

PMA Safeguarding Policy

The safety of learners is paramount. All people, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from harm and abuse. This policy details our approach for promoting and ensuring that all learners are protected from harm and abuse both at home and at work.

We adhere to the 6Rs strategy as outlined within the PMA safeguarding code of conduct. In our approach to safeguarding we will work together with our learners and employers to identify their individual needs, ensuring that their safety, wellbeing and differences are given prominence at all times. We will ensure designated staff are suitably qualified to deal with any issues relating to safeguarding and will ensure that any action required, will be dealt with in line with legislative requirements and government recommendations.

PMA is committed to the values and practises of safeguarding, including those associated with radicalisation and extremism. We expect all those involved with PMA to share this commitment.

The policy extends to:

- All learners, employees, associates and employers
- Arrangements for placement, work experience, subcontracting and work-based training
- The processes, actions, reporting arrangements, documentation and record keeping within related procedures
- Training, updating and other continual professional development related to safeguarding, equality and diversity
- Management and leadership arrangements
- Arrangements for engaging learners; seeking and acting upon feedback regarding safeguarding from all involved.

In addition, the policy commits PMA to being proactive in promoting learner safety, including safeguarding and health and wellbeing.

All staff will continue to be supported and be suitably trained so that they can operate effectively in this area. This will effectively contribute to an excellent experience and support for learners.

In addition, we will continue to work in partnership with our employers, subcontractors, peer mentors and legislative framework to establish and uphold best practice.

PMA is fully committed to the values and practices of safeguarding. As an organisation, PMA recognises the contribution it makes to safeguarding learners, including those who may be a vulnerable adult.

In accordance with legislation (pg8), the aim of this policy is to establish a company approach to safeguarding in order to:

- Provide a safe learning environment
- Identify vulnerable adults and children who are suffering or suspected to be suffering from harm
- Identify appropriate action to preserve their safety both at home and at work.
- At PMA, we have a duty of care to safeguard all young people who work, learn and complete work experience placements both on and away from their premises.

It is, therefore, the responsibility of everyone involved in the learner journey to ensure their safety and wellbeing is met at all times. This includes protecting them from incidents of bullying, harassment and any form of abuse as detailed within the policy.

Equality and diversity

Our ethos is intended to ensure that no-one is treated in any way less favourably on the grounds of race, colour, nationality, ethnic or social origin, race, disability, gender, sexual orientation, gender reassignment, marriage & civil partnership, pregnancy & maternity, age, religion/ belief or political/ other personal beliefs.

Our commitment

Through our commitment we:

- Have a Designated Safeguarding Lead (DSL) and a Safeguarding team who are on hand to support with any issues you may experience
- Have our own Safeguarding policy and information booklet, which is detailed in the Learner Handbook, stored in learner portfolio and can be found on our website
- Ensure every individual is treated with respect in an environment that is free from, harm and discrimination, radicalisation and extremism
- Conduct Health and Safety assessments on the premises of all employers to ensure they are demonstrating safe working practices, providing a safe learning environment
- Work with learners, employers and other agencies to promote a safe and healthy culture
- Work with learners, employers and other agencies to enhance the welfare of learners
- Ensure we prevent slavery and human trafficking in our corporate activities, and that our supply chains are free from slavery and human trafficking (see Slavery and Human Trafficking policy)
- Develop partnerships to proactively protect vulnerable adults from harm, abuse and radicalisation
- Train staff to the appropriate level to ensure they have a clear understanding of personal safety and good safeguarding practices
- Work with learners to promote their own personal health, wellbeing and safety, including their safety on the internet
- Assist learners in developing the confidence and knowledge to challenge extreme views
- Provide learners with confidential advice, guidance and support for a range of issues that they may face
- Conduct DBS checks on all members of the management team and employees engaging with learners. These records will be held in accordance to the General Data Protection Regulation and reviewed in accordance with government recommendations
- Adhere to the General Data Protection Regulation at all times, ensuring careful management of data; storing, processing and retaining data that is absolutely necessary for the requirements of abiding by regulatory bodies and supplying the highest possible qualifications.

Learner entitlement

Learners are entitled to:

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with appropriately by DSL in line with our policies and procedures
- The right to process an allegation against a PMA representative following the allegation procedure.
- Learn in an environment free from bullying or harassment
- Be made aware of some of the basic principles of safer learning and safeguarding relevant to the programme they are completing
- Be made aware of how to access support on personal issues from within PMA or from outside agencies to receive the right help at the right time to address risks and prevent issues escalating
- Be provided with up-to-date information for issues relating to Health and Safety, safeguarding and equality and diversity

- Allow learners the opportunity to provide feedback on how they feel PMA promotes and maintains wellbeing and personal safety
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment
- Learners are asked a series of questions on enrolment to determine their wellbeing. This information can be used to identify vulnerability factors
- Be offered free [online training](#) covering radicalisation and extremism, British values and e-safety.

Key principles

A number of key principles underpin the requirements of child protection (as encompassed in this policy). These include:

- Best interests of any child or young person is paramount and will be the primary concern in our decision making
- **Equality of opportunity:** Ensure that young people have the opportunity to enjoy learning and employment safely regardless of their gender, ability, race, ethnicity, circumstances or age
- **Responsibility:** In order to meet our moral and legal obligations regarding our duty of care towards children and young people. We will take action where we believe that this group of individuals is at risk or is actually harmed
- **Recognition:** Acknowledging that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact
- **Honesty and transparency:** Keep all staff, employers and learners informed about our child protection policies and procedures, to ensure they know we have the appropriate controls in place to try and protect children and young people from harm, abuse and exploitation
- **Confidentiality and protection of all personal data:** Information must only be shared and handled on a need to know basis, by the appropriate person(s); only individuals who have legitimate reasons to access this data will be able to do so
- **Support and training:** provide all staff with the appropriate level of training to recognise and respond to child protection risks and incidents
- **Partnership working:** this includes involving the police, local safeguarding boards and other agencies where necessary
- **Monitoring and review:** the Safeguarding policy (encompassing child protection) will be reviewed in accordance with legal requirements by the DSL. All parties will be informed about any amendments made to the policy
- **Missing from Education:** children, young people and vulnerable adults who go missing from education are at greater risk of all forms of harm. In line with section 10 of the Children's Act 2004, PMA must take reasonable steps to monitor attendance. Staff are appropriately trained to identify and report irregular attendance and PMA will work with employers to identify missing apprentices, reducing the level of risk to the individual.

Teaching, learning and assessment

PMA promotes respect, tolerance and diversity. Learners and employees 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.

Our assessment and review process recognises that learners with low aspirations are more vulnerable to radicalisation and therefore we strive to equip them with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Employees and learners are informed about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are. Our E-safety policy provides appropriate

information and guidance on who to contact in the event that they are subjected to inappropriate behaviours online.

Training, supervision and support

Once an individual has been recruited, they need to be adequately trained and supervised to ensure that any risks to learners are minimised. This aim will be achieved by:

- All staff undertaking basic safeguarding training and continuously updating their awareness of social issues via a robust CPD programme
- All staff are informed about the Safeguarding policy (encompassing child protection), and given the opportunity to discuss its implications for them with both their line manager and/or the Safeguarding team as part of their induction
- Not allowing staff to work alone with a young person somewhere which is isolated or where they cannot be observed. It is acceptable for staff to work alone with a young person where there are visibility panels/windows in doors
- Supervising all learner activities. All learning activities will be completed by a qualified and eligible member of staff. They should always be trained with the necessary skills and qualifications for the work/ role undertaken. All checks must be cleared before any work with young people is approved
- Where PMA arranges a placement for a young person they should never be left unsupervised throughout the duration
- No training or placement is undertaken with young people without written permission of their parents/ carers
- Staff should be informed about all policies in relation to the use of technology (such as: computers and mobile phones), and understand that they must not use this technology for the purpose of accessing, producing or distributing any information or violent or sexual images.
- When working with subcontractors ask for information on how the organisation works to protect young people (such as their policy on child protection)
- Through organisational team meetings, and ongoing resources from the DSL, we will ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; that they are aware of the process of radicalisation and how this might be identified and are aware of how we can provide support as both an employer and training provider to ensure that our learners and employees are resilient and able to resist involvement in radical or extreme activities.

Safer recruitment processes

We provide adequate and appropriate staffing resources and training to meet the needs of learners. All staff, volunteers and learners are informed that their job falls under the DBS requirements for an enhanced check under section 128 of the Education Skills Act 2008; those in management roles need to have an additional check to ensure they are not prohibited from teaching.

There are 3 types of check:

- Standard - this checks for spent and unspent convictions, cautions, reprimands and final warnings
- Enhanced - this includes the same as the standard check, plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (adult, child or other workforce)
- Enhanced with list checks - this is like the enhanced check, but includes a check of the DBS barred lists.
- PMA expect all staff who deliver learning to have an enhanced DBS checks and our back office team each have basic checks.

PMA tutors are on the update service; however, each year a declaration is obtained to confirm that there have been no updates. Our back office team also have basic DBS checks.

All staff have access to a copy of Keeping Children Safe in Education 2020; which is stored on SharePoint (PMA Policies/Safeguarding/Keeping Children Safe 2020).

Information sharing

There may be circumstances where the welfare or safety of an individual may take precedence over confidentiality. PMA are dedicated to following the 6 Rs framework and have built this around General Data Protection Regulation requirements. Staff understand the framework and understand that data protection is not a barrier to sharing information.

Legal requirements

- Prevent
- Vulnerable groups act 2006
- Keeping children safe in education 2020
- Government adult safeguarding
- Working together to safeguard children

PMA have a safer recruitment and screening process for all staff working with children and young people in adherence with relevant legislation.

Definitions

Abuse: Abuse is a violation of an individual's human and civil rights by any other person or persons: *No Secrets* (DH/Home Office 2000).

It includes:

- **Physical:** Is the non-accidental use of force that results in bodily injury, pain, or impairment
- **Emotional or psychological:** The intended act of mental or emotional anguish by threat, humiliation, intimidation or other abusive conduct. It may involve serious bullying (including cyberbullying)
- **Domestic:** Violence or other abuse by one person against another in a domestic setting, such as in marriage or cohabitation
- **Neglect:** Includes withholding the necessities of life, such as: food, drink and love and shelter, and exposing them to unacceptable risk
- **Self-neglect:** A wide range of behaviour; neglecting to care for one's personal hygiene, health or surroundings and includes behaviour, such as: hoarding. This could be also be an indication into a developing mental health condition
- **Sexual abuse:** Is any form of non-consensual sexual contact. Sexual abuse can happen to men or women of any age
- **Exploitation:** The action or fact of treating someone unfairly in order to benefit from their work. Also, the action of making use of and benefiting from resources
- **Organisational:** Neglect or poor care practice within an institution or specific care setting, such as a hospital or care home
- **Financial and material:** Improper use of an individual's funds, property, or resources by another individual
- **Radicalisation:** Is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups
- **Extremism:** Is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas (*HM Government Prevent Strategy 2011*)
- **Discriminatory:** Forms of harassment, slurs or similar treatment because of: race, gender, gender identity, age, disability, sexual orientation or religion

- **Peer on Peer:** This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence, sexual harassment and harmful sexualised behaviour; sexting (also known as youth produced sexual imagery); and initiation/ violence and rituals.

Harm refers to:

- Ill-treatment (including sexual abuse and forms of ill-treatment that are not physical)
- The impairment of or an avoidable deterioration in physical or mental health.

Learner:

The term 'learner' refers to all individuals participating in a work based learning programme with PMA regardless of age.

Learning difficulty and/ or disability:

Individuals with a learning difficulty and/ or disability may be especially vulnerable to abuse and/or radicalisation and may have difficulties raising concerns. PMA do their utmost to identify vulnerabilities, of all learners, at an early stage and staff are appropriately trained in recognising potential signs of abuse and the steps they need to take to report it.

Risk to self and/ or others:

This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others. PMA are committed to supporting individuals through intense monitoring of their welfare.

Vulnerable adult is someone aged 18 or over:

- Who is, or may be, in need of community services due to age, illness or a mental/physical disability
- Who is, or may be, unable to take care of themselves, or unable to protect himself/herself against significant harm or exploitation.
- This can include:
 - Older people
 - People with mental health problems
 - Disabled people
 - People with learning difficulties
 - People with acquired brain damage
 - People who misuse substances.

Child, children and young people:

As defined by The Children Act 1989 "child, children and young people" mean any individual under the age of 18.

Welfare:

Welfare is defined as any individual in need of universal help from those already involved or from alternative agencies.

Bully:

A person who habitually seeks to harm or intimidate those whom they perceive as vulnerable. So not to label victims of bullying as 'weak', the Oxford, Cambridge and Collins dictionaries will no longer define bullies as strong and their targets as weak.

Responsibilities

All staff have a responsibility to provide a safe environment in which learners can progress and develop.

Designated Safeguarding Lead (DSL)

It is the responsibility of the DSL to ensure that all policies relating to safeguarding are adhered to at PMA. It is the responsibility of all staff, to adhere to the Safeguarding policy, and for all learners to behave and act in accordance with the guidance issued. The designated person(s) are responsible for appropriate communication, cooperation and contact with third parties in relation to referrals and other matters. PMA is not an investigative authority. It is therefore essential that all referrals be made, in accordance with the reporting procedure, as set by Local Safeguarding Children Board. The DSL will make aforementioned referrals.

Management team

- Ensure that the principles and standards referred to in this document are followed in all aspects of their employment
- Be responsible for ensuring the procedures for complaints and whistle-blowing are clearly understood and easily accessible, by learners, employers and employees.

Safeguarding team

PMA have appointed a DSL for safeguarding. Within the role they provide support to staff, learners and parents, including those deemed vulnerable and/or require pastoral support. All records of this nature are held securely on the company's internal system. In the absence of the Company's DSL, safeguarding concerns will be directed to a designated safeguarding officer.

The Safeguarding team (comprised of DSL and two designated officers) have a 6 monthly safeguarding review. This gives an overview of and sets recommendations and required updates. A monthly update is sent to the CEO and shared with the board.

The DSL is responsible for:

- Reporting child protection issues to the Local Authority Designated Officer (LADO) within 24 hours of the disclosure being made (see contact and referral flowchart)
- For making contact with the relevant enforcement agencies such as the police in the event that immediate action should be required for any child protection issues
- Keeping individuals informed about outcomes in the investigation process.

Staff

It is not the responsibility of staff to decide whether or not child abuse has taken place. All staff, however, have a responsibility to act on any concerns by reporting them to the DSL or to a designated safeguarding officer in their absence.

All staff must report any of the following situations to the DSL:

- Any concern about actual or suspected staff misconduct and/ or criminal activity involving the abuse of a child/ children, young person or vulnerable adult whether or not they are known to PMA must be reported to DSL as per allegations procedure
- No employee must agree to keep information regarding actual or suspected abuse 'confidential'. We will seek to discuss our concern with the person in a way that is appropriate to their age and understanding, and seek the agreement of the parent/carer if making a referral to the relevant agency. However, in situations where this may place the young person in immediate danger, the DSL may make a decision to refer to the relevant agency without informing the young person and without obtaining the consent of their parents/ carer.

Learner support

The tutor with the support of the DSL shall ensure that:

- Every member of staff, learner and employer knows the names of the designated persons and their roles
- Every member of staff knows where to locate the safeguarding procedures
- Policies are properly followed, using the correct documentation and reporting arrangements
- Clear and detailed records of any concerns about learners are produced. Such records are produced in a timely manner, and kept secure in line with relevant legislation
- Additionally, the tutor/DSL will work together to take ownership following roles/responsibilities:
 - Equality and diversity
 - Pastoral support.

Allegations

We endeavor to ensure that this policy is properly implemented, so the likelihood of an actual situation of abuse occurring from within the organisation will be reduced. Unfortunately, incidents may still arise or information be brought to our attention about the behavior of another employee which creates cause for concern. We may also become aware of situations of actual or suspected abuse from outside the organisation.

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. This includes all cases where a person is alleged to have:

- Behaved in a way that has harmed, 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 they may pose a risk of harm to children.
- All allegations and concerns of abuse must be taken seriously, irrespective of the identity of the alleged perpetrator and victims, and severity of abuse.
- Where allegations are made about an employee, the Chief Executive Officer should be consulted and involved in all processes concerning staff to ensure that employees' rights are not violated. An allegation made about a member of staff will be taken seriously and will also be dealt with in line with our reporting procedure.

If judged appropriate during the initial contact with the LADO, an Allegations Referral Form must be completed by a senior manager in full and forwarded to the LADO via email within 24 hours. More information on the LADO procedures can be found here:

<http://www.cheshireeastlscb.org.uk/contact/contact-us.aspx#:~:text=Contact%20Cheshire%20East%20Safeguarding%20Children's%20Partnership&text=In%20a%20dition%20the%20Local%20Authority,be%20contacted%20on%2001606%20288931.>

A written record of all child protection reports, including any decisions made, must be kept up to date by the DSL.

This will be recorded on LADO paperwork, within the recommended time scales as stated in the reporting procedure. This should include details of any referrals made to the Local Safeguarding Children Board. Referrals must be made to the LADO when sufficient evidence exists that an allegation or concern is a serious welfare and/ or criminal matter, in accordance with the reporting procedure. Apart from referrals to child welfare and law enforcement agencies, no details regarding the circumstances of children and their

families will be passed to other individuals or organisations without the express permission of the young person and their parents/ carers.

Names of those who are alleged to be a risk to children will also be passed on to law enforcement agencies where it is suspected that a crime may have been committed, for investigation in accordance with relevant legislation. This will normally be the local police.

Child protection specifics

At PMA, all suspicions, allegations of abuse and poor practice will be taken seriously and responded to promptly and appropriately, in line with early help protocol.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Early help: Providing support as soon as a problem emerges at any point in a child's life, from the foundation years to the teenage years.

When considering child protection, it is important that everyone involved have a shared understanding of what it really means. It is unlikely that we will be successful in our efforts, if we do not fully understand what we are protecting children and young people from.

Aim

The aim of child protection is to ensure children and young people are protected from abuse and exploitation by:

- Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children have the best outcomes
- Providing young people with the appropriate level of safety and protection whilst undertaking training, employment or work experience
- Ensuring staff are suitably trained to identify signs and symptoms of abuse, and staff understand the importance of early help
- Ensuring staff are fully aware of our safeguarding policies and procedures.
- Allowing all staff to make informed and confident responses to specific child protection issues
- Ensuring the DSL is able to respond appropriately to allegations made against an adult who works with children or young people, or referring to the local children's safeguarding board.

Parental impacts

It is fundamental that wherever a concern is held for a child or vulnerable adult that confidentiality is respected however if the concern must involve the parent/ carer for safeguarding reasons then it is good practise to work together. Local safeguarding boards will inform when unsure of involvement.

Safeguarding Children Boards

Local Safeguarding Children Boards (LSCB) have been set up by the local authority and all have strategic roles to play in protecting children.

The role of the LSCB is to: coordinate what is done by everyone on the LSCB to safeguard and promote the welfare of children in the area and make sure that each organisation acts effectively when they are doing this.

Procedures for dealing with child abuse may be different in different local authority areas and PMA will work with each board accordingly.

In adherence with “Keeping children safe in education, 2020” PMA will obey to all four parts of the legislation. They are:

- Part 1: Safeguarding information for all staff
- Part 2: The management of safeguarding
- Part 3: Safer recruitment
- Part 4: Allegations of abuse made against teachers and other staff.

Local Authority Designated Officer (LADO)

Section 11 of the Children Act 2004 places duties on a range of organisations, agencies and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

Chapter 2 of “Working Together 2018” provides that county level and unitary local authorities should have a Local Authority Designated Officer (LADO) to be involved in the management and oversight of individual cases. The LADO should provide advice and guidance to PMA, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO should be informed within one working day of all allegations that come to PMA attention or that are made directly to the police.

The LADO is located within the Local Safeguarding Children Board and should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against children, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- The LADO role applies to any person who works with children in a paid or unpaid capacity, this can be employees, volunteers, casual or agency staff, or anyone self-employed.

The LADO is responsible for considering concerns, allegations or offences emanating from within or outside of work.

The Prevent Duty

Prevent

Section 6 (1) of the Counter-Terrorism and Security Act 2015 imposes a statutory duty on ‘specified authorities’ when exercising their functions, “to have due regard to the need to prevent people from being drawn into terrorism”. PMA are a specified authority.

The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are “to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism”.

PMA is fully committed to safeguarding and promoting the welfare of all its employees and learners. Every employee recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability individuals may face.

The objectives are that:

- All governors, managers and employees have an understanding of what radicalisation and extremism are and why we need to be vigilant
- All governors, managers and employees will know about our policy on tackling extremism and radicalisation and will follow the guidance promptly when issues arise, such as, extremist views; helping learners build resilience against these and ensuring they know how to protect themselves
- All learners will be taught, if they do not know already, the broad types of extremism that exist in modern Britain
- All parents/ carers (where applicable), learners and employees will know about our policies and will be informed about changes through the review process, this will ensure they are appropriate and effective.

Aims and objectives

The main aims of this policy are to ensure that employees are fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen and that we work alongside other professional bodies and agencies to ensure that learners' and employees are safe from harm.

This policy aims to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. We recognise that our employees are trained to be able to identify safeguarding issues and this policy clearly sets out how we will deal with such incidents and how our ethos underpins our actions.

Responsibilities

All employees must be aware of the processes for reporting concerns about individuals and/ or groups. They must have the confidence to challenge, intervene and ensure that they maintain strong safeguarding practices based on the most up-to-date guidance and best practice.

The DSL (or a member of the Safeguarding team in their absence) will deal promptly with any referrals made by staff or with concerns reported by staff.

The DSL will ensure the Prevent risk register is up to date and fit for purpose.

They will agree the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed.

As with any child protection referral, employees must be made aware that if they do not agree with a decision not to refer, they can make the referral themselves and will be given the contact details to do this. Tutors will be fully briefed about what to do if they are concerned about the possibility of radicalisation relating to a learner, or if they need to discuss specific learners whom they consider to be vulnerable to radicalisation or extremist views.

Senior managers will work together with the Safeguarding team and external agencies to decide the best course of action to address concerns which arise.

Indicators

There are a number of behaviours which may indicate an individual, particular a young person is at risk of being radicalised or exposed to extreme views. These include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to conform to the group
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of materials or symbols associated with an extremist cause
- Attempts to recruit others to the group/ cause
- Communications with others that suggests identification with a group, cause or ideology
- Using insulting to derogatory names for another group.
- Increase in prejudice-related incidents committed by that person – these may include:
 - Physical or verbal assault
 - Provocative behaviour
 - Damage to property
 - Derogatory name calling
 - Possession of prejudice-related materials
 - Prejudice related ridicule or name calling
 - Inappropriate forms of address
 - Refusal to co-operate
 - Attempts to recruit to prejudice-related organisations
 - Condoning or supporting violence towards others.

Reporting procedures

It is important for us to be constantly vigilant and remain fully informed about the issues which affect the areas, cities and society in which we deliver work based learning. All employees are reminded to suspend any 'professional disbelief' that radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns to the appropriate external agencies. We believe that it is possible to intervene to protect people who are vulnerable.

Dealing with referrals

We are aware of the potential indicating factors that a learner or employee is vulnerable to being radicalised or exposed to extreme views, including peer pressure, influence from other people or the internet, bullying, crime and anti-social behaviour, homelessness vulnerability, family tensions, race/ hate crime, lack of self-esteem or identity, prejudicial behaviour and personal or political grievances the following system will be followed:

- All incidents of prejudicial behaviour will be reported directly to the DSL or a representative of the Safeguarding team
- All incidents will be fully investigated and recorded in accordance with our safeguarding reporting procedure
- Parents/ carers (where applicable) will be contacted and the incident discussed in detail, aiming to identify motivating factors, including; any changes in circumstances at home, parental views of the incident and to assess whether the incident is serious enough to warrant a further referral. All records of the meeting will be kept alongside the initial referral form
- The DSL (or a member of the Safeguarding team in their absence) will follow-up four weeks after the incident to assess whether there is a change in behaviour and/ or attitude. A further meeting with parents would be held if there is not a significant positive change in behaviour

- All referrals will be handled with due care; stored and processed in line with the General Data Protection Regulation.

If deemed necessary, serious incidents involving children will be discussed and referred to their local children's safeguarding board via the Integrated Front Door system.

In the event of a referral relating to serious concerns about potential radicalisation or extremism, PMA will also contact a regional Prevent coordinator.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Training providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE.

Safeguarding processes

- How to report a safeguarding concern (learner)
- How to report a safeguarding concern (staff)
- Dealing with a safeguarding concern (DSL)
- Working together to safeguard

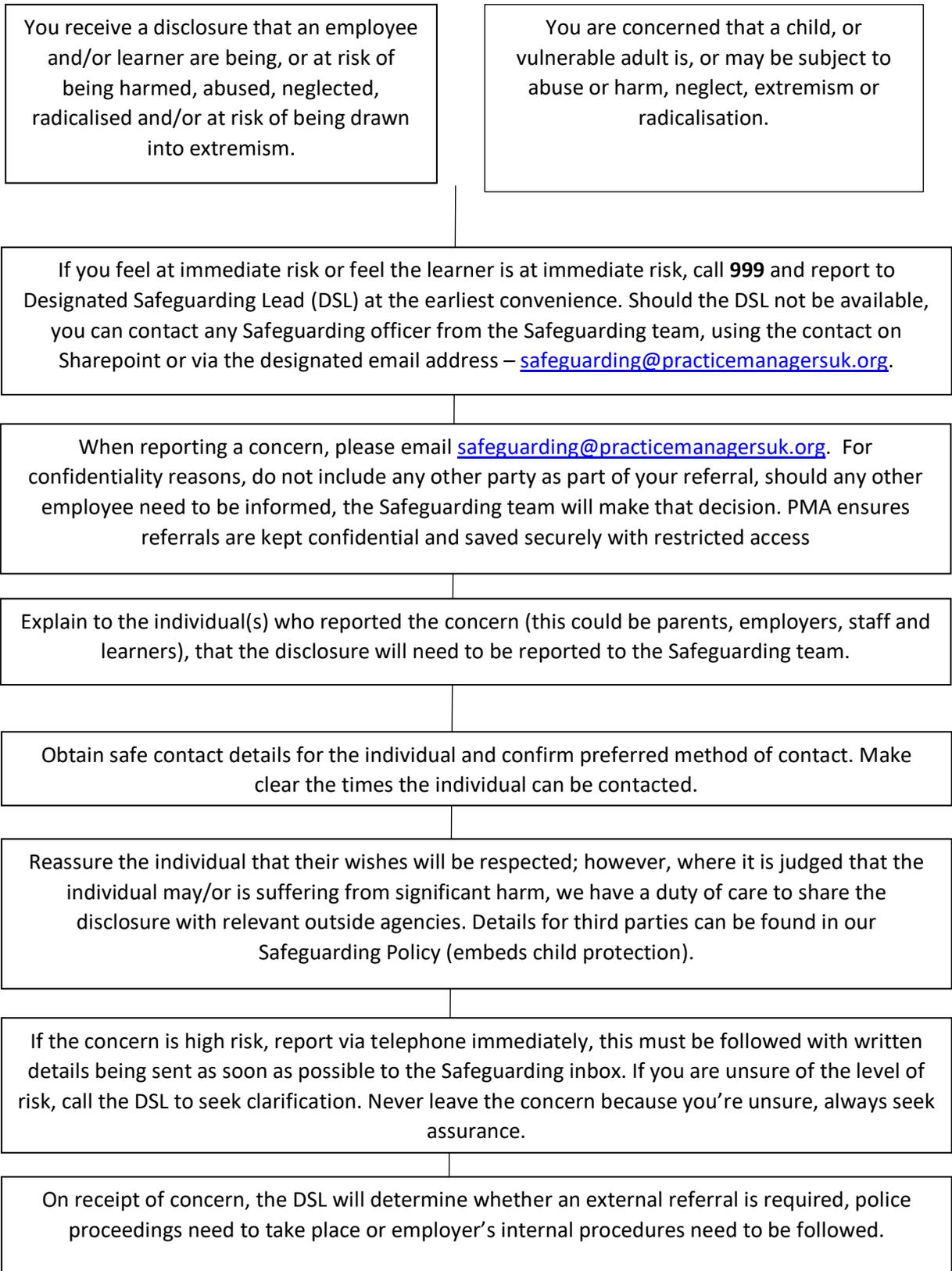
All concerns/ allegations will be documented, and records held in accordance with the General Data Protection Regulation.

Where necessary, outside agencies, such as the police and local safeguarding boards may be contacted (pathways detailed in the code of conduct).

Appendix A

Raising a safeguarding Concern - staff

The purpose of this process is to outline the steps to take when a safeguarding concern/disclosure is first established. This process reflects the guidelines in Keeping Children Safe in Education 2020.



Where online extremist materials have been found this can be reported immediately using the link below <https://www.gov.uk/report-terrorism>.

This must be reported to DSL immediately.

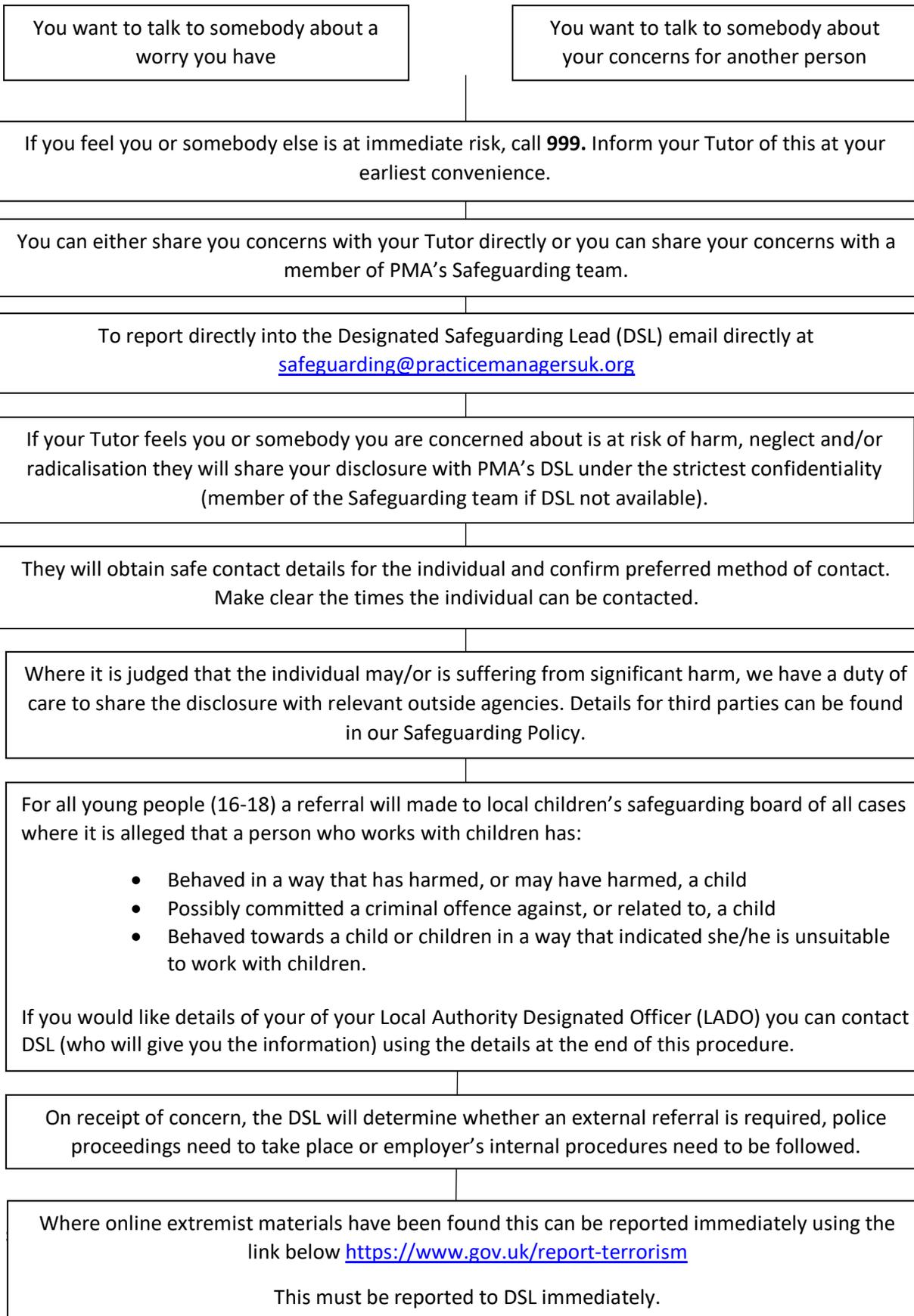
For all young people (16-18), a referral will be made to the local safeguarding board of all cases where it is alleged that a person who works with children has:

- Behaved in a way that has harmed, 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 indicated she/he is unsuitable to work with children.

Appendix B

Raising a safeguarding concern - learner

The purpose of this process is to outline the steps to take when you want to report or seek advice on potential harm that could come to yourself or others. This process reflects the guidelines from 'Keeping Children Safe in Education 2020'.



Signatories

Directors names:		
Signature:		
Date:		

Governance Chair name:	
Signature:	
Date:	

Appendix C

Safeguarding Code of Conduct

This Code of Conduct should be used in conjunction with the PMA Child Protection policy, Safeguarding Vulnerable Adults policy and E-Safety policy. It demonstrates our commitment for the safety and protection of vulnerable groups; including most at risk of radicalisation and extremism, and demonstrates our commitment to the framework of the 6 Rs.

All employees involved with young people and vulnerable adults are required to familiarise themselves with all policies and procedures that safeguard both young people and vulnerable adults and or any or individual who may become vulnerable.

The basic principle of good conduct is that everyone involved with the company must never use their role to gain inappropriate access to vulnerable individuals. This is inclusive of following the rules and regulations as set out by the General Data Protection Regulation (GDPR); PMA sets out the parameters of GDPR within its own specialised policies.

All employees are appropriately trained to identify signs of harm or abuse, including, radicalisation and extremism. All staff consider the 6 Rs framework detailed below.

PMA is committed to the values and practises of safeguarding, including those associated with radicalisation and extremism.

The welfare and safety of all learners and staff is paramount. We expect all those involved with PMA to share this commitment.

Everyone must therefore (in line with equality and Prevent duties):

(1) Recognise

- Recognise behaviour that may indicate abuse
- Spot concerning signs or behaviour in a learner
- Actively contribute to an organisational culture where inappropriate behaviour is not tolerated.

(2) Response

- Value, listen and respect, everyone; treating them as individuals at all times
- Ascertain what you are dealing with. Are you dealing with an allegation or concern?
- Ask open questions (not leading or suggestive ones) and gather just enough information to know that it is a disclosure of abuse that needs to be passed on, and how immediate the danger of harm is to the individual
- Do not make promises about what will happen next
- Be clear that it will be treated in confidence, but recorded and passed on to a member of the Safeguarding team; the Designated Safeguarding Lead (DSL) may escalate to the below pathways:
- Learner 16-18 - Children and Young People's Safeguarding Board
- Learner 18-22 with a disability - Children and Young People's Safeguarding Board
- Learner 19+ - Vulnerable Adults Safeguarding Board (inclusive of people over the age of 23 and with a disability)
- Member of staff - see allegation procedure
- Demonstrate interest and concern, and take it seriously, even if it's difficult to believe or shocks you
- Reassure they have done the right thing and you will do everything you can to help (without making unrealistic promises)

- Ensure that testimony is recorded and reported, and that the complainant and subject of the complaint are treated in line with child protection and safeguarding vulnerable adults policies.

(3) Reporting

- Report your concerns, as soon as possible, as per raising a safeguarding concern procedure
- Positively support a whistle blowing culture where concerns about inappropriate behaviours towards children/young people and vulnerable adults are reported to the Safeguarding team
- Include details of any criminal proceedings or investigations currently being undertaken which involve you.

(4) Recording

- Record precisely what has been alleged, using key phrases and words the individual used. Notes can be made following the conversation to assist with referral but must be appropriately destroyed post-referral (must comply with GDPR legislation)
- Include any observations of the individual, as well as your interpretation of the facts as long as you clearly identify when you are doing so
- All Information is stored securely, and separately to learners individual files
- It is only accessible to those who have responsibility over the safeguarding matters
- Any information gathered for the purpose of safeguarding, young people and vulnerable adults will be treated in the strictest of confidence.
- The information received around disclosures will, unless there are exceptional circumstances will be destroyed after a six-month period.

(5) Referral

- DSL will make referral in with aforementioned pathways
- Cases can be shared with those who hold authority
- Only the DSL will make external referrals
- Positively support and contribute towards protection of data.

(6) Review

- All safeguarding policies and procedures are reviewed annually, unless require earlier
- The safeguarding team continuously review trends and identify learning points.

Remember

Wherever possible ensure that there is always more than one adult present during activities with young people and vulnerable adults or are that you are in view of others.

- Never transport learners alone by car, unless authorised to do so
- Avoid any unnecessary physical contact with learners and colleagues
- Never allow or engage in any sexually provocative activities
- Never make any discriminatory remarks to or about children, young people or vulnerable adults
- Never hold meeting with learners at their home address or isolated environments
- Never befriend any learners through social networking sites or provide learners with personal contact details including telephone numbers and addresses
- Photographs and videos must not include learners unless authorised by the individual. In instances where the learners are under the age of 18, parental consent must be provided
- Sexual relationships between employees and learners are strictly forbidden
- Due to the nature of your role and for the purpose of the Rehabilitation of Offenders Act Exceptions Order 1975, you will be required to provide details of any criminal convictions, cautions, the penalty imposed and whether or not regarded as spent under the act
- PMA reserves the right to request that any person involved in working directly with, young people and vulnerable adults, undertake at their own expense a DBS check (Previously CRB Disclosure) where it is a requirement of their job role

- All PMA staff must wear their ID Badges at all times.

Professional code of conduct

The behaviour expected of all staff and their responsibilities include:

- Agreement to work under the Safeguarding policy.
- Provisions regarding acceptable behaviour in the workplace – for example, not to use physical contact however acceptable or moderate it may seem, not to use language intended to demean or humiliate young people
- To observe confidentiality and not talk about any situations of actual or suspected abuse that occurs except with those who have a legitimate aim to receive it
- Not to pay for sexual services, of any kind
- Having none professional relationships with learners and providing them with access to your personal details
- Not having learners as friends through social networking sites, or engaging with them outside of working hours for purposes other than teaching learning and assessment.

Infatuation

There may be times where a learner develops an infatuation with an individual who works with them. All employees should deal with these situations sensitively and appropriately to uphold the dignity and safety of all involved. Employees must be aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above any criticism or questioning.

Any employee, who becomes aware that a learner is developing an infatuation, should discuss this at the earliest opportunity with of the Safeguarding team, or management, in line with our reporting procedure so appropriate action can be taken to avoid any hurt, distress or embarrassment.

Gifts and favouritism

An employee should never accept gifts from a learner. All gestures of this nature should be sent via written or electronic form to the direct line manager as a compliment.

An employee should never show favouritism to a learner or give them a gift when they have met or exceed their goals. All details of recognition should be detailed on the appropriate documentation within the company.

Transporting learners

It is inappropriate for an employee to offer lifts to a learner outside their normal working duties, unless this has been brought to the attention of the DSL.

There may be occasions where the learner requires transport in an emergency situation or where in situations were not to providing a lift may place the young person at risk. Such circumstances must always be recorded and reported to the DSL and or direct line manager and parents/carers.

All occasions that involve an employee accompanying a learner in their vehicle must be fully recorded on a Young Passenger Safety Document. This will include time and dates of visit, name of individuals involved, reason for visit and a signed declaration.

People in distress

There may be occasions where people become distressed, for example in a teaching session and an employee feels they require comfort and reassurance. Employees should use their professional judgement

in this situation, considering the circumstances surrounding the distress, and the age and gender of the individual. An employee must always ensure they maintain clear professional boundaries in situations of this nature.

Where an employee has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with the DSL. Employees should ensure:

- They consider the way in which they offer comfort and reassurance to a distressed person and do it in an age-appropriate way
- They are vigilant in offering reassurance in one to one situations and always record such actions
- They follow our Safeguarding Code of Conduct
- They never touch a person in a way which may be considered indecent
- They record and report situations which may give rise to concern from either party
- They never assume that all people seek physical comfort if they are distressed.

One-to-one assessment visits

In order to safeguard our staff against allegations, and to safeguard our learners, all assessment activities involving learners will be conducted at our premises and/or the learner's place of work. In the event that both premises are inaccessible, a meeting must be re-arranged or be held in a public place.

First aid

PMA have appointed numerous staff to be qualified in emergency first aid. These individuals will be responsible for the administration of any first aid. When administering first aid, wherever possible, employees should ensure that another employee is aware of the action being taken. Parents should always be informed when first aid has been administered to any learner aged under 18 years old. All accidents, however minor, will also be reported to the DSL, in line with our accident reporting procedure. PMA staff are not qualified in administration of medication. In the event a person requires medication for a personal health problem they will be asked to self-administer medication or treatment including ointment, use of inhalers.

Media, communication & information

This policy should be used in conjunction with our E-Safety policy to ensure that any personal information around media and communication is:

- Kept confidential unless we have a specific agreement in place that dictates otherwise. Information that relates to a safeguarding incident will, however, be passed to the DSL or law enforcement agency
- Used appropriately, inclusive of images, ensuring they are respectful, not degrading, or sexual
- Captured with written permission/consent from the appropriate individual.

Dress code

A person's dress and appearance are matters of personal choice and self-expression. However, when working with young people, adults should dress in a way which is appropriate to their role and this may need to be different to how they dress outside of work. Staff should ensure they are dressed appropriately for the tasks and the work they undertake.

Workplace attire should therefore:

- Be appropriate for the role
- Not to be viewed as offensive, revealing, or sexually provocative
- Not distract, cause embarrassment or give rise to misunderstanding
- Not display any slogan or images that could be considered to be discriminatory or culturally sensitive.

Main Contacts:

Name	Job Title	Address	Mobile phone
Ian Jones	Operations Director	ian@practicemanagersuk.org	07880 788 985
Austin Ambrose	Client Services Director	austin@practicemanagersuk.org	07726 921 685
Lisa Lindgren	Head of Education	lisa@practicemanagersuk.org	07751 091 395

Should you have any concerns around Safeguarding please email:

PMA DSL, Lisa Lindgren at: safeguarding@practicemanagersuk.org

Please be assured your email will be treated in the strictest confidence and that you will receive a direct reply from Lisa within 24 hours.

Revisions control:

Date	Summary of changes made	Changes made by (Name)	Version No.
Sept 2020	Full review and complete replacement to updated policy	Lisa Lindgren	V6.0

Next Review Due: August 2021