

Safeguarding Young People & Vulnerable Adults Policy and Procedures

Aim

The Phoenix Training Group are committed to a whole organisation approach to safeguarding, young people and vulnerable adults, recognising our duty of care and responsibility to protect against any form of abuse within the training environment. All young people and vulnerable adults have the right to be safe, free from harm and must be permitted to live without fear of abuse, neglect, exploitation, radicalisation and extremism. All adults at the Phoenix Training Group recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for young people and vulnerable adults. In adhering to this Policy and the procedures therein, staff and visitors will contribute to the Phoenix Training Group's delivery of the outcomes to young people and vulnerable adults

The policy seeks to promote effective multi-agency working in light of the Children Act 2004 and Safeguarding Vulnerable Groups Act 2006, Working Together to Safeguard Children 2018 and Vulnerable young people along with the acts below:

- Children Act 1989. Currently provides the legislative framework for child protection in England. ...
- Keeping children safe in education 2020
- Children Act 2004. ...
- Children and Social Work Act 2017. ...
- Safeguarding Vulnerable Groups Act 2006. ...
- Protection of Freedoms Act 2012. ...
- Children and Families Act 2014. ...
- Education Act 2002. ...
- Digital Economy Act 2017.

We recognise that:

- The welfare of children, young people and vulnerable adults is of paramount importance
- All young people and vulnerable adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Working in partnership with young people, vulnerable adults, parents, partners, carers and other agencies is essential in promoting their welfare.

Safeguarding team within the Phoenix Training Group Are:

Name Position contact numbers:

- Xtol / Ways2work - Colin Ripley Designated Safeguarding Lead
- Xtol / Ways2work - Rebecca Harrison Safeguarding Deputy
- Contact: 01709 786411

- Engage – Kelly McBride Designated Safeguarding Lead
- Engage - Maria Blackie Safeguarding Deputy
- Contact: 01302 341313

Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

If a child is in immediate danger:

Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm. Anyone can make a referral.

Tell the Designated Safeguarding Lead (DSL) as soon as possible if you make a referral directly. We work in partnership with other agencies in the best interests of the children. Referrals should be made by the DSL to the Multi Agency Safeguarding Hub (MASH). Where the child already has a safeguarding social worker, the request for service should go immediately to the social worker involved, or in their absence to their team manager.

The following link provides additional guidance for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

Will endeavour to safeguard young people and vulnerable adults by:

- Valuing them, listening to and respecting them
- Adopting child protection and vulnerable groups guidelines through procedures for staff
- Recruiting staff safely, ensuring all necessary checks are made
- Sharing information about protection and good practice with young people, partners and staff
- Sharing information about concerns with agencies on a need to know basis and involving partners, young people and vulnerable adults in safeguarding issues
- Remain confident that their personal information is kept safe and secure and that practitioners maintain the privacy rights of the individual, whilst sharing information to deliver better services. It is important that practitioners can share information appropriately as part of their day-to-day practice and do so confidently
- Providing effective management for staff through supervision

Objectives:

To outline the duties and responsibility of staff who are working on behalf of the Phoenix Training Group, in relation to safeguarding young people and vulnerable adults.

- To provide protection for all young people and vulnerable adults who come into contact with the Phoenix Training Group
- To provide training to staff on learners on safeguarding
- To provide staff, contractors with an overview of young people and vulnerable adult protection
- To provide staff and contractors with guidance on procedures they should adopt in the event that they suspect a young person or vulnerable adult may be experiencing, or be at risk of harm

This document sets out the arrangements that the Phoenix Training Group has put in place to safeguard young people (i.e. under 18 years old) and vulnerable adults for the purpose of this policy an adult is a person aged 18 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'. (Definition from 'No Secrets' March 2000 Department of Health).

We know that disabled people are at an increased risk of being abused compared with their non-disabled peers. They are also less likely to receive the protection and support they need when they have been abused. The Phoenix Training Group have a duty to safeguard the well-being of someone who may be disadvantaged, particularly those who are or may be "in need of community care services, learning disabilities, mental health problems, older people and people with a physical disability or impairment. It may also include victims of domestic abuse, hate crime and anti-social abuse behaviour. The persons' need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

It is important to consider the meaning of 'Significant Harm'. The Law Commission, in its consultation document 'Who Decides,' issued in Dec 1997 suggested that; 'harm' must be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also 'the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioral development'.

The Phoenix Training Group's policy is supported by a series of operating procedures relating to the above activities. The named person with responsibility for this policy and for its regular review is Rebecca Harrison.

A number of the Phoenix Training Group's staff are available to act as contact points in case of any query, details are set out in **Appendix A**.

The procedure for reporting any concerns relating to safeguarding young people and vulnerable adults is set out in **Appendices B and C**

Responsibilities of the Designated Safeguarding Lead

The Designated Safeguarding Officer (DSL) is responsible for ensuring that safeguarding is given high priority. Specific responsibilities include:

- Providing support and advice to managers and all staff on safeguarding matters related to children and vulnerable adults.
- Ensuring that all members of staff receive training on child protection and safeguarding as part of their induction, and on an on-going basis where required.
- Managing referrals/cases reported and working with Senior Management to ensure resolutions.
- Carrying out referrals to the relevant local authority social care team where abuse of a child or vulnerable adult is reported or suspected.
- Referring the matter to the local authority designated officer (LADO) where a member of staff is suspected of abuse.
- Maintaining an overview of safeguarding issues and monitoring the implementation of this policy, in conjunction with Senior Management.

The DSL has responsibility for deciding whether to refer any reported matters onto the police or to the local authority social care service. Where possible, referrals should be made on the same working day and certainly within 24 hours. It is the responsibility of the DSL to decide whether the parents/carers (if applicable) of the child or young person should be informed of the referral.

Training

All staff will undertake safeguarding training upon induction and through the completion of online courses, workshops, recognised qualifications and workbooks. This will be reviewed annually or as and when any changes take place with this legislation.

Staff will promote the importance of Safe Guarding to learners through induction, e-learning, workbooks and bi-monthly reviews

Contextual Safeguarding

In Part One of KCSIE is a section on specific safeguarding issues. The 2020 update contains information on Contextual Safeguarding.

All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Contextual Safeguarding helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form

in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

IT usage

The Phoenix Training Group will take all reasonable precautions to ensure online safety of learners and staff.

Staff and learners are given information about infringements in use and possible sanctions. As detailed in the cyber bullying and internet usage policy (QD66)

Any suspected online risk or infringement is to be reported to senior management on that day.

Acceptable use agreements discussed with staff and pupils at the start of their programme.

Any concern about staff misuse is always referred directly to senior management, unless the concern is about the Senior Management in which case the complaint is referred to the Board of Directors

Classroom based learning involving young people and vulnerable adults.

The recommended approach is for the classroom tutor to ensure that staff and learners are not compromised by permitting learners on work placement to work closely on a 1:1 basis with a single member of staff. The agreed position is that learners will work within a team placement, thus minimising the risk of the learner working too closely with one individual or alternatively working unsupervised. If there are specific concerns relating to a particular set of circumstances (e.g. where there may be substantial unsupervised access by a staff member to a young person under 18) then this must be raised with the Phoenix Training Group's Health & Safety Adviser at the earliest opportunity in order that an assessment of the risk may be undertaken. This will allow the necessary checks and balances to be put in place to minimise the risks to all parties.

2.1 The recruitment of learners

Phoenix Training Group admits learners of all ages who can demonstrate that they are able to meet the initial assessment for the course they have chosen and will benefit from the social and learning environment that ThePhoenix Training Group provides. Additional risk assessments are formulated for learners with specific identified needs to maintain a duty of care.

2.2 Staff employment issues

The Phoenix Training Group is a responsible employer and recruitment is carried out safely by staff who are holders of DBS checks. The Phoenix Training Group ensures it engages with staff in a way that compliments aspects of relevant legislation and in particular that, which exempts people with specific convictions from applying for or indeed holding particular job roles where there is an acknowledged risk associated with access to

young people or vulnerable adults. As a direct consequence, all vacant positions within the company are routinely reviewed and a consideration of the risks undertaken. Where there is the potential for substantial unsupervised access to young children and vulnerable adults then a DBS check will be undertaken.

Offers of employment to all posts are subject to a DBS check and conditional with the individual meeting the required standard, failure to do so would result in an immediate withdrawal of the offer of employment. Failure to disclose or the provision of a false statement by a potential employee may result in disciplinary action with a potential sanction up to and including (instant) dismissal of the employee. All DBS disclosures are risk assessed against the job role on an individual basis.

DBS checks are made on all teaching staff including contractors throughout the company; the member of staff responsible for this is Paul Sunderland, in conjunction with the Senior Management Team.

All information regarding DBS checks is being kept confidential in the Single Central Record, in line with the Data Protection Act. Periodically, when the role of an existing member of staff changes it may be necessary to review the job role and for the existing staff member to be required to undertake a DBS check.

Employees are contractually obliged to notify the Phoenix Training Group, as their employer, of any post-employment criminal convictions that may impact upon their future employment with the Phoenix Training Group. If the individual is found to be in breach of this contractual obligation then disciplinary action may be taken.

In the event of an employee having suspicions regarding another employee or individual engaged on the Phoenix Training Group's business with a young person or vulnerable adult, then at their earliest opportunity they should raise this with Rebecca Harrison. This is in order that any potential risks can be minimised with immediate effect and to allow an investigation in to the allegations to take place. All staff within the SMT are responsible to undertake this.

Children with Special Educational Needs and Disabilities (SEND)

Students with special educational needs and disabilities (SEND) may face additional safeguarding challenges and additional barriers may exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Students with SEND can be disproportionately impacted by actions such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Where there are any concerns raised about the safety and welfare of a student with SEND, the Phoenix Training Group will ensure that these will be treated in the same way as with any other child, with careful consideration of any additional needs.

More information on children with SEND is contained in Annex A of Keeping Children Safe in Education 2020.

Staff Training

Upon induction staff receive training on their responsibilities, procedures and policies regarding safe guarding and child protection issues.

The phoenix Training Group staff undertake a range of training programmes both externally or internally to keep their knowledge up to date and to ensure all staff maintain a clear understanding of their role and responsibilities in safeguarding children and young people..

All staff receives guidance on how to deal with suspicions or disclosures of abuse. Designated safeguarding officers renew their training every 2 years and all staff will undertake refresher safeguarding training every 12months

Definitions and indicators of abuse

Categories of abuse

Children and vulnerable adults can experience abuse in a number of ways.

Forms of abuse that may affect children and vulnerable adults include:

- Abuse of trust
- Child sexual exploitation
- Child Trafficking
- Discriminatory abuse
- Domestic violence or abuse
- Emotional Abuse
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Grooming
- Harmful sexual behaviour
- Modern slavery
- Neglect
- Online abuse
- Organisational or institutional abuse
- Physical Abuse
- Psychological or emotional abuse
- Radicalisation of children or vulnerable adults
- Self-neglect
- Sexual Abuse

These categories can overlap and an abused child or adult often suffers more than

one type of abuse.

CSE Definition 2018

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- (a) in exchange for something the victim needs or wants,
- and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Definition of Abuse: A violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts.

It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.

Abuse can occur in any relationship and it may result in significant harm to, or exploitation of the person subjected to it.

The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:

- **Physical abuse** - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- **Sexual abuse** - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.
- **Psychological abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, force, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- **Financial or material abuse** - including theft, fraud, exploitation, pressure in connection with wills property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Neglect and acts of omission** - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services,

the withholding of the necessities of life, such as medication, adequate nutrition and heating.

- **Discriminatory abuse** - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.
- **Institutional abuse** - Institutional abuse although not a separate category of abuse in itself, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level as detailed in the contract specification.
- **Multiple forms of abuse** - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.
- **Domestic abuse** - Home Office Definition 2004
'Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.'
- **Female Genital Mutilation** - Female Genital Mutilation is the partial or complete removal of external female genitalia for non-medical reasons. It is mostly carried out – without anesthetic – on girls between infancy and age 15, however it can take place just before marriage or during a woman's first pregnancy. FGM has zero health benefits and often results in lifelong health problems, increased risks during childbirth, psychological trauma, and even death.
- **Breast ironing** - Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further.

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Keeping Children Safe in Education (2018) mentions breast ironing as part of so-called 'Honour Violence'.

Recognising abuse

Recognising abuse is not easy, and it is not your responsibility to decide whether or not abuse has taken place or if a young person or vulnerable adult are at significant risk. You do however; have a duty of care to act if you have a concern about a person's welfare or safety. The following information is not designed to turn you into an expert but it will help you to be more alert to the possible signs of abuse.

Physical Abuse

Most young people or vulnerable adults will collect cuts and bruises in their daily life. These are likely to be in places where there are bony parts of their body, like elbows, knees and shins. Some, however, will have unexplained bruising, the cause of which could be accidental. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury. A delay in seeking medical treatment for a person when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on people with different skin tones or from different racial groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical abuse include:

- Bruising in young people or vulnerable adults who are not independently mobile
 - Bruising in babies
 - Bruises to the face, back, stomach, arms, buttocks, ears and hands
 - Multiple bruises in clusters or uniform shape
 - Bruises that carry the imprint of an implement used, hand marks or fingertips
- although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any person who has unexplained signs of pain or illness should be seen promptly by a doctor

Other physical signs of abuse may include:

- Cigarette burns
- Adult bite marks
- Broken bones
- Scalds
- Ligature (rope) marks
- Incision marks

Changes in behaviour which can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example wearing long sleeves in hot weather
- Depression/ withdrawn behaviour
- Running away from home
- Reluctance to integrate with others
- Anxiety in the presence of the abuser
- Drowsiness from misuse of medication

Emotional / Psychological abuse

Emotional /psychological abuse can be difficult to measure, and often people who appear well cared for may be emotionally abused by being taunted, put down or belittled.

They may receive little or no love, affection or attention from their parents, partners or carers. Emotional/psychological abuse can also take the form of people not being allowed to socialise with others. Signs of this type of abuse:

- Fear
- Sudden speech disorders
- Developmental delay, either in terms of physical or emotional progress
- Inability to integrate and communicate with others
- Confusion/ Apathy (laziness)
- Lack of eye contact/Disturbed sleep patterns
- Low self esteem
- Reluctance to talk openly
- Neurotic behaviour, e.g. sulking, hair twisting, rocking
- Development of ADHD
- Self-harm

Sexual abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child's behaviour which may cause you to become concerned, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. Therefore, it is important that they are listened to and taken seriously.

Sexual abuse is any kind of sexual behaviour directed towards an older adult without the person's full knowledge and consent. It includes sexual assault, sexual harassment, and rape. Sexual abuse can happen to mentally capable adults by their spouse, partner, a family member or trusted people in their lives. It can also happen to mentally incapable adults.

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal areas
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease/Vaginal discharge or infection
- Stomach pains discomfort when walking or sitting down
- Pregnancy
- Depression, withdrawal from regular activities, fear, anxiety

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares running away from home
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language/ acting in a sexually explicit way towards adults
- Eating problems such as overeating or anorexia , bulimia

- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)

Neglect & acts of omission

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children. The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or smelly
- Loss of weight, or being constantly underweight
- Inappropriate dress for the conditions
- Changes in behaviour
- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning their being left alone or unsupervised
- Withdrawal from intellectual stimulus

Discriminatory Abuse

Some of the signs and symptoms of discriminatory abuse may be very similar to emotional/psychological abuse and involve references to diversities such as disabilities, racial and social economic influences. This can also have a major impact on the wellbeing and social integration of individuals, leading to isolation or withdrawal from religious or cultural activity, services or supportive networks.

Institutional abuse

Institutional abuse can be poor care standards, lack of positive responses to complex needs, rigid routines and inadequate staffing. Insufficient knowledge base within service can also have a negative impact on the individuals. Indicators of institutional abuse:

- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters or unnecessary exposure during bathing or using the toilet
- Absence of individual care plans

- Lack of management overview

Forced marriage

Forcing a person into marriage is a crime. 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 and can come from parents and other family members or elders in a particular religion.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that someone is being forced into marriage, they will speak to the person about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

Speak to the person about the concerns in a secure and private place;

Activate the local safeguarding procedures and refer the case to the local authority's designated officer;

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk

Honour-based violence

Honour-based violence takes many different forms. Most commonly, a girl or woman is abused, disowned by her family or forced to have an abortion. Women and girls are the most common victims of honour-based violence. However, men and boys can be victims, too.

Honour-based violence includes:

- physical abuse (kicking and beating);
- psychological pressure (strict monitoring, humiliation, threats);
- forced marriage
- abandonment (leaving someone in their country of origin or sending them back there);
- forced suicide;
- honour killing (murder).

Motives for honour-based violence

The most common reasons for committing honour-based violence are:

- conflicts of honour, for example concerning an inheritance;
- loss of virginity outside marriage;
- an extramarital affair;
- rebellion against traditional forms of behaviour, dress or occupation;
- insulting a family member;
- not agree with a forced marriage;
- homosexuality;

- refusing to take part in honour-based violence against another person.

Peer-on-Peer abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Hurting others will be dealt with under this safeguarding policy and will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put children at risk;
- Is violent;
- Involves being forced / coerced into drugs or alcohol;
- Involves sexual exploitation or sexual abuse, such as indecent exposure,
- Sexual assault, or sexually inappropriate pictures or videos (including sexting).

If an allegation of abuse against another child is reported you must tell the DSL and record the allegation, but do not investigate it;

The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence; the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

Child Missing Education / Missing Children

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system; come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child’s name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

Private Fostering

A Private Fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Criminal Exploitation

The Phoenix Training Group understands the importance of recognising when Child Criminal Exploitation which is common in county lines may be occurring. The act is when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Identifying signs:

- They have been arrested for possession and intent to supply of significant quantities of drugs, particularly heroin and crack cocaine;
- They were arrested away from their own home area;
- They were arrested on public transport, particularly a train;
- They are Looked After by the local authority, particularly if they are placed in residential care;
- They were carrying a weapon when arrested;
- They have an unexplained injury, possibly caused by a knife;
- They were arrested with or are accompanied by older males or females

Any concerns by all members of staff will be reported to the DSL and referral made to the local authority safeguarding board or if risk of imminent harm to the Police.

Young Carers

A Young Carer is a young learner under 18 years of age who helps to look after a family member who is disabled, physically or mentally ill or has a substance misuse problem. Caring can involve physical or emotional care, or taking responsibility for someone's safety or well-being. The level of responsibility assumed by a Young Carer is often inappropriate to their age and at a level beyond simply helping out with jobs at home, which is a normal part of growing up.

Some of the warning signs that might indicate that a pupil has unrecognised responsibilities are:

- Regular lateness or unauthorised absence, possibly increasing tiredness in school.
- Erratic response to homework with incomplete, late or non-compliance to set tasks
Lack of concentration, anxiety or worry.
- Under-achievement.
- Behavioural problems, especially inappropriate responses possibly resulting from anger or frustration.
- Few or no peer friendships but possibly with a good relationship with adults and presenting as very mature for their age.
- Victim of bullying perhaps linked to a family member's disability or state of health.
- substance misuse problem or due to Young Carer not being perceived by peers as dressing in the latest fashion.

Referral will be made into the local areas support system in place to provide support and assistance. Early Help can be arranged through Barnardo's Young carers Service which can be found locally in all areas.

Female Genital Mutilation

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy

All professionals are made aware of the possibility of a female being at risk of FGM as a result of religious beliefs, nationality and other unusual events that could lead to FGM e.g. a female being taken out of the setting for a six weeks or more by parents or relatives.

FGM is a criminal act and it is mandatory that it is reported to the lead safe guarding officer and the police should any staff come across it or be suspicious about it.

No health benefits, only harm

FGM has no health benefits, and it harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and interferes with the natural functions of girls' and women's bodies. Generally speaking, risks increase with increasing severity of the procedure.

Cultural and social factors for performing FGM

The reasons why female genital mutilations are performed vary from one region to another as well as over time, and include a mix of sociocultural factors within families and communities. The most commonly cited reasons are:

Where FGM is a social convention (social norm), the social pressure to conform to what others do and have been doing, as well as the need to be accepted socially and the fear of being rejected by the community, are strong motivations to perpetuate the practice. In some communities, FGM is almost universally performed and unquestioned.

FGM is often motivated by beliefs about what is considered acceptable sexual behaviour. It aims to ensure premarital virginity and marital fidelity.

FGM is associated with cultural ideals of femininity and modesty, which include the notion that girls are clean and beautiful after removal of body parts that are considered unclean or unfeminine or male.

Though no religious scripts prescribe the practice, practitioners often believe the practice has religious support.

Religious leaders take varying positions with regard to FGM: some promote it, some consider it irrelevant to religion, and others contribute to its elimination.

Local structures of power and authority, such as community leaders, religious leaders, circumcisers, and even some medical personnel can contribute to upholding the practice.

In most societies, where FGM is practised it is considered a cultural tradition, which is often used as an argument for its continuation.

In some societies, recent adoption of the practice is linked to copying the traditions of neighbouring groups. Sometimes it has started as part of a wider religious or traditional revival movement.

Any incidents will be treated in the strictest confidence. Safeguarding the children/young adult in our care is a priority at all times and we will not tolerate any form of child abuse.

If a member of staff had concerns over a child, they would report it to the safeguarding officer in the setting who would then decide whether a referral was needed

18 or under? and would like to speak to someone contact:

Childline offers free, confidential advice and support whatever your worry, whenever you need help. [0800 1111](tel:08001111)

Other contacts

Rotherham Rise – 0330 2020571

National Domestic Violence Helpline - Freephone 24 Hour - 0808 2000 247

Men's Advice Line - 0808 801 0327

Apna Haq - 01709 519211 / 01709 519212

Rotherham Women's Refuge - 0870 8502247

Rotherham Youth Start - 01709 820100

Risky Business - 01709 515423

Choices and Options - 01709 838400

Rotherham Women's Counselling Service (RWCS) - 01709 835482

Victim Support - 01709 361076

Rothacs – 01709 835482

Samaritans - 01709 36171

Safe Guarding, Radicalisation and Extremism

When operating this Policy, the Phoenix Training Group uses the following accepted Governmental definition of Extremism which is:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

There is no place for extremist views of any kind at The Phoenix Training Group, whether from internal sources – young persons or vulnerable adults, staff or visitors – or external sources, local community, external agencies or individuals. We also recognise that if we fail to challenge extremist views we are failing to protect young people and vulnerable adults.

Phoenix Training Group will actively raise awareness and tackle radicalisation by actively promoting and integrating key concepts of equality and diversity with radicalism and ensure staff, tutors and learners have clear definitions, understanding and awareness of both subjects.

As part of wider safeguarding responsibilities, Phoenix Training Group’s staff will be alert to

- Disclosures by people of their exposure to the extremist actions, views or materials of others outside of the Phoenix Training Group, such as in their homes or community groups, especially where pupils have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- People accessing extremist material online, including through social networking sites
- People voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or ‘hate’ terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

All concerns should be reported immediately to the designated Safeguarding Officer

Terror Threat Level Monitoring

The Phoenix Training Group DSL monitors the current level and ensures all staff and learners are made aware of any changes and how this would affect the area where they may live or are visiting.

The terror threat level from international terrorism is currently set at Severe which it has been at since 2017 meaning an attack is highly likely.

The current threat level from Northern Ireland related terrorism for Great Britain is moderate meaning an attack is possible but not likely.

The threat level for the UK from international terrorism is set by the Joint Terrorism Analysis Centre (JTAC).

MI5 is responsible for setting the threat levels from Irish and other domestic terrorism both in Northern Ireland and in Great Britain.

The DSL receives regular updates on threat levels and counter terrorism from the G7-Prevent Regional HE/FE Co-ordinator North East region and checking the Security Service website <https://www.mi5.gov.uk/threat-levels>

Whistleblowing

Where there are concerns of extremism or radicalisation young people, vulnerable adults and Staff will be encouraged to make use of our internal systems to whistle blow or raise any issue in confidence.

Please refer to the separate Whistleblowing Policy.

Channel

Channel is part of the Government's Prevent Strategy and focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Factors that may have a bearing on someone becoming vulnerable include:

- peer pressure
- influence from other people or via the internet
- bullying
- crime against them or their involvement in crime
- anti-social behaviour
- family tensions
- race/hate crime
- lack of self-esteem or identity
- personal or political grievances

The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individual concerned

The multi-agency panel is a collaboration of local authorities, the police, statutory partners and the local community.

Channel is a voluntary programme and aims to safeguard vulnerable individuals through targeted intervention to prevent them from committing criminal acts.

The Channel Procedure

1. If a member of staff is concerned that an individual may be vulnerable to being drawn into terrorism then they should discuss those concerns with their line manager.
2. If appropriate the line manager will report these concerns to the Prevent Lead.
3. If necessary the Prevent Lead will refer to the South Yorkshire Police Prevent Officer contact.
4. This officer will then liaise with the Channel Police Practitioner (CPP), team members and agency staff.
5. The officer will then follow the stages detailed in the 2012 Government publication 'Channel – Protecting vulnerable people from being drawn into terrorism.'

The Channel Stages

1. When the initial referral is received, the CPP will assess if the case is appropriate for Channel.
2. An initial vulnerability assessment will determine: if the individual is vulnerable to being drawn into terrorism and is suitable for Channel; should be referred to other support services; exits the process.
3. If suitable for Channel then the referral passes to the multi-agency panel which will review the vulnerability assessment and risk; assess the support needs; produce a support plan; develop an appropriate support package; review progress.
4. The Channel Panel Chair will ensure that individuals and organisations on the panel carry out their parts of the support plan so that an effective support package is delivered.

This policy will be communicated to all staff through the induction process and re-enforced through staff meetings and reviews, it is made available on the staff intranet. If a person is disabled or speaks a foreign language then the policy will be adapted and communicated to meet their individual needs allowing them to fully understand this.

Remote and Online Teaching

The Phoenix Training Group has no expectation that tutors should teach using online or pre-record lessons. The Department for Education states *schools should consider the approaches that best suit the needs of their pupils and staff* (DfE, 2020¹).

Any online tutoring or contact with learners needs to consider any risks and take appropriate actions to minimise harm, following the Phoenix Training Groups policies and procedures.

Things to consider include:

Where will the online tutoring be taking place?

Tutors should be in a neutral area where nothing personal or inappropriate can be seen or heard in the background. Some programs such as Skype have filters in place to allow the blurring of backgrounds during video calls; this should be used where possible.

Which software will be used?

Always make sure the online resources being used is suitable for the learner's age group and they can access all the features you require them to use. Where possible set up usernames and passwords for learners giving them instruction regarding how to access and operate the software.

(Do not use tutor's personal accounts when using conferencing software with learners, make a new account and use the Phoenix Training Groups details or your departments such as Xtol, Engage or Ways2work).

Consent

Make sure parents, carers and learners understand the benefits and risks of online learning and get consent for children to be involved. Ensure the learner is happy to use video conferencing software and they are in a controlled environment with suitable background details, displaying no personal information about themselves or members of the family.

Contacting learners at home

Tutors and staff might need to contact learners to give feedback on work and provide work to be completed by the learner. Staff should only contact learners during normal hours, or at times agreed by the management team.

All staff should be aware of the Phoenix Training Group's code of conduct and be made clear how they are expected to behave. Also, if staff are working from home, they need to be aware of the Phoenix Training Group's Lone Worker Policy and where to find this.

Any one-to-one sessions should be risk assessed and approved by the management team. Make sure staff know what safeguarding measures to take if they are having a one-to-one conversation with a learner.

All staff must use their Phoenix Training Group email when contacting learners **never tutors personal accounts**; make sure all phone calls to learners are **not carried** out from tutors' personal phones.

If staff members are accessing a learner's personal contact details while working from home, ensure they always comply with GDPR.

Child protection concerns

Staff must contact the designated safeguarding lead and deputy if they have any concerns about a learner. This may be because:

- a staff member sees or hears something worrying during an online lesson
- a learner discloses abuse during a phone call or via email

The designated safeguarding lead will keep a note of any contact numbers they may need if the Phoenix Training Group facilities are closed and follow the referral procedure and contact the relevant support services.

Online safety

Learners are likely to spend more time online due to social distancing which will be with us for some time to come. Staff should talk to them regularly about the benefits and risks of being online and allow them to ask questions and talk about anything that worries them.

These are some of the risks that they need to be aware of:

- Payment diversion / mandate fraud
- Identity fraud
- Misinformation campaigns (esp. 'cure'-related)
- Malware attached to coronavirus trackers
- Online shopping fraud (esp. pets who the fraudsters claim are in quarantine)
- Investment fraud
- Pension liberation fraud
- Data breaches (esp. unsecure video conferencing systems and failing PCI DSS)
- CEO fraud
- Phishing emails (generally)

All staff have access to the Phoenix Training Group's Cyber bullying and internet safety policy which should be reviewed when working with learners using online activities.

Links below are useful website that should be given to learners to raise awareness about being online.

<https://www.internetmatters.org/>

<https://www.common sense media.org/>

<http://www.itai.info/what-is-prevent/>

<https://www.net-aware.org.uk/>

<https://www.thinkuknow.co.uk/>

Implementation of Basic Infection Prevention Measures

Protecting staff and learners visiting any of the the Phoenix training groups offices will be prioritised due to current infection from Covid -19 with basic infection prevention measures being put in place these include:

- Frequent and thorough hand washing observing the 20 second rule also provide alcohol-based hand rubs containing at least 60% alcohol
- Staff and learners to ensure social distancing is always taking place when in the office and when conducting site visits with apprentices
- Staff and learners to stay home if they are sick
- Encourage respiratory etiquette, including covering coughs and sneezes
- Provide learners and staff with tissues and bins to dispose of waste

- The management team will implement staffing system to enable the functioning of the company with minimum staff in the office at any one time. This will increase the physical distance among staff and learners to enable social distancing
- Discourage staff and learners from using other phones, desks or other work tools and equipment, when possible that belong to someone else
- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment
- The Covid-19 declaration form must be read and signed by all learners and visitors to any of the Phoenix Training Group premises for any period of time over 1 day

We will ensure the office is run with maximum risk of non-infection taking place and need the assistance of all staff, learners, and visitors to follow these rules which will help keep risks as low as possible. Visits to toilets must follow the rule of one out one in for the time being to make sure social distancing is followed while on any of the Phoenix training groups sites.

Systems will be in place to ensure social distancing is observed when entering and leaving the offices this will include appointments times for learners which will need to be observed to help stagger flows and ensure all staff and visitors are safe.

Staff who use facilities such as kitchen areas. meeting rooms and rest areas need to ensure they use their own cutlery plates and cups, prepare their own food and drinks, and follow all hygiene and distancing rules during breaks.

All staff members who are required to make visits outside the office either through apprenticeship appointments or meetings must always follow social distancing rules. When visiting the company ensure they wash their hands on entering the premises and if not possible, use hand sanitiser which will be provided to all staff and face coverings where required. The company being visited will have their own rules in place to protect their own staff and visitors, all Phoenix Training Group staff must follow these rules also.

During lockdown we are encouraged to exercise and stay in contact with family and friends, plan your day so you have something to aim towards and keep active. Being placed into lock down can have a huge effect on anyone especially someone who may be suffering from mental health issues in their life, being able to connect with others is vital in their wellbeing. If any learners or staff suffer from any mental health issues during lockdown they are encouraged to reach out to their tutors, managers, and friends for support. Statistics have shown that over the first 2 month of lockdown depression, loneliness and anxiety have risen in both new and existing people.

What to do if you are feeling any of the above symptoms

- Try calling a friend, family member, health professional or counsellor to talk about your feelings
- You could also contact Samaritans, call: 116 123
- Join an online group or class that focuses on something you enjoy – that could be anything from an online exercise class, book club, learning new skills etc
- Consider going for short walks in public places (while keeping social distance rules)

Across UK, as lockdown begins to ease in different ways we will find challenging times are still ahead due to social distancing guidelines, we may be able to see friends and family in person, play sport or return to work however, many of us may find even these changes difficult and still have some anxiety about Covid-19 and being around others.

The Phoenix Training Group have put in place procedures that will protect all staff, learners and visitors to the premises and have the safety of all at the forefront of the company as staff begin to return to work.

Any visitors, learners or staff that are observed constantly not following these rules set out by the Phoenix training group, **which are in place for your safety will be asked to leave.**

Mental health and wellbeing

Learners may be worried about the impact of social distancing which will be with us for some time or self-isolation. Those who already have mental health difficulties such as anxiety might be finding things particularly tough. Talk to them about what is happening, check how they are feeling and keep them as well informed as you can.

Childline provides a range of online tools that young people might find helpful:

- information about [coronavirus](#)
- [Calm Zone](#) – activities to help let go of stress
- [games](#) to help take your mind off things

Childline can also give confidential help and advice. Calls to 0800 1111 are free or children can [get support online](#).

Further information can be gained by visiting the Department for Education (DfE) (2020) [Safeguarding and remote education during coronavirus \(COVID-19\)](#).

Prevent Contacts

- Phoenix Training Group Prevent Lead: Colin Ripley 01709 786411
Maria Blackie 01302 341313
Rebecca Harrison 01709 786411
- South Yorkshire Police: 101 (non-emergency) or 999 (emergency)
- South Yorkshire Prevent Practitioner: Inspector Brendan Pakenham,
Prevent Delivery/Channel Manager, 0114 2961374

The following members of staff have been designated as Safeguarding contacts. These Members of staff undergo specific training in order to be able to respond to incidents, and to advise and support other members of staff. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding policy documents and national updates).

They will also undertake Prevent awareness training.

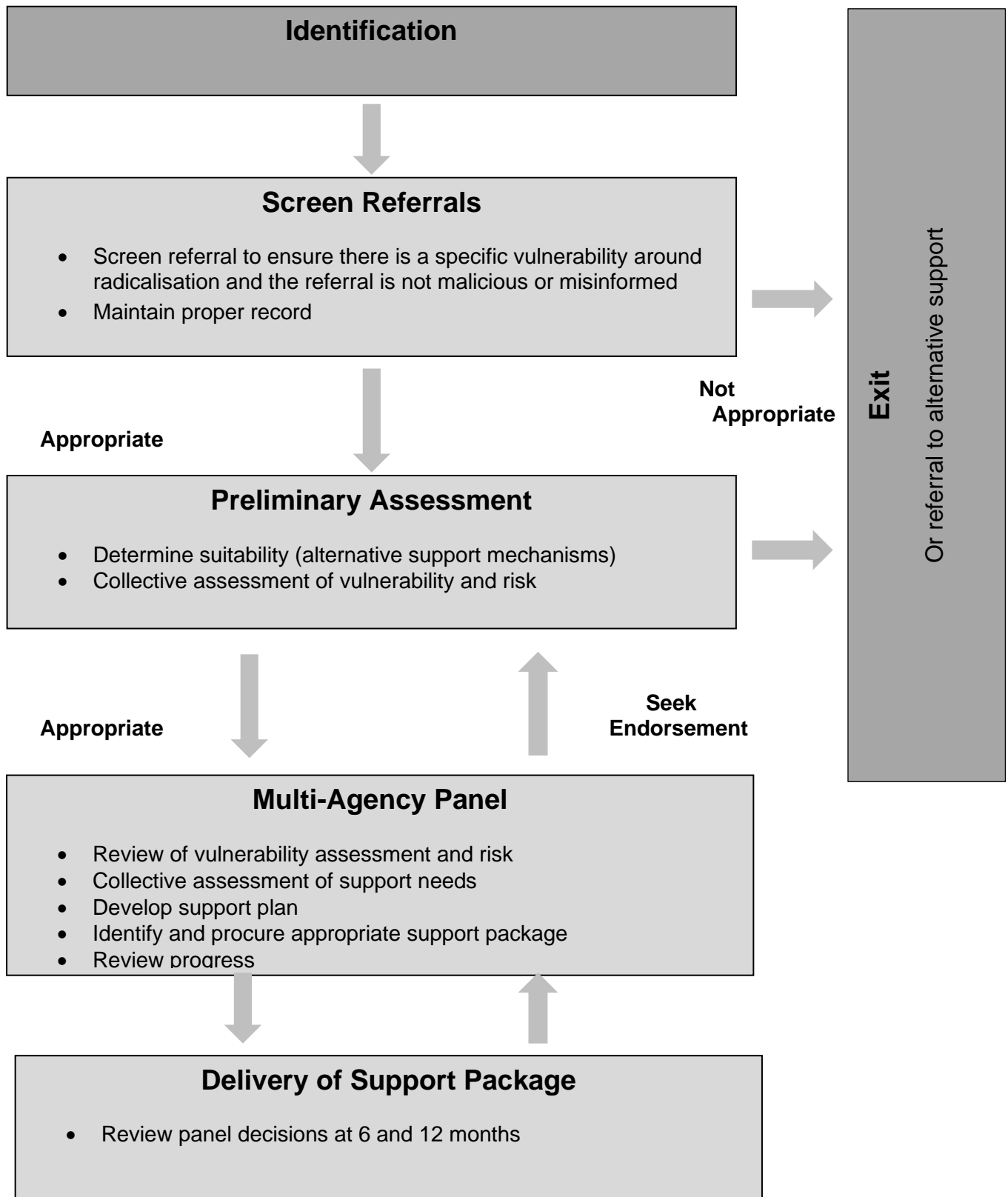
Appendix B- Responding to a disclosure / allegation of abuse

It is important that young people and vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously. If you encounter a safeguarding incident you should follow these basic guidelines. This procedure must be followed whenever an allegation of abuse is made or when there is suspicion that a young person or vulnerable adult has been abused.

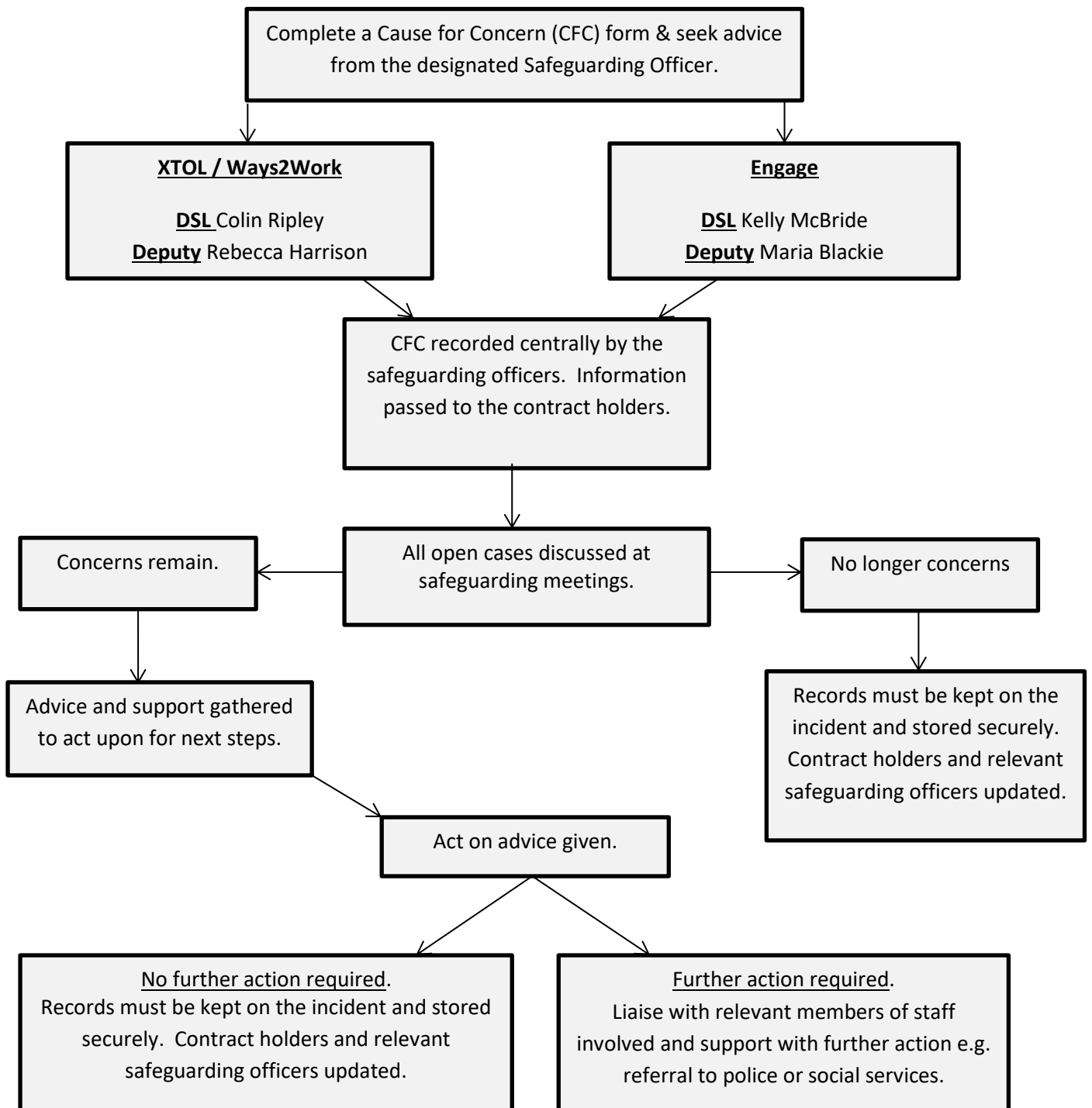
- Stay calm
- Listen carefully
- Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual – do not promise to keep secrets
- Allow the person to continue at her/his own pace
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer
- A full record shall be made as soon as possible of the nature of the allegation and any other relevant information. This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.
- Tell them what will happen next, with whom the information will be shared. Tell them that you will be speaking to the Safeguarding contact person who is responsible for their protection, and that they may contact the relevant Safeguarding Board if we feel it is necessary. Explain to the learner that the Safeguarding Board will advise us as to what we should do next.
- Record in writing what was said using the person's own words as soon as possible – note date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated. Use the Safeguarding Concern Form and the Safeguarding Concern report for reporting abuse
- Contact the Safeguarding Contact Person for further advice and for onwards referral, as necessary
- DO NOT talk to other people about the incident. Others should only be made aware of this on a 'needs to know' basis

This policy will be reviewed and updated on a regular basis by the Senior Management Team in line with Government changes.

The diagram below shows the different stages within the Channel process



Appendix C - Incident reporting procedure



Local Authority Safeguarding protection details

Sheffield Safeguarding Board
 Tel: 0114 273 4450
 Email: sscb@sheffield.gov.uk

Doncaster Safeguarding Team
 Tel: 01302 734100/737391/796000
 Email: ssfirst.team@doncaster.gov.uk (Adult)
dscb@dctrust.co.uk (Children)

Barnsley Safeguarding Children Board
 Tel: 01226 772423 or 438831
 Email: safeguardingunit@barnsley.gov.uk

Rotherham Safeguarding Board
 Tel: 01709 382121
 Email: CYPs-safeguardingboard@rotherham.gcsx.gov.uk

Leeds Safeguarding Children Partnership
 Tel: 0113 3786018
 Email: lscp.info@leeds.gov.uk

Wakefield & District Safeguarding Children Board
 Tel: 01924 306447
 Email: wdscevents@wakefield.gov.uk

NSPCC helpline: 0808 800 5000

Police:
 Non-emergency Tel: 101
 Emergency Tel: 999

Appendix D -Designated Person Flow Chart

