent coordinator.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter- Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Training providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE. Please also refer to our Prevent Duty Statement.

Safeguarding processes

[Appendix A](#) - How to report a safeguarding concern (staff) [Appendix B](#) - How to report a safeguarding concern (learner) [Appendix C](#) - Dealing with a safeguarding concern (DSL) [Appendix D](#) - Working together to safeguard

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All concerns/ allegations will be documented, and records held in accordance with the General Data Protection Regulation.

Where necessary, outside agencies, such as the police and local safeguarding boards may be contacted (pathways detailed in the code of conduct).

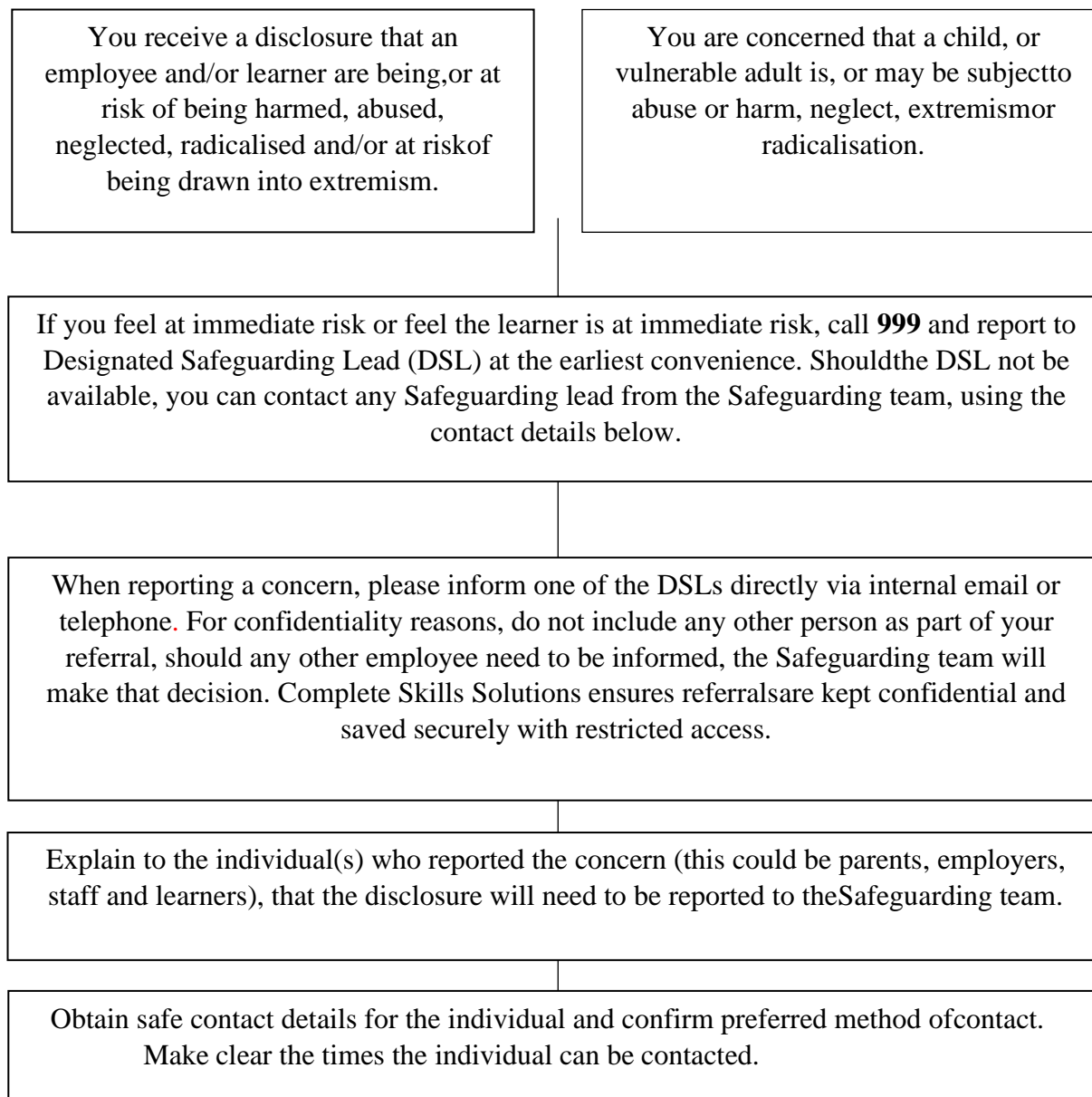
Other relevant policies

Safeguarding Code of Conduct	Recruitment, Fair and Safe Selection Policy
Charity and Volunteer Policy	E-Safety Policy
Prevent; Extremism and Radicalisation Policy	Slavery and Human Trafficking Policy

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Appendix A

Raising a safeguarding Concern - staff



The purpose of this process is to outline the steps to take when a safeguarding concern/disclosure is first established. This process reflects the guidelines in Keeping Children Safe in Education 2023.

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Reassure the individual that their wishes will be respected; however, where it is judged that the individual may be/or is suffering from significant harm, we have a duty of care to share the disclosure with relevant outside agencies. Details for third parties can be found in our Safeguarding Policy (embeds child protection).

If the concern is high risk, report via telephone immediately, this will be followed by the Safeguarding Log being completed by the DSL. If you are unsure of the level of risk, call the DSL to seek clarification. Never leave the concern because you're unsure, always seek assurance.

On receipt of concern, the DSL will determine whether an external referral is required, police proceedings need to take place or employer's internal procedures need to be followed. For further detail, see the [Working Together to safeguard](#) procedure.

Where online extremist materials have been found this can be reported immediately using the link below <https://www.gov.uk/report-terrorism>.

This must be reported to DSL immediately.

For all young people (16-18), a referral will be made to the local safeguarding board of all cases where it is alleged that a person who works with children has:

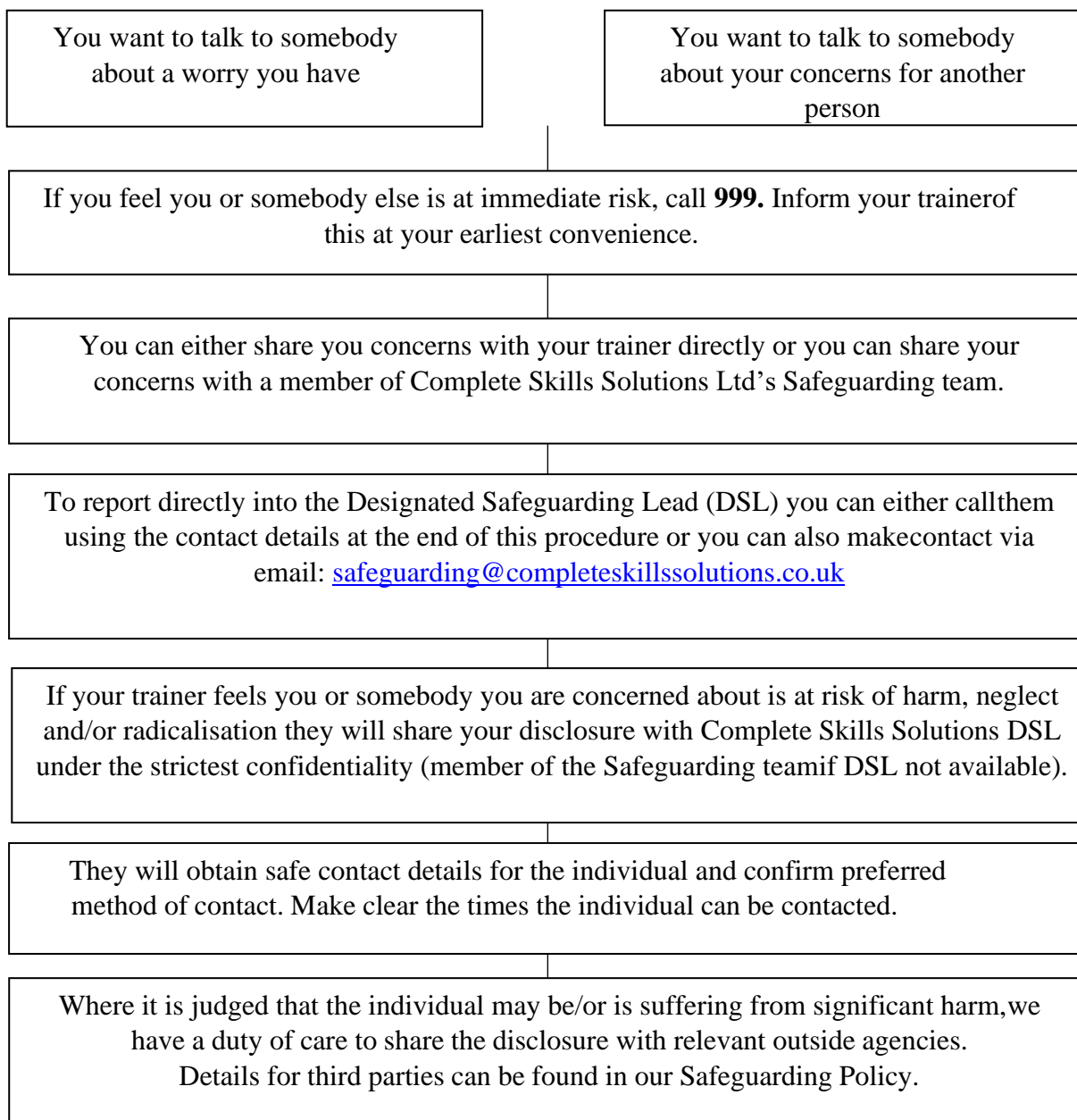
- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against, or related to, a child
- Behaved towards a child or children in a way that indicated she/he is unsuitable to work with children.

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Appendix B

Raising a safeguarding concern - learner

The purpose of this process is to outline the steps to take when you want to report or seek advice on potential harm that could come to yourself or others. This process reflects the guidelines from 'Keeping Children Safe in Education September 2023.

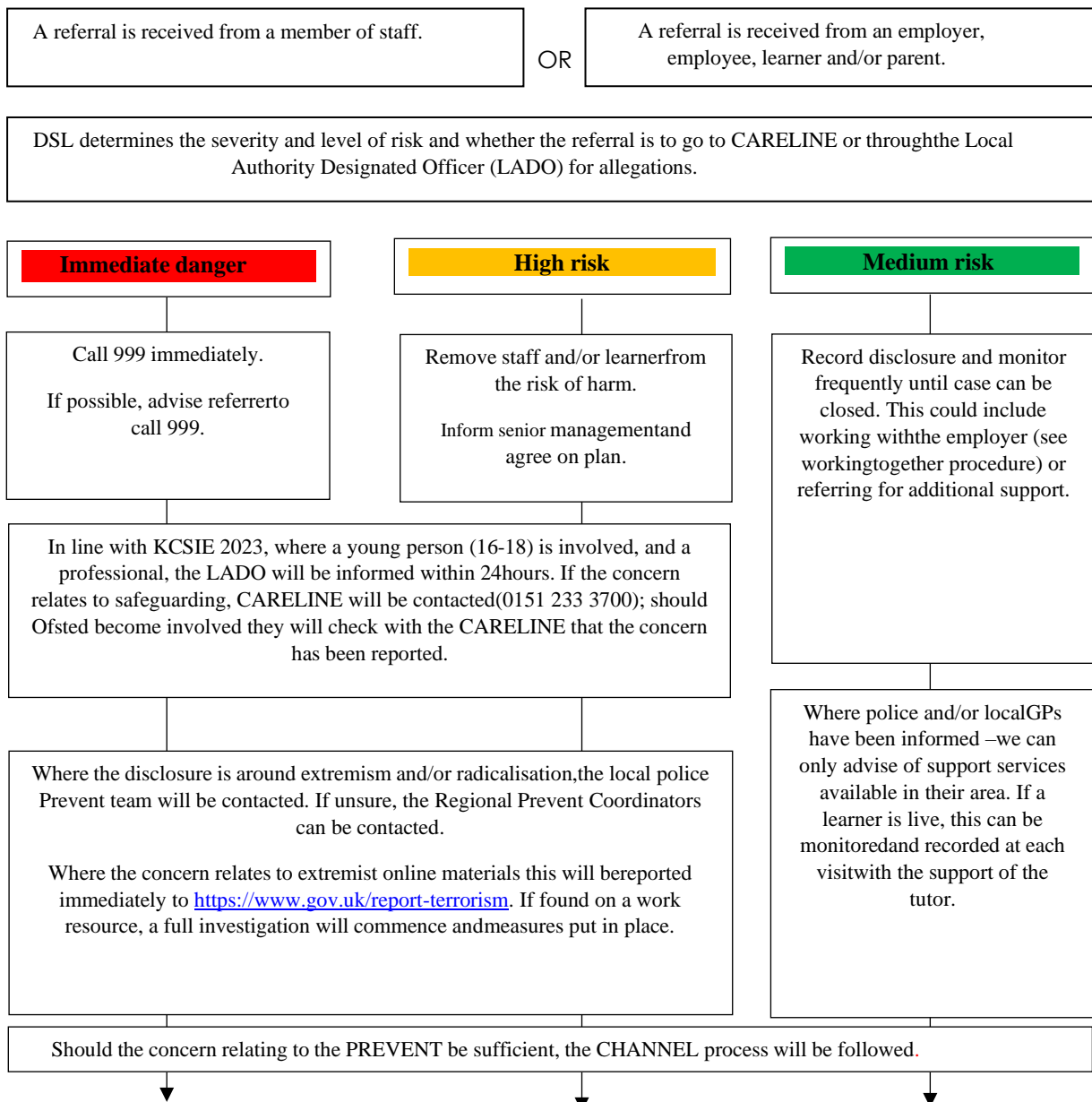


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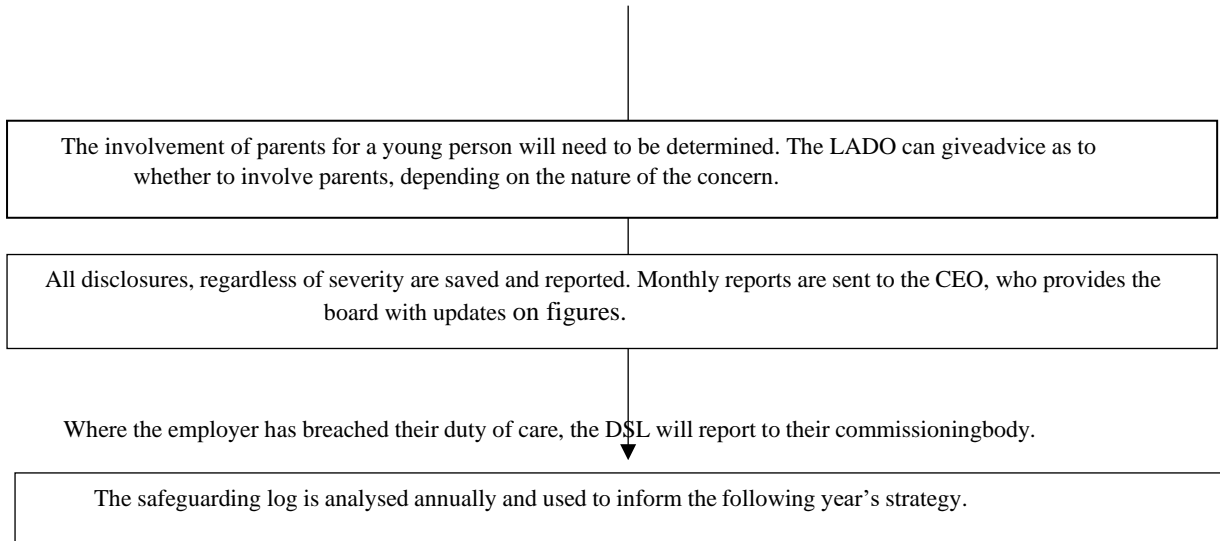
Appendix C

Dealing with a safeguarding concern and/or allegation

The purpose of this process flow is to outline how the Designated Safeguarding Lead (DSL) deals with referrals



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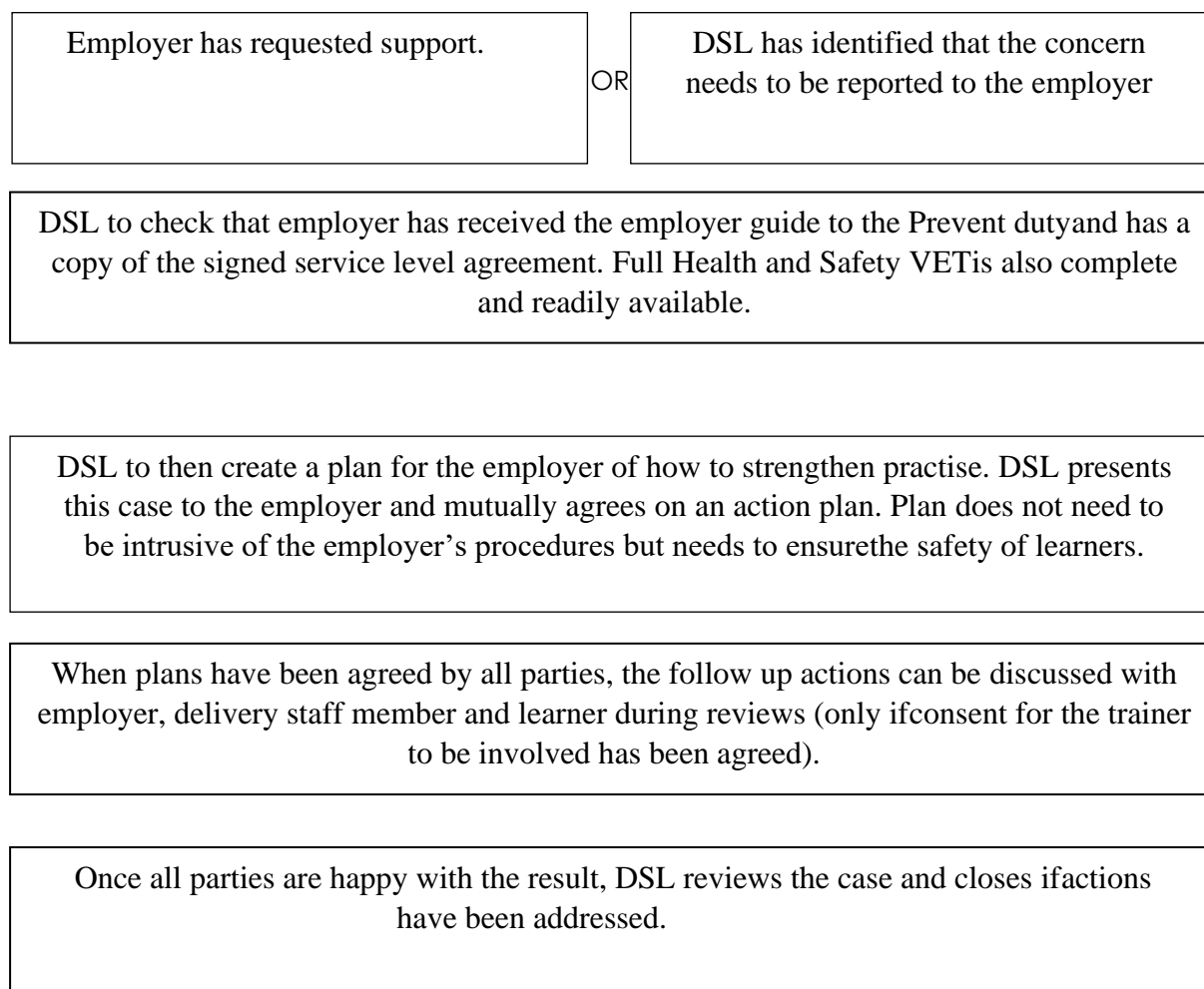
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Appendix D

Working Together to Safeguard Individuals

This procedure should only be followed if the person raising the concern has consented to employer involvement and/or is the employer raising the concern or requesting support. Procedure is only valid for live learners.

The purpose of this process flow is to outline the actions the Designated Safeguarding Lead (DSL) takes when a safeguarding referral needs to be deflected to the employer or the employer has requested support around safeguarding.



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Signatories

MD name:	Ian Green
Signature:	<i>Ian Green</i>
Date:	28/02/2024

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