

# Safeguarding and Prevent Policy for Young People and Adults at Risk

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<u>Annex 1 – Safeguarding Reporting Form</u>

### **Key points**

All schools, colleges and training providers should promote their learners, instructors and employees welfare. SeaRegs will achieve this by:

- providing a safe environment for all children, young people and adults to learn and work
- developing an ethos of listening to, and discussing with learners, instructors and employees issues relating to safeguarding & wellbeing in an open, supportive and non-judgmental way
- promoting SeaRegs' safeguarding policy and procedures
- having systems and processes in place that ensure children, young people and adults at risk are kept safe
- having systems in place to allow for poor and unsafe practices to be challenged
- identifying learners, instructors and employees who are suffering or likely to suffer significant harm at SeaRegs
- identifying learners, instructors and employees who are suffering or likely to suffer in other environments. For example, at home, in the community or other learning establishments
- identifying instances in which there are grounds for concern about a child, young person or vulnerable adult's welfare, and initiating appropriate action to keep them safe
- SeaRegs taking appropriate action when concerns are identified and reporting concerns and to the relevant authorities in a timely manner
- contributing to effective partnership working between all those involved with providing safeguarding services for children, young people and adults at risk
- working in partnership with the relevant authorities to prevent adults, children & young people who are at risk from being drawn into violent extremism and terrorism
- preventing unsuitable people from working within our organisations and with our learners

### 1. **General Policy Statement**

- 1.1 SeaRegs Training has a statutory and moral duty to ensure that its training centre functions operate at all times with robust safeguarding arrangements in place.
- 1.2 SeaRegs actively promotes the safeguarding and wellbeing of children, young people and adults at risk who are either receiving education and training or who are instructors or employees. This applies across all venues used by SeaRegs.
- 1.3 This policy has been written incorporating legislation Keeping Children safe in education (2022), Department for Education (DfE) <sup>1</sup> and Working together to safeguard children 2018 (amended 2020) <sup>2</sup>. The latest version if KCSiE is referred to on an annual basis.
- 1.4 SeaRegs have incorporated the Prevent agenda and its response on counter terrorism into this safeguarding policy and procedure document.<sup>3</sup>
- 1.5 This policy has been written in line with Plymouth's Safeguarding Children Partnership policies and procedures<sup>4</sup>, and the local protocol for preventing violent Extremism and Terrorism<sup>5</sup> in the context of ensuring recognition of Child Protection, Safeguarding and the protection of adults at risk<sup>6</sup>.
- 1.6 Throughout this policy and procedure document, reference is made to children and young people. This term is used to mean those under the age of 18 years (Section 175 of the Education Act, 2018. The safeguarding of children and young persons under 18 in the UK is normally referred to as 'Child Protection' and will be used in this policy document.
- 1.7 The term employee refers to anyone who is a direct employee of SeaRegs Training, this includes instructional staff.
- 1.8 The term instructor also refers to additional instructional staff that SeaRegs may commission to deliver different aspects of the SeaRegs learning programme.
- 1.8 SeaRegs recognises that some adults are also vulnerable to abuse and can also be at risk. SeaRegs' safeguarding policy and procedures will be applied to allegations of abuse and the protection of adults at risk.
- 1.9 SeaRegs has appointed a Designated Safeguarding Lead (DSL) for Children and Young People and a DSL for Adults at Risk. A Deputy DSL is also appointed and responsible for the co-ordination of the centre's safeguarding policy and procedures.

 $<sup>^1</sup> https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping\_children\_safe\_in\_education\_2024.pdf$   $^2 Working Together to Safeguard Children 2018 publishing.service.gov.uk)$ 

<sup>&</sup>lt;sup>3</sup> https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales <sup>4</sup> http://www.plymouthscb.co.uk/professionals/

<sup>&</sup>lt;sup>5</sup> https://www.plymouth.gov.uk/crimepreventionandantisocialbehaviour/preventingextremism/plymouthpreventpartnership <sup>6</sup>https://www.plymouth.gov.uk/multiagencyadultsafeguardingmanual/contents/22adultsafeguardingframeworkexplained

- 1.10 SeaRegs openly promotes the role of the DSL and DDSLs and the contact details for these individuals is shared with all learners. Those appointed to DSL and DDSL roles complete appropriate safeguarding training which is updated regularly.
- 1.10 SeaRegs staff attend safeguarding training on how to:

recognise different types of abuse and neglect respond appropriately to safeguarding reports relating to an alleged person of concern and report alleged or disclosed abuse record and report concerns and share information appropriately

### 1.11 SeaRegs will ensure:

all new instructors and employees are aware of SeaRegs' safeguarding policies and procedures as part of their induction process.

the curriculum and other learning opportunities are identified to promote safeguarding and wellbeing and help children, young people and adults to develop self-esteem, assertiveness and promote their resilience.

instructors and employees are recruited and trained to adopt best practices to safeguard children, young people and adults at risk from abuse.

instructors and employees are trained to understand and adopt safer working practices.

opportunities are provided for all learners, instructors and employees to talk about concerns relating to their welfare.

1.16 SeaRegs will respond swiftly to all allegations of:

abuse or abuse of trust, made against instructors, employees or apprentices

incidents of suspicious poor practice

implementing the appropriate disciplinary and appeals procedures.

- 1.17 All safeguarding concerns must be referred to the Designated Safeguarding Lead (DSL). All allegations relating to an adults unsafe practice towards children, young people and adults at risk will lead to a consultation or referral to the Local Authority Designated Officer (LADO).
- 1.18 SeaRegs will not tolerate inappropriate behavior and has a Whistleblowing Policy to protect staff who disclose information regarding abuse by a colleague or other adult towards children, young people and adults at risk. The whistleblowing policy can be used by anyone to report a concern in confidence and anonymously if they do not feel comfortable reporting the matter directly to the SeaRegs' DSL.

- 1.19 The NSPCC Whistleblowing Advice Line is promoted by SeaRegs. This advice line provides free and confidential advice and support to professionals about how child protection issues must be managed. <a href="https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/">https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/</a> A poster with details is displayed in the resources office.
- 1.20 All individuals, including those in a position of trust, are expected to act professionally at all times, and to be familiar with centre policies and procedures

### 2. Child Protection & Safeguarding

### Definitions:

2.1. Child protection addresses all forms of abuse and neglect and taking appropriate action in line with SeaRegs duty of care.

**Safeguarding** looks at keeping children, young people and adults at risk safe from a much wider range of potential harm, and delivers preventative action, not just reaction.

- 2.2 **Child:** up to their 18th birthday
- 2.3 Adult at Risk: aged 18 year or over;
  - Who may be in need of community care services by reason of mental or other disability, age or illness;
  - and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

For more details Care Act 2014.8

### 3. Directors' responsibilities

- 3.1. SeaRegs Directors are committed to ensuring they:
  - take reasonable and appropriate action to respond to and report safeguarding concerns in line with their statutory duty of care.
  - provide a safe environment for children, young people and adults at risk to learn in.
  - identify children, young people and adults at risk who are suffering, or likely to suffer, significant harm.
  - take appropriate action to see that such children, young people and adults at risk are kept safe: at SeaRegs, at home or any other external environment external to SeaRegs including on-line.

 $<sup>^7\</sup> https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/lines/line$ 

<sup>&</sup>lt;sup>8</sup> https://www.legislation.gov.uk/ukpga/2014/23/contents

3.2 In pursuit of these aims, the Directors will approve and review policies and procedures regularly with the aim of:

protecting children, young people and adults at risk from maltreatment.

preventing impairment of children & young people's health or development.

ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care

where necessary, taking appropriate action in line with SeaRegs safeguarding policy and procedure to enable those children and young people to have optimum life chances and to enter adulthood successfully.

3.3 SeaRegs will refer concerns of a child or vulnerable adult that might be at risk of significant harm to the relevant local authority or the Police, or through other appropriate channels.

### 4. What Employees and Instructors should know

- 4.2 Employees and instructors should be aware of all policy, procedures and other processes within SeaRegs that support and promote safeguarding and wellbeing. This will be included and explained as part of their induction plan.
- 4.3 Instructors should be aware of the signs of abuse and neglect so that they are able to identify children, young people or adults at risk who may be in need of help or protection.
- 4.4 Employees and instructors will receive appropriate training on safeguarding, child protection and prevent.

### 5. Definitions of abuse:

5.1 'Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child 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, including where they see, hear or experience its effects. 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 by another child or children'.

### 6. Safeguarding, Early Help and Prevention

- 6.1 Key employees and instructors should be aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. They should be aware of the process for making referrals and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.
- Anyone who has a concern about a child's welfare should ensure they inform the DSL who will take appropriate action to ensure, when necessary, a referral is made to the relevant local authority. In the first instance staff should generally discuss any potential referral with the designated safeguarding lead who in most instances would make any referral. Instructors may be required to support social workers and other agencies following any referral.
- 6.3 **The child's wishes**: Where there is a safeguarding concern the centre should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. It is important to ensure that Instructors do not agree to keep safeguarding concerns to themselves in confidence but that all concerns are reported to the DSL, acting in the **best** interests of the child.
- 6.4 Instructors will receive appropriate child protection training and prevent training through online courses.

# 7 Disclosure of Abuse and Procedure for Reporting Concerns (General statement)

- 7.1 All SeaRegs employees and instructors have a responsibility to provide a safe environment in which children, young people and adults can learn and or work.
- 7.2 All instructors and employees have a responsibility to identify children, young people and adults at risk who may be in need of early help or extra help or who are suffering, or are likely to suffer, significant harm. All instructors and employees have a responsibility to report concerns to the DSL. SeaRegs will ensure appropriate action is taken and where necessary, engaging with Social Care, Police or Early Help Services as appropriate. In addition to this instructors and employees with support from the DSL should be aware that they may be asked to support social workers or police to support actions and appropriate decision making about individual children, young people or adults at risk.
- 7.3 All and employees should be aware of the signs of abuse and neglect so that they are able to identify cases of children, young people or adults at risk who may be in need of help or protection.
- 7.4 Instructors and employees working with children, young people or adults at risk are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child,

employees and instructors should always act in the interests of the child.

7.5 All instructors and employees have a duty to disclose any personal issues that relate to current or previous child or vulnerable adult protection matters within their personal lives.

### 8. Types of Safeguarding concerns

Concerns can revolve around one or more of the following:

Neglect Physical Abuse Sexual Abuse Emotional Abuse

And specific safeguarding matters:

Bullying or harassment (including cyberbullying)

Child missing from education or home or care

**Forced Marriage** 

Gang and youth violence

Radicalisation

Female genital mutilation

Domestic violence

Child sexual exploitation

Teenage relationship abuse

Sexting

Faith based abuse

**Drug Misuse** 

private fostering

mental health

trafficking

Fabricated or induced illness

Gender-based violence/violence against women and girls (VAWG)

For more information on definitions and signs of any of the above please see the NSPCC fact sheet -

https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf

### 8.1 Child on Child abuse

SeaRegs recognises that children and young people can abuse each other, this is generally referred to as peer on peer abuse. Child on child abuse takes on many forms and can occur inside the learning environment in the community, online or a combination of all of these. This abuse can take on many forms and include:

Bullying - including cyber bullying

Prejudice and discrimination

### Hazing/initiation type violence and or rituals

Abuse within personal relationships between peers, also known as harmful sexual behavior, for example: physical abuse, sexual violence including: rape, assault by penetration and sexual assault, sexual harassment, sharing or showing of nude or semi-nude images (photographs/videos) without consent, causing someone to participate in sexual activity without their consent and up skirting.

This policy takes account of the Ofsted report into sexual awareness (2021)<sup>9</sup>

### 9. Reporting procedures

- 9.1 If a child, young person or vulnerable adult shares a safeguarding concern with an employee or instructor, this must be reported to the DSL. The child young person or vulnerable adult must inform the student that safeguarding concerns must be reported to the DSL but be reassured the matter will be managed sensitively and confidentiality. The safeguarding concerns can be reported using the safeguarding reporting form see Annex 1.
- 9.2 Instructors and employees should:
  - listen to the child, young person or vulnerable adult.
  - not directly question the individual or ask leading questions.
  - not stop the individual who is freely recalling significant events just listen.
  - not show shock or surprise or disbelief.
  - make a written note of the account taking care to record the time and setting as well as what was actually said.
  - record the child, young person or vulnerable adult's own words wherever possible.
  - be objective and precise.
  - explain to the individual what is going to happen next.
  - inform the individual that you will need to pass the information on to the DSL, explaining you are not able to keep safeguarding matters to yourself.
  - ensure the individual is supported and kept informed.
  - always act in the best interest of the child, young person or vulnerable adult.
  - notify the DSL without delay.
  - stay with the individual until the referral has been completed.
- 9.3 Procedures for reporting and recording must be followed and confidentiality adhered to at all times. Lines of communication with regard to safeguarding must be limited to those directly involved on a 'need to know' basis. If you believe it is an emergency call the designated leads and/ or the relevant local authority or the police.
- 9.4 Instructors and employees should not investigate concerns or allegations

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<sup>9</sup> Review of sexual abuse in schools and colleges - GOV.UK (www.gov.uk)

themselves, but should report them immediately in line with procedure to the relevant DSL and or Director.

If, at any point, there is a risk of immediate serious harm to a child, young person or vulnerable adult a report should be made to the relevant local authority or the Police immediately. Anybody can report a concern or make a referral.

If after making a report, the child, young person or vulnerable adult's situation does not appear to be improving the SeaReg's employee who remains concerned should challenge the matter and where necessary escalate the concern and request the matter is re-assessed. Concerns should always lead to help for the child, young person or vulnerable adult.

9.5 Data protection fears should not be a barrier to information sharing as the safety of the child, young person or vulnerable adult should be of the utmost importance. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

### 10 Safer recruitment

- 10.1 SeaRegs fully complies with government guidance: 'Working together to safeguard children (2018)<sup>2</sup> and 'Keeping children safe in Education (2024)<sup>3</sup>
- 10.2 SeaRegs endeavors to prevent people who pose a risk to children, young people or adults at risk, from working within the organisation. SeaRegs adheres to safer recruitment practices in line with its statutory responsibility. All recruits and instructors and employees are subjected to vetting and checking procedures. SeaRegs will assess and make proportionate decisions on whether to ask for any checks beyond what is required as a minimum standard. Where necessary barred list checks will be undertaken.
- 10.3 SeaRegs has procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

### 11 Allegations of abuse made against employees and/or instructors

- 11.1 Duties as an employer and an employee/instructor
- 11.2 SeaRegs has a duty of care to all of their instructors and employees. SeaRegs will ensure they provide appropriate support to anyone that is subjected to an allegation.
- 11.3 These procedures apply to ALL instructors and employees and must be used in respect of all cases in which it is alleged that an employee has:
  - 1) behaved in a way that has harmed a child, young person or vulnerable adult, or may have caused actual harmed to a child, young person or vulnerable adult:

- 2) possibly committed a criminal offence against or related to a child, young person or vulnerable adult; or
- 3) behaved towards a child, young person or vulnerable adult in a way that indicates they would pose a risk of harm if they work regularly or closely with children, young people and or adults at risk.
- 11.4 Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

### 12 Allegations

- 12.1 It is essential that any allegation of abuse made against an employee or instructor is dealt with promptly, in a fair and consistent way that provides effective protection for the child, young person and vulnerable adult involved while also providing appropriate support to the person who is the subject of the allegation.
- 12.2 The framework for managing allegation of abuse against people who work with children and young people is set out in 'Keeping children safe in education September 2021' which provides an overview.

### 13 Receiving an Allegation of abuse

- 13.1 All allegations should be reported immediately to the DSL and SeaRegs Director must be informed. If an allegation is made against the SeaRegs Director, the report should be made the DSL and the Local Authority.
- 13.2 The SeaRegs Director and/or the DSL will act as Case Manager (CM) and will
- 13.3 Obtain a written account of the allegation, from the person who received it and ensure that it has been dated and signed. Relevant information such as dates, times, location and names of potential witnesses should be obtained and recorded. The written statement should be countersigned and dated by the Director and or the DSL.
- 13.2 In the first instance, the CM will immediately discuss the allegation with the Local Authority Designated Officer (LADO).
- 13.3 The purpose of a consultation between the LADO and the case managers to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous concerns either safeguarding or conduct as well as ascertain the individual's current contact with children, young people or adults at risk. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to pose an immediate risk or there is evidence of a possible criminal offence. The LADO will assess the case being presented and ascertain if the matter require a statutory intervention and police involvement.
- 13.4 If the LADO deems that the matter does not reach a statutory threshold for intervention, in most cases, it is likely the LADO will request SeaRegs to

conduct an internal investigation into the matter raised and ensure a full record of the case is held securely including a record of decisions made, the justification for the decisions and any final outcomes.

### 14. Allegation Management

- 14.1 Those who are subjected to an allegation will be informed of the reported concerns or allegations as soon as possible and given an explanation of the likely course of action. In some circumstances details of an allegation may have to be withheld due to instructions given by the police or social care.
- 14.2 The SeaRegs CM must keep a full written record of the actions taken in connection with allegations received. The CM will keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual.
- 14.3 If appropriate, SeaRegs Directors may suspend the employee whilst an investigation is carried out. Wherever possible the Investigating Officer or the Director will meet with the employee to discuss the need for, and nature of, the investigation before the investigation takes place. An investigation will be carried out as efficiently and quickly as possible to cause minimal disruption to the SeaRegs operations. When a suspension is necessary, SeaRegs will keep the individual/s informed of the progress of their case.
- 14.4 Parents and carers of a child or young person who, who is at the centre of a safeguarding concern will be informed about the allegation/s as soon as possible unless such a disclosure is deemed to put the child or young person in further risk of harm.
- 14.5 When the Local Authority threshold is met for a statutory assessment, SeaRegs will take direction from them as to if, when and how information can be disclosed to the parents and carers.
- 14.6 Where parents and carers are informed, SeaRegs will endeavor to keep them informed about the progress of the case, and told in brief case outcomes with the exception of a criminal prosecution or details of the outcome of any disciplinary process.
- 14.7 In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's services social care, or the police as appropriate, should consider what support the child or children involved may need. SeaRegs will work in partnership with appropriate agencies to agree what support can be provided to the learners who continue to attend their training while a safeguarding case is open and ongoing.

### 15 Suspension of Employees and or Instructors

15.1 SeaRegs Directors may take the view that an employee may have been guilty of gross misconduct, pose a significant risk, or because of some other good and urgent cause, the continuing attendance of the employee at SeaRegs cannot be permitted. Therefore, SeaRegs Director may suspend an employee or instructor from duty, pending an investigation and the holding of a formal disciplinary hearing.

15.2 A suspension should only be imposed after careful consideration has been given and it should be made clear to the employee or instructor that it is not considered a disciplinary act. All suspensions must be confirmed in writing, including the reasons why.

### 16 Disciplinary Investigations

- 16.1 Disciplinary investigations should be conducted in accordance with SeaRegs' disciplinary procedures.
- 16.2 Employees and instructors subjected to disciplinary procedures must be informed of:

the disciplinary charge against them.

their entitlement to be accompanied or represented by a trade union representative or friend.

- 16.3 The child, children or young person making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the employee under investigation returning to SeaRegs. Consideration should be given as to how SeaRegs will manage this process to ensure all parties involved feel appropriately supported.
- 16.4 Where the employee or instructor has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the employee or instructor to return to work. It may be appropriate to signpost them to counselling or look at other assistance as based on the circumstances of the event.
- 16.5 If on conclusion of the investigation, the case subject is deemed no longer appropriate to practice at SeaRegs or, if while under investigation the subject resigns or withdraws their services from SeaRegs, SeaRegs must consult the LADO and seek guidance regarding the appropriateness of referring the subject to the Department for Education / Disclosure and Barring Service. If a referral is appropriate the report should be made within one month.

### 17 Safeguarding Investigation Outcomes

17.1 When a safeguarding investigation reaches an outcome the DSL will consult with the LADO, on the findings and discuss and agree appropriate outcomes. The following definitions will be used when determining the outcome of safeguarding allegation investigations:

**Substantiated:** there is sufficient evidence to prove the allegation; **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

**False:** there is sufficient evidence to disprove the allegation; **Unsubstantiated**: there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

17.2 Once and outcome has been reached, SeaRegs Director will:

inform the employee or instructor under investigation of the outcome decision. This is to be communicated verbally and in writing. Where cases have been substantiated or unsubstantiated, SeaRegs must agree, if any on additional actions that may be required e.g. additional training, coaching and guiding or other actions as SeaRegs see fit. Such outcome actions will also be discussed in conjunction with the LADO.

For cases where it is identified no disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.

inform the parents/carers of the alleged victim that the allegation has been investigated and an outcome has been reached.

where the allegation was made by a child or young person, other than the alleged victim, consideration to be given to informing the parents/carers of that young person, this will help to ensure the child or young person receives appropriate support from the home environment.

prepare a full investigation report outlining the allegation and giving reasons for the conclusion and confirming any actions that have been taken.

- 17.3 When an allegation is made, SeaRegs will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation.
- 17.4 The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence. Parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

### 18 Children, young people and adults at risk: Child on child abuse

18.1 Concerns relating to Child on child abuse will be taken very seriously. SeaRegs Director will ensure that:

All employees and instructors understand and recognise child on child abuse and when child on child abuse is identified or reported to them, that these concerns are reported to the DSL.

Appropriate action is taken when reports of child on child abuse are received ensuring ALL incidents are fully followed up including conducting enquiries or

investigations in line with SeaRegs learners' code of conduct.

All allegations and incidents must be recorded, learners should be involved in this process and told what is being recorded, and why.

Where appropriate, incidents will be referred to children's social care and the police. Where incidents have been assessed by statutory agencies and the concerns do not meet the statutory threshold, SeaRegs will conduct an internal enquiry into the reported concerns.

Parents and cares of those involved in child on child abuse will be informed of the reported concerns – unless it is assessed that by doing so would place any of the young people involved risk of harm or further harm (this will be agreed in partnership with the children and young people involved, police and, or social care.

While investigations are in place, risk will be assessed and where appropriate, alleged perpetrators of peer on peer abuse may be suspended whilst an investigation takes place

Children and young people involved in child on child incidents and investigation will be treated fairly and equally and will be offered appropriate support which may include referrals to Early Help or other support services.

All enquires are fully document and recorded noting clearly the concerns in hand and those involved, details of witnesses and actions taken by SeaRegs as part of the investigation and enquiry process. The outcomes reached must be clearly document and reasons for how such decisions were reached. Children, young people and their families will be kept updated in the process.

### 19 Record Keeping

- 19.1 It is important that clear, accurate, concise and comprehensive safeguarding records are kept and stored securely. On completion of any safeguarding investigation, either: employee, instructor or learner, a copy of the investigation report must be held securely on the individual's file. The purpose of the record is to enable all concerns to be appropriately recorded and whereby new concerns or repeated concerns or patterns or behaviors arise, these can be clearly identified for the purpose of ongoing management of risk. Accurate records will ensure there is clear evidence that SeaRegs can evidence they have taken appropriate action in line with our statutory duty when managing and handing safeguarding cases. Records may be required to be shared with statutory agencies and may be needed as evidence for criminal inquiries or statutory investigations.
- 19.2 Accurate records will ensure that when an individual leaves SeaRegs, information can be shared in response to any future request for a professional or other reference. It will also ensure, when and individual leaves SeaRegs and at a future time wishes to re-join the organisation, their records will be available and any concerns regarding safeguarding can be assessed as part of the safer recruitment process.
- 19.3 Accurate record keeping will help to prevent unnecessary re-investigation of a

- case, as sometimes happens, if allegation re- surfaces after a period of time in cases where no new evidence is presented.
- 19.4 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the centre's statutory duty to inform Disclosure and Barring Service.

### 20 Monitoring Effectiveness

- 20.1 Where an allegation has been made against an employee or instructor the Director, should, at the conclusion of the investigation and any disciplinary outcome consider whether there are any matters arising or lessons learned that could lead to the improvement of SeaRegs safeguarding processes and other relevant policies and procedures. SeaRegs will also consider cases or concerns should be drawn to the attention of the Devon Safeguarding Children's Board. Consideration should also be given to the training needs of staff.
- 20.2 The procedures need to be applied with common sense and judgement. It is important to ensure that even allegations that appear less serious are seen to be followed up and taken seriously, and that they are examined objectively by someone independent of the SeaRegs. The LADO should be informed of all allegations that come to the centre's attention and appear to meet the criteria.

### 21 Safer Recruitment

- 21.1 SeaRegs has safer recruitment and selection procedures in place. These are reviewed at Director level annually.
- 21.2 Our safer recruitment practices apply to all applicants whereby the role they are applying for requires them to work with children, young people and adults at risk and includes:

A clearly defined role description and person specification.

Vacancies are advertised widely in order to ensure a diversity of applicants.

Specific safeguarding and child protection questions are asked at interview.

A number of vetting and checks are conducted as part of the safer recruitment process including:

Documentary evidence is required of academic/vocational n qualifications.

Previous employment history is verified. Criminal disclosure checks are carried out (maintain sensitive and confidential use of the applicant's disclosure)

- 22 Safeguarding learners whilst accommodated away from home.
- 22.1 To enable apprentices the opportunity to access SeaRegs' training, some learners will be required to stay away from home.
- 22.2 It is the responsibility of the employer to organise accommodation bookings. However, SeaRegs works in partnership with employers to support them by giving guidance on how to identify appropriate accommodation based on the individual and diverse needs of their apprentices. The employer should assess the needs of their employee/apprentice and ensure that they are suitably accommodated.

### 22.3 Accommodating Young People Under 18 Years

- 22.3.1 Designated and exclusive accommodation has been identified for all learners who are under 18 years of age and who require accommodation to access SeaRegs learning in Plymouth.
- 22.3.2 Additional information is required when accommodating young people under 18 years to ensure their needs are suitably assessed. This information may be shared by employers, apprentices and their parents/guardians. The information will include the accommodation type and any special requirements needed.
- 22.3.3 SeaRegs DSL provides additional oversight on the care of these learners while they are staying away from home. The Health and Safety (H&S) of this accommodation is overseen by SeaRegs directly as detailed in SeaRegs Residential Training Policy 2021.
- 22.3.4 Apprentices, Employers and Parents/guardians are provided with SeaRegs 24/7 phone line and the contact details for the DSL.

### 22.4 Additional Support for all learners accommodated away from home

- 22.4.1 All apprentices staying away from home are provided with the SeaRegs out of hours contact number. The purpose of this is for apprentices to contact SeaRegs for any safeguarding, welfare or other concerns they may have while away from home and while not in attendance at the training venue. All apprentices are provided with this information as part of their training pack.
- 22.4.2 SeaRegs holds a record of where all apprentices are accommodated, while they are away from home.

### 23 SeaRegs Safeguarding Roles and Responsibilities

DSL – Vicky Jinks 07768 282256 – admin@searegs.co.uk DDSL – Rachel Miller 01752 408270 – info@searegs.co.uk

### 24 IT Usage

24.1 The Directors, Administration staff and Curriculum manager have designated SeaRegs email addresses which are used to correspond with Employers and Apprentices. The Directors have the ability to monitor the email accounts for

- outgoing and incoming emails.
- 24.2 Where appropriate Apprentices have use of Training Record book App on their phones to record training tasks for their End Point Assessment.
- 24.3 Computers/tablets are available for Apprentices to use as necessary during training blocks. Primarily these are used for Functional Skills Initial Assessments and to look up relevant Merchant Shipping Notices online. Use of the computers during this time is monitored by the Assessor

### 25 Prevent

- 25.1 The government Counter-Terrorism and Security Act 2015, places a duty on education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy:
  - Prevent terrorism stop people becoming terrorists
  - Pursue terrorism disrupt and stop terror attacks
  - Prepare to deal with terrorism mitigate impact of attacks that can't be stopped.

As a nation we continue to prioritise according to the threat posed to our national security; the allocation of resources will be proportionate to the threats we face. There has been an increase in far right inspired terror attacks and lone acts of terror opposed to mass organised terror activities, the government strategy now includes ways in which to identify risk of these instances.

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.
- 25.2 SeaRegs recognises the positive contribution it can make towards protecting its students from radicalisation and violent extremism. SeaRegs will help to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. All instructors and apprentices will undergo appropriate Prevent training. SeaRegs will support the British Values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" in promoting free debate during training.
- 25.3 Key Contacts

DSL – Vicky Jinks 07768 282256 – admin@searegs.co.uk DDSL – Rachel Miller 01752 408270 – info@searegs.co.uk

South West Prevent Contact: Cheri Fayers Email: Cheri.FAYERS@education.gov.uk

Telephone: 07392 135 873

### 25.4 Definitions

Radicalisation - is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo.

Terrorism - an act of terror/ violence based on a political objective, whether that means the politics of nationalism, ethnicity, religion,

Extremism - an ideology that is far outside the mainstream attitudes of society, including 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.

### 25.5 Referrals

If an apprentices has concerns about themselves or we have a concern that an apprentice is at as risk of being radicalized please inform the Designated or Deputy Designated Safeguarding lead who will decide on whether the issue needs to be escalated to the local police or prevent officer

Should you feel the apprentice, yourself or any members of the public are in immediate danger report to the police immediately.

Policy Approved by:

Simon Jinks Director Vicky Jinks Director

### Annex 1 - Safeguarding Reporting form:

### **CRITERIA FOR REFERRAL**

- Where there is an allegation or concern that a young person or vulnerable adult may have been harmed or neglected or is at risk of harm/neglect or you have concerns relating to their welfare.

  And/or
- 2 A person working with young persons (YP) or vulnerable adult (VA) has:
  - Acted in a way that would have breached the SeaRegs policies, procedures, or code of conduct.
  - Possibly committed a criminal offence against or related to a YP or VA.
  - Behaved in a way that indicated they would pose a risk of harm if they worked with young persons or adults at risk closely or regularly.

# PLEASE NOTE THAT ALL INFORMATION PROVIDED MAY BE SHARED WITH OTHER AGENCIES/THE SUBJECTS OF THE REFERRALS WHERE REQUIRED.

Date form comple		Is this concern/incide	nt in relation to:	
		Student	or	Staff member/helper
Your details (Pe	rson	making the referral -	report)	
Full Name			Position	
Are you reporting your		eporting own concern		else
own concerns or reporting on behalf of	If you			eone else, please provide
someone else?				
		Young person or	r vulnerable adult de	tails
Name			Gender	
Age			DOB	
Company			Additional needs	
Parent/carer name/address	Nam			
(if applicable) Addr		ess:		
		Staff mem	ber/helper details	
Name			Gender	
Age			DOB	
Contact details address			Contact number	

Incident or concern	Incide	ent date/time	Date	Time			
YP or VA invo	olved						
Staff involved	l						
Description of incident or concern							
	s associated	d with the incident	Details of witnesses				
Name:			Name:				
Name:			Mob: Name: Mob				
Have concerr		s	If yes, provide details of wha	t was said below.			
been discuss with parent/C	140		If no, state the reason for this	below.			
Any other info	ormation:						
Actions take	n/Close out	: – continue on anot	her page if required				

Ends.