CWLC
Safeguarding and Prevent Policy

Introduction:

CWLC Ltd consists of the following companies.

- *Bona Fide Site Services Ltd (Trading as CWLC)*
- *Yeti Partnerships Ltd (Trading as CWLC)*

The company is a private Training Provider who deliver a range of apprenticeships, nationally accredited qualifications and a selection of short accredited courses. The company are committed to providing a curriculum to develop a learner's skills, increase their knowledge and in return become a great asset to an organisation.

The company is committed to be an Equal Opportunities Employer and Provider of Training in accordance with the Equality Act 2010 – *'legally protects people from discrimination in the workplace and in wider society. It replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in certain situations*.

The company is committed to safeguarding and aims to create a culture of vigilance.

1. Scope

Safeguarding is everyone's responsibility. This policy applies to all employees and self-employed partners conducting onsite and offsite activities with learners, regardless of position, role and responsibilities.

This policy deals with the protection of Young People (children) and Adults at Risk. For the purpose of clarity, **any person under the age of 18 is deemed a child**, and an **adult at risk** replaces the previously used term 'vulnerable adult' as set out in the governments 'No Secrets' guidance 2010. The Care Act 2014 defines an **adult at risk** as a person who has care and support needs and/or is at risk of, being abused or neglected and unable to protect themselves against the abuse or neglect or risk of it because of those needs.

Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Source: No Secrets Guidance

2. Objectives

The company aim to ensure that: Appropriate action is taken in a timely manner to safeguard and promote learner's welfare.

The company will appoint and train a senior board level Designated Safeguarding Lead to take leadership responsibility on all safeguarding arrangements (including Prevent) and appoint and train a team of Deputy Designated Safeguarding Leads to manage the day to day safeguarding issues.

This policy will be reviewed annually by the Designated Safeguarding Lead and/or in line with changes or new legislation and/or regulations.

3. Safeguarding Adults

The Care Act 2014 defines safeguarding as "protecting an adult's right to live in safety, free from abuse and neglect." The duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support.

Types of Abuse and Neglect - Adults

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; and 'honour' based violence (HBV) is a form of domestic abuse which is perpetrated in the name of so called 'honour-based violence.

- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

- **Financial abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Doorstep crime is also a common form of financial abuse.

- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion

- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect also includes not being provided with enough food or with the right kind of food or taken proper care of.

- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

Source: CQC

4. Safeguarding Young People (children)

A **child** is someone who has not yet reached their 18th birthday.
Once they turn 18, they are legally an adult.

Types of Abuse and Neglect - Children

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Source: Keeping Children Safe in Education 2018

5. Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

There are four main types of FGM:

- **Type 1 (clitoridectomy)** – removing part or all of the clitoris.
- **Type 2 (excision)** – removing part or all of the clitoris and the inner labia (lips that surround the vagina), with or without removal of the labia majora (larger outer lips).
- **Type 3 (infibulation)** – narrowing of the vaginal opening by creating a seal, formed by cutting and repositioning the labia.
- **Other harmful procedures** to the female genitals, including pricking, piercing, cutting, scraping or burning the area.

Signs, Symptoms and Effects of FGM

A girl or woman who has had FGM may;

- Have difficulty walking, sitting or standing;
- Spend longer than normal on the bathroom or toilet;
- Have unusual behaviour after an absence;
- Be particularly reluctant to undergo normal medical examinations;
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

What to look out for before FGM happens

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about;

- Being taken 'home' for a visit;
- A special occasion to 'become a woman';
- An older female relative visiting the UK.

If a tutor/assessor, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the police.

The practice is illegal in the UK and is classed as child abuse. It is also illegal to arrange for a young person to be taken abroad for FGM to find out more about Female Genital Mutilation:
https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/

FGM helpline – the NSPCC have a 24-hour dedicated **FGM helpline** offering information, advice and guidance **Tel**: 0800 028 3550 or **email** fgmhelp@nspcc.org.uk

Source: Female genital mutilation (FGM) - NHS.UK

6. Forced Marriage

Forced marriage is a marriage performed without the full and free consent of one or both parties. Emotional, financial, physical and sexual threats and abuse, as well as notions of 'honour', can all be used to force someone to marry. Force marriage can lead to physical violence, rape and even murder.
https://www.gov.uk/guidance/forced-marriage

The pressure put on people to marry against their will may be:

- **Physical** – for example, threats, physical violence or sexual violence.
- **Emotional and psychological –** for example, making someone feel like they are bringing 'shame' on their family.

Forced Marriage Unit

Contact the Forced Marriage Unit (FMU) if you're trying to stop a forced marriage or you need help leaving a marriage you've been forced into.
Tel: 020 7008 0151, email: fmu@fco.gov.uk

If you're trying to stop a forced marriage or you need help leaving a marriage you've been forced into call 999 in an emergency.

Source: Forced marriage – GOV UK

7. Specific Safeguarding issues

Safeguarding issues can manifest themselves via **peer on peer abuse**. Employees should be aware that learners are capable of abusing their peers. 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 and sexual harassment;
- Sexting (also known as youth produced sexual imagery);
- Initiation/hazing type violence and rituals.

Peer to peer abuse is unacceptable and will be recorded and investigated accordingly in line with this policy. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

The company is committed to responding to all concerns about learners in relation to any form of abuse or welfare concerns. This includes any form of peer to peer abuse, harassment or bullying, including cyber bullying.

8. Contextual Safeguarding

Safeguarding concerns, incidents and behaviours can be associated with factors outside of the company. Employees must consider the wider context in which incidents and behaviour occurs. This is known as contextual safeguarding which means that assessments of learners must consider wider environmental factors that are present in the learners' life that are a threat to their safety and welfare.

10. Prevent

The Prevent statutory duty requires local authorities, schools, colleges, higher education institutions, health bodies, prisons and probation, and the police to consider the need to safeguard people from being drawn into terrorism. It sits alongside long-established duties on professionals to safeguard vulnerable people from exploitation from a range of other harms such as drugs, gangs and physical and sexual exploitation. Protecting learners from radicalisation is part of the wider safeguarding duties of teachers, tutors and academics.

The Government's Counter Terrorism Strategy CONTEST' overarching aim is to reduce the risk to the UK and its Citizens and interests overseas from terrorism, so that people can go about their lives freely and with confidence.

The governments **approach** to the CONTEST strategic framework is made up of the four 'P' approach:

- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Pursue**: to stop terrorist attacks.
- **Protect:** to strengthen our protection against a terrorist attack.
- **Prepare**: to mitigate the impact of a terrorist attack.

Of the four Ps' approach **Prevent** is at its heart to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism.

The objectives of Prevent are to:

- **Tackle the causes of radicalisation** and respond to the ideological challenge of terrorism.
- **Safeguard and support** those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to **disengage and rehabilitate**.

The government expects educational institutions to encourage learners to respect other people with particular regard to understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity.

The Prevent statutory duty encourages free speech and open debate as one of our most powerful tools in promoting critical thinking and preventing terrorist and extremist narratives taking hold.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

The company recognises that any learner in danger of radicalisation or demonstrating extremist tendencies (violent or non-violent) is deemed to be vulnerable and appropriate support under the PREVENT strategy or through CHANNEL will be sought.

Prevent is an integral part of the Safeguarding and should be must be reported in accordance with this procedure.

For immediate terrorist threats: Call 999 or the police anti-terrorist hotline 0800 789 321

Source: Keeping Children Safe in Education 2018, CONTEST 2018, Channel guidance – GOV.UK and Prevent Duty Guidance

Definitions

- **Safeguarding** in terms of Prevent is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorist related activity.

- **Vulnerability** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **Ideology** is a set of beliefs

- **Extremism** The government defines extremism in the Prevent strategy as: "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. the strategy also include in the definition of extremism calls for the death of members of our armed forces", whether in this country or overseas.".

- **Prevent** is an integral part of the government's counter-terrorism strategy, CONTEST. Prevent tackles non-violent extremism where it creates an environment conductive to terrorism and popularises ideas that are espoused by terrorist groups.

- **Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by: identifying individuals at risk. assessing the nature and extent of that risk.

11.Approach

The company take all reasonable measures to ensure that risks of harm to Young People and Adults at Risk's welfare is minimised by appropriate:

- Staff selection, recruitment, induction and training
- Risk Assessment
- Health and Safety Procedures
- Effectively respond to referrals

12.Implementation

At least one person on any interview panel will have undertaken safer recruitment training.

The company will ensure that all new employees are subject to a Disclosure and Barring Service (DBS) check. The level of DBS check will depend on the role that is being offered and duties involved.

All new employees complete mandatory Safeguarding, Prevent, Equality & Diversity, GDPR, Online Safety and British Values training through the formal induction process and undertake refresher training at least on an annual basis.

The Safeguarding Team will be trained to Level 3 in Safeguarding and undertake refresher training at least every two years, attend Prevent group meetings, attend the Workshop to Raise Awareness of Prevent (WRAP) and undergo regular CPD events to keep updated with legislation and refresh knowledge.

In order for learners and visitors to feel safe and be able to recognise individuals who can offer support on behalf of the company employees are required to wear their official DBS badge at all times.

All employees are required to refer safeguarding (including prevent) incidents to the Safeguarding Team within 24 hours of disclosure.

Monthly 'Hot Topics' are distributed via these internal communications to raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as British Values, Radicalisation, Mental health issues, positive relationships, Staying Safe Online, Health and Safety and Health and Wellbeing which will educate employees alongside giving greater knowledge to be passed onto learners.

Safeguarding, Equality and Diversity, Data Security and Health and Safety remain a fixed agenda item at all meetings.

During leaner induction and enrolment if a learner discloses an unspent criminal conviction or has been convicted of terrorism related offences. If deemed necessary, in relation to the type of disclosure a risk assessment may be completed by a member of the safeguarding team.

In order to stay safe online all employees are required to read and follow ICT policies.

Learners are taught about Safeguarding, Prevent, Online Safety, Data Protection and British Values through induction and during tutor sessions.

13.Responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility.

Directors fulfil statutory responsibilities, directors will ensure that arrangements are in place to create and maintain a safe learning environment and ensure that policies, procedures and practices comply with the law.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection. The activities of the designated safeguarding lead may be delegated to appropriately trained deputies however, the ultimate lead responsibility for safeguarding and child protection, remains with the designated safeguarding lead.

The Deputy Designated Safeguarding Leads are responsible for the day to day operational management of safeguarding issues. Deputies will deal with employee concerns over learner's welfare, signpost, offer guidance and liaise with the Safeguarding Lead for concerns requiring referral to external agencies. When the DSL is absent, the deputies will act as cover.

Employees must be familiar with this safeguarding policy and record and refer, in a timely manner, concerns with safeguarding.

The following actions are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visiting learners at home
- Transporting learners to and from locations (this includes travelling in the car with a learner driving)
- Using sarcasm, insults or belittling comments towards learners
- Engaging in personal relationships with learners beyond that appropriate for a learner /tutor relationship
- Engaging in inappropriate touching of any kind
- Making sexual suggestive comments

Employees must always act professionally and any employee who breach the above may be subject to the disciplinary procedure.

14. Allegations against an Employee

If you suspect an employee is abusing a learner or breaching their position in a safeguarding capacity if is your responsibility to whistle blow and report the allegation in line with this procedure.

15. Safeguarding Concerns (Including Prevent)

If an employee is unsure if their concern is safeguarding, they must seek advice from a member of the safeguarding team. *(refer to page 11-12 for contact details)*

If the concern is identified as not being safeguarding, seek guidance in line with the Information Advice and Guidance Policy.

Reporting Safeguarding Concerns:

- **Complete an Incident Reporting Form** located on the companies shared drive
- Reports must contain as much detail as possible:
    - *Contain factual evidence*
    - *Use the persons own words and phrases.*
    - *Report all feelings and suspicions, but clearly separated from the factual evidence.*
    - *Describe the circumstance in which the disclosure came about.*
    - *Include information about the setting and anyone else who was there at the time.*
- Submit the incident form within **24 hours of disclosure**
Submit to info@cwlc.co.uk
- All follow ups must be reported within 24 hours to the Safeguarding Team
- The Safeguarding Team must be informed when a learner, where there has been a safeguarding concern, is withdrawn from the programme and why.

If you are in doubt about recording requirements, employees are required to speak to a member of the Safeguarding Team. *(refer to pages 11-12 for contact details)*

The Designated Safeguarding Lead will as required, refer cases:

- Of suspected abuse to the appropriate agencies and Safeguarding Board
- To the Channel programme where there is a radicalisation concern
- Where a person is dismissed or left due to risk/harm to a Young Person or Adult at Risk to the Disclosure and Barring Service
- Where a crime may have been committed to the police

16. Confidentiality and Information Sharing

Employees must maintain confidentiality by not discussing their concern with anyone other than the Safeguarding Team.

Employees must be aware that they cannot promise to keep secrets which might compromise a learner's safety or wellbeing.

- **Safeguarding Young People (children**) statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm. Such concerns will be referred into Children Social Care and the Police if appropriate.

- **In relation to learners 18 years and over**, and classed as an adult in law, the company has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act (including DoLs) 2005 and the Human Rights Act 1998.

The Safeguarding Team have a professional responsibility to share relevant information with other agencies to safeguard within the boundaries of the Data Protection Act 2018 and General Data Protection Regulation (GDPR) which as such does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

17. Escalation

If a disclosure is made but is not resolved to your satisfaction, then you have the right to escalation. The issue should be raised to the Designated Safeguarding Lead unless your concern is about them when you should raise this with a member of the Board.

18. Monitoring

Compliance with this procedure will be monitored by the Safeguarding Team.

An annual report will be produced for the Board of Directors to include:
- Legislative changes
- Outcomes of the policy review
- Company training requirements
- Number of disclosures for the current academic year (not detailed or identifying to individuals)
- Any changes required to current practice.
- Allegations against staff
- Recommendations that the board must endorse

19. Useful contacts

Reporting a Safeguarding concern

Help and advice between Monday-Friday 8am – 5pm contact a member of the Safeguarding team

Kirsty Dunlop, Centre Administrator
Designated Safeguarding Lead (Strategic Lead)
Mobile: 020 7418 2290
Email: info@cwlc.co.uk

Alan Keating, Lead IQA/Centre Manager
Deputy Designated Safeguarding Lead
Mobile: 020 7418 2291
Email: info@cwlc.co.uk

Glenn O'Neill, Operations Director
Deputy Designated Safeguarding Lead
Mobile: 020 418 2291
Email: info@cwlc.co.uk

- **Personal safety:** contact the Police 999 or 101
- **Health and Wellbeing** contact your out of hours Doctors or call the Hospital on 111
- **Abuse of an older person:** call 999 to report a crime that is in progress or if someone is in **immediate danger**
- **Reporting abuse**: contact the local police https://www.police.uk/ if you think a crime has been committed or contact the local council https://www.gov.uk/find-local-council if you think someone is at risk of being abused.
- **Concerns about the quality of care** contact the Care Quality Commission (CQC) Customer Service on 03000 616161 https://www.cqc.org.uk/contact-us
- **Care homes and home carers**: contact the local council if you are concerned about someone not being treated properly in a care home or someone is being mistreated by a carer.
- **Help and advice** – if you want to discuss concerns and get some advice, contact Action on Elder Abuse helpline on 0800 808 8141
- **18 or under** call the NSPCC on 0800 1111. call or email the NSPCC helpline on 0808 800 5000 or email help@nspcc.org.uk
- Contact your local Authority Out of Hours Social Care number for any concerns relating **to a child (under 18),** which you can find by putting in the postcode here https://www.gov.uk/report-child-abuse-to-local-council
- **Helping children stay safe online** https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/

Worried about online sexual abuse or the way someone has been communicating to you online?

Make a report to CEOP's Child Protection Advisors https://www.ceop.police.uk/safety-centre CEOP helps any child or young people under the age of 18 who is being pressured, forced or tricked into part in sexual activity of any kind. This can be something that has taken place either online or in 'the real world', or both. The CEOP Safety Centre has clear information and advice on what can be reported to CEOP, the reporting process and what will happen if you do decide to make a report.

20.Related Policies

- Modern Slavery Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- Grievance Policy
- Data Protection Policy

Any questions or concerns about the operation of this policy, or if you consider that this policy has not been followed, you should raise the matter with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

Document Control

Date of change	Version	Overview of amendment	Amended by (Job title)	Approved by	Approval date