

Safeguarding Policy - Child Protection and Adults at Risk

Designated Safeguarding Officer: Meagan Cheek

1. Policy Statement

- 1.1. Venture Training is committed to a whole organisation approach to providing a safe and supportive learning environment that promotes the wellbeing and security of all students and staff. The Company recognises that all staff members have a role in safeguarding the welfare of children, young people and adults at risk and preventing them coming to any harm or suffering abuse.
- 1.2. Young people and adults learn best when they feel safe, supported and free from fear, worry and concern. Venture Training recognises that Safeguarding is about the protection from harm and abuse, but also prevention and supporting students to achieve their full potential.
- 1.3. Venture Training will always respond to disclosure in a proportionate and appropriate way.
- 1.4. The following principles underpin this policy:
 - The welfare of young people (defined by the Children Act 1989 as under 18 years of age) and adults at risk is the primary concern
 - All young people and adults at risk regardless of their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse and harm
 - Everyone has a responsibility to report concerns, but it is the responsibility of child and adult protection professionals to decide whether or not abuse has taken place.
 - All incidents and allegations of suspicious/poor practice and indications of abuse should be taken seriously and responded to swiftly and appropriately.
 - Confidentiality will be upheld in line with the Data Protection Act 1998.

2. Reason for the Policy

- 2.1. To ensure that Venture Training adheres to its legal obligations and social responsibilities in relation to safeguarding children, young people and adults at risk.
- 2.2. Relevant legislation and government guidance:
 - Children Act (1989) s. 44 & 47 and s. 17
 - Children Act (2004) s.11
 - Working Together to Safeguard Children (2013)
 - Keeping Children Safe in Education (2016)
 - Safeguarding Vulnerable Groups Act (2006)
 - Education Act (2002) s.175
 - Protection of Children Act (1999)
 - Care Act (2014)
- 2.3. To ensure that Venture Training complies with:

- Kent Inter-Agency Safeguarding Procedures (for children) <https://www.proceduresonline.com/kentandmedway/chapters/contents.html>
- Kent Multi-Agency Safeguarding Adults Policy and Procedures (Care Act 2014) <https://www.kent.gov.uk/social-care-and-health/information-for-professionals/adult-safeguarding/adult-protection-forms-and-policies/national-adult-protection-legislation>

3. Policy Objectives

- 3.1. To raise awareness of all staff of the need to safeguard children, young people and adults at risk, and their responsibilities in identifying and reporting possible cases of abuse,
- 3.2. To ensure all staff are familiar with the safeguarding procedure.
- 3.3. To contribute to assessments of young people and adults at risk conducted by external agencies,
- 3.4. To maintain effective working relationships with external partners in regard to safeguarding.
- 3.5. To provide opportunities for all students to learn about safeguarding as part of the curriculum.
- 3.6. To ensure all staff are informed of the most recent and up to date developments in safeguarding.
- 3.7. To ensure that Venture Training complies with safeguarding requirements in Human Resources.

4. Policy

- 4.1. This policy covers all aspects of the Company activities, including the apprenticeships, work placements and leisure courses.
- 4.2. Safeguarding will be considered primarily as the protection from harm and abuse but also preventing abuse by creating an environment of trust and confidence where students are aware of their rights and responsibilities. The Company recognises that students can be the cause of abuse and harm to other students.
- 4.3. The Company recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The Company will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.
- 4.4. Venture Training will utilise the tutorial programme, the Company website and social media to deliver positive messages about safeguarding including; healthy relationships, personal safety, e-Safety and healthy living.
- 4.5. The procedures for safeguarding should be followed in every case
- 4.6. A “child” and “adult at risk” are defined below. (5. Definitions)

- 4.7. A concern with definition in regard to adults should not interfere with an objective assessment of an individual's needs and therefore a student 'at risk' may include those who do not fall within the definition in 5.0.
- 4.8. Children, young people and adults, who are vulnerable shall be identified and their educational progress monitored and reviewed. Resources shall be prioritised to ensure that vulnerability and disadvantage are not reasons for lack of educational achievement.
- 4.9. Students will be provided with intimate personal care when it is planned appropriately in advance and staff have received appropriate training.
- 4.10. Children under the age of 16 who are not engaged in Company activities are NOT permitted access to the learning areas of the Company. Parents and/or carers of young children are to be advised that they should not bring their children into Company unless as part of a special event or activity where children are invited.

5. Definitions

- 5.1 A **Child** is defined as
Anyone who has not reached their 18th birthday (Children Act 1989)
- 5.2 An **Adult at Risk** is defined as:
'someone age 18 years or over, who is or may be in need of community care services by reason of mental or other disability, age or illness and who is, or may be, unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation'. (No Secrets, Department of Health 2000)
- 5.3 However a concern with definition should not interfere with an objective assessment of an individual's needs and 'at risk' in this policy therefore will also include those adult students who fall within one of the following categories and are considered to be **vulnerable**:
 - Looked After Child/Care Leaver
 - Refugee/Asylum Seeker
 - Over 18 Carer
 - Pregnant
 - Young Parent
 - Socio-economic deprivation
 - Transient family background
 - Homeless
 - Offender
 - Substance Misuse
 - Mental Health
 - Disability/Chronic Illness
- 5.4 **Abuse of Trust**
In all cases and within the definition of a child or adult at risk, the Company shall consider the abuse of trust as significant harm. A relationship of trust is one in which one person is in a position of *power or influence* over the other person because of their work or the nature of their activity.

The abuse of trust shall be considered gross misconduct.

5.5 Harm

Harm is defined as:

“a violation of an individual’s human or civil rights by any other person or persons which results in significant harm” (DoH 2000)

5.6 Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues or external partners if they have any concerns:

- 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 to an extremist ideology

If the Company has any significant concerns about a student beginning to support terrorism and/or violent extremism, they will discuss them with the nominated local police officer so that appropriate action can be taken.

6. Policy Owner

6.1 Operations Director

7. Who Will Need To Know About This Policy

7.1. This policy will be disseminated as widely as possible and will be made known to the following as appropriate:

- All Senior Leadership Team
- All staff (inc. agency/temporary)
- All Parents/Carers and students (current and potential)
- All volunteers (current and potential)
- All Employers participating in work-based learning, work experience opportunities or guest speakers for students at the Company.
- External contractors who will be asked to provide evidence that their staff are aware of our policy, its implications and where necessary have been subject to appropriate vetting procedures and are aware of their legal responsibilities

- Visitors – who will need to have an understanding of safeguarding arrangements and should wear appropriate identification, i.e. a visitor's badge.
- 7.2 The Company accepts full legal liability for meeting the duty and will take all reasonable action to ensure that all individuals who have contact with the Company meet the requirements of the duty.

8. Responsibility

1. The Company is committed to working together with the Kent Safeguarding Children and Kent Safeguarding Adults Teams and complying with their procedures. We recognise that we have a responsibility towards all children, young people and adults attending or visiting the Company, to safeguard their welfare and to take appropriate steps to ensure this can be achieved.
2. It is not the responsibility of the Company to investigate abuse. However, it has a duty to act if there is suspicion that a child/adult has suffered or is likely to suffer significant harm and to notify the appropriate agencies so that they can intervene, investigate and take appropriate action
3. Venture Training Directors will be responsible for overseeing that the Company management team implements the safeguarding strategy, policies and procedures effectively. It will receive and review reports at appropriate intervals to be re-assured of the Company safeguarding compliance. It will ensure that one individual on the Senior Leadership Team and designated Safeguarding link, will liaise monthly with the Designated Safeguarding Lead regarding all safeguarding matters.
4. The Company Safeguarding Committee will have delegated responsibility for delivery of the safeguarding strategy, policies and procedures.
5. Safeguarding officer
6. will normally be responsible for attending local safeguarding conferences, reviews and Looked after Children reviews.
7. Venture Training will ensure all Safeguarding policies and procedures are communicated to all Company. Staff, Students, visitors and stakeholders as appropriate.
8. The Company will ensure there is a Designated Teacher for Looked after Children/Care Leavers. This person will be appropriately trained and liaise with the Designated Safeguarding lead to ensure that all relevant information is shared, including the name of the young person's social worker.

9. Human Resources (HR) Policy and Procedures

- 9.1 The Company is committed to ensuring a safe and secure environment for all its students, staff, volunteers and visitors. A fundamental part of this is the provision of the highest quality HR policy and procedures.
- 9.2 The Company HR department adheres to the guidance given in 'Keeping Children Safe in Education' (2016) and the responsibilities under the Protection of Children Act (1999)

This means that there are a number of policies, procedures and processes that it manages or maintains to ensure compliance.

In summary these are:

- Recruitment and selection documentation makes reference to and highlights the Company commitment to safeguarding
- Vetting procedures are carried out on all new staff, agency staff, contractors, volunteers and governors. All staff will be DBS checked to an enhanced level as all employment is considered to be in 'regulated activity'. All staff will also be subject to a Barred List check, where appropriate.
- All Staff will be subject to updated DBS vetting every three years.
- A single central record of all information is maintained that identifies the evidence collected to ensure vetting procedures have been carried out
- Appropriate safeguarding induction and training is carried out on an on-going basis and updated regularly
- Specialist safeguarding training will be provided for the nominated members of staff with child protection and adult at risk responsibilities, including the Designated Safeguarding Lead and a Designated Governor for Safeguarding
- Safeguarding Officers will be required to update training every 2 years or when significant changes to requirements and legislation occur, whichever is earlier
- Policy, procedures and processes are monitored and audited on a regular basis to ensure they meet current requirements and legislation
- All information and records are maintained, stored and updated confidentially in line with appropriate legislation
- Contractors who are likely to have any direct contract with children, young people and adults at risk, for any extended period, are subject to appropriate vetting and required to provide evidence of same

9.3 Staff Training and Development

9.3.1 All designated safeguarding officers will be required to attend specialist training to maintain up to date knowledge of local referral and assessment processes.

9.3.2 All staff will be required to complete safeguarding training on their induction.

9.3.3 There will be ongoing safeguarding training provided to all staff.

10. Review and Monitoring of the Procedures

10.1 It will be the responsibility of the Designated Safeguarding lead to review and monitor the procedures and to review relevant legislation changes when they occur in order to keep this policy and associated procedures up to date. When required the advice of the Safeguarding Boards and local social care will be sought.

11. Distribution of This Policy

1. Staff will be made aware of this policy at induction, through the Company handbook, continuous staff training, posters and site notices.
2. Employers, parents/carers and students will be made aware of this policy through Company marketing information, website briefing documents and information sessions.
3. All contractors will be made aware of this policy prior to any works being undertaken on Company premises.
4. The full policy will be available on the Company intranet (staff) and website.
5. This policy will be made available in other formats as appropriate.

Safeguarding Steps and Procedures

If a student or Apprentice discloses anything that gives you reason to suspect that they may be at risk of harm, you should:

- Listen carefully and take what is being said seriously.
- Tell the student you have a duty to report concerns.
- Tell the student you cannot promise confidentiality.
- Write down what the student says in their own words.
- Immediately contact your Venture Training assigned tutor, or email the designated Safeguarding Lead

You will be asked to follow this up with a written report including the time, date and what happened. The Venture Training Designated Safeguarding Officer will decide how to follow up the report. They will notify you of the outcome. If you are worried or concerned about anything, please contact our Safeguarding team.

Concerns and identifying possible warning signs

Signs of vulnerability may include:

- Loneliness or isolation
- Changes to a family situation/family tensions
- Poverty
- Political grievances
- Crime/anti-social behaviour

Possible warning signs may include:

- Progressive changes in behaviour – such as significantly changing their appearance, changing peer/friendship groups
- Argumentative and unwilling to listen
- Unwilling to engage with those of different race, religion, gender etc
- Accessing extremist material, showing sympathy to extremist groups

Employer Responsibility:

Be alert to any changes in behaviour that may give your cause for concern.

Advise Venture Training of any concerns regarding your student to allow us to investigate any issues further

Provide opportunities for employee to discuss their own concerns about extremism, events in the news and about British values. Venture Training Responsibility:

All staff have completed training on Prevent Duty

Be aware when it is appropriate to refer concerns to our Safeguarding and Prevent teams ▪ All staff to undergo DBS (Disclosure and Barring Service) checks

Provide students with information so they know how to protect themselves from extremist views contrary to British values Reporting Concerns If you are worried or concerned about your apprentice, please contact your Venture Training assessor,

Once we have investigated concerns, the Prevent Lead Officer will determine the most appropriate course of action and may refer to the Channel programme.

CODE OF PRACTICE

All staff should take precautions not to place themselves in a vulnerable position with relation to safeguarding. It is always expected for work with individual children to be conducted in view of other adults. Newly appointed staff will be required to complete and submit an Enhanced Disclosure Form for the Criminal Record Bureau (CRB). All staff of Venture Camps must have a DBS with no previous convictions that may affect his/her ability to work for the company.

MONITORING AND RECORD KEEPING

What do we need to consider?

- Ensure the safety and confidentiality of files. Child protection records should be kept securely locked.
- Child protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 1984.
- Encourage/train all staff to record information in factual, non-emotive, non-judgemental terms, with notes of the date, time and content.

- In cases of alleged child abuse which come to court, the court may require the child protection records.

Staff and parents share a common responsibility to keep children safe. This is emphasised in the Children Act 1989 which highlights the welfare of the child as paramount.

CCPAS (Child Protection Advisory Service) is the umbrella organisation through which Venture Training receives its advice, disclosures and support for matters relating to Safeguarding. Their address and contact details are;

Kent Central Duty Team - 03000 411111. This number should be called if you do not feel it safe to speak to the CPC regarding your area of concern.

PREVENT RADICALISATION

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

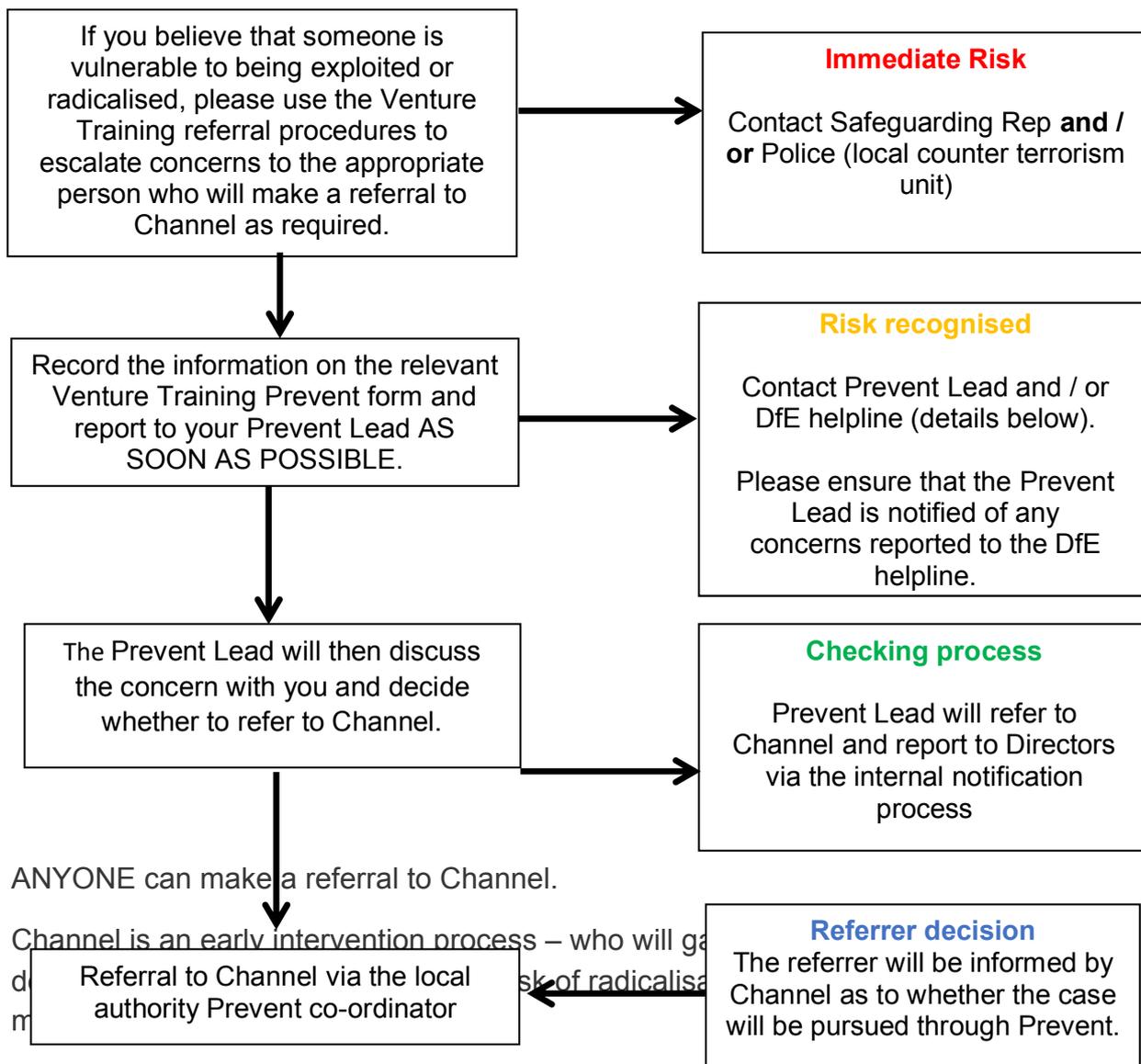
- Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:
- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around 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 material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes

that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.

- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to the Kent Safeguarding Team.



ANYONE can make a referral to Channel.

Channel is an early intervention process – who will gain a better understanding of the risk of radicalisation

The local authority Prevent co-ordinator and the police Channel co-ordinator will identify the type of support required and refer to a Multi-Agency Channel Panel.

A Multi-Agency Channel Panel is made up of external agencies based around the persons vulnerabilities (health, employment, housing, education, etc) – who will arrange for tailored support approved through the Channel intervention to be implemented.

The Department for Education has launched a helpline for anyone concerned about a child who may be at risk of extremism, or about extremism within an organisation working with children and young people. Email: counter.extremism@education.gsi.gov.uk. Telephone: 020 7340 7264.