

# Child Protection, Safeguarding and Prevent Policy

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## POLICY STATEMENT

EAS Mechanical Ltd has a statutory and moral duty to ensure that the Centre functions with a view to child protection, safeguarding and promoting the welfare of children and vulnerable adults receiving education and training at the Centre. The Centre's responsibility to safeguard and promote the welfare of children and vulnerable adults is of paramount importance.

This policy has been developed in accordance with the principles established by the Children's Acts 1989 and 2004; the Education Act 2002 and in line with government publications including 'Working Together to Safeguard Children' 2018, Revised Statutory Guidance 2 'Framework for the Assessment of Children in need and their Families' 2000, "Tackling Extremism in the UK", DfES "Teaching Approaches that help Build Resilience to Extremism among Young People" and the revised Prevent Duty within the Counter-Terrorism and Security Act 2015. 'What to do if you are Worried a Child is Being Abused' 2015 and it reflects 'Keeping Children Safe in Education' 2021.

The Centre should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. Throughout these policies and procedures, reference is made to "children and vulnerable young people". This term is used to mean "those under the age of 18". The Company recognises that some adults are also vulnerable to abuse, accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. All children and young people, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

A child is legally defined as '*any person who is under the age of 18 years*'. Further education providers are required to safeguard and promote the welfare of children. The broad definition of a vulnerable adult is '*a person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation*'.

The main categories of people covered by this definition of vulnerable adult include people:

- who have a learning disability
- who have physical or sensory impairments
- who have a mental illness including dementia
- who are old and frail
- detained in custody or under a probation order
- who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).

Children and vulnerable adults will include those who are in care; have been previously 'looked after' by Social Services; are living independently and are under the age of 18; have had (or are still experiencing) mental health issues; have disabilities; are children that are also carers; have suffered abuse (as defined by the government).

## **POLICY AIMS**

In order to protect our children and young people the Centre aims to:

- create an environment where everyone can feel secure, valued and listened to
- recognise signs and symptoms of abuse
- respond quickly and effectively to cases of suspected abuse
- monitor and support those at risk
- use the curriculum to raise their awareness, build confidence and skills
- work closely with parents/carers and support external agencies
- ensure that all adults within our Centre who have access to children have been checked as to their suitability.

## **Preventing Extremism and Radicalisation**

A further key aim of our Safeguarding Policy is to prevent students being drawn into terrorism which we aim to achieve by:

1. Promoting and reinforce shared values; to create space for free and open debate within the law and with respect to fundamental British values.

2. Breaking down segregation amongst different student communities including by supporting inter-faith and inter-cultural dialogue and understanding and to engage all students in playing a full and active role in wider engagement in society.
3. Ensuring student safety and Centres that are free from bullying, harassment and intimidation.
4. Providing support for students who may be at risk and appropriate sources of advice and guidance.
5. Ensuring that students and staff are aware of their roles and responsibilities in preventing violent extremism.

The Centre will closely follow any locally agreed procedure as set out by the Local Authority Safeguarding Children's Boards agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

In developing safeguarding policies and procedures, the Centre will consult with, and take account of, guidance issued by the Department for Education and other relevant bodies and groups. The procedures have been developed in conjunction with the Northamptonshire Safeguarding Adults Board (NSAB) and the Northamptonshire Safeguarding Children Partnership (NSCP). The PREVENT Risk Assessment and Action Plan is attached (Appendix 5)

The Centre will refer concerns that a child or young person might be at risk of significant harm to the relevant Children's Social Services Department of the area in which the young person's home address is located.

All staff have a duty to safeguard children and a responsibility for the active protection of children from harm. We will ensure that arrangements are in place for all persons working at this Centre to be made aware of this policy and to receive appropriate training so that they can carry out this duty as required.

### **EARLY INTERVENTION/EARLY HELP**

Any child/young person may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child/young person who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);

- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has experienced recent trauma i.e. bereavement
- is frequently missing/goes missing from care or from home;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of honour based abuse such as Female Genital Mutilation or forced marriage;
- is a privately fostered child;
- is persistently absent from education.

## **CATEGORIES OF ABUSE**

The Company recognises the following as categories of abuse:

### **Physical Abuse**

Physical abuse may involve: hitting, shaking, throwing, biting, scalding, burning, drowning or suffocating.

- Giving of poisonous substances, inappropriate drugs and alcohol
- Physical harm may also be caused when a parent feigns the symptoms of, or deliberately causes ill-health to a child whom they are looking after. This is referred to as fabricated or induced illness (used to be known as Munchausen Syndrome by Proxy).
- FGM (Female Genital Mutilation) is a form of physical abuse. It is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK. There is a mandatory duty to report FGM to the Police where they discover that FGM appears to have been carried out on a girl under the age of 18. Failure to report is now a criminal offence.

### **Forced Marriage**

Forced Marriage - falls within the Crown Prosecution Service definition of domestic violence and is dealt with by the Forced Marriage Unit.

## **Neglect**

Neglect is the persistent failure to meet a child's basic physical, emotional and psychological Needs including:

- The persistent failure to protect from: cold, starvation, danger including leaving a child unsupervised or the use of inadequate care-takers.
- The failure to provide adequate clothing or shelter including exclusion from home or abandonment.
- The failure to access appropriate medical care or treatment.

Neglect is different from deliberate or malicious failure to meet a child's needs which is done in the full knowledge of the potential effects on the child or parents/careers are reckless as to whether harm is caused to the child. That is serious physical and/or emotional abuse. Neglect may arise from a lack of knowledge, lack of ability to meet child's needs, competing priorities, stress or deprivation.

## **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. It includes:

- actual or attempted sexual exploitation of a child by adults, adolescents, or other children able to exercise dominance
- activities with physical contact either penetrative or non-penetrative
- non-contact activities such as involving children in looking at or in the production of pornographic material or watching sexual activities
- encouraging children to behave in sexually inappropriate ways

## **Peer on Peer/Child on Child abuse**

This occurs when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children. It includes:-

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos<sup>13</sup> (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

There should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

### **Responding to reports of Peer on Peer/Child on Child Sexual Violence and Sexual Harassment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator(s);
- all the other children/young persons (and, if appropriate, adult students and staff) at the Centre, especially any actions that are appropriate to protect them.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the Centre should be actively considering the risks posed to all their students and put adequate measures in place to protect them and keep them safe.

When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children’s social care and/or the police, then, as a general rule, the college or Centre should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations.

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause persistent and severe adverse effects on the child's emotional development, including:

- Conveying to children that they are unwanted, ugly, worthless, guilty, inadequate or unloved or valued only insofar as they meet the needs of another person.
- Threats, verbal attacks, taunting, constant lack of love and affection.
- Age or developmentally inappropriate expectations being imposed on children including interactions that are beyond the child's development capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another person.
- Causing children frequently to feel frightened or in the danger or the exploitation or corruption of children.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Children may be vulnerable to multiple harms including (but not limited to) sexual exploitation (CSE), criminal exploitation (CCE), and serious youth violence. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical; it can be facilitated and/or take place online. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears

to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

## **County Lines Exploitation**

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County lines is the organised criminal distribution of drugs from the big cities into smaller towns and rural areas using children and vulnerable people. Although cannabis is occasionally linked to the county lines organisations, it is harder drugs that provide the focus: heroin, cocaine, and amphetamines.

## **Serious Violence**

Indicators, which may signal children are at risk from, or are involved with serious violent crime include:-

- increased absence from college,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Risk factors increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **Domestic Abuse/Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and education work together to provide emotional and practical help to children/young people. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the designated safeguarding lead. Where appropriate, the police and/or colleges should make a referral to children's social care if they are concerned about a child's welfare.



## **Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children/young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, and their high prevalence of special educational needs and mental health needs, can impact on their behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

## **Children/Young People with Special Educational Needs (SEND)**

Children and young people with special educational needs and disabilities (SEND) and/or physical health issues can face additional safeguarding challenges, both in relation to their vulnerability to possible abuse and neglect and also in terms of being able to report such incidents. These challenges, can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

## **Children Missing in Education**

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. Attendance of compulsory college age children under the age of 16 is monitored by the college's team and the colleges sending children to Centre. Weekly attendance reports are sent to the nominated person at the referral agency/college or local education authority.

## ROLES AND RESPONSIBILITIES - SAFEGUARDING

### **The Managing Director**

The Managing Director will ensure that:

- The policies and procedures adopted by the Centre are fully implemented and followed by all staff. The Managing Director (Designated Senior Lead (DSL)) holds overall responsibility for the child protection and safeguarding functions of the Centre for the day to day operations.
- Sufficient resources and time are allocated to enable the Designated Persons and other staff to be able to perform their duties.
- All staff feel able to raise concerns about poor practice, and concerns are addressed sensitively and effectively in a timely manner.
- Student peers feel able to raise concerns confidentially and are addressed sensitively and effectively in a timely manner.

### **Designated Personnel with Responsibility for Child Protection and Safeguarding**

Designated Personnel with responsibility for Child Protection are:

- Designated Senior Lead (DSL): Eamon Wilson
- Deputy Designated Deputies: Jennie Wilson, Tracey Richardson and Patrick Franks

The Designated Senior Lead is responsible for:

- Adhering to the NSCP procedures with regard to referring a child or vulnerable young adult if there are concerns about possible abuse.
- Keeping written records of all concerns about a child or vulnerable young adult even if there appears to be no need to make an immediate referral.
- Liaison and joint working with Social Care Services, NSCP and other relevant agencies, including three partners; the local authority; the clinical commissioning group for any area that falls under the local authority; and the chief officer of police for any area that falls under the local authority.
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with NSCP.
- Providing advice and support to other staff on issues relating to safeguarding and child protection.

- Ensuring that parents of children and vulnerable young people within the Centre are aware of the Centre's Safeguarding, Child Protection and Prevent Policy and will receive a copy of the policy on request.
- Liaising with secondary colleges which send pupils to the Centre to ensure that appropriate arrangements are made for the pupils.

### **Other Designated Staff Members:**

There are trained safeguarders.

These designated staff members will:

- report to the DSL with lead responsibility
- know how to make an appropriate referral
- be available to provide advice and support to other staff on issues relating to safeguarding and child protection
- have particular responsibility to be available to listen to children and vulnerable young people studying at the Centre
- deal with individual cases, including attending case conferences and review meetings as appropriate.
- have received training in safeguarding and child protection issues

The role of all staff and other persons within the Centre

All staff have a duty to safeguard children and vulnerable adults. To carry out this duty they need to be:

- trained and aware of potential indicators of abuse
- open to hearing concerns from children and others, without seeking to investigate these concerns
- informed on how to report any concerns to their DSL

## **ROLES AND RESPONSIBILITIES – PREVENTING EXTREMISM AND RADICALISATION**

### **Designated Safeguarding Lead**

The Designated Safeguarding Lead will act as the Prevent Single Point of Contact (SPOC) who will liaise with the police, social services or Counter Terrorism Unit when required.

The Designated Safeguarding Lead (DSL)/ Single Point of Contact (SPOC) may in certain circumstances take the decision to report any suspicious activity or concerns relating to violent extremism to the Police Counter Terrorism Unit.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Disciplinary Policy for students and staff.

### **All Staff**

As part of wider safeguarding responsibilities Centre staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of Centre, such as in their homes or community groups, especially where students have not actively sought these out
- Graffiti symbols, writing or art work promoting extremist messages or images
- Students accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Partner Centres, local authority services, and police reports of issues affecting students in other Centres or settings
- Students voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or hate terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others which are contrary to fundamental British Values.

### **Training**

- The DSL and deputies will receive training at an appropriate level in Safeguarding and Child Protection issues. Other staff will receive appropriate Safeguarding and Child Protection training every 3 years.
- With regard to preventing extremism and radicalisation mandatory training for all staff will be available online.
- The DSL will keep a record of all Safeguarding and Prevent training completed.

# PROCEDURES

## **SAFEGUARDING AND PREVENT PROCEDURES AND GUIDANCE NOTES**

### Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

(Flow chart procedure see Appendix 1)

It is important to remember that safeguarding incidents could happen anywhere, and all staff should be alert to possible concerns being raised in Centre. What to do if a learner tells a member of staff about possible abuse:

- Listen carefully and stay calm. Treat the matter seriously.
- Questions should be kept to the minimum necessary to understand what is being alleged. Care must be taken in asking or interpreting responses to questions about indications of abuse, as this could have an effect on the evidence which is put forward if there are subsequent legal proceedings.
- Reassure the learner that by telling you, they have done the right thing.
- Promises of confidentiality should not be given.
- Inform the learner that you must pass the information on, but that only those who need to know about it will be told. Inform them whom you will report the matter to.
- If possible, use a silent witness.
- Any additional notes should be signed, dated and attached to the INCIDENT REPORT FORM. This should be completed as soon as possible. Incident Report Forms are available on Google Drive (See Appendix 2)

Note the main points carefully:

- The name of the complainant, and where different, the learner who has allegedly been abused
- When and where the alleged incident(s) took place, including date(s) and time(s)
- Who was present
- The account of what is alleged to have happened
- A description of any injuries observed

Staff should not investigate concerns or allegations themselves but should report them immediately to the Safeguarding Officer

Never:

- ask leading questions
- ask the child or vulnerable young person to write down their account
- investigate with or without others

- take photographs of marks
- attempt any medical judgement
- arrange a medical examination
- tape or video record an interview
- ask a child or vulnerable young person to remove any clothing

Staff should always be aware of their own vulnerability and should take steps to minimise the risk to themselves whilst supporting the child or vulnerable young person (See Appendix 3 notes for staff guidance).

We recognise that all matters relating to safeguarding and child protection are confidential. The DSL will disclose any information about a learner to other members of staff only on a need-to-know basis. All concerns will be received by the DSL or Deputy DSL who will seek advice/make a judgement as to whether a referral to Social Care Services or the police or any other action is necessary. This includes situations where any professional feels that a young person has abused another child or young person.

### **Notifying Parents**

The Centre will normally seek to discuss any concerns about a child or vulnerable young person with their parents/carers. This must be handled sensitively, and the DSL or Deputy DSL will make contact with the parents/carers in the event of a concern, suspicion or disclosure. However, if the Centre believes that notifying parents/carers could increase the risk to a child or vulnerable young person, or even exacerbate the problem, and then advice will first be sought from local Children's Social Care Department.

### **Notification to companies**

The Centre will notify companies, to make them aware of any situations that arise, in agreement with the Apprentice/parents/guardian, if this is felt appropriate.

### **Reporting directly to Child Protection Agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if the situation is an emergency and the DSL, and the deputies are all unavailable.

### **Reporting to the Police**

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the Centre should cease their own investigation, having asked only enough questions to establish the basic facts of the incident. Every effort should be made by the Centre to preserve any relevant evidence. Initial enquiries

undertaken by the Centre should be fully documented as they may be required if the matter goes to court. This includes recording questions asked to young people and their replies. Where a crime is reported to the police, it will be recorded as a crime and an investigation will commence.

## **Supporting Staff**

We recognise that staff working in the Centre who have become involved with a child or vulnerable young person who has suffered harm or who is likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

## **Children and Young People who abuse others**

Children are vulnerable to abuse by their peers or other children. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Practitioners should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.

Particular difficulties arise in responding to a child or young person who abuses another child because:

- There is no clear dividing line between abusive behaviour and normal childhood behaviour;
- Many adults who abuse children repeatedly established this pattern of behaviour in childhood or adolescence, but a single incident of abuse does not indicate that a young person is likely to abuse again; and
- Some young people who abuse have themselves been abused, but this cannot be assumed in any particular case.

The needs of the victim and the needs of the alleged perpetrator must be considered separately. In addition to safeguarding the identified victim, agencies must consider whether the alleged perpetrator seems to pose a risk to any other children. Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes. The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. There is no clear boundary between incidents which should be regarded as abusive and incidents which are properly dealt with as bullying, sexual experimentation etc. Issues relating to the safety of victims and potential victim must be discussed first and completely separately from any issues relating to the alleged perpetrator.



If one child or young person causes harm to another, this should not necessarily be dealt with under these procedures: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (e.g. age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

Staff should also be aware that the abuse could be related to:

- Sexual activity
- Group behaviour - there may be evidence suggesting that two or more abusers have acted together and/or that more than one child has been abused.
- Cyberbullying - potential uses of information technology for bullying and abusive behaviour between young people.
- Victims of crime - there is the added vulnerability of children and young people who have been the victim of violent crime, including the risk that such young people may respond to this by abusing other, younger or weaker children.
- Gangs - children and young people may be vulnerable to abuse by other young people because of gang activity in the area.

## **Reporting and Dealing with Allegations of Abuse Against Members of Staff**

In rare instances, staff of educational institutions have been found responsible for safeguarding or child abuse. Because of their frequent contact with children and vulnerable young people, staff may have allegations of child abuse or a safeguarding issue made against them. The Centre recognises that an allegation of child abuse or any other safeguarding allegation made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigation is thorough and not subject to delay.

The Centre recognises that the Children's Acts of 1989 and 2004 state that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the Centre will do so with sensitivity and will

act in a careful, measured way. This is also supported by the Safeguarding Vulnerable Groups Act of 2006.12

#### Receiving an Allegation from a Child or Vulnerable Young Person

See Appendix 4 (flow chart)

- A member of staff who receives an allegation about another member of staff from a child or vulnerable young person should follow the guidelines in Part C for dealing with disclosure.
- The allegation should be reported immediately to the DSL, unless the Managing Director is the person against whom the allegation is made, in which case the report should be made to one of the Deputy DSL's. The DSL or deputy (if the allegation is against the Managing Director) should: obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated.
- Record information about times, dates, locations and names of potential witnesses.

### **Referral and Intervention Processes for Radicalisation and Extremism**

The Association of Chief Police Officers (ACPO) guidance provides a model referral process for children and young people who are vulnerable to radicalisation and/or who may be at risk through living with or being in direct contact with known extremists. A model flowchart for referral of Children and Young People for Concerns of Radicalisation can be found in Appendix 1.

Staff working with children should use this model to assist them in identifying and responding to concerns about children who may be vulnerable to being drawn into violent extremist activity. Any member of staff who identifies such concerns, for example as a result of observed behaviour or reports of conversations to suggest the child supports terrorism and/or violent extremism, must report these concerns to the named Designated Safeguarding Lead, who will consider what further action is required.

As set out in the flowchart, the named or designated professional must discuss any such concerns with the local police/CTU. After consultation with the police and in light of any further information gathered about the child and the family, if it is considered there are grounds for further involvement, a multi-agency assessment meeting (usually involving the child, parents and relevant professionals) should be convened to determine the appropriate response and how this should be delivered.

The aim is to ensure an early identification of children's vulnerabilities and promote a coordinated response, wherever possible within universal provision or through targeted interventions and the Early Help process. The emphasis should be on supporting vulnerable children and young people,

rather than informing on or "spotting" those with radical or extreme views. In exceptional cases, it may be considered that a child or young person is involved or potentially involved in supporting or pursuing extremist behaviour. This may be, for example, where the child is part of a family with known extremists (e.g. people who are currently subject to criminal proceedings or who have been convicted of terrorism related offences.) Where this is the case, a referral must be made to Children's Services under the Referrals Procedure and the police must be informed. Further investigation by the police will be required, prior to other assessments and interventions.

While the nature of the risk may raise security issues, the process should not be seen as different from dealing with the likelihood of significant harm or vulnerability due to the exposure to other influences. Consideration should be given to the possibility that sharing information about the concerns with the parents may increase the risk to the child and therefore may not be appropriate at the referral stage.

Consideration should also be given to the need for an emergency response - this will be extremely rare, but examples are where there is information that a violent act is imminent or where weapons or other materials may be in the possession of a young person or member of his or her family. In this situation a 999 call must be made. Where there is involvement as a result of the concerns, any provision of services should be subject to regular reviews until it is deemed appropriate to end the agreed response.

## **Assessment**

The Early Help process remains the primary vehicle for assessing vulnerable young people, including those who may be vulnerable to violent extremist messages. However, where a referral is made to Children's Services, given the complexity of this issue and the need to access materials that may only be available within the appropriate Counter-Terrorism Unit, cases will be subject to an initial Vulnerability Assessment as identifying vulnerabilities is necessary for effective intervention and the understanding of individual risk management.

Information received will be used to guide the decision-making process. Most children and young people do not become involved in violent extremism.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism. Therefore, in many cases interventions identified through the Channel process may not appear to be specific to the threat of radicalisation. For example, they might relate to other needs of the individual such as in respect of mental health support, housing, relationships, offending behaviour or drug and alcohol issues. There may however sometimes be a need for specialist interventions in relation to de-radicalisation and disengagement. These will be commissioned as required

## Understanding and Recognising Risks and Vulnerabilities of Radicalisation

Children and young people can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause Significant Harm. 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 of an individual becoming radicalised 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.

Research shows that indicators of vulnerability which may make an individual susceptible to being radicalised can include:

- Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them;
- Personal Crisis - Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;
- Personal Circumstances - Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations - Perceptions of injustice; feeling of failure; rejection of civic life;
- Criminality - Experiences of imprisonment; poor resettlement/reintegration; previous involvement with criminal groups.
- Being in contact with extremist recruiters;
- Articulating support for violent extremist causes or leaders;
- 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.
- However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of exploitation for the purposes of violent extremism.

### **External Speakers and Events**

The Government Prevent Duty Guidance, 2015, requires Centres to ensure they have risk assessment processes for speakers and ensure those espousing extremist views do not go unchallenged.

All concerns should be reported to the Designated Safeguarding Lead and Single Point of Contact Eamon Wilson 07958 029573.

Police Anti-Terrorist Hot Line number 0800 789 321 and text phone 0800 032 539

### **Allegations made against teachers, including supply teachers, other staff, volunteers and contractors**

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues and where it is alleged that anyone working in the Centre has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All concerns must be shared with the DSL in the first instance.

Concerns regarding the Managing Director/Managing Director should be made to the Deputy DSL.

If it becomes necessary to consult outside the Centre, the Deputy DSL will refer to the Local Authority Designated Officer (LADO).

#### **Initial Assessments**

- The initial assessment of the allegation, consulting with the Deputy DSL and the NSCP. Where the allegation is considered to be either a potential criminal act or indicates that the child has

suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the NSCP.

It is important that the Initial Assessment does not investigate the allegation. The initial assessment should be based on the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or vulnerable young person. The matter should be addressed in accordance with the Centre disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

## **Enquiries and Investigations**

- Child protection and vulnerable adult enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the Centre. The Centre may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection and safeguarding agencies, including the police, have no power to direct the Centre to act in a particular way; however, the Centre should assist the agencies with their enquiries.
- The Centre shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.
- If there is an investigation by an external agency, for example the police, the DSL should normally be involved in, and contribute to, the inter-agency strategy discussions. The DSL is responsible for ensuring that the Centre gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The DSL shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the DSL shall:

1. Inform the child/children/vulnerable adult or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.

2. Ensure that the parents/carers of the child/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
3. Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
4. Inform the designated governor of the allegation and the investigation.
5. The DSL shall keep a written record of the action taken in connection with the allegation.

The Designated Safeguarding Lead is Eamon Wilson

The Deputy Designated Safeguarding Leads are Jennie Wilson, Tracey Richardson, and Patrick Franks.

**This policy has been approved & authorized by:**

**Name:** Eamon Wilson      **Position:** Managing Director

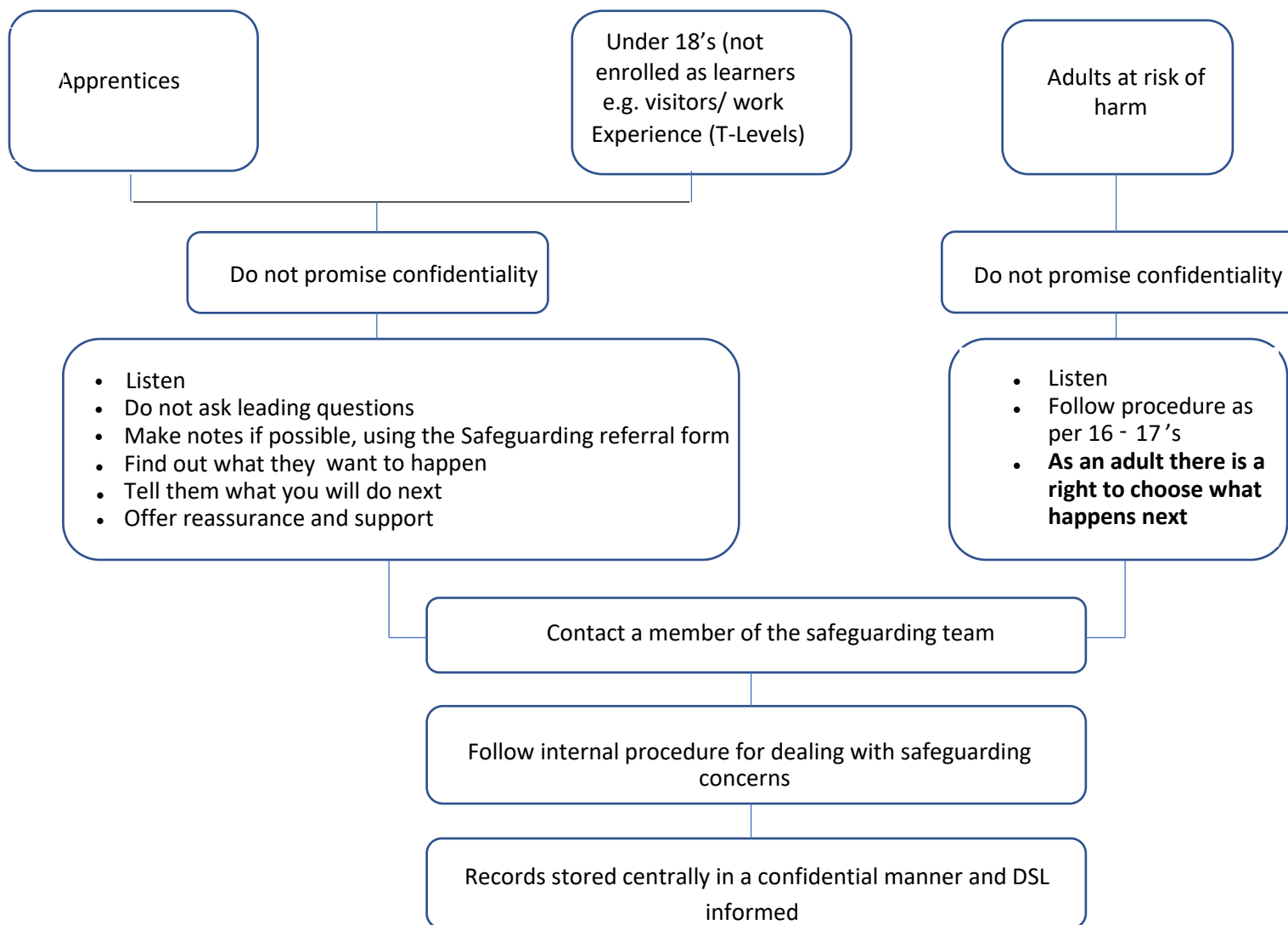
**Signature:**       **Date signed:** 27 Sept 2023

**Appendices**



## Appendix 1

### Dealing with a Disclosure of Abuse and Procedure for Reporting Concerns



## APPENDIX 2 – Safeguarding Referral Forms (Found on Google Drive)

<p>FORM 1</p> <p>STRICTLY CONFIDENTIAL</p> <p><b>MUST BE KEPT SEPARATE FROM DISCLOSURE DETAILS FORM</b></p> <p><b>CHILD PROTECTION/SAFEGUARDING – REFERRAL DETAILS</b></p> <p>Send directly to <a href="mailto:safe@easmech.co.uk">safe@easmech.co.uk</a></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2">Child Protection / Safeguarding Referral / Incident Report (please complete all fields)</td> </tr> <tr> <td style="width: 30%;">Learner ID number</td> <td></td> </tr> <tr> <td>Learner DOB</td> <td></td> </tr> <tr> <td>Learner contact Tel number (if consent given)</td> <td></td> </tr> <tr> <td>Course</td> <td></td> </tr> <tr> <td>Course Tutor</td> <td></td> </tr> <tr> <td>Incident Date</td> <td></td> </tr> <tr> <td>Name of person making referral</td> <td></td> </tr> </table>	Child Protection / Safeguarding Referral / Incident Report (please complete all fields)		Learner ID number		Learner DOB		Learner contact Tel number (if consent given)		Course		Course Tutor		Incident Date		Name of person making referral		<p>FORM 2</p> <p>STRICTLY CONFIDENTIAL</p> <p><b>MUST BE SENT IN A SEPARATE EMAIL TO LEARNER NAME/DOB ETC</b></p> <p><b>CHILD PROTECTION/SAFEGUARDING – REFERRAL DETAILS</b> <i>(Enter Learner Initials here)</i></p> <p>Send directly to <a href="mailto:safe@easmech.co.uk">safe@easmech.co.uk</a></p> <div style="border: 1px solid black; padding: 10px; min-height: 200px;"> <p>Outline of disclosure:</p> </div>
Child Protection / Safeguarding Referral / Incident Report (please complete all fields)																	
Learner ID number																	
Learner DOB																	
Learner contact Tel number (if consent given)																	
Course																	
Course Tutor																	
Incident Date																	
Name of person making referral																	

## **APPENDIX 3**

### **SAFE WORKING CODE OF CONDUCT – NOTES FOR STAFF GUIDANCE**

#### **Introduction**

EAS Mechanical seeks to provide a safe and supportive environment where the welfare and health and safety of students is paramount. Staff should act professionally at all times, but we recognise that tensions and misunderstanding can occur in the context of interaction between staff and students. This guidance aims to help staff safeguard students and reduce the risk of conduct which could be mistakenly interpreted as improper and lead to allegations being made against individuals.

#### **Principles**

- Staff are responsible for their own actions
- Staff should be seen to work in a transparent way
- All staff should report any incident which may give rise to concern to the Managing Director
- All staff should be aware of and follow the Centre's safeguarding procedures
- Staff who breach this code of conduct may be subject to the Centre's disciplinary procedures.
- Serious breach of this code may result in a referral being made to an external or statutory agency such as the local authority Social Care Team or the Police.

#### **Duty of Care**

All staff have a duty of care to keep students safe and are accountable for the way in which they use their authority and position of trust. This duty can be best exercised through the development of caring but professional relationships. Staff should avoid situations where their motives can be questioned.

If concerns or incidents arise staff are to:

- report incidents causing concern;
- record discussions and actions taken.

#### **Confidentiality**

Staff should never share information about students in a casual manner or allow student access to staff computer user privileges. Concerns about child protection issues should be reported to the Designated Safeguarding Lead.

Staff responsibilities:

- Never give out your own personal details or a student's personal details to students
- Do not give out a student's email address to other students
- Log off or lock your computer whenever leaving your computer unattended
- Do not allow students to use your computer unless you have logged off.

## **Behaviour**

Staff should adopt high standards of personal conduct at all times.

- Do not swear or use offensive or discriminatory language
- Do not use demeaning or racist comments (directly or indirectly)
- Never make sexual remarks to a student or discuss personal sexual relationships
- Never make suggestive or derogatory remarks or gestures in front of young people
- Avoid any communication which could be interpreted as sexually provocative
- End the discussion if it becomes uncomfortable or embarrassing
- Never make personal comments which humiliate a student or may seem to do so
- Dress in a manner which will avoid inappropriate comments
- Follow the ICT safety policy and report any breaches
- Never act in a way that can be perceived as threatening
- Under no circumstances should staff access inappropriate images at Centre
- Storing or disseminating such material is illegal and if proven will lead to the person being barred from working with young people.

## **Social Contact**

Staff should never make contact with a student outside of Centre for the purpose of friendship.

- Do not accept gifts that could be construed as bribes
- Never give out personal contact details, mobile phone numbers or personal email addresses
- Report any suspected infatuation
- Report any situation which you may feel compromises your professional standing.

## **Physical Contact, Intervention and Control of Students**

It is not necessary to have physical contact with students even when they are distressed, and this should be avoided at all times. Try to defuse a situation before it escalates.

**Never endanger your own safety**

## **One to One Situations**

Staff are vulnerable to accusations when working alone with a student. If possible, leave the door open or use a room with a window in the door. Never meet a student away from Centre unless the Managing Director has given permission. Avoid travelling in a car with one student and inform someone if the situation is unavoidable.

## **Educational Visits and Centre Activities**

Staff should take extra care in less formal situations and remember they are still in a position of trust.

## APPENDIX 4

### External Speakers Vetting Procedure

#### 1. Policy Statement

EAS Mechanical Limited (EAS) is committed to creating an environment where everyone is treated with dignity and respect and where diversity is valued. This policy outlines the procedures relating to events involving the use of external speakers regardless of who is organising them.

It also details our approach to ensuring that we are protecting both staff and students and the reputation of EAS whilst following the legislation that we're responsible for upholding. This policy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Centres, in the exercise of their functions, must have "due regard to the need to prevent people from being drawn into terrorism".

#### 2. Scope

- To provide an environment where freedom of expression and speech are protected balanced with the need to ensure that the Centre is not providing a platform for extremist views.
- To provide clearly defined and effective procedures to ensure that the law is upheld.
- To collaborate with others to reach sound, evidenced judgments about proposed external speakers ensuring that the Centre can meet their legal obligations.
- To encourage and provide a balance of opinion at any academic discussion or debate
- To provide clear instructions for organising an event with external contribution e.g. speaker, representatives, film and guidance for researching an external speaker

#### 3. Freedom of speech and expression

'Academic freedom' is a term used to describe the law that allows for open and honest debate in an academic context. The Centre will uphold the right to freedom of speech within the law.

#### 4. External speakers and their responsibilities

An external speaker or visitor is used to describe any individual or organisation who is not a student or staff member for EAS or one of its contracted partners and who has been invited to speak to students and/or staff This includes any individual who is a student or staff member from another institution. It also includes the main contact from any external venue hire client who is paying to use Centre facilities.

An event is any event, presentation, visit, activity or initiative organised by a student group/society, individual or staff member that is being held on the EAS premises or where EAS is being represented by a stand on non-Centre premises e.g. at an exhibition, college event or fair. It also includes events where external speakers are streamed live into an event or a pre-recorded film is shown, or activity being held on EAS premises but organised by external venue hire clients

Centre premises or facilities must not be used to promote:

- opinions that are contrary to fundamental British values (democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths or beliefs)
- attacks upon members of the UK armed forces whether in the UK or overseas.

## **5. Guidance for EAS staff and students organising an event with an external speaker or venue hire client**

The Designated Safeguarding Lead must be informed of any events that involve external speakers through this procedure. The Designated Safeguarding Lead must complete a risk assessment of a proposed event to assure compliance with the conditions in paragraph 4 (see appendix 5). No event involving any external speakers may be publicised or considered confirmed until the speaker has been cleared through the procedure detailed in this policy. This includes advertisement through any social media platform.

EAS reserves the right to cancel, prohibit or delay any event with an external speaker if the policy is not followed or if health, safety and security criteria cannot be met.

Any room booking/ event organisation with an external speaker involved must be made no later than 14 days before the date of the event. This is to allow for the organiser to have made adequate safeguarding checks as well as allowing time for alterations to the event if necessary. Any request made outside of this timeframe will be rejected unless there are extreme extenuating circumstances.

The individual/group organising an external speaker should conduct brief research into the proposed speaker. If in doubt as to the suitability of a speaker, they should refer the decision to the Designated Safeguarding Lead or Deputy Safeguarding Lead for a decision.

In making a decision the Safeguarding/Deputy Safeguarding Lead will have regard to whether any of the following apply:

- (i) The speaker is a person or belongs to a group on/or linked to the UK Government list of proscribed terror organisations <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2> ;
- (ii) The speaker is known to have previously expressed views that would be in breach of the conditions in section 4,

The Safeguarding Lead/Deputy Safeguarding Lead may approve the event/speaker unconditionally, set conditions on the event/speaker or refuse permission for the event/speaker.

The External speaker consent form should be completed and forwarded to the DSL no later than 14 days before the planned event. The completed form should be forwarded to the Safeguarding Officer for logging on the Central Record.

Managers are responsible for ensuring that their staff team and students are aware of and support the policy.

## Appendix 5

### Centre Prevent Risk Assessment & Action Plan

Risk Area	Risk	Level	Current Activity	Actions (to action plan)
Overarching risks	Centre fails to introduce adequate safeguards against students and staff being drawn into terrorism.	Low	<p>The Centre has a well-established structure with regular contact between staff and students. Key topics, inclusive of Prevent and British Values, are delivered and discussed in tutorial sessions and embedded into lessons.</p> <p>There is good contact and information sharing with other Centres (JTL/LCB) which help to raise awareness of emerging issues.</p> <p>All staff are trained in Prevent to ensure all staff and students are aware of their roles and responsibilities.</p>	<p>The Centre regularly reviews its relevant policies and processes and the way they are carried through including training of staff on the issues raised by the PREVENT Duty.</p> <p>The reviews of the policy is carried out by the Managing Director and Deputy Safeguarding staff.</p> <p>The Centre will closely follow any locally agreed procedure as set out by the Local Authority Safeguarding Children Boards agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.</p>
	PREVENT policies undermine free expression and academic freedom	Low	The Centre has adopted an overarching policy statement on freedom of expression to promote and reinforce shared values; to create space for free and open debate within the law and with respect to fundamental British Values.	The Centre will review the progress made in complying with the PREVENT Duty with due regard to freedom of expression as embodied in the policy statement, and report annually to the Managing Director.



	PREVENT policies undermine the autonomy of students and staff	Low	The overarching policy statement embodies a commitment to adopt policies that secure and protect the rights of students and staff to hold, articulate and act upon their political, religious and ideological opinions at all times, within the law, and subject only to their contractual agreements and terms of employment.	The Centre will review the progress made in complying with the PREVENT Duty with due regard to the autonomy of students and staff, as embodied in the policy statement, and report annually to the Managing Director.
	PREVENT policies undermine confidence in relationships within Centre	Low	The overarching policy statement embodies a commitment to adopt policies that secure and protect the rights of students and staff to confidentiality and privacy at all times, and subject only to their contractual agreements and terms of employment.	The Centre will review the progress made in complying with the PREVENT Duty with due regard to the right to confidentiality and privacy, as embodied in the policy statement,
	PREVENT policies result in discriminatory outcomes	Low	The overarching policy statement embodies a commitment to adopt policies that are not discriminatory, and which secure and protect the rights of all students and staff to equal treatment under the law, regardless of racial or ethnic origin, or religious belief, and which are in the strictest accordance with the Equality Act 2010 and with their Public Sector Equality Duty.	The Centre will review the progress made in complying with the PREVENT Duty with due regard to the rights of all academics, students and staff to equal treatment under the law, regardless of racial or ethnic origin, or religious belief, and which are in the strictest accordance with the Equality Act 2010 and with their Public Sector Equality Duty.

	PREVENT policies are not proportionate	Low	The Centre has adopted policies which are proportionate on the belief that its structure makes the risk of individuals being drawn into terrorism to be judged to be low. These policies remain subject to, and do not undermine, existing legal rights, including under the Education (No 2) Act 1986, the Human Rights Act 1998, the Equality Act 2010 and data protection legislation.	Monitoring risk and behaviour is the responsibility of all staff who report to the Designated Safeguarding Lead (DSL) where concerns arise. The Managing Director will create a annual Safeguarding Report.
	PREVENT training fails to secure and protect respect for rights to free expression, academic freedom, autonomy, confidentiality, privacy and equal treatment under the law	Low	All staff have had training on the need to conduct compliance with the PREVENT duty with due regard to free expression, academic freedom, autonomy, confidentiality, privacy and equal treatment under the law. The need for training is recognised in the overarching policy statement	PREVENT is one of the mandatory training modules all staff complete.
Leadership and Governance	Managing Director does not assess the ongoing impact of PREVENT on the rights to free expression, academic freedom, autonomy, confidentiality, privacy and equal treatment under the law	Low	The Managing Director has agreed to create an annual Safeguarding Report whose scope is outlined above involving student and staff representatives.	This will be repeated annually, along with a refresh of the PREVENT training.
	Compliance with PREVENT duty is not reviewed at a sufficiently senior level within the Centre	Low	The duty will be reviewed annually. Noncompliance with the PREVENT obligations, alongside the need to comply with other statutory obligations is included in the policy review	The Safeguarding annual report is reviewed by the Managing Director.

	Managing Director, students and staff do not know who has primary responsibility for compliance with the PREVENT Duty	Low	The Key Individuals have been identified and their identities will be included in the annual refresh of the Child Protection, Safeguarding and PREVENT policy.	Annually refreshed.
Partnership	External agencies and other Centres do not know whom to contact in Centre on PREVENT enquiries	Low	The Managing Director for Learner Services is identified as the Designated Safeguarding Lead and PREVENT lead.	Managing Director to agree this choice is most appropriate in the light of the application of the PREVENT-related procedures.
	Centre is not linked adequately with statutory partners and does not know how to share PREVENT related concerns and key information appropriately	Medium	The Centre will establish lines of communication with the PREVENT team at Northamptonshire Police.	Where there is a risk of serious PREVENT related crime or of vulnerable individuals being drawn into terrorism, the DSL will receive information from the local PREVENT coordinator. The DSL and 2 deputy Safeguarding Leads will make all external referrals. Any referrals to Channel will be made via the DSL.
	Information is not effectively shared with other Centres.	Low	Special arrangements apply to the exchange of sensitive personal data.	Centre reviews existing data sharing protocols with other Centres in a manner that is consistent with data protection law and secures and protects the existing legal rights of students and staff, including, in the absence

				of serious crime, to confidentiality and privacy
	Inadequate engagement and consultation with students	medium	Course representatives to attend the Learner Voice meetings where their views are discussed and listened to.	The course representatives to be included in the development of relevant policies and communication of these policies to students. To be initiated 2022.
Student welfare and pastoral care	Students at risk of being drawn into terrorism are not identified by Centre welfare systems	Low	The close relationship between individual students and tutors and pastoral mentors who are aware of their responsibilities makes this risk low. The Centre has a broad pastoral support system for students coordinated by personal tutors and support teams.	Procedures to include guidance on dealing with any concern that students may be drawn into terrorism, including, in the absence of serious crime, to secure and protect the existing rights of students to confidentiality and privacy
Events and venue hire	Arrangements to risk assess events contravene the Centre's statutory duty to promote freedom of speech.	Low	The Centre does not organise or promote speaker events other than on its own premises.	The member of staff will fill in an External Speaker request form and hand it to the Managing Director.
	Staff arrange external speakers without risk assessment	Low	Staff are responsible for risk-assessing their own events and for implementing Centre policy to secure and protect the primacy of free expression within the Centre, and for	A member of staff will always chaperone external speakers.
			external speakers, including under the Education (No 2) Act 1986.	

Training	Key Individuals do not understand their duties and are not aware of the resources available to them.	Low	All staff have received training on key rights, protection and the risk-based and proportionate approach to the PREVENT duty. It has been agreed that this will be shared with the Managing Director and updated and repeated annually.	Some key individuals will have responsibilities for welfare where it is appropriate that they are able to recognise factors which may make people vulnerable to a range of risks, including the risk of being drawn into terrorism. Other colleagues will have responsibility for ensuring the security of Centre events, which will mean that they may need to know how best to evaluate booking requests.
IT Safety	Users of Centre IT systems break the law	Low	All students and staff are bound by the Centre's IT and Social Media Policy.	Regular monitoring and review of policies.