

Safeguarding and Prevent Policy

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7.3	January 2023	Review and amendment re KCSIE 2022, Martyn's Law - Protect Duty, Defining process for allegations against TSH members of staff	Bev McGowan	January 2024

Approved by: Bev McGowan, CEO

Date: 6 January 2023

Signed:




Introduction

The Prevent and Safeguarding Policy for The Specialists Hub reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual or emotional abuse, neglect and bullying. We are committed to providing a caring, friendly and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

The Specialists Hub have a statutory requirement under Sections 27 and 47 of the Children Act 1989 to assist the Local Authority Social Services Department acting on behalf of children in need. The Specialists Hub will safeguard and promote the welfare of children in compliance with the DfE guidance Keeping Children Safe in Education (July 2015) KCSIE (September 2016 updated September 2022) and associated guidance, Working Together to Safeguard Children (2015) WT in addition to the Care Act 2014. The Specialists Hub also complies with the statutory guidance on children who run away or go missing from home or care (January 2014) and The Prevent Duty (The Counter-Terrorism and Security Act June 2015) and Social Media for Online Radicalisation (July 2015) and this Policy should be read in conjunction with these procedures and guidance.

The main aims of this policy are to ensure that staff are fully engaged in being vigilant about raising awareness; that they overcome professional disbelief that such issues will not happen at The Specialists Hub and ensure that we work alongside other professional bodies and agencies to ensure that our apprentices and staff are safe from harm.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views. At The Specialists Hub, we are fully committed to safeguarding and promoting the welfare of all learners and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

At The Specialists Hub, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.



The principal objectives of this policy are that:

All staff will understand what radicalisation and extremism are and why we need to be vigilant.

All apprentices and staff will know that The Specialists Hub has policies in place to keep them safe from harm and that The Specialists Hub regularly reviews its systems to ensure they are appropriate and effective.

The Specialists Hub's curriculum promotes respect, tolerance, and diversity. Apprentices and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

It is recognised that apprentices or staff with low aspirations are more vulnerable to radicalisation and, therefore, we strive to equip our apprentices and staff with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Apprentices and staff are briefed during induction about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the Internet.

Inappropriate websites are banned and cannot be accessed from The Specialists Hub premises.

The Specialists Hub staff, contractors, associates and volunteers undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties.

Through various training opportunities within The Specialists Hub, we ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; are aware of the process of radicalisation and how this might be identified early on.

All staff will receive update sessions annually to refresh knowledge on safeguarding and prevent. This is to ensure that prior knowledge is retained and any new topics are taught.

Scope:



This policy is applicable to all staff, learners, visitors, contractors, volunteers, service providers, subcontractors who may be working with children (those under 16), young persons (those aged 16 - 18) and vulnerable adults (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006 and/or those persons aged 18 and over who by reason of mental or any other disability, age or illness are or may be unable to look after themselves or are or maybe unable to protect themselves against harm or exploitation) whom The Specialists Hub encounters through any of their programmes.

Aims:

The aims of this Policy are:

- To identify the expectations of staff in relation to safeguarding
- To ensure relevant and effective safeguarding practices are in place
- To ensure the right of every applicant and apprentice to learn within a safe environment
- To promote awareness to staff of the need to safeguard children, vulnerable adults and all people and to recognise that safeguarding is everyone's responsibility
- To ensure that the fundamental rights and needs of our applicants and apprentices are observed
- To prevent abuse through the pastoral support offered to all applicants and apprentices
- To raise awareness of different types of abuse and children in need issues
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse
- To ensure staff act professionally
- To deter potential, unsuitable individuals from applying to The Specialists Hub by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- To reject at interview stage anyone where we have doubts about suitability
- To prevent the risk of abuse by ensuring procedures and standards are in place
- Academies to enable all staff to recognise the signs and report accordingly

Please note: in order to retain relevancy, this policy is reviewed annually in correlation with a meeting between The Specialists Hub's CEO and Safeguarding Officer. This is in order to monitor the effectiveness of our safeguarding strategy.



Definitions

What is "abuse"?

Abuse is a violation of an individual's human or civil rights by another person and may consist of a single act or multiple acts. As well as physical and psychological abuse, acts of neglect or an omission to act may amount to abuse. Abuse may also occur when a child or vulnerable adult is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent.

Physical abuse – causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be a deliberate failure to prevent injury.

Neglect – is the persistent or severe failure to meet a physical and/or psychological need.

Sexual abuse – involves a child, young or vulnerable person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the consent of the child is irrelevant.

Emotional abuse – occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young or vulnerable person's behaviour and emotional development, resulting in low self-worth.

Children and Young Persons/Vulnerable Adults

'Children and young people' in terms of this policy mean those under the age of 18. Vulnerable adults are aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or being exploited.

Support – The Specialists Hub will take appropriate action to ensure that staff, apprentices and clients are kept safe, at home, in work and at our centres by working in partnership with external agencies and promoting welfare.



Safeguarding and Recruitment**Recruitment**

The Company will make it clear when advertising jobs whether the work will involve "regulated activity" as defined by the Protection of Freedoms Act 2012 (amending the Safeguarding Vulnerable Groups Act 2006).

Before an applicant can be employed in a regulated activity, the Company will require individuals to provide a satisfactory Enhanced Disclosure from the Disclosure and Barring Service (DBS) with a barred list check to confirm suitability to carry out regulated activity.

Safer Recruitment, selection and employment procedures

- The Specialists Hub take all appropriate steps to ensure that unsuitable people are prevented from working with vulnerable people.
- Each Job Description clearly states the responsibility of the post holder to safeguard children and vulnerable adults.
- The Specialists Hub ensure that any member of staff or any student who will have substantial one to one contact with children, young people or vulnerable adults will be Data Barring Service enhanced checked for relevant criminal convictions.
- The Specialists Hub has a duty to comply with the Safeguarding Vulnerable Groups Act 2006.

Work that becomes a regulated activity

If the work undertaken either becomes a regulated activity or where an individual is asked to perform work that is a regulated activity, the Company will require a satisfactory Enhanced Disclosure with a barred list check to confirm suitability to carry out regulated activity

If an individual refuses to undertake this check, or if appears on the barred list, the Company will investigate whether it is possible they can continue to be employed in activities that are not regulated activities, but the Company reserves the right to terminate an individual's employment if no suitable alternative can be identified.



If an employee is added to a barred list during their employment

If an employee is added to a barred list during their employment, the Company will be legally obliged not to allow them to engage in any further regulated activity. This may mean that the Company cannot continue to employ them.

If the Company receives notification that an individual has been barred, the Company will investigate whether they can continue to be employed in activities that are not regulated activities, but in these circumstances the Company reserves the right to terminate their employment without notice.

The Company's duty to refer information

By law, the Company has a duty to refer certain information to The Independent Safeguarding Authority (ISA). This includes:

- if the Company has dismissed an individual because he or she has harmed, or may harm, a vulnerable adult or child
- if an individual has resigned from employment with the Company in circumstances where there is a suspicion that he or she has harmed, or may harm, a vulnerable adult or child (this will apply where an allegation has been made and the employee resigns before the Company can take investigatory action)

if the Company has suspended an individual and has reason to think the employee has engaged in "relevant conduct" or has harmed, or may harm, a vulnerable adult or child, or has received a caution or a conviction for, a relevant offence.

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults. All members of staff, consultants and trainers working in settings with children, young people or vulnerable adults, present on site, must have a current DBS (within 3 years) and submit a copy to the Designated Safeguarding Officer. All members of staff, consultants and trainers working in settings with children, young adults or vulnerable adults, present on site, must have completed PREVENT and safeguarding in the last year. This will be checked as part of occupational competency.

The Safeguarding Children and Safer Recruitment in Education guidance which came into force on 1st January 2011, recommends that in addition to the various staff records which are kept as part of normal business, The Specialists



Hub will keep and maintain a single central record of recruitment and vetting checks. (Last updated 26 April 2012). The Specialist Hub will apply principals of Safer Recruitment to staff working with children, young adults and adults at risk of harm as part of their apprenticeships. It will be the employer/ workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures. The Specialist Hub will not undertake DBS checks for apprentices. All staff who participate in the recruitment process are required to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received Safer Recruitment training.

See Safer Recruitment policy

List of posts that require appropriate type of DBS and barring list check

JLMS Management Posts	No check	Enhanced DBS check	Enhanced DBS check (Child Barred List)
Main learner facing teams (e.g., Assessors, EPA's Learner Support Tutors)			✓
Potential to be learner facing (e.g., Area Managers, Internal Quality Assurers)			✓
Learner contact with potential influence (e.g., Apprenticeship Recruitment)		✓	
Other field based staff (e.g., Account Managers)	✓		
Other head office staff (e.g., IT)	✓		



Roles and Responsibilities

The Designated Safeguarding Officer has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the Company and of overseeing the referral of cases of suspected abuse or allegations.

The Designated Safeguarding Officer will maintain their skills and knowledge levels across Safeguarding and Prevent with annual updates from an external body, working closely with sector experts and regional LADO's and Prevent leads to ensure currency of information.

As part of this role they will monitor and manage the dissemination of all safeguarding and prevent updates to the team.

All members of staff will undertake regular updates utilising the Education and Training Foundation series of educational qualifications annually and on commencement of employment.

Standardisation and dissemination of information/updates will be run monthly as part of the staff meetings and national policy changes disseminated via My Concern to support Caspian newsletters.

The Designated Safeguarding Officer is Hannah Lloyd

The Designated Safeguarding Officer has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the Company and of overseeing the referral of cases of suspected abuse or allegations.

The Deputy Safeguarding Officer is Bev McGowan

Contact: safeguarding@specialistshub.co.uk

0800 538 5680

Alternatively, contact directly:

Hannah@specialistshub.co.uk

bev@specialistshub.co.uk

teresa@specialistshub.co.uk

Ref: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>



Procedure

Employees must remain vigilant at all times of the risk to clients of abusive behaviour from different sources including members of their family, other clients and employees.

Any suspicion, allegation or incident of abuse employees must be referred to a line manager (or another manager if appropriate) for full investigation.

If the alleged perpetrator of abuse is another employee, the circumstances will be investigated fully under the Company's Disciplinary Procedure.

If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the Designated Safeguarding Officer within 24 hours.

If necessary, the Company will refer details of the circumstances to the Independent Safeguarding Authority.

Responding to suspicions and allegations if concerns a member of The Specialists Hub staff

The procedures apply to all staff, consultants, and trainers whether teaching, administrative, management or support.

Employees must remain vigilant at all times of the risk to clients of abusive behaviour from different sources including members of their family, other clients and employees.

Allegations of abuse against a member of staff can be defined as when a person has: -

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm
- Possibly committed a criminal offence against or related to a child, young person or adult at risk of harm
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm.

Following an allegation of abuse against a member of staff, consultant or trainer, the Designated Safeguarding Officer would inform the appropriate authority (LADO, Police).

Any suspicion, allegation or incident of abuse employees must be referred to a line manager (or another manager if appropriate) for full investigation.



If the alleged perpetrator of abuse is another employee, the circumstances will be investigated fully under the Company's Disciplinary Procedure.

The member of staff, consultant or trainer would either be suspended or not offered any further work until the outcome of the allegation is confirmed.

If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the Designated Safeguarding Officer within 24 hours.

If necessary, the Company will refer details of the circumstances to the Independent Safeguarding Authority. Dealing with suspicious or allegations of abuse.



Dealing with suspicious or allegations of abuse

- Concerns for the safety and well-being of children, young persons or vulnerable adults could arise in a variety of ways and in a range of different settings. For example, a child may report or display signs of abuse, someone may hint that a child is at risk or that a colleague is an abuser, an individual may witness or hear about abuse in another organisation. It is essential to act quickly and professionally in all cases of suspected abuse.
- Any allegation by a child, young person or vulnerable adult against a member of staff, another student or volunteer should be reported immediately to the (Safeguarding Lead) relevant individual who has responsibility under this policy. In dealing with such allegations The Specialists Hub has a duty of care to the individual and staff member, student or volunteer against whom the allegation has been made.

The difference between an 'allegation' and a 'concern'

- An allegation is classed as such when the alleged incident is sufficiently serious as to suggest that harm was caused, intended to be caused, or posed a risk of harm. Issues that do not meet this threshold may constitute conduct or disciplinary issues and should be addressed by the normal disciplinary method.
- Concern constitutes a feeling of worry that the individual has committed an offence but with no solid evidence of the individual having done so. This situation should still be taken seriously, and dealt with in accordance with 'Responding to Disclosure'.

Responding to Disclosure

- Abused children, young people and vulnerable adults are more likely to disclose details of abuse to someone they trust and whom they feel safe with. By listening and taking seriously what the child, young person or vulnerable adult is saying you are already helping the situation. The following points are a guide to help you respond appropriately.



Actions to be taken by the person being disclosed to:

- React calmly so as not to frighten them
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said, they may be formally interviewed by the correct authority and they should not have to repeat their account on several occasions. Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation.
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.
- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible in the light of the developments. Explain to them that you will have to share your concerns with the Designated Safeguarding Officer who has the authority to act.
- Immediately record in writing the details disclosed using the child, young person or vulnerable adults' own words. This is to be written in the Safeguarding Incident Report Form and MyConcern system.

Actions to Avoid

The person receiving the disclosure should not:

- Dismiss the concern
- Panic
- Allow their shock or distaste to show
- Speculate or make assumptions
- Probe for more information that is comfortably offered
- Make promises or agree to keep secrets
- Make negative comments about the alleged abuser
- Should not suggest any actions or consequences that may be undertaken in response to the disclosure.



Responding to Suspicions

All suspicions, concerns and disclosures have to be reported immediately to the appropriate member of staff. They have the responsibility to:

Ensure that arrangements are made to identify staff that require training in child, young person and vulnerable adult protection issues

Ensure that reports forms and copies of policies and procedures are made available to staff

Receive information from staff, volunteers, children, young person and vulnerable adults who have concerns and record them using appropriate forms and procedures identified

Receive the appropriate training required for their job role

Represent The Specialists Hub on formal investigations into allegations of abuse led by Social Care Services.

Where a matter appears urgent and the Child/Adult Safeguarding officer is not available delay should be avoided, at such times contact should be made to the Director.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned in the safeguarding of children, young person and vulnerable adults. Information should be handled and disseminated on a need to know basis only. This includes the following people:

- A Designated Child/Adult Safeguarding Officer
- The parents or carers of the person who is alleged to have been abused
- Police/Social Care Services
- Senior Management where appropriate
- The person making the allegation
- The alleged abuser (and parents or carers if the abuser is a child or young person)



Whistleblowing

All employees must be aware of and follow The Specialists Hub Whistleblowing Policy. Whistleblowing deals with any concerns raised by an employee, apprentice, client, stakeholder, or member of the public. Investigations can include safeguarding concerns such as health and safety, fraud and corruption, for example.

By enabling staff to raise concerns, it allows for the prevent of malpractice from anybody linked to the company. Through encouraging honesty and transparency, The Specialists Hub are implementing the ability to take swift measures. By taking these steps, it enables a higher chance of safeguarding the interests of all staff, protecting the organisation and preventing harm to young people, vulnerable adults and children.

Reporting FGM

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 FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl’s age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.



Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number.

You should be prepared to provide the call handler with the following information:

Explain that you are making a report under the FGM mandatory reporting duty

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means.



Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

FGM is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.

Breast Ironing

This is also known as breast flattening, and is done to prepubescent girls using hard or heated objects in order to stop them from developing. Although practiced in some African countries, it can occur anywhere in the world and The Specialists Hub staff must take safeguarding action if made aware of this practice happening. Please see 'Reporting FGM' for information on how to respond.

Up skirting

Up skirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). Under British law, Up skirting has been illegal since 2019. The new law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress or alarm. Such behaviour is criminal and will not be tolerated at The Specialists Hub, or by any of its staff.

Cyberbullying

What is cyberbullying?

- Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs
- Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications
- Who is most at risk?



- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

Definitions**Flaming**

Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.

Denigration

Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.

Exclusion

Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.

Outing

Sharing secrets about someone online including private information, pictures, and videos.

Impersonation

Tricking someone into revealing personal information then sharing it with others.

Harassment

Repeatedly sending malicious messages to someone online.

Cyberstalking

Continuously harassing and denigration including threats of physical harm.



Online Grooming

Definition: Online grooming is the act of an adult befriending a child/young person online via chatrooms, websites social media etc., usually posing as someone their age. The criminal builds up the child's trust with the intention of exploiting them and causing harm. This harm can take forms such as: sexual abuse, both in person and online; exploitation to obtain sexually explicit images and videos; and coercing into meeting with them in real life.

What to do if you are made aware of online grooming occurring:

- Follow the procedures outlined in this document
- Inform the CEO
- Contact the police
- If the accused adult is a staff member or apprentice, then also follow the allegations procedures outlined within this policy

COVID-19 and Safeguarding

Due to the pandemic, employees may be required to self-isolate or work from home. The Specialists Hub recognises the dangers that can come from this in forms such as abuse (domestic or otherwise) and neglect. It remains everyone's role to recognise and respond to potential indicators of such safeguarding issues, and action should be taken by those with statutory powers to help individuals. The Specialists Hub is aware that many services are now operating digitally and is vigilant to the risk of abuse and harm.

How to safeguard virtually:

- Although advised by the government to stay at home if self-isolating, individuals must remember that they are not expected to follow such guidelines if they place them at risk – whether this be from abuse, isolation or neglect.
- If you, or another person is in immediate danger, call 999.



- If you are not in immediate danger but feel threatened or fearful, dial a helpline such as the 24-hour National Domestic Abuse Helpline on: 0808 247 2000.

Coercive control

Coercive control is recognised as the behaviour that underpins domestic abuse. It is a pattern of behaviour which seeks to take away the victim's sense of self, minimising their freedom of action and violating their human rights. It is also used in other types of abuse, such as modern- day slavery.

The Serious Crime Act 2015 creates a new offence of controlling or coercive behaviour in intimate or familial relationships. The new offence closes a gap in the law around patterns of controlling or coercive behaviour in an ongoing relationship between intimate partners or family members. The Specialists Hub recognises the need to safeguard victims and prevent this abuse.

Financial Abuse or Material Abuse

Financial or material abuse includes: coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions and the misuse or misappropriation of property, possessions or benefits.

As an organisation we are aware of this threat and will respond appropriately. The Specialists Hub is also mindful of the fact that this strand of domestic abuse may be more prevalent during COVID-19.

Peer on Peer/Child on Child Abuse

Peer-on-peer abuse includes but is not limited to: physical and sexual abuse, sexual harassment and violence, emotional harm, on and offline bullying and teenage relationship abuse. Peer on peer and child on child-on-child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences. It can result in significant, long lasting, and traumatic isolation, intimidation, or violence to the victim.



Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited (Barnardo's 2012).

Children who run away or who are missing from home: There are no exact figures for the number of children who go missing or run away, but estimates suggest that the figure is in the region of 100,000 per year. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse.

Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after and go missing from their family home. They can face the same risks as a child missing from local authority care.

Gang Culture/County Lines: County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse.

Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime.

Child Trafficking: Child trafficking is a form of abuse. It involves the recruiting, moving, receiving, and harbouring of children with purpose of exploiting them (HH Department for Education, 2011) Child trafficking is a form of modern slavery. Children are trafficked for:

- Sexual exploitation
- Criminal activity
- Moving drugs



The Specialists Hub

Safeguarding and Prevent Policy

V7.2 Jan 2023

- Benefit fraud
- Selling pirated goods
- Forced marriage
- Domestic servitude
- Forced labour
- Illegal adoption
- Unreported private fostering



Domestic Violence

The Home Office defines domestic violence as, "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable. There are other forms of abuse or behaviour that put children at risk; the links below provide useful information.

Female Genital Mutilation: This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

Radicalisation

Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal.



Prevent Policy

The Specialists Hub strongly believes in and adheres to the governments prevent strategy laid out in the 2015 Counter Terrorism and Security Act and the duty it places on training providers. This is as per paragraph 114 of the Counter-terrorism strategy (CONTEST) 2018.

All Apprentices engaging with The Specialists Hub in any way will undertake an induction session at our academy which is to include but not exclusively; health and safety in the workplace, awareness of safeguarding and British values and prevent.

It is our aim to set core values that are for all stakeholders, The Specialists Hub have set parameters embedded in to our expectations for staff. We view British values of paramount importance, underpinning what it is to be a citizen in a modern & diverse Great Britain. As well as actively promoting these values to our learners, we embed our strategy across the full apprentice journey, staff promote it through their delivery & embed safeguarding naturally with learners.

Leaders & Managers champion 'Prevent' & 'Safeguarding', leading strongly on ensuring that these points are discussed in a variety of forums & relevant communication & promotions are a regular feature. We actively promote all forms of equality & foster greater understanding of & respect for people of all faiths (or those of no faith), races, genders, ages, disabilities & sexual orientations.

The Prevent Strategy will specifically

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are give appropriate advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address.



What is CONTEST?

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.'

CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- PREVENT - to stop people becoming terrorists or supporting violent extremism
- PURSUE - to stop terrorist attacks through disruption, investigation and detection
- PREPARE - where an attack cannot be stopped, to mitigate its impact
- PROTECT - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places.

What is Extremism?

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs.

What is Terrorism?

An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological



cause.

What is radicalisation?

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

Use of inappropriate language

- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation.



Channel

What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Who does Channel work with?

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologies. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

How does Channel work?

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

What does Channel support look like?

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



How will the person be involved in this process?

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

Who can make a referral?

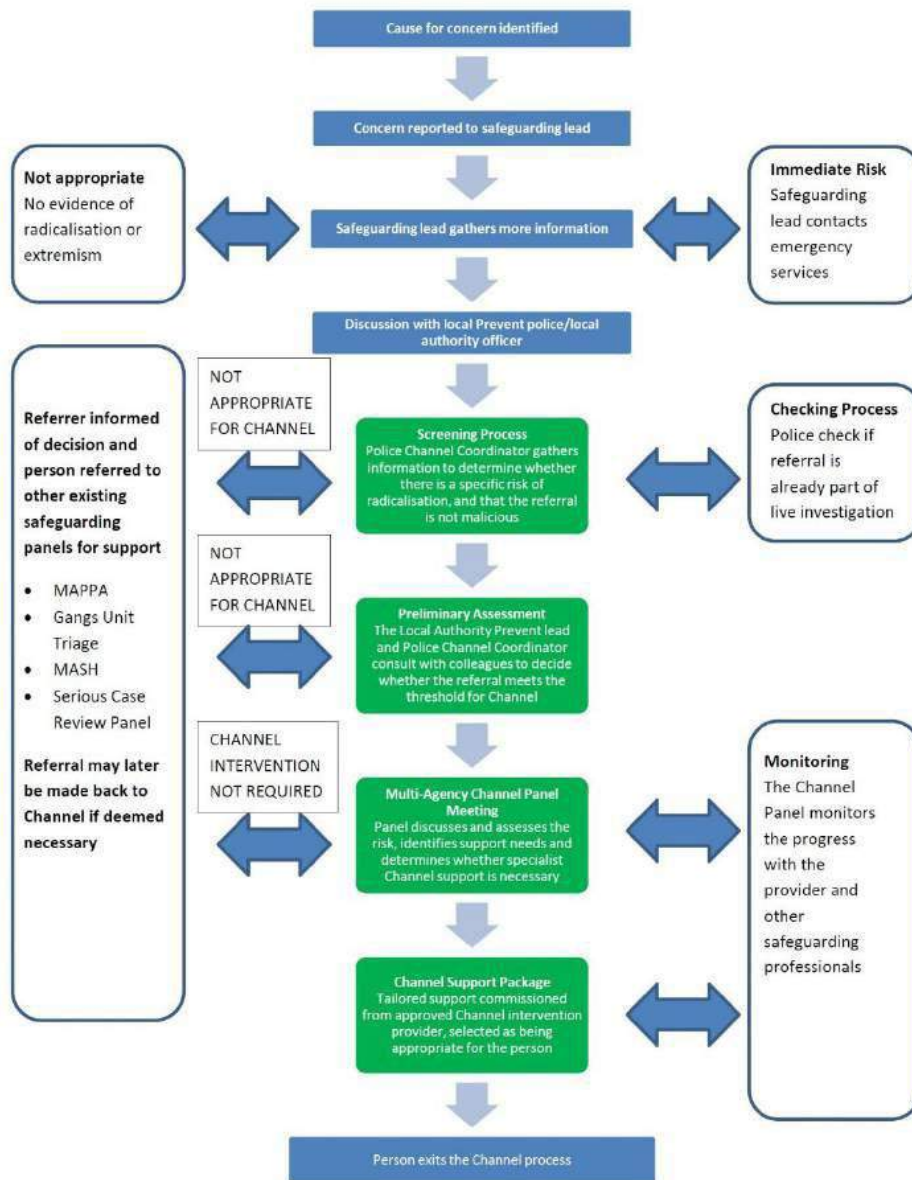
Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

Further Prevent Definitions:

- **Advocacy** – Support to help people secure their rights, represent their interests and obtain services they need. Under the Care Act, the local authority must arrange for an independent advocate to represent and support an adult who is the subject of a safeguarding enquiry or a safeguarding adult review if they need help to understand and take part in the enquiry or review and to express their views, wishes, or feelings.
- **Best interests' decision** – A decision made in the best interests of an individual when they have been assessed as lacking the mental capacity to make a particular decision. The best interest decision must take into consideration anything relevant such the past or present wishes of the person, a lasting power of attorney or advance directive. There is also a duty to consult with relevant people who know the person such as a family member, friend, GP or advocate.



Channel Referral Process



In December 2022 a new Protect Law was passed - Martyn's Law

On Monday 19 December, the Government announced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017. Why do we need Martyn's Law?

There have been 14 terror attacks in the UK since 2017. These tragic attacks have caused deaths and casualties amongst people going about their everyday lives. The terrorist threat we currently face is multifaceted, diverse, and continually evolving.

As such, it remains difficult to predict which locations could be targeted by terrorists with attempts being harder to spot and harder to stop. We need to improve security and ensure robust, proportionate, and consistent measures at public places to make sure we can better prepare and improve public security, in light of possible future attacks. We are aware through engagement with industry that, without legal compulsion, counter terrorism security efforts often fall behind legally required activities. The prioritisation, consideration and application of security processes and measures is currently inconsistent.

What will Martyn's Law do?

Martyn's Law will keep people safe, enhancing our national security and reducing the risk to the public from terrorism by the protection of public venues. It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. The legislation will ensure parties are prepared, ready to respond and know what to do in the event of an attack. Better protection will be delivered through enhanced security systems, staff training, and clearer processes.

How will it work?

The Bill will impose a duty on the owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place there. Proportionality is a fundamental consideration for this legislation. It will therefore establish a tiered model, linked to the activity that takes place at a location and its capacity:

- A standard tier will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.
- An enhanced tier will see additional requirements placed on highcapacity locations in recognition of the



potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time. This could include live music venues, theatres, and department stores.

Premises will fall within the scope of Martyn's Law where "qualifying activities" take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions.

Due to working locations and Premises utilised by both Apprentices and Employees within The Specialists Hub consideration will be taken by the DSL/DSO of any steps needed to ensure safety of individuals during working activities.

Contacts

- Criminal Justice and Courts Act 2015
<https://www.legislation.gov.uk/ukpga/2015/2/contents/enacted>
- FGM Act 2003 genital-mutilation-resource-pack
<https://www.gov.uk/government/publications/female-genital-mutilation-resourcepack/female->
- HH Department for Education
<https://www.gov.uk/government/organisations/department-for-education>
- Serious Crime Act 2015
<https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted>
- Safeguarding Vulnerable Groups Act 2006
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
- Protection of Freedom Act 2012
<https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>
- Counter Terrorism and Security Act 2015
<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>
- Counter Terrorism Strategy (CONTEST) 2018
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>
- Working Together to Safeguard Children 2020
<https://www.gov.uk/government/publications/working-together-to-safeguard-children>



- Greater Manchester Police
www.gmp.police.uk/advice/advice-and-information/t/prevent/prevent
Urgent: call 999
- Greater Manchester Police Prevent Team: 0161 856 6345
- National Police Prevent Advice Line: 0800 011 3764

This policy relates to all Staff and Apprentices and Stakeholders.

The Specialists Hub Designated officers in relation to Prevent is:

- **Hannah Lloyd (DSL)**
- **Beverley McGowan (DSO)**
- **Teresa McGowan (Deputy DSO)**

Email: safeguarding@specialistshub.co.uk

Phone: 0800 538 5680



Appendix B

Local Authority Designated Officers

Area	Phone number	Email	Website
Manchester City Council	0161 203 3232	majella.o'hagan@manchester.gov.uk	
Blackpool Council	01253 477558	lado@blackpool.gov.uk	www.blackpoolsafeguarding.org.uk
Royal Borough of Greenwich, London	020 8921 3930	childrens-Lado@royalgreenwich.gov.uk	www.greenwichsafeguardingchildren.org.uk
City of London	020 7332 1215	pat.dixon@cityoflondon.gov.uk	
Stockport Borough Council	0161 474 5657	N/A	Contact the LADO - Stockport Council
Derbyshire Council	01332 642376	cypsafeguarding@derby.gov.uk	Allegations against staff and volunteers who work with children - Derby City Council
Buckinghamshire Council	01296 387915	N/A	Home - Buckinghamshire Safeguarding Children Partnership (buckssafeguarding.org.uk)
Wirral Council	0151 666 5525	anneking1@wirral.gov.uk	LADO Allegations - Wirral Safeguarding Children Partnership (iprogress.co.uk)
Warwickshire Council	0300 123 1650	LADO@warwickshire.gov.uk	This form should only be completed when making a referral or seeking advice from the LADO regarding a Person in a Position of Trust with children or young people (warwickshire.gov.uk)
Staffordshire Council	0800 1313 126	I am a professional - Staffordshire County Council	
Cheshire East	01606 288931	LADO@cheshireeast.gov.uk	lado-omg-2020.doc (live.com)



Area	Phone number	Email	Website
Monmouthshire Council (Chepstow)	01291 635669	contact@monmouthshire.gov.uk	Safeguarding and protecting children - Monmouthshire
Shropshire Council	01743 256247	michelle.taylor@shropshire.gov.uk	Managing Allegations - Shropshire Safeguarding Partnership (safeguardingshropshireschildren.org.uk)
Milton Keynes Council	01908 254300	lado@milton-keynes.gov.uk	Safeguarding Children - Milton Keynes Council (milton-keynes.gov.uk)



Safeguarding Concern Record

This form has been designed to help the Safeguarding Representatives record all the information they need when dealing with a safeguarding incident.

Name of Person Reporting the Incident		Relationship to the Student	
Name of the Student		ULN	
DOB			
Apprenticeship Programme		Trainer	
Date of Incident		Time of Incident	
Date of Report		Time of Report	
Detail of Disclosure (Give full description with as much detail as possible) <i>Attach any other notes.</i>			
Decision made			
Form completed by – name		Date	



Procedure Flowchart – Dealing with Safeguarding Concerns/Disclosure of Harm or Abuse

