

## **Safeguarding Policy**

### **Scope**

This policy outlines Training Works 4 U's proactive response to the Safeguarding Vulnerable Groups Act 2006.

The term 'safeguarding children and young people' embraces both child protection and a preventative approach to keeping young people safe, it is relevant to those participants/customers under 18 years of age and vulnerable adults.

'Safeguarding' encompasses many aspects and has a bearing on many of Training Works 4 U's existing policies and practices including health and safety, equality and diversity, bullying, meeting the medical needs of those with medical conditions, providing first aid, security, support/safeguarding from drugs and substance abuse etc.

The definition of a vulnerable adult is derived from the Safeguarding Vulnerable Groups Act 2006 which defines a vulnerable person as: A person aged 18 and over who is:

- Receiving a social care service
- Receiving a health service
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of his/her affairs
- Receiving a service or participating in an activity targeted at older people

### **Policy Statement**

Training Works 4 U has a duty to safeguard and promote the welfare of children, young people, and vulnerable adults attending Training Works 4 U programmes. It will carry out these responsibilities under relevant legislation and formal guidance (Appendix 1).

Training Works 4 U will endeavour to:

- Provide a safe environment for children, young people and vulnerable adults in which to learn.
- Identify young people and vulnerable adults who are experiencing, or likely to experience significant harm, providing support and taking appropriate action with the objective of producing positive outcomes for the young person/vulnerable adult.
- Safeguard through the support given whilst on programme and by the promotion of an ethos where the young person/vulnerable adult feels secure is valued and listened to.

Related Policies/Areas of Activity

- Mission - Vision Statement
- Recruitment and selection
- Code of Conduct
- Health and Safety
- Whistle blowing
- Equality and Diversity

Training Works 4 U will strive to:

- Identify young people and vulnerable adults at risk of significant harm, or where there are concerns for a person's welfare; and provide procedures for reporting such concerns.
- Prevent unsuitable people from working with children and young people.
- Allow for reporting and dealing with allegations of abuse against members of staff.
- Work in partnership with local agencies.

- Provide a safe environment for young people and vulnerable adults to learn in.
- Contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours.
- Ensure all staff and visitors know they have an important role to play in safeguarding young and vulnerable adults and protecting them from abuse.

Training Works 4 U will take action to:

- Appoint and train a designated Safeguarding Officer who will coordinate reporting procedures. Name, role and contact details will be available to all staff and participants/customers.
- Train all staff in responsibilities for recognising abuse and responding appropriately with updates every 3 years. Induction training for all new staff working in the company.
- Keep accurate records of concerns about individuals, even when there is no need for immediate referral to outside agencies.
- Provide a systematic means of monitoring children and vulnerable adults who are thought to be at risk of harm; and contribute to assessments/support plans with other agencies.
- Make accessible sources of help and support for young people/vulnerable adults who may be experiencing abuse.
- Train staff in safe practices to safeguard people in the learning environment and also to protect themselves from false allegations of abuse.
- Implement the Training Works 4 U Whistleblowing Policy.
- Ensure safe recruitment practices by implementing Disclosure and Barring Services check (DBS) checks on all new and existing staff, taking of references, training interviewers to effectively establish suitability for role at the time of employment.
- Provide tutorials to help participants/customers develop their self-esteem, assertiveness and problem-solving skills and to promote their resilience.

## **Training Works 4 U Ltd Staff Guidance**

### **Introduction**

Staff have a crucial role to play in shaping the lives of some vulnerable people. They have a unique opportunity to interact with children and vulnerable adults in ways that are both affirming and inspiring. This policy has been produced to help staff establish the safest possible learning and working environments. The aims are to safeguard young people/vulnerable adults and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

### **Duty of Care**

Skills Development Coaches and other training staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect participants/customers/customers from discrimination and avoidable harm.

All staff have a duty to keep vulnerable people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and participants/customers/customers and behaviour by staff that demonstrates integrity, maturity and good judgement.

The ESFA, Employers, participants/customers and their parents have legitimate expectations about the nature of professional involvement in the lives of young and vulnerable people. When individuals accept a role that involves working with children and vulnerable people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

### **Exercise of Professional Judgement**

This policy cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child or vulnerable persons which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the child or vulnerable person in their charge and in so doing, will be seen to be acting reasonably.

### **Power and Positions of Trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and vulnerable people in education or training settings are in positions of trust in relation to the vulnerable people in their care. A relationship between a member of staff and a member or a vulnerable group cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour, which might be misinterpreted by others, and report and record any incident with this potential.

Where a person aged 18 or over is in a position of trust with a child under 18, it is an *offence* for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that that child to engage in or watch sexual activity.

### **Confidentiality**

Members of staff may have access to confidential information about young and vulnerable people in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information. They should never use confidential or personal information about a vulnerable person or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the vulnerable person.

Confidential information about a young or vulnerable person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the young or vulnerable person's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a young or vulnerable person, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated child protection responsibilities.

If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from a senior member of staff. Any media or legal enquiries should be passed to senior management.

The storing and processing of personal information about all participants/customers is governed by the Data Protection Act 1998. Training Works 4 U provides clear advice to staff about their responsibilities under this legislation.

### **Lone Working – Visits not conducted in an employer environment**

There may be occasions where Skills Development Coaches must visit their participants/customers in a non-Employer environment, this may be due to loss of Employment and disengagement.

We will always try to encourage participants/customers to be seen in an Employer environment or suitable alternative and home visits should be a last resort. However, there may be a need for a minority of participants/customers to be visited at home and in this case the Skills Development Coach will need to complete a 'Participant Safeguarding' form.

Once this form been fully completed the relevant information from the form will be logged on to a 'risk log', the risk log will be monitored and discussed during the performance review meetings. This will ensure that any risks are identified on an ongoing basis and any concerns will be identified and resolved in a prompt manner.

Skills Development Coaches diaries are monitored daily and can be viewed electronically by both the Skills Development Coach- and the allocated office staff members. The Skills Development Coach is responsible for assuring the Performance Manager of their safety daily by calling or contacting her to confirm that they are home safely.

### **Remote learning sessions**

Keeping our participants and staff safe during remote learning sessions is essential. The Skills Development Coaches delivering remote online learning session should be aware that the safeguarding principles apply in the same way as a face to face visit.

Virtual learning sessions can take place via Microsoft Team and will on occasions be recorded. Its important when carrying out the learning session the Skills Development Coach follows the below principles:

- Use company backgrounds.
- Ensure appropriate privacy setting are in place.
- Ensure all participants have a clear understanding of expectations around behaviour and participation.
- Ensure participants are comfortable with the recorded session and the camera being on.
- Ensure that you carry out basic checks to ensure the participant feels safe and is in a suitable environment to complete the learning session.

### **Extremism and Radicalisation**

Since 2010 when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Training Works 4 U values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Individuals have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Training Works 4 U is clear on its legislative and moral duty to view exploitation and radicalisation as a safeguarding concern and act accordingly.

Signs and Symptoms of Extremism or Radicalisation can include:

- being in contact with extremist recruiters.
- accessing violent extremist websites, especially those with a social networking element.
- possessing or accessing violent extremist literature.
- using extremist narratives and a global ideology to explain personal disadvantage.
- justifying the use of violence to solve societal issues.
- joining or seeking to join extremist organisations • significant changes to appearance and/or behaviour.
- experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis

Training Works 4 U ensure we comply with and support CONTEST, the Government's Counter Terrorism Strategy and in particular the PREVENT strategy to stop people from becoming terrorists or supporting terrorism.

### **Propriety and Behaviour**

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young and vulnerable people. They should adopt high standards of personal conduct to maintain the confidence and respect of their peers, participants/customers and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting.

Staff should support the place of Training Works 4 U in the community and should appreciate the importance of their own professional status in society. They recognise that professionalism involves using judgement over appropriate standards of personal behaviour.

### **Dress and Appearance**

A person's dress and appearance are matters of personal choice and self-expression. However, staff should consider the manner of dress and appearance appropriate to their professional role which may be different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation.

### **Infatuations**

Staff need to be aware that it is not uncommon for participants/customers to be strongly attracted to a member of staff and/or develop a heterosexual or homosexual infatuation; it is at this stage the participant can become vulnerable. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

A member of staff, who becomes aware that a participant may be infatuated with themselves or a colleague, should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

### **Social Contact**

Staff should not establish or seek to establish social contact with young or vulnerable people for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young or vulnerable person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued.

Staff should not give their *personal details* such as home/personal mobile phone number; home or e-mail address to young or vulnerable participants/customers unless the need to do so is agreed with senior management.

### **Behavior Management**

All participants/customers have a right to be treated with respect and dignity. Staff should not use any form of degrading treatment towards a participant. The use of humour can help to defuse a situation. The use of sarcasm, demeaning or insensitive comments towards participants/customers/customers is not acceptable in any situation.

### **Sexual Contact with Young People**

'Working Together to Safeguard Children', defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening'.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

## **Safeguarding Children, Young People & Vulnerable Adults Who Are Vulnerable to Extremism**

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people, vulnerable adults and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children, young people and vulnerable adults to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Training Works 4 U values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Participants/customers, Skills Development Coaches and staff have the right to speak freely and voice their opinions.

However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the UK may include the exploitation of vulnerable people, to involve them in Terrorism or in activity in support of Terrorism. The normalisation of extreme views may also make children, young people and vulnerable adults, vulnerable to future manipulation and exploitation. Training Works 4 U is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

### **Indicators of Vulnerability to Radicalisation**

- Identity Crisis – the participant is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the participant may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the participants/customers country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the participant may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of criminality – which may include involvement with criminal groups; imprisonment, and poor resettlement/reintegration.

This list however is not exhaustive, nor does it mean that all young people/vulnerable adults experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve social issues.
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis

Training Works 4 U will:

- Ensure that staff are aware who the single point of contact is in relation to protecting participants/customers from radicalisation and involvement in terrorism.



- Maintain and apply a good understanding of the relevant guidance in relation to preventing participants/customers from becoming involved in terrorism and protecting them from radicalisation by those who support terrorism or forms of extremism which led to terrorism.
- Raise awareness about the role and responsibilities of Training Works 4 U in relation to protecting Participants/customers from radicalisation and involvement in terrorism.
- Raise awareness within the company about the safeguarding processes relating to protecting Participants/customers from radicalisation and involvement in terrorism.
- Share any relevant additional information in a timely manner.

Training Works 4 U seeks to protect children, young people and vulnerable adults against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights movements.

When any member of staff has concerns that a participant may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Lead.

### **Safeguarding Children, Young People and Vulnerable Adults exposed to Abuse/Bullying through Digital/Social Media – E-Safety.**

Internet Abuse relates to four main areas of abuse to children, young adults and vulnerable adults.

- Abusive images (although these are not confined to the internet).
- A child, young person or vulnerable adult being groomed for the purpose of sexual abuse.
- Exposure to pornographic or other offensive material via the Internet.
- The use of the internet, and in particular social media, to engage children in extremist ideologies; and
- Cyber Bullying

The term digital and interactive technology covers a range of electronic tools. These are constantly being upgraded and their use has become more widespread through the Internet being available using text, photos and video. The internet can be accessed on mobile phones, laptops, computers, tablets, webcams, cameras and games consoles.

Social networking sites are often used by perpetrators as an easy way to access children and young people for sexual abuse, bullying and in addition radical and extremist groups may use social networking to attract children, young people and vulnerable adults into rigid and narrow ideologies that are intolerant of diversity; this is similar to the grooming process and exploits the same vulnerabilities.

Internet abuse may also include cyber-bullying. This is when a person is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another person using the Internet and/or mobile device. It is essentially behaviour between children, young people or vulnerable adults, although it is possible for one victim to be bullied by many perpetrators.

E-Safety is the generic term that refers to raising awareness about how children, young people and vulnerable adults can protect themselves when using digital technology and in the online environment, and examples of interventions that can reduce the level of risk for children, young people and vulnerable adults.

Training Works 4 U will:

- Where there is suspected or actual evidence of anyone accessing or creating indecent images of children, this must be referred to the Training Works 4 U Safeguarding Officer, Employer, Police and/or Children's Social Care.
- Where there are concerns about a child, young person or vulnerable adult being groomed, exposed to pornographic material or contacted by someone inappropriately, via the internet or other ICT Tools like a mobile phone, referrals should be made to Training Works 4 U Safeguarding Officer, the Employer and Police where necessary
- Where there are concerns about Cyber bullying referrals should be made to Training Works 4 U Safeguarding Officer, the Employer and Police where necessary.

### **One to One Situations**

Staff working in one-to-one situations with children and young people may be more vulnerable to allegations.

Skills Development Coaches, IQA's and others should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and participant/customer are met.

### **Whistle blowing**

Whistle blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Training Works 4 U has a clear and accessible whistle blowing policy that meets the terms of the Public Interest Disclosure Act 1998.

Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies at the earliest opportunity but within 2 hours of the incident being disclosed. This is particularly important where the welfare of young persons or vulnerable adults may be at risk.

### **Sharing Concerns and Recording Incidents**

In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to senior staff. Early discussion with a parent or employer could avoid any misunderstanding.

Members of staff are able to discuss with their Line Manager any difficulties or problems that may affect their relationship with participants/customers so that appropriate support can be provided or action can be taken.

### **Future Development**

Education providers of post-16 learning, and skills have responsibilities to ensure the safety of children, young people and those adults deemed 'vulnerable'.

Following the publication of the Safeguarding Vulnerable Groups Act in 2006, a new vetting and barring scheme will be established from November 2010. Training Works 4 U will ensure that its policies and procedures meet the requirements of the Act and will act accordingly to ensure the relevant employees adhere to the scheme.

### **Health and Wellbeing**

Training Works 4 U aims to create a safe and caring environment where the physical, mental and emotional health and wellbeing of staff and participants is a priority. Training Works 4 U understands the importance of supporting our participants and staff, we provide this support by establishing strong relationships with participants and identifying any support needs they may have. Training Works 4 U have a responsibility to measure the wellbeing of our participants, we do this by:

- Regularly review current records of participant needs, particularly pinpointing any known learning strategies which encourage the participant.
- Skills Development Coaches and Employers work together to support participants

Training Works 4 U ensure all staff are aware of the safeguarding policy and process and if they have any concerns this is highlighted to the Safeguarding officer as a priority.



### **Appendix 1– Definitions of abuse and reporting procedures**

Prompt and sensitive action, in accordance with these procedures may sometimes prevent actual abuse or reduce the level of harm if it has occurred. If a member of staff suspects or knows of abuse of a young person or vulnerable adult, they have a responsibility to act on those concerns immediately.

The ‘Safeguarding Risk Assessment’ Form should be completed by the recipient of disclosed information if the above were to take place.

## **Definitions and terms of abuse**

**Child** - A child is defined as someone who has not reached 18 years of age.

**Young Person** - A young person is defined as someone normally between the age of 14 – 17 years of age.

**Vulnerable Adult** - Following the Protection of Freedoms Act 2012 the definition of regulated activity relating to adults no longer labels adults as ‘vulnerable’.

Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received; or the personal characteristics or circumstances of the adult receiving the activities or the frequency in which they receive the service. An adult is defined as vulnerable when they are in receipt of a ‘regulated activity’ in relation to vulnerable adults. Regulated activity is therefore defined by the following 6 broad categories:

- Providing health care
- Providing personal care
- Providing social work
- Assistance with cash, bills and/or shopping
- Assistance in the conduct of a person’s own affairs
- Providing transportation of individuals where that transport is provided because of age, health or disability

For more information, please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

**Discriminatory Abuse** Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated by a person’s age, gender, disability, sexual orientation, race, cultural background or religion. Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime.

Where the abuse or neglect is motivated by age, gender, sexual orientation, immigration status, racial, religion or disability; or occurs in a domestic violence situation; or perceived as a Hate Crime: the abuse will be considered to be aggravated by these factors.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal discrimination is the prejudice of the individual, whereas Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service.

Signs and symptoms of Discriminatory Abuse can include:

- fearfulness expressed in the eyes, person avoids looking at the potential abuser, flinching on approach
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- isolation/shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions
- continual favouritism to other people in preference to the individual
- internalising the discrimination to the extent that they express similar discriminatory views about others

## **Other types of Abuse which could be considered Discriminatory:**

**Hate Crimes:** any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.

**Ageism:** discrimination based on age, especially against the elderly.

**Gender Discrimination:** is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives and status greater than those of the inferior sex.

**Homophobia:** discrimination against (fear or dislike of) homosexual people and homosexuality

**Transgender Discrimination:** discrimination against people who are transgender

**Religious Intolerance:** is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.

**Racism:** the belief that all members of each race possess characteristics or abilities specific to that race, especially so as to distinguish it as inferior or superior to another race or races.

**Disablism:** discriminatory, oppressive or abusive behaviour arising from the belief that disabled people are inferior to others.

### **Physical Abuse**

Physical Abuse is the physical mistreatment of one person by another which may or may not result in physical injury. Physical abuse includes assault, hitting, slapping, scratching, pushing, kicking, pinching, burning, force-feeding, misuse of medication or the withholding of medication or treatment, unwarranted or inappropriate restraint, forced isolation or inappropriate sanctions, unwarranted or unauthorised deprivation of liberty, false imprisonment or abduction, rough handling causing injury, or any injury not fully explained by the history given.

#### **Signs and symptoms of Physical Abuse can include:**

- unexplained bruises or welts on body, including face, lips, mouth, body, arms, back, buttocks, thighs
- bruises in various stages of healing, clusters forming regular patterns, reflecting the shape of an article or finger marks
- unexplained burns, especially on soles, palms and back, immersion burns, rope burns, electric appliance or carpet burns
- unexplained fractures to any part of the body, especially if in various stages of healing, multiple or spinal injuries
- unexplained lacerations or abrasions to the mouth, lips, gums, eyes, external genitalia
- recoiling from physical contact or flinching
- malnutrition – rapid or continuous weight loss, insufficient supply of food on premises, dehydration, complaints of hunger
- lack of personal care, inadequate or inappropriate clothing, inadequate heating
- untreated medical problems
- unmanaged urinary/faecal incontinence
- signs of medication misuse such as drowsiness
- use of furniture and other equipment to restrict movement

#### **Other types of Abuse which could be considered Physical:**

**Domestic Violence:** any incident, or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners, or family members regardless of gender or sexuality.

**Forced Marriage** is a marriage conducted without the valid consent of one or both parties where duress is a factor. Forced Marriage is a violation of internationally recognised human rights and contrary to the Matrimonial Causes Act 1973.

**‘Honour’ Based Violence** is an incident or crime carried out to protect or defend the honour or ‘izzat’ of the family or community. This type of violence can be distinguished from other forms of violence as it is often committed with some degree and or collusion from the family and/or community. Honour based violence includes acts of harassment, assault, imprisonment, unexplained death (suicide), forced pregnancy/abortion and in some cases murder. The family may perceive that the person has acted inappropriately and dishonored the family and community. Consequently, the violence carried out is to punish them for this. For more information about honour-based violence visit Karma Nirvana’s website [www.karmanirvana.org.uk](http://www.karmanirvana.org.uk)

**Environmental Abuse:** includes depriving someone of their liberty, sustained restrictions on a person’s freedom of movement as a result of the physical environment the person is in, culture of the environment or institution. It can also mean a child living without expressions of love, living in unsuitable /unclean accommodation.

**Sexual Abuse:** Sexual abuse is the involvement of individuals in sexual activities to which they have not had the freedom and capacity to give their informed consent to, before and during the act, and/or may not fully comprehend. These acts include rape and attempted rape, sexual assault by penetration, sexual assault, abuser touching the victim’s body for their own gratification, indecent exposure, non-contact abuse (pornography), and sexual harassment, causing or inciting a person to engage in sexual activity without their consent. The use of social media and the internet has introduced ‘cyber’ sexual abuse such as ‘sexting’ and un-authorized sharing of sexual images.

Signs and symptoms of sexual abuse can include:

- full or partial disclosure or hints of sexual abuse
- signs of depression, stress
- recoiling from physical contact
- unusual difficulty in walking and sitting
- sexually transmitted disease, urinary tract/vaginal infections
- love bites, bruises or finger marks on thighs or arms
- significant change in sexual behaviour, language or outlook
- fear of males or females
- pregnancy in a person who is not able to consent
- Worries over social media content and sharing of personal content (see Cyber Abuse)

**Other types of Abuse which could be considered Sexual:**

### **Female Genital Mutilation**

(FGM) is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other non-therapeutic reasons.

### **Sexual Exploitation**

Sexual exploitation of young people and vulnerable adults involves exploitative situations, contexts and relationships where the vulnerable person receives ‘something’ (e.g., food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/boyfriend as a result of them performing, and/or others performing on them, sexual activities.

### **Psychological/Emotional Abuse**

Psychological or emotional abuse is action or neglect by a person which impairs the psychological wellbeing of another person. This results from being repeatedly made to feel unhappy anxious afraid humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. People who use social media can be at risk from being humiliated or abused ‘on-line’

Signs and symptoms of Psychological/Emotional abuse can include:

- fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach

- ambivalence to carer
  - emotional withdrawal
  - sleep disturbance
  - low self-esteem
  - unexplained fear or defensiveness
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- threats or intimidation, bullying or shouting
  - significant pressure on a person to commit criminal acts
  - threat to abandon person or put them “away”
  - promises which are not kept
  - few visitors, phone calls or outings
  - locking the person in at home, or in a car
  - significant community pressure for example anti-social behaviour
  - Withdrawing from on-line or reality social groups (see Cyber Abuse)

### **Other types of Abuse which could be considered Psychological:**

**Anti-Social Behaviour:** acting in a manner that caused or was likely to cause harassment alarm or distress to one or more persons not of the same household as the defendant.

**Discriminatory Abuse:** as described above

### **Cyber Abuse**

The use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and wellbeing or discriminate against an adult at risk. This could be through the use of a PC, laptop, tablet, mobile phone, gaming console or television with internet access. Threats can come through content, contact and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room messages, instant messaging and websites. Signs and symptoms can include spending long periods of time online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming. For more information see [www.digital-stalking.com](http://www.digital-stalking.com)

**Financial or Material Abuse** Financial abuse is the misappropriation of an individual’s funds, benefits, savings, assets etc. or any other action that is against the person’s best financial interests. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, denying access to money, or the misuse or misappropriation of property, possessions or benefits.

Signs and symptoms of Financial/Material Abuse can include:

- unusual or inappropriate bank activity
- a Power of Attorney obtained when a person is unable to comprehend
- recent change of deeds or title of house
- person lacks belongings or services which they can clearly afford
- recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- carer asks only financial questions of the worker, does not ask questions about care • withholding money
- person managing financial affairs is evasive or uncooperative.

### **Neglect and Acts of Omission**

Neglect is the deliberate withholding OR unintentional failure to provide appropriate and adequate care and support. Section 44 Mental Capacity Act 2005 states “Anyone who has a duty of care to a person who lacks capacity is guilty of an offence if they deliberately or recklessly ill-treat that person or if they willfully neglect that person.”

It does not matter whether the behaviour was likely to cause, or actually caused, harm or danger to the victim's health. Willful neglect usually means that a person has deliberately failed to carry out an act they knew they had a duty to do.

Signs and Symptoms of Neglect and Acts of Omission can include:

- physical condition of the person is poor
  - unexplained or untreated deterioration in health and wellbeing, including not seeking appropriate medical attention
  - inadequate heating or lighting
  - poor personal hygiene
  - malnutrition – loss of weight
  - dehydration
- 
- demanding food or drink
  - pressure sores
  - inconsistent or reluctant contact with health or social agencies
  - lack of social support and/or refusal to arrange access to callers/visitors
  - inappropriate, old or shabby clothing, or being kept in night clothes during the day
  - sensory deprivation, not allowed to have hearing aid, glasses or other aids to daily living
  - accumulation of medication, or prescriptions not being collected from pharmacy
  - increased number of incidents or accidents e.g., falls or physical altercations with others, which appear to have resulted from a lack of supervision both inside and outside of the home environment

### **Involvement of parents/carers**

Insensitive action may result in breakdown in relationships between young people/vulnerable adults and the family, which can damage attachment and may make a person more vulnerable. Co-operation is usually necessary to keep the person safe. A working relationship between professionals and the family needs to be maintained. People are generally less likely to change if they feel judged within a framework of blame and deficit. Both can adversely affect outcomes.

Research has shown that to narrow a focus on abuse may lead to some situations being handled in an unnecessarily heavy-handed way.

Where possible, referral to other agencies should be discussed with parents/carers before referral. This must be weighed against increased risk if abuser is forewarned, or if no action is taken.

### **Support for Children and Vulnerable Adults**

#### **In Training Works 4 U:**

Jane Lanaghan - Director

Contact on 07402 070767

#### **External agencies**

Samaritans: 08457 909090

All referrals to Children's Social Care: 0845 345 9122

Childline: 0800 1111

#### **Duty of Care**

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect young people and vulnerable adults from discrimination and avoidable harm staff should develop respectful, caring and professional relationships between themselves and young people. Staff behaviour should demonstrate integrity, maturity and good judgement. e.g. management of risk in external visits/residential visits.

#### **Breach of Trust**

Under the Sexual Offences Act 2003, It is an offence for a person over 18 e.g., teacher to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual.



## **Appendix 2 – Roles and Responsibilities**

### **Role of the Directors**

- Policies and procedures are fully implemented and followed by all staff.
- Sufficient resources and time are allocated so that Designated Person and staff can attend strategy discussions, interagency meetings, contribute to assessments etc.
- Staff feel able to raise concerns about practices by addressing these sensitively and effectively in a timely manner in accordance with whistle blowing policies.
- Make policy/procedures available to parents/carers on request.
- Operate safe recruitment and ensure checks on new staff are carried out if appropriate.

### **Role of the Safeguarding Officer:**

Jane Lanaghan is the Safeguarding Officer and may be contacted on 07402 070767

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the company when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with Manager to inform of any issues/ongoing investigations and ensure there is always cover for the role.
- Training in how to recognise signs of abuse, and when it is appropriate to make a referral.
- Working knowledge in how Local Children's Safeguarding Boards (LCSB) work, the conduct of case conferences, and be able to attend and contribute to these when necessary.
- Ensure all staff have access to and understand the company Safeguarding policy.
- Ensure all staff have induction training and are able to recognise and report any concerns as they arise.
- Ensure staff receive training/updates when the policy is updated or reviewed.
- Keep detailed, accurate and secure written records of referrals/concerns.
- Have access to resources and attend relevant or refresher training courses at least every 2 years.
- Ensure the Safeguarding policy is updated and reviewed annually.
- Ensure participants/customers/parents/carers see copies of the Safeguarding policy, which alerts them to the fact that referrals may be made, and the role of the company.
- Where a young/vulnerable person leaves Training Works 4 U, ensure the file/information is transferred to a new provider.

### **Whistleblowing**

Staff should acknowledge their individual responsibility to bring matters of concern to the attention of senior management using the Training Works 4 U Whistle Blowing Policy and/or relevant external agencies (Public Interest

Disclosure Act 1998) this should be a mechanism by which staff can voice concerns, made in good faith, without fear of repercussion.

### **Appendix 3 – Staff Training**

All staff will receive adequate training to familiarise themselves with Safeguarding issues and responsibilities

#### **Key messages:**

- Abuse can affect any young person or vulnerable adult and may be carried out by anyone. It is usually carried out by someone well known to the person.
- Safeguarding is everyone's responsibility.
- Abuse has a profound emotional and/or physical effect on the young/vulnerable person, the family and the wider community.
- All people who work with young people and vulnerable adults need to know of their responsibilities.
- Some groups of young/vulnerable adults seem to have an increased risk of abuse, for example, children with disabilities or children living in stressful, violent or chaotic situations.
- The prevalence of abuse.
- Signs which may indicate abuse.
- Up to date legislation and guidance.
- The roles of individual agencies, and the importance of working together.

The Outcome of training will be that all staff will:

- Be vigilant and sensitive to situations where a young person may be at risk. Develop their understanding of the signs and indicators of abuse.
- Know how to respond to a young/vulnerable person who discloses abuse.
- Treat all information received with sensitivity and with regard to confidentiality and its limits in Safeguarding matters.
- Behave, dress, talk to young/vulnerable people in an appropriate way i.e., non-sexual, non-aggressive, not abuse trust etc.
- Avoid situations where they may be at risk of false allegations e.g., safe practice with interviewing, travelling in cars.
- Seek the advice of the Safeguarding Officer if they have concerns about a situation where they feel they may be vulnerable, such as a young/vulnerable person may have a crush on them.
- Respect and promote the rights, wishes and feelings of young/vulnerable people, and be sensitive to their developmental needs and capabilities.

- Regard all young/vulnerable people as having an equal right to protection irrespective of age, culture, disability, gender, language, religious belief or sexual identity.
- Regard the interests and safety of the young/vulnerable person to be paramount. Where there is conflict of interest between the young/vulnerable person and an adult, the welfare of the young/vulnerable person will be considered paramount.
- Work in partnership with young/vulnerable people and their parents/carers.
- Be effective role models.

Training Staff have a responsibility for Educating Young/Vulnerable Adults about issues of Safeguarding. This will be part of the training.

It is important to make young and vulnerable people aware of behaviour towards them that is not acceptable and how they can help keep themselves safe. Opportunities for young/vulnerable people to learn about keeping safe; and who to ask for help if their safety is threatened should be available. As part of developing a healthy, safer lifestyle, participants/customers should be aware, for example:

- To recognize and manage risks in different situations and then decide how to behave responsibly.
- To judge what kind of physical contact is acceptable and unacceptable.
- To recognize when pressure from others threatens their personal safety and well-being and develop effective ways of resisting pressure; including knowing when and where to get help.
- To use assertiveness techniques to resist unhelpful pressure.

Issues such as domestic abuse can be difficult to broach directly in the work /training environment. However, discussions about personal safety and keeping safe can reinforce the message that any kind of abuse is unacceptable; let young/vulnerable people know that it is okay to talk about their own problems; and signpost sources of help. Raising these issues can lead young/vulnerable people to bring up personal problems and concerns and staff delivering sessions on these subjects need to be prepared for that possibility.

Training staff need to know how to listen to Young People and Vulnerable Adults. Experience, and consultation with young/vulnerable people, shows that they will talk about their concerns and problems to people they feel they can trust, and they feel comfortable with. This will not necessarily be a Skills Development Coach or Skills Development Coach. It is therefore essential that all staff in the company know how to respond sensitively to a young person's concerns, who to approach for advice about them, and the importance of not guaranteeing complete confidentiality.

Young people and vulnerable adults also want to know that they will be listened to, and their concerns will be taken seriously, so we will seek to provide a positive experience and demonstrate to young/vulnerable people that we provide them with a safe environment where it is okay to talk. Displays of helpful information about such things as national children's help lines (Child Line, NSPCC) and peer support schemes for young people in easily accessible places can encourage them to share concerns.

#### **Appendix 4 - Relevant Statutory Legislation and Guidance:**

The Children Act, 1989, provides the legal framework for child protection Section 175 of the Education Act 2002 came into force in June 2002, and created an explicit duty to strengthen arrangements for safeguarding children The following guidance is issued by the Secretary of State:

<i>Criminal Records Bureau: Managing the Demand for Disclosures DfES/0780/2002</i>
<i>Child Protection: Preventing Unsuitable People from Working With Children and Young Persons in the Education Service DfES/0278/2002</i>
<i>Child Protection: Procedures for Barring or Restricting People Working with Children in Education (July 2003)</i>
<i>Caring for Young People and the Vulnerable: Guidance for preventing abuse of trust (published by the Home Office, Department for Education and Employment, Department of Health, National Assembly for Wales and the Northern Ireland Office)</i>
<i>Safeguarding Vulnerable Groups Act 2006</i>
<i>The Safeguarding Vulnerable Groups Act 2006 (Regulated Activities) (Coronavirus) Order 2020</i>
<i>Mental Capacity Act 2006</i>
<i>Protection of Freedoms Act 2012</i>
<i>Matrimonial Causes Act 1973</i>

Health and Safety: Responsibilities and Powers DfES/0803/2001

Safe Keeping – A Good Practice Guide for Health and Safety in Study Support DfES/0197/2000

**Appendix 5 – Documentation**

<b>Safeguarding Risk Assessment - Strictly Confidential</b>			
<b>Personal Information</b>			
Name:	Date of Birth:	Sex M: <input type="checkbox"/>	F <input type="checkbox"/>
Current Address:			
Telephone Number:			

Date:	
<b>Risk Assessment</b>	
Are there factors which may mean the alleged victim is more vulnerable?	
Level of mental capacity (initial assessment)	
Physical disability	
Level of emotional dependency	
Level of financial dependency	
Communication needs	
Social or cultural isolation	
High levels of stress	
<b>What is the Possible Issue?</b> <i>(Detail what risks have been identified, how the risk was identified alongside the evidence provided?)</i>	
<b>What is the Potential Extent of the Safeguarding Issue, Including Abuse?</b> <i>(Detail what is the actual or potential harm caused by the alleged abuse and what is the worst possible outcome)</i>	
<b>Assessment of the seriousness of the alleged abuse</b> <i>(Please detail the length of time the abuse has been occurring, whether any previous concerns have been raised, how it has impacted the individual and others – how will the situation be monitored?)</i>	
<b>Assessment of the risk</b>	
<i>The risk should be considered high if: There is reason to believe that someone's life may be in danger, there is reason to believe that major injury or serious physical or mental ill health could result, the incidents are increasing in frequency and/or severity or the abusive behaviour is persistent and/or deliberate Please discuss is there a history of abuse or domestic violence, does the alleged perpetrator still have access to the victim, Are supportive and monitoring measures in place, or can they be put in place.</i>	



**What are the wishes of the participant**

*(What is their view of what has happened, does the person understand the risks around the situation they are in, do they want to remain in their current environment, do we need to consider the views of the family, does the participant want to involve the police or other agency)*

Does the participant consent to the information being shared with others?

Yes

No

**Are there issues which mitigate the risk (protective factors)?**

*(Please details and consider what support services are in place, what is the current relationships with family, friends, neighbours who do not present a risk, what access to social/support groups do they have. Are they aware of personal safety/security within the home, do they have access to mainstream and specialist services - What is the immediate protection plan to be agreed with Director)*

**What is the ongoing plan?**

*(Comment on how often the situation will be reviewed and how will the alleged victim and carer/family (where appropriate) be kept informed)*

**Note to user:** When you have fully completed this form send via recorded delivery only to:

**Jane Lanaghan/Safeguarding Officer  
Training Works 4 U,  
Unit 9, Universal House,  
41 Catley Road,  
Sheffield, South Yorkshire,  
S9 5JF**

If you require any guidance upon completion of this form, please contact Jane Lanaghan via the above contact details.

I ..... (Safeguarding Officer name) confirm that the above details were reported to  
(Prime Provider Name)

..... (Contract Manager name) ..... on  
..... (date).

Signature \_\_\_\_\_ Name \_\_\_\_\_ Date \_\_\_\_\_

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Person Responsible for policy and review	Director