

SAFEGUARDING POLICY

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1. Policy Statement

Free2Learn is fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for its stakeholders including children and vulnerable adults.

The company recognises its responsibility and acknowledges that it is the duty of Free2Learn's workforce in its entirety to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation or victimisation. Therefore employees, volunteers and contractors will at all times show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

It is Free2Learn's intention to:

- ensure that all stakeholders are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership.
- ensure that staff are appropriately trained in safeguarding and understand the risk of radicalisation.
- ensure that appropriate supervision is given where required.
- take the necessary steps to inform all stakeholders of relevant policies and procedures.
- regularly review and monitor Free2Learn's policies and procedures to ensure our legal, moral and social responsibilities are met.
- take all suspicions and allegations of abuse including risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration.
- work in partnership with and in accordance with organisations' procedures where required.
- comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance to any amendments to such.
- have a Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers (DSO) in place to advise on and manage any concerns and referrals made.
- ensure that relevant employment and security checks are undertaken, as required.
- ensure that all personal data will be processed in accordance with the requirements of the Data Protection Act 1998.
- ensure that personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the disclosure of confidential information is necessary in order to protect a child or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or vulnerable adult and on a strict "need to know" basis.

2. Associated Policies

This Policy and associated procedures should be read in conjunction with the following Free2LearnPolicies:

- Preventing Extremism & Radicalisation
- Recruitment & Selection
- Health and Safety
- Equality and Diversity
- Anti-Harassment and Bullying
- Feedback and Complaints
- Whistleblowing
- Disciplinary & Dismissal
- Lone Working
- Data Protection
- E-Safety

3. Introduction

Free2Learn believes that it is always unacceptable for a child or vulnerable adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and vulnerable adults by a commitment to practice which protects them. Free2Learn has a commitment that no child or vulnerable adult will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy.

This policy has been developed to describe the responsibilities of Employees, Volunteers, Partners and Contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that Free2Learn fulfils its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

Free2Learn will endeavour to safeguard children and vulnerable adults by:

- Valuing and respecting them.
- Adopting policies and procedures and a code of conduct and behaviour for Employees, Volunteers, Stakeholders and Contractors
- Sharing information about concerns with agencies which need to know and involving parents and children appropriately.
- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers and delivery partners.

- Recruiting staff and volunteers safely, ensuring checks including online checks are made.
- Making all staff aware of our safeguarding policy and procedures
- Providing all staff, volunteers and delivery partners with safeguarding training
- Ensuring all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding.

Free2Learn is committed to reviewing its policies and good practice annually unless there is a change to legislation The DSL is responsible for updating the policy with support from the Senior Leadership Team.

4. The 5 R's:

Free2Learn operates a culture of openness and transparency and embeds the principles of the 5R's across all our services and ensure all staff, volunteers, delivery partners and contractors understand their responsibilities with regard to Safeguarding.

These are:

1. Recognise
2. Respond
3. Report
4. Record
5. Refer

Details of the Safeguarding Leads and central Designated Safeguarding Lead and Deputy roles mentioned in the following procedure can be found at each of the centres.

Recognise

Any client or other party with a concern about safeguarding may approach any member of Free2Learn staff to report their concern.

All staff must familiarise themselves with the types of abuse that they may identify Free2Learn will arrange safeguarding awareness training for staff to help them understand how to recognise abuse. This will also feature within our staff induction.

Abuse may be recognised through:

- Disclosure of alleged abuse by the individual.
- A third party or anonymous allegation.
- Observed behaviour by staff including change in behaviour or appearance, inappropriate behaviour or language.

Where abuse is suspected but not disclosed by the alleged victim, the member of staff with the concern should complete the Safeguarding Alert Form (Appendix 1) with their

observations and the facts behind their concern e.g. inappropriate behaviour between a member of staff and service user, bruises or suspicious marks on a learner

Absence from Education - All staff should be aware that absence from education, particularly repeatedly and/or for prolonged periods, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, or other safeguarding concerns. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of non-attendance in future.

Response

Appropriate response is vital. No disclosure about possible abuse or neglect should ever be ignored. The most appropriate response will depend upon whether the disclosure is direct from the alleged victim, a third party, or whether this is observed behavioural change.

The member of staff should assess whether anyone is at immediate risk and take reasonable steps within their role to protect any person from immediate harm, for example:

- move people away from a potential source of physical harm.
- call the emergency services/Police if a crime is in the process of taking place.
- call an ambulance or a GP if someone needs medical attention.

In deciding the immediate action, careful considered professional judgement will often be needed as to a person's capacity to make informed decisions and the extent to which she/he is able to protect her/himself.

Where appropriate the individual making the disclosure should be given details of the Designated Safeguarding Lead/Officer to enable them to report any further issues or ask any questions that may arise.

Reporting

The member of staff receiving the disclosure must immediately report this to the DSO/L (by telephone and in all cases within one hour)

The Safeguarding Alert Form (Appendix 1) or Prevent Alert Form (Appendix 2) must be fully completed, where possible using the key words and phrases used by the person who made the disclosure. Staff may also record their own observations. Care must be taken that the information is not "interpreted" by the member of staff. The report must not include their personal explanation or opinion as this could affect the evidence put forward if there are subsequent legal proceedings.

Where possible the completed alert form should be handed to the DSL. Where this is not possible it should be securely emailed (using password protection). Due to the sensitive

nature of the information, it is essential that the report is transferred securely and does not get picked up by anyone other than the intended recipient. Once the report has been made, the responsibility will lie with the DSL/O to take appropriate action. Where the DSO is unavailable staff should report directly to the Designated Safeguarding Lead (DSL). If neither is available, they should contact the Chief Operating Officer (COO)/Principal for advice.

The member of staff may wish to check at a later stage that appropriate action has been taken, but confidentiality may mean that the DSO is unable to share this information with them. If for any reason they feel the matter has not been taken forward, they should contact the Designated Safeguarding Lead or the COO with their concern.

The DSO will ensure that all the information required to make a decision about referral or other action is available. They may need to clarify information with the reporting staff member but should not “investigate” the case. The DSO should record any action taken locally e.g., clarification notes; steps taken to ensure immediate security and non-escalation; risk to other clients, children etc; and report to the DSL within two hours of receiving the original notification. They may include a recommendation for action by the DSL if appropriate.

The Line Manager (where appropriate) should be informed within 24 hours of the initial concern being notified, enabling them to ensure appropriate support mechanisms are in place locally, to monitor progress and instigate preventive action where appropriate.

Recording

The Safeguarding / Prevent Alert Form should be passed on in person to the DSL. Where this is not possible it should be securely emailed or faxed.

Records will be allocated a reference number which may be annotated to a client’s record if necessary to denote a safeguarding concern has been raised. Records will be stored securely by the DSL in line with Information Assurance & Security procedures, ensuring they are only accessible to staff with safeguarding responsibilities.

The DSL should gather enough information to decide what further action should be taken, including whether a referral should be made (see below). The DSL should consult Human Resources Managers and other agencies where appropriate. If an individual does not wish to be named, advice should be sought from the appropriate authority e.g. local Social Care Services’ Safeguarding Manager.

The DSL should update the Safeguarding / Prevent Alert Form to show the action taken including the name and position of the person to whom the matter is reported and any future review activity agreed. The DSL should retain a copy of:

- any report to an external referral agency e.g. Children’s/Adult Social Care Services/ Police
- notes, memoranda or correspondence dealing with the matter
- other relevant material

Referral

The DSL may decide to monitor the concern for a period or refer the incident immediately to the appropriate authorities.

Only the DSL should make referrals outside of the organisation to ensure consistency and control of contact. Where the DSL is unavailable the Head of Human Resources may take this action.

This includes:

- Local Authority Social Care, Family Services team (or local equivalent),
- Local Safeguarding Adults/Children Board,
- Police Vulnerable Adults Unit / Prevent Team
- Probation Trust, and/or
- other agency relevant to the case.

Consideration of wider risks e.g., to other children or vulnerable adults should be considered when deciding to refer. Free2Learn has a responsibility to notify Children's Social Care where a child or other children may be at risk of harm.

The DSL should report to the Local Authority Designated Officer in respect of a child, or Adult Social Care Services in respect of a vulnerable adult, within 24 hours if the allegation suggests a person who works with children/vulnerable adults has:

- behaved in a way that has harmed or may harm a child/vulnerable adult.
- possibly committed a criminal offence against or involving a child/vulnerable adult.
- behaved towards a child/vulnerable adult in a way that indicates unsuitability to work with children/vulnerable adults in connection with employment or voluntary activity.

Any verbal report made via telephone to any agency must be confirmed in writing within 24 hours. Any documents sent must be transmitted securely, either in person or via secure email in line with Data Protection and Information Assurance & Security processes. Where a referral to an external agency is made, the DSL should keep a note of any conversations together with confirmation of any steps agreed to safeguard the individual and/or other people.

If an adult is not legally considered vulnerable, not engaged with social services, care providers or other support, a referral to formal agencies is not likely to be appropriate. In such cases the individual should be supported and encouraged to seek support from a support agency e.g., police Domestic Violence Team, Victim Support etc. In such cases staff must take care not to breach confidentiality and Data Protection policies.

A brief written summary of the incident/allegation together with the action taken should be made to the Safeguarding Team within five working days and a final report submitted to confirm when the matter has been concluded.

5. Definitions

Children

For the purpose of this policy and procedures, children are any persons up to the age of 18 years.

Adult at risk

An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]).

An adult at risk may be a person who;

- has a physical or sensory disability.
- is physically frail or has a chronic illness.
- has a mental illness or dementia.
- has a learning difficulty.
- misuses drugs and or alcohol
- has social or emotional issues.
- exhibits challenging behaviour.

Statutory guidance and legislation differ in relation to working with these two groups e.g. children and vulnerable adults. Practitioners are familiar with the differences if they are working across the age groups and take advice from the DSL when appropriate.

6. Regulated Activity

A legal term defining the type of activity that persons barred by the Disclosure & Barring Service (DBS) must not undertake. This primarily covers childcare, health care, personal care, social care and education. Regulated activity undertaken by Free2Learn staff may include teaching, training, instruction of children (although not in the course of employment). See www.gov.uk *Safeguarding Vulnerable Groups Act 2006* for full definitions of regulated activity.

7. Legislation and Guidance

This policy is governed by Government Legislation and Guidance in respect of protecting children and vulnerable adults including:

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2023
- Protection of Freedoms Act 2012
- Care Act 2014
- Children and Social Work Act 2017
- Prevent Duty Guidance 2021
- Modern Slavery Act 2015

- Education Act 2002
- Education and Training (Welfare of Children) Act 2021
- Data Protection Act 2018
- General Data Protection Regulations (GDPR)
- Human Rights Act 1998
- Equality Act 2010
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018.
- Guidance for safer working practice for those working with children and young people in education settings 2022.
- Sharing nudes and semi-nudes: advice for education settings 2020.

Our policy also encompasses best practice for specific elements of our business, such as DfES/NIACE “Safer Practice, Safer Learning” (https://repository.excellencegateway.org.uk/7aef319e-9SaferPractice_1.pdf)

8. Definitions and Indications of Abuse

Abuse, including neglect, is a form of maltreatment of a child or adult at risk (often called a vulnerable adult). In relation to adults the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm' which is a term from the Children’s Act 1989. Someone may abuse a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm.

Children and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them, or more rarely by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2015 defines four types of abuse; physical, emotional, sexual and neglect. Vulnerable adults may also be subjected to these forms of abuse therefore the wording from Working Together to Safeguard Children 2015 has been slightly altered to reflect this fact. Adults may also be subjected to financial, discriminatory and institutional abuse and staff should be familiar with indicators for all forms of abuse.

Physical Abuse

<p>Physical Abuse: this may involve</p> <ul style="list-style-type: none"> ● Hitting ● Shaking ● Throwing ● Poisoning ● Burning or Scalding ● Drowning <p>Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates illness in a child, young person or vulnerable adult</p>	<p>Signs: this may include</p> <ul style="list-style-type: none"> ● Unexplained bruises, marks, or injuries on any part of the body ● Frequent visits to the GP or A&E ● An injury consistent with the explanation offered. ● Fear of parents or carers being approached for an explanation. ● Aggressive behaviour or severe temper outbursts ● Flinching when approached
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	<ul style="list-style-type: none"> ● Reluctance to get changed or wearing long sleeves in hot weather. ● Depression ● Withdrawal behaviour or other behaviour change ● Running away from home/residential care ● Distrust of adults
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Emotional / Psychological Abuse

<p>Emotional Abuse: this may involve:</p> <ul style="list-style-type: none"> ● conveying to the child or vulnerable adult that they are worthless and unloved, ● that they are inadequate, or valued only insofar as they meet the needs of another person. ● not giving the child or vulnerable adult opportunities to express their views. ● deliberately silencing them ● making fun of what they say or how they communicate. ● age or developmentally inappropriate expectations being imposed on the child or vulnerable adult. ● interactions that are beyond the developmental capability ● overprotection and limitation of exploration and learning ● preventing the child or vulnerable adult participating in normal social interaction ● seeing or hearing the ill-treatment of another child or vulnerable adult ● serious bullying (including cyber bullying) ● causing children or vulnerable adults frequently to feel frightened or in danger ● exploitation or corruption of children or vulnerable adults <p>Some level of emotional abuse is involved in all types of maltreatment of a child or</p>	<p>Signs: this may include:</p> <ul style="list-style-type: none"> ● A failure to thrive or grow ● Sudden speech disorders ● Developmental delay, either in terms of physical or emotional progresses ● Behavioural change ● Being unable to play or socialise with others. ● Fear of making mistakes ● Self-harm ● Fear of parent or carer being approached regarding their behaviour. ● Confusion ● Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others.
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vulnerable adult though it may occur alone.

Sexual Abuse

<p>Sexual Abuse this may involve:</p> <ul style="list-style-type: none"> ● forcing or enticing a child/ren or vulnerable adult/s to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or vulnerable adult is aware of what is happening ● physical contact including assault by penetration (for example rape or oral sex) ● non-penetrative acts such as masturbation ● Kissing ● Rubbing and Touching outside of clothing ● They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities ● encouraging children to behave in sexually inappropriate ways ● grooming a child in preparation for abuse (including via the internet) 	<p>Signs this may include</p> <ul style="list-style-type: none"> ● Pain or itching in the genital/anal areas ● Bruising or bleeding near genital/anal areas ● Sexually transmitted diseases ● Vaginal discharge or infection ● Stomach pains ● Discomfort when walking or sitting down ● Pregnancy ● Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn ● Fear of being left with a specific person or group of people ● Nightmares ● Leaving home ● Sexual knowledge which is beyond their age or developmental age ● Sexual drawings or language ● Bedwetting ● Saying they have secrets
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Neglect

This is the persistent failure to meet a child's or vulnerable adults basic physical and or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development.

<p>Abuse by Neglect: this may involve:</p> <ul style="list-style-type: none"> ● Neglect may occur during pregnancy as a result of material substance abuse. ● A parent or carer failing to provide adequate food, clothing and shelter. ● Exclusion from home or abandonment 	<p>Signs : this may include</p> <ul style="list-style-type: none"> ● A Constant hunger, sometimes stealing food from others ● Dirty or smelly ● Loss of weight or being constantly underweight ● Inappropriate dress for the weather
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<ul style="list-style-type: none"> • Failure to protect a child or vulnerable adult from physical harm or danger. • Failure to ensure adequate supervision. • Failure to use adequate care takers. • Failure to ensure access to appropriate medical care or treatment. • Neglect of, or unresponsiveness to a child's or vulnerable adult's basic emotional need. 	<ul style="list-style-type: none"> • Complaining of being tired all the time. • Not requesting medical assistance and or failing to attend appointments. • Having few friends • Worsening health conditions • Pressure soles • Mentioning their being left alone or unsupervised. • Sore or extreme nappy rash • Skin infections • Lack of response to stimuli or contract • Poor skin conditions • Frozen watchfulness • Distress and anxiety • Inappropriate emotional responses • Language delay
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Financial Abuse

<p>Financial Abuse: this may involve:</p> <ul style="list-style-type: none"> • Being overcharged for services • Being tricked into receiving goods or services they do not want or need. • Inappropriate use, exploitation, or misappropriation of property and or utilities • Theft • Deception • Fraud 	<p>Signs: this may include</p> <ul style="list-style-type: none"> • Lack of basic requirements eg. Food, clothes or shelter • Inability to pay bills. • Unexplained withdrawals from accounts • Inconsistency between standard of living and income • Reluctance to take up assistance which is needed. • Unusual interest by family or other people in the persons assets • Recent changes in deeds.
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Domestic Violence and Abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse; psychological, physical, sexual, financial and or emotional.

9. Modern Slavery

The Modern Slavery Act 2015 aims to eradicate modern slavery, which encompasses human trafficking, slavery, forced labour and servitude.

10. Forced Marriages

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the people who are marrying.

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct the purpose of which is to cause a child to marry before their 18th birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

11. So-called Honour-Based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

12. Sexual Harassment

Free2learn mainly works with adults over the age of 19, but we occasionally have learners who are children. Free2learn carefully handles concerns about harmful sexual behaviour towards or between learners who are children and young people (including sexual harassment and violence and online sexual abuse).

Free2learn follows the relevant DfE guidance about peer-on-peer abuse between children, and:

- have appropriate company policies and procedures in place that make it clear that all harmful sexual behaviour is unacceptable and that assume that sexual harassment and online sexual abuse are happening in Free2Learn, even when there are no specific reports.
- Free2learn's policies are reflected in their curriculum, which specifically addresses sexual harassment and violence, online sexual abuse, healthy relationships, online safety, local risks, Prevent and radicalisation, British Values, language and consent
- all staff are clear as to Free2Learn's relevant policy and procedures, and this is supported by relevant training.

- all learners are supported to report concerns about sexual harassment and violence and online sexual abuse.
- concerns are taken seriously and dealt with swiftly and appropriately, and learners are confident that this is the case.
- comprehensive records of concerns are kept.
- Free2Learn has considered the findings and recommendations of Ofsted's review of sexual abuse in schools and colleges.

Free2Learn works to prevent sexual harassment and violence and online sexual abuse between learners using a whole-organisational approach that includes an effective behaviour policy, pastoral support and a carefully planned curriculum with respect to relationships.

Free2Learn's staff will be alert to factors that increase the vulnerability or potential vulnerability of learners, such as mental ill health, domestic abuse, children with additional needs, and learners from groups at greater risk of harm (including vulnerable adults). Free2Learn staff will also seek to identify and address any barriers that could prevent a learner from making a disclosure, for example communication needs.

Free2Learn will:

- understand how to handle reports of harmful sexual behaviour between learners, both on and outside our premises, in line with the DfE's guidance, and train staff accordingly
- have good awareness of the signs that a child/young person who is a learner is being neglected or abused, as described in 'What to do if you're worried a child is being abused'
- be confident about what to do if a learner reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another learner
- ensure that learners are taught about safeguarding risks, including online risks
- support learners to understand what constitutes a healthy relationship, both online and offline
- will keep accurate records and conduct reviews, in relation to safeguarding, including those relating to sexual harassment and violence and online sexual abuse.
- ensure that allegations of sexual harassment violence and online sexual abuse are reported to the appropriate authority as appropriate.

13. Abuse through Radicalisation & Violent Extremism

Free2Learn is also concerned with the abuse of children and vulnerable adults through radicalisation and violent extremism. Violent extremism is defined by the Crown Prosecution Service (CPS) as:

"The demonstration of unacceptable behaviour by using any means or medium to express views, which:

- encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
- seek to provoke others to terrorist acts.

- encourage other serious criminal activity or seek to provoke others to serious criminal acts.
- Foster hatred which might lead to inter-community violence in the UK."

Free2Learn is vigilant about the presence of radicalisation and/or extremism and is committed to addressing such issues appropriately in partnership with police, communities and other organisations, including through local Prevent strategies where they exist.

To ensure staff are appropriately aware of such incidents and are able to report them appropriately, further guidance is available in the Preventing Radicalisation & Extremism Statement.

14.County Lines

A term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Learners can be targeted and recruited into county lines in a number of locations, including education establishments and social settings, with social media being increasingly used to target and recruit victims.

15.Cuckooing

There are different types of cuckooing:

- Using the property to grow, deal, store or take drugs.
- Using the property to sex work.
- Using the property to store weapons.
- Taking over the property as a place for them to live.
- Taking over the property to financially abuse the tenant.

The most common form of cuckooing is where drug dealers or gang members take over a person's home and use it to store or distribute drugs. They may begin by befriending the adult at risk. They will then offer the adult at risk something of interest to them, this could be a relationship, friendship, drugs and/or alcohol, money, or clothing. In exchange they may ask to 'borrow' a room, to store something or meet other 'friends' at the property. In some cases, the gang may make it clear that this is for criminal purposes, i.e., drug supply, or they may use an excuse as to why they want to use the property. Gradually the 'benefits will reduce and may eventually come to an end, and more and more people will come and go from the address. The gang members/drug dealers may threaten the adult at risk verbally or physically if they try to put a stop to their criminal activity. They will also discourage family/friends and support workers from visiting the vulnerable adult's address.

16.Prevent Duty

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The Prevent Team will, in partnership with other professionals including those involved in Safeguarding investigate further to assess the nature and extent of the risk. The relevant local police prevent teams will complete an initial assessment which will be used to inform the decision as to whether an individual should be referred to Channel.

17. How does Channel work?

Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age and is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

18. What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

19. Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

20. What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

21. Raising a concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSL, who can raise concerns to Channel if appropriate.

22. Abuse of Position of Trust

Free2Learn recognises that our staff, volunteers, delivery partners and contractors are in a position of trust with the learners in our care whether children, young people or vulnerable adults and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by

23. Anti - Bullying

Free2Learn's policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding children or vulnerable adults procedures. All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying, will be dealt with in accordance with our Bullying & Harassment policy. Free2Learn recognises that children and vulnerable adults with special needs and or disabilities are more susceptible to being bullied. Free2Learn maintains a log of bullying incidents in our programmes. Our policy on bullying is explained at the induction process for new Learners.

All staff, volunteers, delivery partners and contractors if relevant are trained in and receive regular updates in e-safety and recognising and reporting concerns. Our e-safety recognises that internet safety is a whole team/organisation responsibility which includes Learners and their parents and carers.

Learners may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some children, young people and vulnerable adults may find themselves involved in activities which are inappropriate or possibly illegal.

Free2Learn therefore recognises our responsibility to educate our learners teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. These issues are addressed within the learner journey and relevant policies and procedures.

Free2Learn will ensure filters are in place to prevent access to unsuitable sites and we will monitor the use of the network and internet to ensure that any Learner, staff, volunteer, delivery partner or contractor attempting to access inappropriate, abusive or harmful material is appropriately advised and or supported.

If inappropriate, harmful, or indecent images are found then the Police will be informed immediately and Free2Learn will fully support their investigation. If involving a staff member/volunteer, immediate suspension in line with the Disciplinary and Grievance Policy, will immediately take effect and the managing safeguarding allegations procedure may need to be instigated by the Lead DSL. Free2Learn will take police advice when this is involving a learner as to whether the relevant commissioner should be informed.

The welfare and protection of children and vulnerable adults is paramount and consideration should always be given to whether the use of photography will place them at risk. Images may be used to harm children or vulnerable adults for example, as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason consent is always sought when photographing learners and additional consideration given to photographing vulnerable children (particularly looked after children) or vulnerable adults, those known to be fleeing domestic violence. Consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

We are aware of the LSCB escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

24. Online Safety and social media

Online safety also involves being aware of the risks to young people, our staff/volunteers and vulnerable adults when communicating via the internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities, and social networking sites such as Tick Tock and Instagram.

As an organisation working with adults, we acknowledge the impact and involvement that social networking sites such as Tick Tock and Instagram have on the lives of people and their role in the ways in which they interact with each other. These tools are used by Free2Learn to encourage learners in their projects and involvement with learning activities.

There is a wide range of ways to communicate with young people and this is a rapidly changing environment as new technologies, applications and social media sites merge. No code of conduct for e-safety can cover all of these separately. However, there are broad principles that we expect all staff/volunteers to adhere to in order to safeguard young people and themselves in respect of using all these forms of media, devices, apps and social networking sites:

Content

- When communicating with young people/vulnerable adult online staff will observe the same rules of behaviour as if speaking with them in person that is by being professional - polite, respectful, not swearing or saying anything (using the written word, images or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Ask themselves whether the content of the message could be misunderstood or misinterpreted by someone else.
- Will always ensure the content of any online communication has a clear work purpose.
- Will not use any text speak abbreviations or symbols/emoticons even if they ordinarily use these in your personal life.
- Never disclose non-public and confidential information about Free2learn staff and learners.
- Not to say anything or re-tweet any posts that could be deemed offensive, controversial or socially inappropriate in any way.
- Contact with young people or vulnerable adults online; it should only be a recognised element of the business of Free2Learn.
- Not to send any illegal or inappropriate content (written, images or icons) including sexting via mobile phones.

Recording

Only use social media and apps where there is a permanent record of what's been said and sent thereby being open to scrutiny e.g. the use of Snapchat is not appropriate.

Use of equipment

Free2Learn IT equipment (including computers, laptops, mobile phones, notebooks, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content including abusive images of children or young people).

25. Responsibilities

It is everyone's responsibility to remain vigilant and ensure that children and vulnerable adults, and our wider client base are provided with a safe and secure environment. Staff dealing with children and vulnerable adults will be trained in how to recognise and respond to a situation where abuse is reported and how to report this or any concerns. Specific responsibilities are as follows:

Chief Operating Officer

- Allocate required resources and time to provide adequate safeguarding measures.
- Provide leadership in ensuring the safety of children and vulnerable adults.

Director of Education and Quality

- Audit and review each centre's performance against safeguarding procedures.
- Ensure arrangements for safeguarding are comprehensive, and that their performance against these are audited and reviewed.
- Review systems and procedures to report to the Free2Learn Senior Leadership Team.
- Ensure recognised safer recruiting methods are followed.
- Ensure Disclosure & Barring Service checks are conducted on staff as appropriate for their role and that all staff have been thoroughly vetted prior to undertaking duties.
- Support the Designated Safeguarding Manager in implementing this policy.

Designated Safeguarding Lead

- Maintain knowledge of current safeguarding legislation and good practice to inform development of policies and procedures.
- Establish a comprehensive training programme to ensure all staff have a good understanding of safeguarding relevant to their role.
- Ensure all staff are competent to undertake their safeguarding duties.
- Support, advise and guide staff to apply the policy effectively and consistently across the business.
- Promote good practice and effective communication internally.
- Investigate safeguarding concerns and decide on referral or other action.
- Liaise with local Adult Social Care Services to ensure Free2Learn is aware of local interagency protocols and practice and incorporate these into procedures; gaining access to local authority training that may be available.
- Liaise with Children's Social Care (lead agency in the protection of children/young people) to seek advice and refer as necessary.
- Undertake referral of safeguarding concerns to other external bodies as appropriate.
- Securely retain records of allegations, incidents, referrals and outcomes.
- Must attend Designated Safeguarding Officer training course annually or should legislation change.
- Alert the DBS where a person has been dismissed or left due to risk or harm that they have presented or may have presented to a child or vulnerable adult
- Liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether or not a resolution has been achieved. DSL ensures that Free2Learn works with employers and other training organisations that provide apprenticeships and or work placements for children or vulnerable adults from Free2Learn to ensure that appropriate safeguards are in place
- If the Lead DSL is absent from the business the Deputy DSL will be responsible for undertaking Lead DSL duties

Line Managers

- Manage the application of safeguarding procedures in their centre.
- Act as the focal point for safeguarding in their centre.

- Clearly communicate the safeguarding policy to all staff
- Liaise with local partner agencies as required, including Local Safeguarding Children Board.
- Ensure publicity and organisational position statements are on display at relevant sites with up-to-date information on contact details.

Employees

- Actively promote a safe learning environment.
- Ensure all learners, partners and employers with whom they work are aware of the Safeguarding policy.
- Report any safeguarding concerns immediately in line with this procedure.

Under no circumstances should a member of staff, volunteer or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSL with support from the senior leadership team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

26. Responding to Concerns

Free2Learn ensures and emphasises that everyone in the organisation understands and knows how to share any concerns immediately with the lead or deputy for safeguarding and the Centre Managers. The process for responding to concerns is set out in Appendix 1.

27. Allegations Of Abuse

When an allegation of abuse is made to a member of staff, the member of staff who receives it should.

- reassure the individual (child or vulnerable adult) making the allegation that they have done the right thing
- listen and not interrupt
- do not promise that the matter will be kept confidential. Explain to him/her that you must report the matter to a member of Free2Learn 's designated Safeguarding team as part of your legal duty, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding staff.
- let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding issue
- note, this is not an investigation, simply establish the key facts, remember TED – Tell, Explain, Describe
- only ask simple, open, non-leading questions, e.g. if a child or vulnerable adult tells you they have been hurt ask “Can you describe how that happened” rather than “did someone hit you”

- accept what the individual is saying and do not offer an alternative interpretation of the alleged events
- raise the concern with a Safeguarding Lead, do not ask any more questions
- write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual and you ensure you make clear what is fact and what is opinion or hearsay in any given piece of information
- not ask the individual to sign anything at this stage
- note anything about the individual which may be connected e.g. any visible injuries including the position and description
- report the matter to a Safeguarding Lead immediately within the same working day
- complete the relevant documentation (the Alert Form) and submit to the designated safeguarding Lead
- ensure you tell the individual what will happen next

Remember, if a child or vulnerable adult tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, it doesn't make it any less real and distressing for the child or vulnerable adult. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred on to the DSL as per this procedure.

Staff should be mindful that an allegation may involve another child/children/young person(s) and if a child has been involved, and the Safeguarding Lead should be connected immediately as equally the welfare of the child being accused is paramount at this time. The Centre Manager will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.

If a child or vulnerable adult chooses to disclose, **you should never:**

- take photographs of injuries
- examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse
- make promises to the individual about confidentiality or keeping secrets
- assume that someone else will take the necessary action
- jump to conclusions or react in any way to what the individual is disclosing
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur.

Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED THEN IT IS ASSUMED THAT IT DID NOT HAPPEN

- fail to pass the information on the designated safeguarding lead.
- ask the individual to sign a written copy of the disclosure or a statement.

Where a child or vulnerable adult has communication difficulties or use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children or vulnerable adults.

If a young person or adult has personal needs their requirements would be discussed prior to commencement of programme and additional support plan implemented. Free2Learn will respect personal privacy and dignity, ensuring that young people and adults are supported in meeting their own physical care needs wherever this is possible.

The DSL is responsible for following up any referrals made to social care to ensure that action has been taken. This should be done within 3 working days of having made the referral if social care has not been back to the DSL to confirm their actions. A record of actions being taken must be made by the DSL.

28. Talking to Parents/Carers

In most cases it is good practice to be open and honest at the outset with parents/carers about concerns and any action that Free2Learn intends to take. However, there are cases where it **would not** be good practice for the Safeguarding Lead to discuss concerns with parents/carers before referral.

In these cases, arrangements for discussing concerns with the parents/carers should be agreed in advance with Social Care and or the Police. Concerns must not usually be discussed with parents/carers before referral where:

- discussion would put a child or vulnerable adult at risk of significant harm
- discussion would impede a police investigation or social work enquiry eg FGM or forced marriage
- sexual abuse is suspected.
- organised or multiple abuse is suspected
- the fabrication of an illness is suspected
- to contact parents/carers would place you or others at risk
- it is not possible to contact parents/carers without causing undue delay in making the referral.

In each case the lead DSL must make a reasoned judgement and record the decision s/he reaches. Where further guidance is needed, contact should be made with the Designated Local Authority Person or relevant social care department or Police.

29. Abuse Requiring Immediate Response

If medical attention or police emergency action is required then:

- The emergency services should be contacted on 999 immediately. The Free2Learn DSL should be informed without delay.
- The DSL will contact the relevant Social Care and or police services.
- If the referral is out of hours, then you will need to inform the DSL
- The DSL must consider if it is safe for the child or vulnerable adult to return home to a potential abusive situation, seeking advice from Social Care or Police as required
- Managers in the Police or Social Care agencies will then advise about how to proceed to ensure immediate wellbeing of the child or vulnerable adult
- If the child or vulnerable adult is in immediate danger or in need of medical attention they should remain with Free2Learn staff, volunteers, partner or contractor.

Where there is any doubt about the safety of the child or vulnerable adult if they were to return home to a potentially abusive situation, the lead DSL must inform the relevant Social Care agency and or the Police of their concerns. Managers in the Police or Social Care agencies will then advise about how to proceed to ensure the immediate well-being of the child or vulnerable adult.

If after 48 hours no action has been taken the Lead DSL should utilise the escalation process with the LSCB.

Staff must also be aware that if they feel the referral has not been dealt with, no action has been taken or that Free2Learn is trying to disregard the referral they should follow the procedures as set out in the Whistleblowing Policy.

30. Allegations against Staff, Volunteers, Partners or Contractors

All allegations of abuse made against a member or members of staff, volunteers, delivery partners or contractors will be managed in line with Free2Learn's safeguarding and employment policies and procedures.

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or vulnerable adults in their present position or in any capacity. It is essential that any concerns for the welfare of a child or vulnerable adult arising from abuse or harassment by a member of staff, volunteer, delivery partner or contractor should be reported immediately to the Lead DSL who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures are, therefore, to be followed in respect of allegations that a member of staff, volunteer, delivery partner or contractor has:

- Behaved in a way that has harmed, or may harm a child or vulnerable adult
- Possibly committed a criminal offence against, or related to, a child or vulnerable adult.
- Behaved towards a child, children or vulnerable adult in a way that indicates they are unsuitable to work with children or vulnerable adults.

Where you have concerns about a colleague, volunteer, delivery partner or contractor, you should report these concerns to the DSL immediately, detailing your concerns on the safeguarding alert form, who will manage the allegations in line with agreed policy.

The DSL will discuss allegations against staff, volunteers, partners or contractors with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action, if any, is necessary, notifying the parents/carers, the person the allegation has been made against will be suspended partly to protect them during any investigation, risks to other children, communication with relevant organisations/bodies, supporting the person the allegation has been made against and ensure they are treated fairly and with impartiality as detailed in Free2Learn 's disciplinary policy and procedures and will include any support from the other agencies involved and managing possible media interest. Disciplinary or Capability procedures will not be initiated until the investigation by police or social care has been Safeguarding concluded, Free2Learn will take the lead from these bodies at all stages of the process and involve the relevant DSL, Senior Managers and HR personnel.

This may include:

- Child Protection or Vulnerable Adult safeguarding Investigation – this will assess whether the child/adult is in need of protection or in need of services – led by Social Care
- Criminal Investigation – led by the relevant Police force.
- A Disciplinary Investigation – in line with Free2Learn 's Disciplinary and Grievance Policy

In the first two instances Social Care and or the Police will lead on investigations.

Free2Learn 's Lead DSL will notify the Disclosure and Barring Service (DBS) where:

- Free2Learn have permanently removed a member of staff, volunteer, delivery partner or contractor from regulated activity.
- Free2Learn thinks that the person has either:
 - Engaged in relevant conduct, or
 - Satisfied the harm test, or
 - Received a caution for, or been convicted of, a relevant offence.

For most cases, the DBS only has the power to bar a person who is, has been or might in future engage in regulated activity.

Free2Learn's Director of Human Resources and the COO will act as Free2Learn's Named Senior Manager to provide high level support to the DSL in handling allegations of abuse made against a member of staff, volunteer, delivery partner or contractor in line with current Free2Learn Safeguarding policy.

If the concern raised is relating to a Centre Manager, then the Lead DSL in conjunction with the senior management team will follow the safeguarding process. If concerning the Lead DSL then the Deputy DSM would be involved with the Senior management team. If

concerning the named Senior Manager, then the Lead DSL would be informed in conjunction with the Board of Advisors

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken the individual the allegation was made against will be supported back into work and their team environment by the HR Director with an agreed support plan put in place.

31. Support for the Referrer

Free2Learn will fully support and protect staff, volunteers, partners and contractors who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or vulnerable adult and report his or her concern about a colleague's practice. This support may take the form of counselling, moving the person reporting the abuse/potential abuse to another workplace temporarily whilst the incident is investigated. Free2Learn Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately.

However, all staff, volunteers, delivery partners and contractors have a duty to safeguard and promote the welfare of children and vulnerable adults. However, in order to investigate concerns robustly, it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Following a referral, staff, volunteers, partners and contractors may be involved in the assessment and management process led by the relevant Social Care Team and may be invited to take part in any strategy meeting or attend an initial Case Conference, where there is a criminal investigation, they may be required to cooperate with the Police. In all these circumstances they will be offered sufficient time to prepare and attend meetings with the support of their line manager and Free2Learn Safeguarding Team.

They will also receive appropriate senior leadership support and the DSL will continue to provide support and guidance as required/appropriate.

Records will be kept of every concern raised and they will be detailed as what actions have been taken, whether an external agency has been involved and is leading on any investigation and what the outcome has been so that the file can be closed and then stored for legal purposes.

32. Record Keeping and Information Security

Well-kept records are essential in situations where it is suspected or believed that a child or vulnerable adult may be at risk from harm.

Records should state who was present, time, date and place. Be factual, state exactly what was said, observed or alleged, be written in ink and signed by the recorder.

Records must also be stored, retrieved and destroyed within current Data Protection laws and Free2Learn's robust Data and Information Security requirements.

The use of a standard Safeguarding Alert Form for all staff irrespective of their role or which delivery contract they currently work with and is available on the secure G Drive.

Staff, volunteers, delivery partners and contractors are guided in recording, to be mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that they may become evidence in court proceedings. Equally staff, volunteers, delivery partners and contractors must be aware that documents regarding an individual that Free2Learn hold may be subject to a Freedom of Information request under the Freedom of Information Act.

Under the Act individuals have the right to access their own records unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender.
- Information held for the purposes of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person.

Records are kept for the time required legally and or contractually by the various government Commissioners and there is a robust storage, retrieval and disposal process and system in place.

Details of allegations that are found to be malicious will be removed from personnel files. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, detail of how the allegation was followed up and resolution to the allegation and notes of action/s taken and any decisions reached, is kept on the confidential personnel file of the accused and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.

It will provide clarification in cases where future DBS checks reveal information from the Police about an allegation that did not result in a criminal conviction, and it will help to prevent unnecessary re-investigation if an allegation re-surfaces at a later date. In respect of safeguarding allegations against an adult the record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Records in respect of a safeguarding concern about a child should be kept for 7 years unless a minimum time is specified by specific contracts held by Free2Learn.

Where a request for information sharing is made, the Lead DSL and Chief Executive, would make a decision as to whether they are able to share the information and if necessary, would seek relevant legal advice and advice from other bodies such as the NSPCC and Childline. All decisions taken about information sharing are expected to keep the safety of

the young person or vulnerable adult of central and paramount importance. Once the decision has been made regardless of whether it is to be shared or not this is still recorded identifying the reasons for the decision. If the request has come from the LSCB, they will provide Free2Learn with clear rationale as to why the information is needed and the request should be proportionate to the reason.

Free2Learn follows the 7 Golden Rules to Information Sharing as per the guidance document "Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers".

All learners undergo induction relevant to the business or contract area. Part of this process includes consent forms as required and collection of other personal details. This is recorded on the secure G Drive including but not limited to PICs systems, and other documents directly relating to delivery, all are stored securely. Learners and carers are made aware of the need for Free2Learn and or partners to hold information relating to them, what will be held, how it will be held, how long it might be held, who might have access to it and how it will be used.

The safeguarding form is sent to Safeguarding Lead and this is kept in a secure location on the G Drive within 24 hours and can only be accessed by the DSL. Once a copy has been saved to the G Drive local records will be destroyed. All concerns and incidents are reported on at senior management level and lessons learnt in how these were dealt with are discussed and where appropriate procedures are revised.

33. Safer Recruitment and Training for Staff

When recruiting new members of staff Free2Learn follows the government guidance "Safeguarding Children: Safer Recruitment in Education and Safer Recruitment principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012) for all appointments, Free2Learn ensures that they use the relevant DBS checking service to assess applicants' suitability for positions of trust, the Company complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

34. Monitoring & Review

Following any safeguarding incident, the Designated Safeguarding Lead (DSL) and HR Director will undertake a case review against the policy to ensure that it has been fully and correctly implemented. They will agree system and procedural changes required and identify and address training needs for staff. Staff knowledge will be tested on a regular basis by the DSL to identify individual and company wide training requirements.

This policy will be reviewed annually by the Designated Safeguarding Lead to ensure that it continues to meet current legislative requirements, adopts emerging best practice, and continues to be effective and relevant to the wider business; reporting to the Senior Leadership Team with recommendations for improvement.

Appendix 1 - Safeguarding Alert Form

This form is to be used by a member of staff to report concerns about the abuse of a child or vulnerable adult or who receives a disclosure of abuse. This must be completed immediately and forwarded securely to Designated Safeguarding lead in line with the procedure within an hour of the concern being raised. **Please ensure that prior to sending a completed form to the Safeguarding Lead, that you “Password Protect” the form. Please send a separate email to the recipient with the Password you have allocated**

If you do not have all the information requested please complete the parts you can.

Your Details
Name: Position:.....
Centre
Address.....
Email: Tel No:
Date and Time of Disclosure/ Incident

Details of Alleged Victim
Name: Date of Birth:
Address:.....
Tel No:
In Receipt of Health or Social care Yes <input type="checkbox"/>
No <input type="checkbox"/>
If Yes, name, address and tel no of provider

Detail of Alleged Perpetrator

Name:

Position/ Relationship

Address:

.....

Tel No:

Official Report

Has the incident been reported to any authority e.g. Police, HSE, etc Yes

If yes name of authority/ agency

Crime or Case Ref No:

Contact Name

Tel No

Employer Details

Organisation

Address:

.....

Manager:

Main Contract if different

Email :

Tel No:

Details of Incident/ Disclosure

Provide full details of the incident or disclosure – try to be as factual as possible, and use the words and phrases of the person making the disclosure, if possible. **Under no circumstances** note opinion, or interpret what an individual “meant”. You can include observations of body language, emotional state, injuries, etc. Include all details of what alleged, dates, times and locations of where the alleged incident occurred and persons present. Include any immediate action taken such as first aid.

Report of Incident/Disclosure

Reported to Safeguarding Lead

This form was passed to: In Person Secure Email

Name

Date:

Signed:

Safeguarding Lead Advisory Lead

Include details of any clarification gained where initial information is unclear and any recommendation

This form was passed toIn Person Secure Email

Name

Date:

Signed:

Designated Safeguarding Lead Action

Note below action taken, personnel consulted and any additional information gained relating to the allegation.

Referral made to external agency e.g Social Services, Police?

Yes No

If yes, name of referral agency:

Contact Name

Tel No:

Referral Date:

If no, reason for note referring and other action to be taken if any:

.....

Signed: Date:

Follow up Notes:

Appendix 2- Prevent Alert Form

This form is to be used by a member of staff to report concerns about the potential radicalisation, extremist activities and or signs/ behaviours that indicate extremism by staff, partners, employers or learners engaged in our programmes. This form must be completed when you are presented with the cause for concern and forwarded securely to the Local safeguarding Lead in line with the procedure, within an hour of the concern being raised.

Please ensure that prior to sending a completed form to the Safeguarding Lead, that you “Password Protect” the form. Please send a separate email to the recipient with the Password you have allocated

If you do not have all the information requested please complete the parts you can.

Your Details
Name:
Position:.....
Centre
Address.....
.....
.....
.....
Email:
Tel No:
Date and Time of Disclosure/ Incident

Details of Individual Causing Concern
Name: Position.....
Address:.....

.....

.....

.....

Tel No:

Colleague Partner Learner Employer

Full Explanation of Relationship to individual giving cause for concern

.....

.....

Official Reporting to Date

Has the incident been reported to any authority e.g. Police, HSE, etc

Yes No

If yes name of Police Service?

Crime or Case Ref No:

Contact NamePosition.....

Tel No

Report of situation leading to Concern

Provide full details of the situation that has led to the cause for concern – try to be as factual as possible, and use the words and phrases of the person making the disclosure, if possible. **Under no circumstances** note opinion, or interpret what an individual “meant”. You can include observations of body language, emotional state, injuries, etc. Include all details of what alleged, dates, times and locations of where the alleged incident occurred and persons present. Include any immediate action taken

Report (please continue on another sheet if necessary)

Reported to Safeguarding Lead

This form was passed to: In Person Secure Email

Name

Date:

Signed:

Safeguarding Lead Advisory Notes

Include details of any clarification gained where initial information is unclear and any recommendations

This form was passed to

.In Person Secure Email

Name

Date:

Signed:

Designated Safeguarding Lead Action

Note below action taken, personnel consulted and any additional information gained relating to the allegation.

Referral made to external agency e.g Social Services, Police?

Yes No

If yes, name of referral agency:

.....

Contact Name

Tel No:

Referral Date:

If no, reason for not referring and other action to be taken if any:

.....

.....

.....

Signed: Date:

Follow up Notes:

[Large empty rectangular box for follow-up notes]

Appendix 3 – Safeguarding code of Conduct for Staff

This code aims to assist staff in maintaining proper and professional relationships with learners.

All employees are required to abide with the Free2Learn Safeguarding Code of Conduct below, which applies to behaviour of all staff and volunteers in direct contact with young people and online,

This Safeguarding Code of Conduct also details how individuals can protect themselves against allegations of abuse.

How to Protect Yourself against Allegations of Abuse:

Avoid personal and social contact with children or vulnerable adults and seek to minimise the risk of any situation arising in which misunderstandings can occur.

You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult
- Issue or threaten any form of physical punishment
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person even where the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment in order to discipline. Shouting at young people should be avoided whenever possible and only if alternative forms of discipline have failed.
- Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer or games etc.) that has inappropriate content for young people.
- Invite, or allow, a young person or vulnerable adult who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in, or tolerate, any inappropriate physical activity involving young people
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature for children or vulnerable adults that they can do for themselves
- Dismiss an allegation of any sort relating to a learner's welfare or delay the reporting of an allegation
- Discourage anyone from reporting concerns or ask individuals to keep secrets
- Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they suspect abuse
- Spend excessive amounts of time alone with children or vulnerable adults, away from others

- Make unnecessary physical contact with children or vulnerable adults, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports or similar. In all cases, contact should only take place with consent of the child or vulnerable adult
- Do not arrange to meet a child or vulnerable adult or their families with whom you work outside of working hours unless it is with consent of the parents/carer and person in charge of the activity
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a young person or their family.
- Consume alcohol, take illegal drugs or legal highs, during the working day/evening or at events, including during any breaks or when in the presence of young people.
- Smoke/vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.

You Should:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and vulnerable adult's rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviours they do not like
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
- All staff, volunteers, delivery partners and contractors at organised activities will be expected to act with discretion with regard to their personal relationships. This should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff, volunteers, delivery partners, contractors and or participants of the organised activities must be declared
- Avoid working in isolation with Children and vulnerable adults, follow the recommended adult-to-young people ratios for meetings and activities and ensure there is separate sleeping accommodation for young people, adults and Young Leaders.
- Never give out a personal mobile number or private email address and ensure working hours of contactability are stated
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the Safeguarding leads
- Treat all young people and adults equally and listen to them; avoid favouritism and gossiping.
- Ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children or vulnerable adults on social network sites. Always use professional language when writing, phoning, emailing or using social media to communicate with young people or vulnerable adults.

- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned
- If staff, volunteers, delivery partners and contractors have concerns relating to the welfare of a child or vulnerable adult in their care, be it concerns about actions/behaviours of another colleague or concerns based on any conversation with the child or vulnerable adult, particularly where they make an allegation, they should report this immediately
- Act as a role model
- Set and monitor appropriate boundaries and relationships when working with children and vulnerable adults based on openness, honesty and respect for the child or vulnerable adult. Ensure that the focus of your relationship with a young person that you have met through any programmes remains professional at all times. The aim should never be to develop the relationship into a friendship or intimate relationship.
- Respect a young person's/adult's right to personal privacy but never agree to keep any information relating to the harm of a young person/adult confidential. Provide support to a child, young person or vulnerable adult making a complaint
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the Safeguarding Leads without delay and record all the facts
- Ensure that if a young person who has become distressed needs comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a young person before you act. Hugging should be limited and never initiated by staff/volunteers. Any hugging should be done by the side of the young person with an arm placed around the shoulders side by side.
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary in relation to the activity and that this is done in a way that other colleagues can observe you.
- Upon induction to the programme the learner will be given a copy of the code of conduct and the Free2Learn staff will go through this document with them to ensure they understand their responsibilities.
- If a learner feels that there has been a breach of the code of conduct they should report this breach by utilising the Free2Learn complaints policy. The complaint will be fully investigated as per the policy/process and actions taken to ensure the individual making the complaint is fully supported. If the complaint is in regard to another child, young person or vulnerable adult there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of code of conduct may need the intervention of the DSM and the Free2Learn safeguarding procedures should be followed.

- All complaints are recorded and followed up to a satisfactory conclusion. Staff/volunteers who breach this code of behaviour may be subject to Free2Learn's disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.
- All children, young people and vulnerable adults should be treated with respect and the code of conduct has been written with respect, dignity and safety for every individual in mind, however staff understand that children/young people are capable of abusing their peers. Peer abuse can take many forms such as sexting, bullying, physical and emotional abuse, and inappropriate

Staff/volunteers who breach this code of conduct may be subject to Free2Learn's disciplinary and Grievance policy whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.