

Safeguarding and Prevent Policy

1. Introduction

The purpose of this policy is to ensure that everyone connected with Watson Martin, including staff and sub-contractors, understand how we safeguard learners, including those at risk of radicalisation and potentially becoming involved in terrorist activities.

Safeguarding seeks to keep children, young people and adults safe from a range of potential harm and looks at preventative action, not just reaction. It is directed by various legislation and statutory duties including *Keeping Children Safe in Education* - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

2. Objectives

The objective of the Safeguarding and Prevent policy is to provide an environment where:

- The welfare of the learner is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- The learning environment is safe and fundamental British values are promoted.
- Staff, learners and stakeholders have an understanding of safeguarding which then enables them to fulfil their statutory obligations; they are aware of their roles and responsibilities in preventing radicalisation and extremism.
- Support, advice and guidance is provided for learners and staff who may be at risk of radicalisation. This may include referral to Channel, the process by which multi-agency support is provided to individuals who are at risk of being drawn into terrorism.

3. Implementation

As part of Watson Martin's approach to Safeguarding and the promotion of fundamental British values, we will:

- Promote the welfare of children and vulnerable adults and have procedures in place to seek to protect our learners.
- Ensure staff understand their responsibility to recognise risks to learners and to identify learners that may be at risk of harm from radicalisation.
- Promote fundamental British values through our curriculum.
- Ensure learners are informed about the content of this policy at induction and are reminded during workshops and progress reviews.
- Recruit staff in line with safer recruitment guidelines by ensuring:

- all applicants are considered equally and fairly;
- staff are recruited based on their suitability, merits and abilities for the role;
- compliance with all necessary statutory guidance and legislation, such as Disclosure and Barring Services (DBS), Prevent Duty Guidance and Keeping Children Safe in Education;
- to carry out all necessary pre-employment checks

Information surrounding the Recruitment of Ex-Offenders can be found in the Equality and Diversity policy.

- Share information about concerns with agencies who need to know and involving parents/carers and young people/adults at risk appropriately.
- Support employers with whom we engage to recognise their own safeguarding and Prevent obligations to learners aged under 18 by providing timely information advice and guidance.
- Promote this policy at quarterly and annual staff training events.

The Senior Safeguarding Lead:

- Will be a member of the senior management team
- Will deal with any concerns raised against the Designated Safeguarding Officer
- Will ensure the organisation's safeguarding policy is implemented, monitored and that safeguarding practices are regularly reviewed and evaluated.

4. Safeguarding Principles

The term 'child' means anyone who has not yet attained the age of 18 and the term 'vulnerable adult' means a person, aged 18 or over, who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation.

The following six key principles underpin all adult safeguarding:

1. **Empowerment:** people being supported and encouraged to make their own decisions and give informed consent
2. **Prevention:** it is better to take action before harm occurs
3. **Proportionality:** the least intrusive response appropriate to the risk presented
4. **Protection:** support and representation for those in greatest need
5. **Partnership:** local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse
6. **Accountability:** accountability and transparency in safeguarding practice

An adult at risk may be a person who:

- Is living in areas of high crime
- is elderly and frail due to ill health, physical disability or cognitive impairment
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- is unable to demonstrate the capacity to make a decision and is in need of care and support.

(This list is not exhaustive - Taken from Social Care Institute for Excellence (SCIE) Report 39: Protecting adults at risk: London multi-agency policy and procedures to safeguard adults from abuse.)

5. What is abuse (taken from: Working Together to Safeguard children 2018 and Working Together to Safeguard Children 2018 (publishing.service.gov.uk):

Everyone has the right to live in safety, free from abuse and neglect. Abuse is a form of maltreatment. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

5.1 Categories of abuse

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, young person or vulnerable adult. 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though 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.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Neglect

Neglect is the persistent failure to meet a child's, young person's or vulnerable adult's basic, physical and/or psychological needs, likely to result in serious impairment of the child's health or development. This could be when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger.

Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Other forms of abuse associated with adults at risk include:

- **Financial Abuse – this could include;** undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, theft of money or possessions or misuse of benefits.
- **Discriminatory Abuse – this could include;** Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as ‘**protected characteristics**’ under the Equality Act 2010)
- **Institutional abuse – this could include;** Not offering choice or promoting independence, failure to respond to abuse appropriately or abusive and disrespectful attitudes towards people using the service

County Lines

As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of ‘deal line’. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child criminal exploitation

As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Female genital mutilation (FGM) Signs, indicators and effects - NSPCC.

- Where it is discovered that an act of FGM appears to have been carried out on a girl who is aged under 18, they should personally report it to the police.

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

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.

The effects of abuse are wide-ranging and will vary according to the type of abuse and duration, but can include:

- behavioural problems
- mental health problems
- educational problems
- relationship problems
- drug and alcohol problems
- self-harm
- suicide
- in extreme cases, death following abuse.

6. Recognising abuse

- In order to identify cases of children, young people or adults who may be in need of help or protection, staff should be aware of the signs of neglect and abuse. When concerned about the welfare of a child, young person or adult, staff should always act in their best interest.
- Young people who regularly go missing from work and home may be at risk of sexual exploitation and abuse and must be viewed as a safeguarding concern.
- Child abuse can and does occur both within a child/young person's/adult's family and in institutional or community settings. It is acknowledged that some individuals seek to use childcare and community organisations to gain access to children, and that it is necessary to have an open mind when the possibility arises that a member of staff employed by Watson Martin or a learner is suspected of abuse or inappropriate activity.

Physical signs that may indicate that a child or vulnerable adult is being or has been abused:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally
- An injury for which the child's or adult's explanation appears inconsistent

- Bruising/burns/cigarette burns/fractures which are unexplainable
- Genital injuries/infections/bleeding or discomfort
- Sudden speech disorders, delayed development, failure to grow
- Constant hunger, stealing food, frequently dirty or smelly
- Untreated medical conditions or lack of treatment for illness or injury

A behavioural sign that may indicate a child or adult has been abused or is being abused:

- Inappropriate sexual awareness or sexually explicit behaviour
- The child appears distrustful of adults
- Unexplained changes in behaviour
- Concerning behaviour
- Aggressive behaviour or severe temper outburst
- Running away, not wanting to go home
- Cover up clothing to hide injuries
- Flinching when approached, fear of adults, fear of men or women
- Depression, low mood, self-harm, eating disorders
- Sexualised language, play, drawings or knowledge
- Nightmares, bed wetting
- Behaving increasingly secretly, possessing unexplained amounts of money, gifts
- Drug and alcohol abuse, suicide
- Excessive lack of confidence, need for approval, attention or affection
- Missing classes, appointments, being continually late
- Difficulty forming relationships, no friends

The recognition of abuse is not easy, and it is not the place of staff to make such a judgement. However, it is their responsibility to act on concerns in order to safeguard the welfare of the child/adult.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

7. How to respond to signs or suspicions of abuse

All Watson Martin staff should report any concerns to a member of the Watson Martin Safeguarding Team using the Safeguarding Reporting Form. This form should be emailed to the Designated Safeguarding Officer.

The following '5R' process MUST be followed by all Watson Martin staff:

Recognise the signs of abuse.

Respond and react accordingly

Record the facts of the disclosure

Report the disclosure to the Designated Safeguarding Officer (or Deputy Safeguarding Officer) immediately.

Refer to the emergency services or social services or through the Channel process in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the Designated Safeguarding Officer (or Deputy Safeguarding Officers) immediately.

How to respond to a child/young person or adult telling you about abuse

There are some basic principles in reacting to suspicions, allegations, and/or disclosures of abuse.

What to do:

- stay calm
- listen, hear and believe
- ask open ended questions for clarification only
- give the child/young person/adult time to say what they want
- reassure and explain that they have done the right thing in telling. Explain that only those people who need to know will be informed
- act immediately in accordance with the procedure in this policy
- record in writing as near as verbatim as possible what was said as soon as possible
- report to a member of the safeguarding team
- record the events in a 'safeguarding concerns report'
- consider their immediate safety

What not to do:

- do not over-react. It is extremely unlikely that the child/young person/adult is in immediate danger
- do not probe for more information, questioning the child/young person/adult may affect how their disclosure is received at a later date
- do not make assumptions, paraphrase and do not offer alternative explanations
- do not promise confidentiality to keep secrets or that everything will be ok (it might not)
- do not try to deal with it yourself
- do not make negative comments about the alleged abuser
- do not 'gossip' or disclose any information with colleagues about what has been said to you
- do not make the child/young person/adult repeat the story unnecessarily

8. Prevent Duty and Channel

The Prevent policy places a duty on bodies receiving public funding to have due regard to the need to prevent people from being drawn into terrorism. It requires all staff to be alert to any reason for concern in a learner's life at home or elsewhere.

Channel is an early intervention process which will gather information as to determine whether there is a specific risk of radicalisation and whether the threat is malicious.

The local authority Prevent coordinator and the police Channel coordinator will identify the type of support required and refer to a Multi-Agency Channel Panel.

Contest

Contest is the Government's Counter Terrorism Strategy. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST's consists of four 'P' workstreams:

- 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.

9. IT Usage

Information Technology (IT) plays an important role in in the everyday lives of children, young people and adult and is now an essential resource to support learning and teaching.

IT covers a number of resources including web-based and distance learning. Technologies are currently used both inside and out of the learning environment. Examples of these include websites, virtual Learning Environments (VLE), Mobile/smartphones with text, video and/or web functionality, social networking websites, chat rooms, email and instant messaging, social networking websites and video/music broadcasting.

Whilst being beneficial both in and out of the learning environment, a lot of IT, particularly web-based resources, is not consistently policed. It is therefore important that all users are aware of the range of risks that are associated with the use of these technologies and staff understand the responsibility to educate learners on e-safety issues to enable them to remain both safe and legal when using the internet.

The internet is an open communication medium that is available to everyone. Anyone can view information, send messages, discuss ideas and publish material, which makes it both an invaluable resource for education, business and social interaction, as well as a potential risk to young and vulnerable people. All internet use is recorded appropriately. However, to ensure that learners are protected against unnecessary risks, all staff must ensure learners are not accessing inappropriate material, discourage raw image searches when working with young people and observe copyright laws at all times.

IT Monitoring

To aid effective safeguarding of learners Watson Martin employs the following technologies and processes:

- Internet and email monitoring solution activity is monitored and recorded in line with the relevant UK law
- Internet access is controlled through an appropriate web filtering service
- Staff and learners are made aware that email and internet activity can be monitored and explored further if required

- If learners or staff discover an unsuitable site, the incident should be reported immediately to a member of staff or a member of the management team
- Learners and staff are not permitted to download programs or files on centre-based IT facilities
- If there are any issues that are related to viruses or anti-virus software, then the Reed IT Team should be informed immediately.

9. Referral Process

It is the duty of anyone who works with children/young people/ adults to report and record disclosure of abuse.

It is not for staff to decide whether or not a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with accordingly to this procedure. If the disclosure is made by a parent/guardian/carer, you should follow the same procedure and refer them to the Designated Safeguarding Officer.

Individual staff should never deal with abuse disclosures in isolation and should always refer to a Designated Safeguarding Officer with responsibility for child/adult protection. The decision whether or not to report suspected abuse to Social Services or the Police will be made collectively by the Safeguarding Team.

No member of staff should give a learner their personal phone numbers, email address or home address or have a 'Facebook' link with a learner.

The Safeguarding Referral form should be completed and sent to the Designated Safeguarding Officer within 24 hours.

Once a referral is made to the Designated Safeguarding Officer

The Designated Safeguarding Officer will make an initial assessment of the allegation; consult with the staff involved and other designated staff as appropriate. This will usually involve speaking to the learner at the earliest opportunity. The first priority is to ensure that the learner is not in any immediate danger. Designated staff will seek medical attention if the learner is suffering from a serious injury.

The learner may be asked to repeat the disclosure they have made. Every effort will be made to communicate with the learner in a way that is appropriate to their age, understanding and preference. This is especially important for learners with a disability or those whose preferred language is not English.

The learner will be asked if there are younger children or any other adults who might also be at risk. However, the Designated Safeguarding Officer will avoid asking leading questions and will not attempt to investigate the allegations. A written account will be made of the disclosure and the context and the learner may be asked to sign it.

If the learner wishes to take the allegation forward, the Designated Safeguarding Officer should support the learner in contacting Social Services, the Police or the NSPCC. When a learner is not sure about taking the allegation forward, the Designated Safeguarding Officer can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.

Following consultation, the Designated Safeguarding Officer ask for the learner's views, if it is clear that they can understand the significance and consequences of a referral to Social Services or the Police (or Forced Marriage Unit or Counter-Terrorism Team).

It remains the responsibility of the Safeguarding Team to take whatever action is necessary to ensure the learner's safety and that of any other children or adults who may be at risk. This may on occasion involve a referral against the wishes of the learner involved.

All concerns, discussions, decisions made and reasons for those decisions will be recorded. Written records will be kept confidential and in accordance with the Data Protection Act/GDPR. However, where the police are involved then such records may need to be disclosed.

At Watson Martin the Designated Safeguarding Officer will be the contact if Social Services or the Police require further information about the learner.

There may be instances where more than one member of the designated staff will be involved in a particular disclosure. On occasion, they may work collaboratively to deal with a case.

10. Confidentiality

The safety and well-being of the child or adult at risk is paramount. Staff may have access to confidential information about learners in order to undertake their everyday responsibilities. In some circumstances, staff may be provided with highly sensitive or private information. They should never use confidential or personal information about a learner or his/her family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass a learner.

- The Designated Safeguarding Officer (or Deputy Safeguarding Officer) will disclose personal information about a learner to other employees on a need-to-know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children/young people and adults at risk, in consultation with the Designated Safeguarding Officer (or Deputy Safeguarding Officer).
- All safeguarding records are subject to the Freedom of Information Act and the Data Protection Act. If there is any doubt as to the rights of any party to access information, Watson Martin may seek legal advice prior to releasing any information.
- All staff must be aware that they cannot promise a child, young person or adult at risk confidentiality, which might compromise the safety or well-being of the learner, or that of another.

11. Allegations of abuse made against members of Watson Martin staff or an employer.

Any allegation made against a member of staff or another learner will be treated seriously and investigated immediately. The Designated Safeguarding Officer will report to the Directors and appropriate action will be taken to safeguard the welfare of the child, young person, adult at risk or any others who it may affect. If necessary, Children's social care and the Police may have to be notified.

12. Whistleblowing

All staff should feel able to raise concerns through the Whistleblowing procedure about poor or unsafe practice and potential failures in Watson Martin's safeguarding regime and know that such concerns will be taken seriously.

13. Safeguarding Contact Information

The Designated Safeguarding Officer is Emma Taylor (07541 682964, 020 7932 2760, emma.taylor@watsonmartin.com), and the Deputy Safeguarding Officer is Marissa Bryan 07813 454343, 020 7932 2760, marissa.bryan@watsonmartin.com). Martin Watson's Designated Safeguarding Officer is the Prevent Officer. sh

14. Useful External Contacts:

In an emergency

If you think a child is in immediate danger you should **call 999**

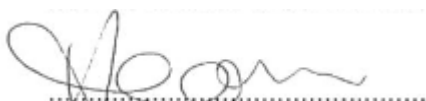
Key External Agencies

NSPCC 0808 800 5000 (**Monday to Friday 10am – 6pm and 12pm – 4pm at the weekend**)

Jennie Fisher – Regional London Prevent Co-ordinator -Jennie.fisher@education.gov.uk - M 07880 469 588 [FE/HE Regional Prevent Co-ordinators \(preventforfeandtraining.org.uk\)](https://www.preventforfeandtraining.org.uk)

Police Child Abuse Investigation Team (CAIT) - 020 8247 6331

Watson Martin's Safeguarding and Prevent Policy is reviewed and updated annually.

A handwritten signature in black ink, appearing to read 'Heather', written over a horizontal dotted line.

Heather Watson, Director, Watson Martin Limited
(August 2021)

Safeguarding and Prevent Notification Form (Strictly Confidential)

This form is to be used by all Watson Martin staff to record basic information on any Prevent, safeguarding concerns, incidents, disclosures or potential risk of harm relating to a child (under 18 years), young person or adult at risk.

Once completed and checked, the form should be sent to the Designated Safeguarding Lead within 24 hours: Emma Taylor (emma.taylor@watsonmartin.com) or Deputy Safeguarding Officer Marissa Bryan (marissa.bryan@watsonmartin.com).

Name of the person completing this form (YOU):	
Date and time of completing this form:	
Your position or relationship to who your safeguarding concern is about:	
Your contact details – email and telephone number:	
Name/names of person/s the safeguarding concern or incident is about:	
DOB and age of point of referral:	
Course / Apprenticeship Title:	
Name of Employer (If an apprentice):	
Is this a Prevent Incident?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is this a Safeguarding Incident?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Detail of Concern:	
Has the alleged victim said anything to you? <i>(do not lead or investigate – Just record actual details)</i>	

<p>Have External Agencies been Contacted? If so, detail:</p>	<p>Police <input type="checkbox"/></p> <p>Social Services <input type="checkbox"/></p> <p>Local Authority <input type="checkbox"/></p> <p>Other <input type="checkbox"/> Detail: _____</p> <p>Contact spoken to at agency:</p>
<p>Additional Risk Factors (please state):</p> <ul style="list-style-type: none"> • Radicalisation • Pregnant • Has responsibility for children • Current of recent suicide attempts • History of self-harming • Self-neglect • Threats of violence to others • Substance misuse • Currently receiving medication • Mental health problems • Other (please state) 	
<p>Notes:</p>	