



# Safeguarding and Prevent Policy

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<b>Title of Policy</b>	Safeguarding and Prevent Policy
<b>Policy Owner</b>	Louise Nixon
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<b>Authorised by</b>	Andrea Rushton
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Safeguarding is underpinned by the principle that everyone deserves to live free from abuse and neglect. It's about protecting those who are vulnerable or in certain groups, for example, those with a learning disability or those who become vulnerable because of circumstances, such as experiencing domestic violence. Safeguarding is also about supporting these principles through policies, procedures and greater actions in the community

Blackburne House is committed to safeguarding and providing an environment where:

- Welfare is at the centre of the organisation
- Where all learners are protected and feel safe
- Relationships are developed outside of the organisation with local safeguarding partnerships and the regional prevent co-ordinator to support the creation of a safe environment
- Staff have a clear knowledge of safeguarding responsibilities and roles enabling them to fulfil their duties
- Learners understand safeguarding enabling them to make choices that support them to stay safe and know where they can seek support or make a disclosure

To achieve this, we follow the principles of Keeping Children Safe in Education 2025 and Working Together 2025 to create a safe learning environment. We recognise our responsibilities to safeguard all learners and minimise the potential of harm. We recognise that safeguarding is the responsibility of all members of the organisation.

## **Scope**

This guide applies to all staff, including senior managers and the Board, paid staff, volunteers, learners or anyone working on behalf of Blackburne House. It outlines our approach to safeguarding learners and outlines the responsibilities that we all must promote the welfare of our learners and each other. It describes what Blackburne House will do to ensure that learners in our care are kept safe, receive an appropriate and relevant social education and how we will respond to concerns or risks of harm.

All those that act on behalf of Blackburne House are expected to enact the principles contained within this guide.

## **Definition and Legislation**

The purpose of safeguarding is to keep children and adults safe from harm. We aim to promote the safeguarding of others through clear policies and procedures. For the purpose of this document, a child is anyone under the age of 18 'vulnerable adult' means a person aged 18 or over who is, or may be, in need of community care services because of disability, age or illness; and is or may be unable to take care or unable to protect themselves against significant harm or exploitation.

Some other situations may render an adult 'vulnerable' such as domestic violence, addiction, mental ill-health, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities. With specified consent, we extend our safeguarding approach to any such individual.

All staff should be aware that early support can mitigate some safeguarding risks. Staff should be aware of potentially vulnerable learners. For example:

- Learners who have a learning disability
- Learners who are in care/ previously been in care
- Learners with an EHCP or special educational needs
- Learners at risk of criminal exploitation through their peers/home situation
- Learners with caring responsibility for others
- Learners who are self-harming including the misuse of drugs or alcohol
- Learners at risk of modern-day slavery
- Learners are at risk of violence or sexual harassment
- Learners showing signs of domestic violence
- Learners within the court system or who have family members in prison
- Learners with poor mental health or poor mental well-being
- Learners at risk of radicalisation.

The legal framework for the role of Blackburne House in Safeguarding is linked to:

- The Equality Act 2010
- Care Act 2014 and Statutory Guidance issued under the Act
- The Human Rights Act 1998 • Mental Capacity Act 2005
- The Education Act 2002 - Sections 157 & 175
- Safeguarding Vulnerable Groups Act 2006
- The Public Interest Disclosure Act 1998 (PIDA)
- Protection of Freedoms Act (2012)

Further guidance to be considered:

- ESFA Apprenticeship Agreement for Training Providers (Spring 2020, Version 1.0)
- The Education Inspection Framework (2023)
- Inspecting safeguarding in early years, education and skills settings (2019)
- Further education and skills inspection handbook

Further guidance for safeguarding children\*: • Keeping Children Safe in Education (2025) • Working together to Safeguard Children (2025)

## Key Contacts and Responsibilities

The safeguarding team at Blackburne House are the key contacts for all matters linked to this guide.

Safeguarding Role	Name	Job role	Contact Details
DSO	Andrea Rushton	CEO	<a href="mailto:Andrearushton@blackburnehouse.co.uk">Andrearushton@blackburnehouse.co.uk</a>
DSL	Louise Nixon	Head of Education and Compliance	<a href="mailto:louisennxion@blackburnehouse.co.uk">louisennxion@blackburnehouse.co.uk</a>
DSO	Caitlin Cotton	Learning Support Officer	<a href="mailto:Caitlincotton@blackburnehouse.co.uk">Caitlincotton@blackburnehouse.co.uk</a>
DSO	Jane Hitchin	Tutor	<a href="mailto:Janehitchin@blackburnehouse.co.uk">Janehitchin@blackburnehouse.co.uk</a>
All officers secure mailbox			<a href="mailto:safeguardingwtec@blackburnehouse.co.uk">safeguardingwtec@blackburnehouse.co.uk</a>

We all have a responsibility to ensure that children, young people, and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against you. All staff are expected to comply with DBS checks and have a good understanding of what constitutes a concern and how to escalate a concern.

A dedicated safeguarding board, including all the Executive Leadership Team, meet quarterly providing a greater focus on safeguarding and safety of learners. The effectiveness of all welfare support and educational material is analysed monthly by the safeguarding team. The safeguarding team are also subject to quality assurance checks carried out by the Safeguarding Lead.

The responsibilities of individuals are listed below.

### Non-Executive Directors

To ensure that robust policies and procedures are in place which seek to minimise the risk of harm posed to our learners

### CEO

To ensure the policies are implemented across the organisation and sufficient time is allocated to equip staff to implement their duties.

### Designated Safeguarding Lead

To ensure safeguarding forms a part of self-assessment activity. Responsible for leading any investigation into disclosures, supported by the Designated Safeguarding Officers, where these are related to harm posed to learners by any member of Blackburne House. To brief the Board, maintain logs of safeguarding concerns and to investigate any safeguarding concerns against staff. To maintain links with local safeguarding partners and regional partners prevent coordinators to ensure legislation is implemented, identify themes, and implement training to ensure that staff are equipped to implement their duties. To monitor any safeguarding cases being investigated by safeguarding officers. This includes carrying out investigations, quality-assuring processes, and reporting to the Board any issues that arise. To implement training.

## **The Executive Assistant to the CEO**

To maintain the Single Central Register, ensure DBS checks and references are in place and any introductory safeguarding training is completed and lodged against individual staff files.

## **Safeguarding Officers**

To deal with any concerns regarding safeguarding and signpost learners with welfare to concerns to services that offer support or guidance and/or to escalate any concerns to the DSL.

## **Tutors**

To check the welfare of learners and ensure that learners develop their knowledge of maintaining their own safety as they progress on their course. Tutors should report any safeguarding or welfare concerns to Safeguarding Officers. To report any disclosures or allegations to a Safeguarding Officer and to complete all assigned training.

## **Other staff**

All staff should be aware of the signs of safeguarding or welfare concerns and the reporting procedures. Staff should also be aware of the Prevent statutory duty and how to report the concerns.

## **Safeguarding Procedure**

At Blackburne House, we will use the 5 Rs - Recognition, Response, Reporting, Recording and Referral when approaching safeguarding matters and require all staff to operate in line with this process. These have been developed with reference to 'What to do if you are worried a child is being abused – Advice for practitioners' 2015. All concerns about learner/apprentice welfare must be logged, by the colleague identifying it using the safeguarding concern and incident report, and discussed with a designated safeguarding officer/lead. All reports should be completed within 1 working day. Disclosures of immediate risk of harm should be raised immediately with a designated safeguarding officer. Where an allegation of harm or abuse of a learner/apprentice is aimed at a colleague, this must be reported immediately to the Designated Safeguarding Lead or Interim CEO.

### **Recognition**

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour that cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns to raise them, any concerns raised should be taken seriously.

### **Response**

No report or concerns about possible abuse should be ignored. Your main role here is to listen and record with no judgements or leading questions; use an open question to gather factual details – when did it take place, who said what, what happened? You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the designated person within Lifetime, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e., have the police already been informed, is the person receiving local authority or medical support?

## Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took. Use the disclosure form where possible, but any form of notes will be acceptable.

## Report

Report on the concerns to the designated person, ensuring you have recorded all details as above. This communication can be face to face, via email to the secure mailbox [safeguardingwtec@blackburnehouse.co.uk](mailto:safeguardingwtec@blackburnehouse.co.uk), or phone call followed up by email. All communication and documents will remain confidential between the designated person and the individual that has reported it unless the designated person deems it appropriate to take further action and involve other agencies.

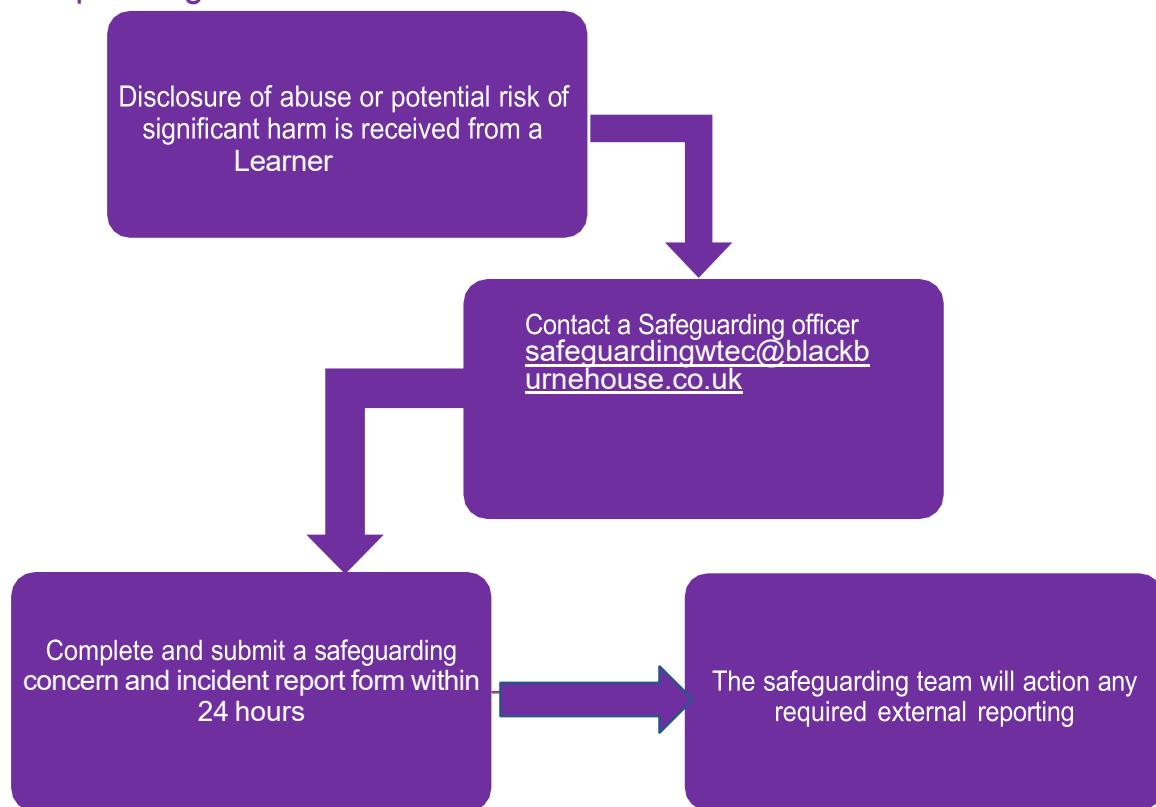
## Referral

The designated person will then decide what course of action should be taken. The designated person will inform you of the action that they are taking and the reason behind that action. If you disagree with the decision not to refer externally, please raise this with the designated person. In the event of an emergency or if staff disagree with the decision made by the designated person, staff should raise a referral with external agencies independent of the safeguarding officer.

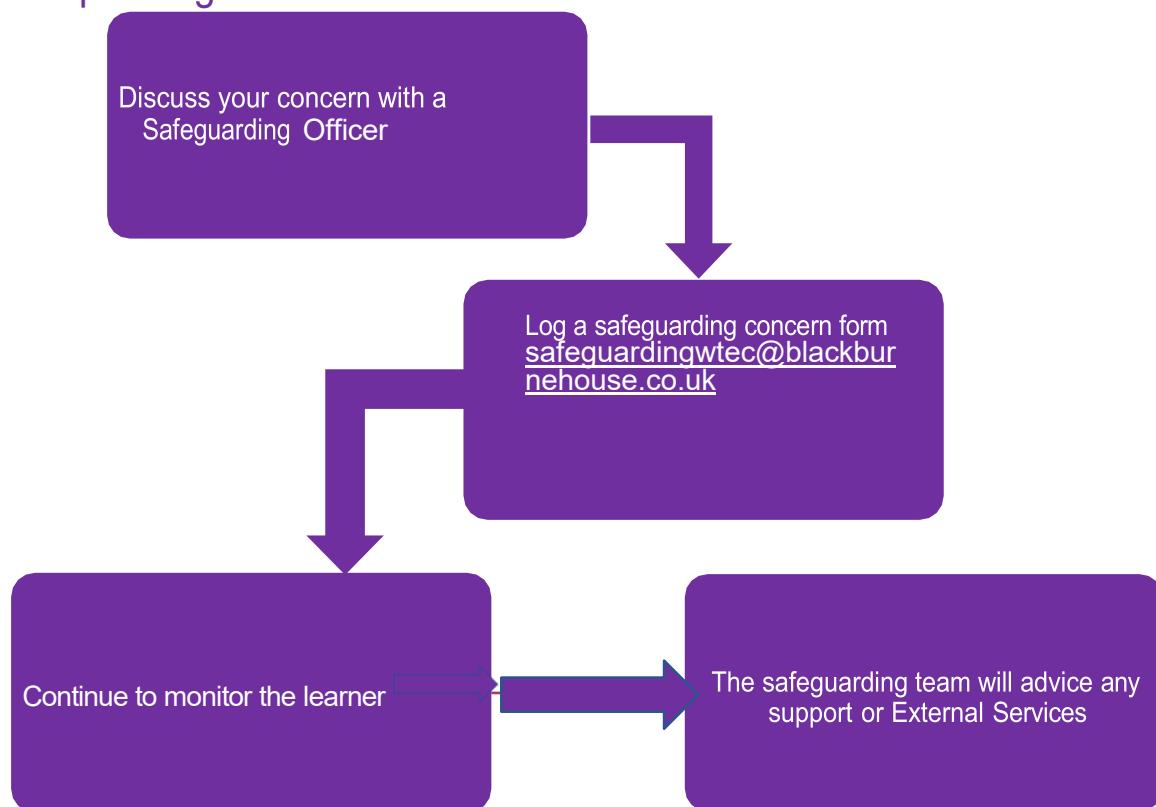
## Responding to an Immediate Risk of Harm



## Responding to a Risk of Harm



## Responding to a Welfare Concern



## Types of Abuse and Indicators of Abuse

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The Safeguarding Agenda includes a wide range of potential risks.

These include:

SAFEGUARDING DEFINITION	ISSUE	INDICATORS
PHYSICAL ABUSE	Deliberately causing physical harm	<ul style="list-style-type: none"><li>• Cuts, bruises, burns,</li><li>• Wearing long-sleeved clothes</li><li>• Pain</li><li>• Cowering</li></ul>
NEGLECT	The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in serious impairment of health or development.	
	Neglect is when a partner, 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	<ul style="list-style-type: none"><li>• Withdrawn</li><li>• Weight loss</li><li>• Fear of going home</li><li>• Improper hygiene</li><li>• Confusion</li><li>• Inappropriate clothing</li></ul>
SELF-NEGLECT	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding	<ul style="list-style-type: none"><li>• Poor diet and nutrition</li><li>• Poor personal hygiene</li><li>• Not taking prescribed medication</li><li>• Substance misuse</li><li>• Doesn't always encompass all aspects of life.</li></ul>
PSYCHOLOGICAL ABUSE	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	<ul style="list-style-type: none"><li>• Withdrawn</li><li>• Depression</li><li>• Lack of confidence</li><li>• Socially awkward</li><li>• Easily manipulated</li></ul>

<b>FINANCIAL ABUSE</b>	Theft, fraud, internet scamming, coercion concerning 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.	<ul style="list-style-type: none"> <li>• Change in appearance</li> <li>• Having expensive gadgets</li> <li>• Having no money</li> <li>• Not eating properly</li> </ul>
<b>SEXUAL ABUSE</b>	Forcing or enticing a vulnerable adult, child or young person or any person to take part in sexual activities, whether the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> <li>• Spending a long time in the toilet</li> <li>• Discomfort in sitting down</li> <li>• Inappropriate behaviour</li> </ul>
<b>ORGANISATIONAL ABUSE</b>	<p>Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or concerning care provided in one's own home.</p> <p>This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes and practices within an organisation.</p>	<ul style="list-style-type: none"> <li>• Activity defined by a regime/task orientated setting</li> <li>• Dismissive of complaints. The learner may need to leave at certain times</li> <li>• Ask permission to do everything</li> <li>• Appear brainwashed</li> </ul>
<b>DISCRIMINATION</b>	The unjust or prejudicial treatment of different categories of people, especially on the grounds of one of the protected characteristics	<ul style="list-style-type: none"> <li>• Fearful of certain people</li> <li>• Avoiding certain situations</li> <li>• Being asked to do more work than they should</li> </ul>
<b>SEXUAL EXPLOITATION</b>	Sexual abuse involves forcing or enticing a vulnerable adult, child or young person or any person to take part in sexual activities, whether the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> <li>• Change in behaviour</li> <li>• Change in appearance</li> <li>• Increased sexualised behaviour/language</li> <li>• Drug/alcohol abuse</li> <li>• Suddenly wearing expensive things</li> </ul>
<b>BULLYING (INC. CYBERBULLYING)</b>	Behaviour by a group of individuals repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, social media exchanges)	<ul style="list-style-type: none"> <li>• Withdrawn/nervous</li> <li>• Signs of physical and emotional abuse</li> <li>• Constant use of or fear of internet usage</li> </ul>
<b>DOMESTIC VIOLENCE</b>	Incident of a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between	<ul style="list-style-type: none"> <li>• Signs of physical or emotional abuse</li> </ul>

	those aged 16 or over who have been intimate partners or family members, can also be honour based	<ul style="list-style-type: none"> <li>• Show signs of being controlled</li> <li>• Withdrawn</li> <li>• Anxiety around others</li> <li>• Low self-esteem</li> </ul>
<b>DRUGS</b>	Alcohol, tobacco, illegal drugs, medicines or psychoactive substances	<ul style="list-style-type: none"> <li>• Smelling of alcohol</li> <li>• Regular hangover symptoms</li> <li>• Inability to concentrate</li> <li>• Lateness</li> <li>• Change in commitment levels</li> </ul>
<b>FABRICATED OR INDUCED ILLNESS</b>	Making up signs and symptoms of an illness, falsifying medical records or inducing an illness to someone by any means	<ul style="list-style-type: none"> <li>• A person could pretend to be ill, think ill, and talk about people taking them to Drs or hospital</li> <li>• Parents could talk about child consistent illness</li> </ul>
<b>FAITH ABUSE</b>	This type of abuse relates to faith or belief, include concepts of witchcraft and spirit possession, rituals and sacrificial murders	<ul style="list-style-type: none"> <li>• Talking about beliefs and faith-related activities</li> <li>• engaged or family engaged with</li> </ul>
<b>FORCED MARRIAGE</b>	One or both spouses do not or cannot, due to vulnerabilities, consent to marriage and duress is involved	<ul style="list-style-type: none"> <li>• Traveling abroad recently</li> <li>• Talking about getting married/meeting men through family connections</li> <li>• Upholding religious duties</li> </ul>

<b>BREAST IRONING</b>	<p>The pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear.</p> <p>It is typically carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name or allow the girl to pursue education rather than be forced into early marriage.</p>	<ul style="list-style-type: none"> <li>• Unusual behaviour after an absence from school or college includes depression, anxiety, aggression, withdrawal etc.</li> <li>• Reluctance in undergoing normal medical examinations</li> <li>• Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear</li> </ul>
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		<ul style="list-style-type: none"> <li>• Fear of changing for physical activities due to scars showing or bandages being visible</li> </ul>
<b>GANGS AND YOUTH VIOLENCE</b>	<p>Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending</p>	<ul style="list-style-type: none"> <li>• May have expensive items</li> <li>• Change in behaviour</li> <li>• Bruises/cuts</li> <li>• Social activities change</li> <li>• Gang tattoos</li> <li>• Carrying weapons</li> </ul>
<b>PRIVATE FOSTERING</b>	<p>Fostering arrangement without consent of the local authority</p>	<ul style="list-style-type: none"> <li>• Moving to different homes regularly</li> <li>• Not discussing family life</li> <li>• Abandonment characteristics</li> </ul>
<b>FEMALE GENITAL MUTILATION (FGM)</b>	<p>Partial or total removal of female external genitalia or injury to another part of the female genitalia for non - medical reason</p>	<ul style="list-style-type: none"> <li>• Spending a long time in the toilet</li> <li>• Uncomfortable sitting down</li> <li>• Long trips away from home</li> </ul>
<b>GENDER-BASED VIOLENCE</b>	<p>Violence (either physical or sexual) towards women/men</p>	<ul style="list-style-type: none"> <li>• Withdrawn</li> <li>• Nervous</li> <li>• Physical signs of abuse</li> </ul>

<b>RADICALISATION</b>	The process by which a person comes to support/partake in terrorism and extremism (also includes – political/animal rights and ecological extremist). Extremism is an ideology that is considered to be far outside the acceptable mainstream attitudes of society. – include opposition to British values.	<ul style="list-style-type: none"> <li>• Long trips away from home</li> <li>• Talking about being wronged by a state or political system</li> <li>• Strong views about changing life</li> <li>• Talk of harming others in the plight for cause</li> <li>• Possession of violent literature</li> <li>• Behaviour changes</li> <li>• Extremist views/ association with extremists</li> <li>• Trying to recruit others</li> </ul>
<b>SEXTING</b>	Exchange of self-generated sexually explicit images through mobile picture messages. It is illegal to send an image of a person under 18	<ul style="list-style-type: none"> <li>• Withdrawn</li> <li>• Boasting</li> <li>• Hiding mobile phones</li> </ul>

<b>TEENAGE RELATIONSHIP ABUSE</b>	Abuse in a relationship – either physical, sexual, emotional or financial	<ul style="list-style-type: none"> <li>• Withdrawn</li> <li>• Constantly responding to messages/calls</li> <li>• Detect a control aspect</li> <li>• Physical signs of abuse</li> </ul>
<b>TRAFFICKING AND MODERN SLAVERY</b>	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	<ul style="list-style-type: none"> <li>• Talking about travelling abroad</li> <li>• Talking about someone else having control over them</li> <li>• Moving home regularly</li> <li>• Avoid eye contact and appear frightened</li> <li>• No identification documents</li> <li>• Physical or emotional abuse.</li> </ul>
<b>MENTAL HEALTH</b>	Absence of psychological wellbeing and effective physical or psychological functioning	<ul style="list-style-type: none"> <li>• Becoming more withdrawn</li> <li>• Changes in behaviour or personal appearance</li> <li>• Less punctual than normal, less interest</li> </ul>

<p><b>CHILDREN MISSING IN EDUCATION</b></p> <p>(WHILE THIS AFFECTS 14-16-YEAR OLDS IN COMPULSORY EDUCATION, THE RECENT LEGISLATION REQUIRING ALL CHILDREN TO STAY IN SOME FORM OF EDUCATION OR TRAINING TILL AGE 18 MEANS THAT WE SHOULD INVESTIGATE ANY LEARNERS THAT GO MISSING WITHOUT TRACE WITH THIS AGE RANGE)</p>	<p>Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.</p>	<ul style="list-style-type: none"> <li>• Not showing up for visits with no explanation</li> <li>• Not contactable</li> <li>• Neither lifetime nor employer can get hold of them or know where they have gone</li> </ul>
<p><b>SEXUAL HARASSMENT AND VIOLENCE (INCLUDING CHILD ON CHILD ABUSE)</b></p>	<p>Sexual violence and sexual harassment can occur between two people of any age and sex. It can also occur when a group of sexually assaulting or sexually harassing a single child / adult or group of children/ adults.</p> <p>Victims of sexual violence and sexual harassment will likely find the experience</p>	<ul style="list-style-type: none"> <li>• Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT learners are at greater risk Whilst not intended to be an exhaustive list, OFSTED review stated Girls</li> </ul>

	<p>stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are never acceptable. All victims must be taken seriously and offered appropriate support.</p> <p>Sexual assault is the intentional touching of a sexual nature, where the other party does not consent. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature that can occur online and offline. When we reference sexual harassment, we do so in the context of the child on child OR peer on peer sexual harassment. Sexual harassment is likely to: violate a learner's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.</p>	<p>often view it as harassment whereas boys can view as banter</p> <p>sexual harassment can include:</p> <ul style="list-style-type: none"> <li>• Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names</li> <li>• Children being the victim of abuse or harassment may avoid social interaction, be withdrawn, be self-conscious, use sexualised language</li> <li>• Sexual harassment should be deemed as it is taking place even if not reports of it - as many young people view it as behaviour that just happens and doesn't bother reporting it</li> <li>• Observe and address inappropriate behaviours</li> </ul>
<b>COUNTY LINES</b>	<p>Organised criminal distribution of drugs from the big cities to smaller towns and rural areas using children and vulnerable people. The main county line gangs operate from Liverpool and London, but other groups operate in Birmingham and Manchester. The influence is nationwide. These drug networks or gangs groom and exploit children and young people to carry drugs and money. N.B can still be exploited even if the activity appears consensual.</p>	<ul style="list-style-type: none"> <li>• It can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.</li> <li>• Can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of</li> </ul>

		<p>other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources</p> <p>Young and vulnerable people may exhibit:</p> <ul style="list-style-type: none"> <li>• Persistently going missing from school or home and/or being found out-of-area</li> <li>• Unexplained acquisition of money, clothes, or mobile phones</li> </ul>
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## **The Mental Capacity Act 2005**

One of the most challenging aspects of adult safeguarding is balancing these principles, e.g. where someone may be at risk of harm but does not wish for Blackburne House's staff to act or share information. In assessing Blackburne House's response to concerns the following principles from the Act should be followed:

- assume a person has the capacity to make a decision themselves unless it's proved otherwise
- Wherever possible, help people to make their own decisions
- don't treat a person as lacking the capacity to make a decision just because they make an unwise decision
- if you make a decision for someone who doesn't have the capacity, it must be in their best interests
- treatment and care provided to someone who lacks capacity should be the least restrictive of their basic rights and freedoms

## **Prevent- Extremism and Radicalisation**

The Counterterrorism and Security Act 2015 places a duty upon local authorities and education providers to 'have due regard to the need to prevent people from being drawn into terrorism.'

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.' (Work Based Learners and the Prevent Statutory Duty 2018 updated May 2021)

Prevent is a strand of the Government's counter-terrorism strategy CONTEST 2023. As an Independent Training Provider, Blackburne House has a statutory duty to prevent people from being drawn into terrorism under the Counterterrorism and Security Act (2015). Blackburne House is

committed to its responsibility to protect its learners from radicalisation, terrorism and violent extremism. It promotes an ethos designed to empower its learners to be resilient to extremism and protect the wellbeing of those who may be vulnerable to being drawn into violent extremism or crime.

The government has defined extremism in The Prevent Duty 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. This also includes calls for the death of members of the British armed forces.'

## **Implementation of the Duty**

Blackburne House is committed to the effective implementation of the Prevent strategy through:

- effective and regular training to ensure:
  - staff know when and how to refer learners who may be at risk of radicalisation
  - staff are aware of the indicators of extremism and radicalisation and know how to respond in keeping with local and national guidance
  - senior leaders and Board members understand their responsibilities around Prevent
  - all staff challenge extremism with confidence and consistency
- effective delivery of Prevent information and learning to ensure learners can:
  - identify and protect against the risk
  - access support
  - understand British values
- ensuring that adults at risk are safe from terrorist and extremist material when accessing the internet at Blackburne House
  - identification and support of vulnerable learners
  - appropriate sharing of information and CHANNEL referrals
  - a commitment to equality, diversity and inclusion
  - partnership working with local support networks and Channel members
  - exemplification of British values of 'democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs'
  - risk assessing visiting speakers and guest lecturers

We meet these obligations by considering radicalisation and extremism as a safeguarding matter. The Channel: Vulnerability assessment framework (HMG 2012) involves three dimensions: engagement, intent and capability, which are considered separately. 'It should not be assumed that the characteristics set out below necessarily indicate that a person is either committed to terrorism

or may become a terrorist' but understanding these factors may assist in identifying a person who is vulnerable to radicalisation and/or a potential risk to others.'

It should not be assumed that the characteristics set out necessarily indicate that a person is either committed to terrorism or may become a terrorist. The assessment framework involves three dimensions: engagement, intent and capability, which are considered separately.

### **Engagement with a Group, Cause or Ideology**

Engagement factors are sometimes referred to as "psychological hooks". They include needs, susceptibilities, motivations and contextual influences and together map the individual pathway into terrorism. They can include:

- feelings of grievance and injustice
- feeling under threat
- a need for identity, meaning and belonging
- a desire for status
- a desire for excitement and adventure
- a need to dominate and control others
- susceptibility to indoctrination
- a desire for political or moral change
- opportunistic involvement • family or friends' involvement in extremism
- being at a transitional time of life
- being influenced or controlled by a group
- relevant mental health issues

### **Intent to Cause Harm**

Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- over-identification with a group or ideology
- 'Them and Us' thinking
- dehumanisation of the enemy
- attitudes that justify offending
- harmful means to an end
- harmful objectives

## **Capability to Cause Harm**

Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage to take a high level of personal capability, resources and networking to be successful. What the individual is capable of is, therefore, a key consideration when assessing the risk of harm to the public. Factors can include:

- individual knowledge, skills and competencies
- access to networks, funding or equipment
- Criminal Capability Channel: Vulnerability assessment framework (HMG 2012)

If any member of staff has any concerns about a learner beginning to support terrorism and/or violent extremism, they should discuss them with a member of the Safeguarding Team following the published safeguarding procedures so that actions to address the issues may be addressed immediately. The Prevent Lead and/or DSL will coordinate the organisation's response.

## **Information Sharing**

Information Sharing when sharing information, Blackburne House always acts within all legislative, common law and other related provisions concerning information processing and sharing including, but not limited to, the Data Protection Act 2018 and General Data Protection Regulations. Staff and the Board must understand and act within the rules set out in our Data Protection Policy.

Blackburne House recognises that safeguarding vulnerable adults raises significant issues concerning information sharing, especially when trying to balance an adult's right to free choice, including the choice about sharing of information, with the responsibility to keep people safe. Adults who have capacity are free to make certain choices which objectively could be considered as abuse or neglect, and they may object to further sharing of information; however, it is also recognised that there might be circumstances where, despite the choices made by the adult, information can be shared in the context of safeguarding.

If an issue arises where there is a serious conflict between safeguarding an adult and that adult's rights to consent, either to the behaviour or the sharing of information, then Blackburne House will seek advice from the relevant agency. This may be done anonymously in the first instance. Agencies can be asked to deal with the matter in confidence. The police and local authority adult safeguarding team are trained to deal with such disclosures in line with all relevant statutory and common law rules.

Blackburne House recognises where:

- There is a real risk of serious harm
- There is a risk of harm to the wellbeing and safety of the adult or others
- Other adults or children could be at risk from the person causing harm
- It is necessary to prevent crime or if a crime may have been committed

- The person cannot consent the safety of the adult must be paramount, and a report should be made either in an emergency via 999/101 or to the relevant multi-agency safeguarding hub (MASH).

In such circumstances where adults disclose that they are being abused or neglected, but do not want it to be reported, staff members should tell the person that they must raise their concern in confidence with the Designated Safeguarding Lead as soon as possible.

## **Training**

We provide training to our staff and support learners to recognise where learners or peers may be at risk of being drawn into radical or extreme behaviour as part of our overall approach to safeguarding. All staff undertake Prevent training in accordance with their roles and responsibilities with periodic updates to ensure that they understand their duties and are confident raising a concern. Our designated Prevent Officer is the Interim Head of Education and Compliance with the Safeguarding Leads deputising. The Interim Head of Education and Compliance along with the Safeguarding Lead is responsible for making all decisions regarding referrals to local authority safeguarding hubs for consideration under Channel panels on a case-by-case basis.

All staff should be vigilant to extremist behaviour as a wider part of their safeguarding duties and report their concerns to the safeguarding team in line with our wider safeguarding reporting procedures. Tutors are expected to deliver teaching and learning which reflects fundamental British Values and improves learners' knowledge of the Prevent agenda.

## **Managing and Responding to Risk**

We will operate a critical incident management plan in dealing with terrorism-related incidents. This will form part of our Disaster Recovery Plan and ensure that there are plans in place which respond to any direct threats within our buildings. Key colleagues will be trained in ACT (Action Counters Terrorism) and all staff will be briefed on how to behave in the event of an act of terror attack.

Risk assessments will be undertaken on any external speakers and clear guidance will be issued as to levels of acceptable behaviour whilst on site. Where available, scripts will be approved before delivery to ensure that the content is consistent with fundamental British values and our approach to safeguarding.

We have a zero-tolerance approach to racism, discrimination, religious or cultural intolerance and indifference and will treat these as safeguarding matters. Incidents or patterns of incidents, which undermine the promotion of fundamental British values will be viewed as a safeguarding concern with support being sought from the relevant DfE Prevent Coordinator to address these; these will also be reported to the ESFA via [www.gov.uk/government/organisations/education-and-skills-funding-agency](http://www.gov.uk/government/organisations/education-and-skills-funding-agency) in line with our contractual obligations.

## **E-Safety**

Blackburne House aims to ensure the safety and well-being of our learners whilst developing their knowledge of how to stay safe online and manage risks. The use of the internet is an integral part of our day-to-day operation and is regularly utilised for learning purposes. We believe that learners should be able to use the internet for education and personal development confidentiality without fear of discrimination or abuse and should understand how to raise concerns and seek support should they feel uncomfortable online.

We will review internet activity and analyse usage patterns within our site to identify any potential risks of harm and may choose to perform a detailed analysis of this data.

## **Keeping Yourself Safe**

To maintain your own and the learner's safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home or transport learners to and from locations (this includes travelling in a car with a learner driving)
- Directing sarcasm, insults or belittling comments towards learners
- Personal relationships with learners

It is also important to be mindful of the following when conducting yourself:

- You will naturally build a rapport with learners, and the learners may see you as a confidante and support but be sure to maintain professional boundaries.
- Be respectful of all young and vulnerable people and appreciate you are in a position of trust. We can listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable, for example during a formal assessment/examination, ensure a member of the site staff is aware of where you are and monitors this.
- Be careful when giving learner advice – as this is based on your opinion, focus support on information (facts), and guidance (signposting).
- If a learner offers you gifts of any sort because of the support through their program, please refer to the Blackburne House Bribery Policy

## **Personal Social Networking**

Staff should not engage with learners through social networking without the authorisation of a senior leader. Information, when published, is difficult to control and maybe manipulated and /or reused without consent. We recommend that staff ensure that their social media accounts are secure and security settings are applied.

## **Managing An Allegation Against Staff**

Blackburne House commits to fully and sensitively investigating any concerns/allegations made against a colleague which might indicate they would pose a risk of harm to children. Staff have the right to confidentiality in such situations and steps will be taken to maintain this throughout. Suspension from the regulated activity may be considered whilst an investigation occurs, with any investigation being managed in line with our disciplinary process and part four of KCSIE (2021). Suspension from learner/apprentice facing duties will not be the default action. Any colleague under investigation will be allocated welfare support – this will be provided by a manager within the business but may not be their direct line manager. This approach is extended to staff considered to be exhibiting low-level concerns.

Allegations will be discussed with the relevant local authority (LADO) and if the investigation identified that a colleague has harmed a learner there is evidence that they had planned to do so, or their actions put a learner at risk, a referral will be made in line with the referral guidance to the [Disclosure and Barring Service](#). In line with our contractual obligations, any such referral will be notified to the ESFA.

Allegations/concerns that do not meet the harms threshold are referred to as 'low-level concerns'. Concerns may arise in several ways and from several sources. For example, suspicion; complaint; or disclosure made by others within or outside of the organisation; or as a result of vetting checks

undertaken. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a learner does not meet the harm threshold. Our Code of Conduct outlines what may constitute a low-level of concern. Any such concern should be reported to the Designated Safeguarding Lead.

## **Safer Recruitment**

Blackburne House carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements. See Recruitment & Selection Policy for further details on recruitment procedures.

### **DISCLOSURE AND BARRING SERVICE CHECKS**

The Disclosure and Barring Service (DBS) and Disclosure Scotland are executive agencies of the Home Office, and their primary purpose is to help employers make safer recruitment decisions and appointments.

By conducting checks and providing details of criminal records and other relevant information, DBS/PVG helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiries about the applicant's criminal record and seek disclosure through a DBS or PVG check. Blackburne House can undertake six types of criminal records checks depending on the role applied for:

#### Standard DBS check

This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

This type of check contains details of an individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

#### Enhanced DBS check

This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that are reasonably considered to be relevant to the post applied for.

#### Enhanced DBS & barred list check (child)

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

#### Enhanced DBS & barred list check (adult)

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations

An enhanced check with information from the DBS' children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations.

### WHEN AND WHAT TYPE OF DBS CHECK IS APPROPRIATE

The Executive Assistant and Designated Safeguarding Lead are responsible for deciding which level of check is appropriate for a particular role and whether barred list checks are necessary. Even where a post has some contact with children or adults at risk, the definition of regulated activity may not be fully satisfied, but to safeguard our learners any unsupervised contact with learners will result in an enhanced DBS check with child barred list. The Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012) defines what types of activities involving children and adults at risk are regulated and therefore require barring list checks. Appendix A specifies current posts at Blackburne House that require DBS and/or barring list checks.

Regulated Activity – is a term that defines activities that an individual engages in. The criteria for regulated activity differ for adults and children as shown overleaf:

Enhanced DBS & barred list check (child and adult)

Children

Regular activity (once per week or 4 times over 1 month)

Unsupervised activity

Teaching, training, assessing, mentoring based activities concerning non-work-related activities - working intensively and closely with a child

Within specified setting

Adult Healthcare

professionals - giving first aid or receiving first aid

Receiving or giving personal assistance to those due to age, illness or disability (going to the toilet/washing/nutritional advice)

Providing social care - being subject to or assessing the need for health/social care

Assisting in someone's personal affairs or allowing someone else to do so

Assist with cash, bills and shopping (allowing someone else to or shopping on someone's behalf)

A person who transports or is transported because of their illness

Working directly with children and/or protected adults

Individuals must not engage in regulated activity with either children or adults at risk if they have been barred from doing so by the Disclosure and Barring Service (DBS). How we meet our responsibility towards this is explained below. Further advice on types of DBS disclosure and the circumstances in which regulated activity applies can be obtained from the HR Team.

Where Blackburne House is recruiting for a role that qualifies for a DBS/PVG disclosure, the advert and further information will confirm the type of DBS disclosure required. When the most suitable candidate for the position has been identified, the offer of appointment will be made subject to a satisfactory DBS, right to work, references and qualification checks. In the instance that the outcome of a DBS check has not been received from the appropriate authority before learner visits are carried out, all visits with learners aged below 18 will be supervised by a person whose DBS outcome has been received and approved. The Head of Education will be responsible for arranging this supervision. Quality assurance of this process will take place weekly.

As a DBS check forms part of our recruitment process, we encourage all candidates to declare anything relevant to the type of disclosure required for the role. Once an offer has been made, candidates should tell us of any further details of convictions, including those that normally would be considered as spent, cautions or reprimands.

As part of our safeguarding obligations, we will re-apply for the appropriate types of DBS checks on a 3-year basis during employment with Blackburne House. If someone is already part of the update service, we will request an updated check for that number.

**CONFIDENTIALITY**

Information provided in a DBS disclosure report must be kept confidential and only on a need-to-know

basis. Such information will be handled following Blackburne House's 'Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information', Appendix B. Any other information regarding offences must be kept securely and following Blackburne House's Data Protection Policy.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to staff unless there is a specific reason for doing so. Those involved in recruitment decisions should ensure that when appointing an individual with a conviction, they are advised as to whom within Blackburne House knows of their conviction and the reasons why the information has been disclosed.

First, standards have a satisfactory privacy policy to align with our requirements

If you would like further information on our disclosure process, please see Appendix C.

#### FAILURE TO DISCLOSE INFORMATION RELEVANT TO THE TYPE OF DBS CHECK APPROPRIATE TO YOUR ROLE

Having a criminal record does not necessarily preclude an individual from working at Blackburne house. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors.

Nonetheless, we request all employees to tell us about any information relevant to the type of DBS check appropriate for their role. This could mean, for example, that if your role requires satisfactory Enhanced DBS and Barring check, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS check appropriate to your role would be seen by Blackburne House as a breach of trust and confidence. Such acts are considered gross misconduct and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

#### EXPLORING THE RELEVANCE OF INFORMATION PROVIDED IN THE DISCLOSURE REPORT

As we explained in the previous section, having a criminal record does not necessarily preclude an individual from working at Blackburne House. The decision as to whether a candidate with a criminal record should be appointed, or an offer of employment withdrawn, will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors.

Like the recruitment process, a disclosure of a criminal record will not necessarily lead to termination of your employment with Blackburne House, and the decision will be taken only after careful and thorough consideration of the job and offence related factors. Any decision to terminate employment would follow our Disciplinary Policy (or Probationary Policy if you have not yet passed your probation).

A member of the Senior Leadership Team, alongside the Designated Safeguarding Lead, will make an initial assessment of the content of the disclosure report. If the report provides no evidence of convictions or any other related information, no further action will be taken. If the report confirms a conviction or any other related information, a member of the HR Team, alongside the Designated Safeguarding Lead, will make an initial assessment of whether the information provided has any potential

relevance to the post. If there is clearly no potential relevance, no further action will be taken.

If the report confirms a potentially relevant conviction or any other potentially relevant information further exploration will be required following the process outlined below.

## EXPLORING A CONVICTION AND ITS RELEVANCE

All discussions relating to convictions must take place after the selection process has been completed and will involve the line manager and a member of the HR Team and, if appropriate, the company Designated Safeguarding Lead. As part of the decision-making process, they will normally meet with the individual to gain more information from the person about the nature and circumstances of any conviction.

The suitability for employment of a person with a criminal record will vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision will be made based on a risk assessment to enable the applicant's criminal record and circumstances to be assessed concerning the tasks he or she will be required to perform and the circumstances in which the work is to be carried out.

The following job-related factors should be considered:

Does the post involve direct contact with learners or the public?

What level of supervision will the post-holder receive?

What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to re-offend in the place of work?

Does the post involve any direct responsibility for finance or items of value?

Does the post involve any contact with children or other vulnerable groups of learners or employees?

- The assessment is also likely to include consideration of the following factors relating to the individual's offence(s):
- The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc.
- The length of time since the offence(s) occurred.
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example, the influence of domestic or financial difficulties.
- The degree of remorse, or otherwise, expressed by the person and their motivation to change.
- Whether the offence was a one-off or part of a history of offending.
- Whether a person's circumstances have changed since the offence(s) was committed, making re-offending less likely.
- Whether the offence has since been decriminalised

Following careful and thorough consideration of all these matters and consultation with the Executive Assistant and Designated Safeguarding Lead, a decision will be made as to whether the individual should be appointed. If appropriate we may seek further information from relevant bodies when reaching this decision. If the decision is made not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases, Blackburne House would reserve the right to withdraw the offer of appointment where appropriate or terminate employment in line with the Blackburne House's Disciplinary Policy (or Probationary Policy if in probationary period).

#### **Learner DBS checks**

We have a duty to ensure that learners understand what a DBS check is and if it is required for their role on the completion of their course.

**Adult Learning Loan learners** – for those learners who are studying an adult learning loan program information, advice and guidance regarding the requirement of DBS check learners are provided with during enrolment and learners are made aware of the requirement for DBS when they enter employment. During the learner's program, relevant curriculum content educates learners about the importance of the DBS process.

### **Associated Policies and Documentation**

- The following documentation should be read alongside this policy
- Part One Keeping Children Safe in Education
- Our Guide to Safer Recruitment Supporting Looked after Children Staff Handbook
- Whistleblowing Policy
- Complaints Policy
- Data Protection
- Policy Equality and
- Diversity Policy
- Grievance Policy
- Disciplinary Policy

### **Monitoring and Review**

The safeguarding Lead will review this annually in accordance with statutory requirements. Overall responsibility for this policy lies with the Blackburne House Board. Safeguarding reports are provided to the Board quarterly to enable them to monitor the implementation and effectiveness of this guide.

