Safeguarding & Prevent Policy

Responsible Manager	**Designated Safeguarding Lead**
Date of Issue	**June 2018**
Issue Number	**V7.0**
Date for Review	**June 2019**

Summary of Key Points of Policy

The following policy constitutes the approach adopted by CXK and its group of companies, (hereafter known as CXK), when dealing with children, young people or adults on a day to day basis. Ultimately, effective safeguarding of children, young people and adults can only be achieved by putting them at the heart of our processes. Additionally every individual must play his or her full part by working together, and with other agencies, to meet the needs of the most vulnerable.

It is expected that all employees and sub-contractors, refer to the safeguarding procedures for their specific area of work as there may be differences with regard to reporting arrangements for incidents depending upon contractual specifications.

Safeguarding & Prevent Policy

Table of Contents

Appendix 1: Prevent Strategy

Safeguarding & Prevent Policy

1 Statement of Intent

1.1 The creation of a safe and friendly environment throughout CXK is important to us, as such we understand both our responsibility and duty of care to ensure that we have effective arrangements to safeguard and promote the welfare of children, young people, adults, their families, our employees and stakeholders.

1.2 Everyone has the right to be safe, and to be protected from abuse and exploitation. This is acknowledged throughout our culture, behaviour, working practices and policies. We are committed to responding with integrity and respect to anyone who is in contact with our charity and its services.

1.3 As a provider CXK does not officially investigate individual cases, however we have a responsibility to identify cases and respond appropriately. This may include gathering enough information to be able to pass on concerns over a period of time, and documenting events. We will share all relevant information with the appropriate agencies without delay and within agreed protocols.

1.4 We recognise that:

- The welfare of the individual; be they a child, young person or adult is paramount, and will be given the highest priority.
- All children, young people and adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, adults, their parents, carers and other agencies is essential in promoting an individual's welfare.
- All individuals that CXK works with, and in particular the learners on CXK programmes, have a right to know how to protect themselves from the risks associated with radicalisation, extremism, forms of abuse, grooming and bullying, including through the use of the internet, to ensure that they understand the risks posed by adults or young people who use the internet to bully, groom or abuse other people, especially children, young people and vulnerable adults.
- It is essential that our employees act appropriately during their interactions with our service users at all times, and understand safe practices in carrying out their duties for CXK in all its parts, across all aspects of service delivery.
- Safeguarding is everyone's responsibility. No single agency can have a full picture of the needs or circumstances of a child, young person or adult. Therefore a culture of documenting concerns, potentially over time, multi-agency collaboration and the use of early intervention/help services is key to the successful safeguarding of our service users.

2 Statement of Purpose

- To provide protection
- To provide guidance
- To provide legislative compliance
- To promote confidence
- To promote integrated working
- To promote a caring, accessible and safe environment

3   Principles and Values

3.1   It is everyone's right to live free from abuse in accordance with the principles of respect, dignity, autonomy, privacy and equity.

3.2   Priority is given to the prevention of abuse by raising the awareness of safeguarding and protection issues and by fostering a culture of good practice throughout everything we do.

3.3   Identification of concern that anyone who is suspected of, or subjected to abuse, or mistreatment, will be prioritised. Employees will respond to such concerns with prompt, timely and appropriate action.

3.4   This document applies to all employees regardless of status and contracted agents, volunteers and consultants. It is everyone's responsibility to respond, refer, record and review any concerns about abuse appropriately in line with protocols and policies.

3.5   Protection is a multi-agency responsibility and activity and we expect all partners to actively work together to provide safe places, people and services. For services to be effective, each professional and agency should play their full part.

3.6   We are committed to supporting inclusive, multi-agency training, education and information, in line with Working Together 2018, for everyone concerned, to create a climate in which abuse is regarded as unacceptable.

3.7   We are committed to providing a client-centred approach to services that is based on a clear understanding of the needs and views of the children, young people and adults that we work with.

4   Aims and Objectives

4.1   CXK offers a broad range of activities and programmes for service users. As well as responding to immediate concerns, we will ensure that appropriate measures and practices are in place to promote the welfare of children, young people and adults, bringing matters requiring attention to the relevant persons within the charity or outside it.

4.2   We expect that all those who work for or represent CXK in all its parts to maintain a proper focus on safeguarding children, young people and adults, which is reflected both in sound individual practice and internal policies and guidance. All those who work for or represent CXK in all its parts must be able to:

- Give the highest priority to the welfare of children, young people and adults.

- Recognise and identify signs of abuse and neglect and any other concerns relating to children and young people and adults.

- Support service users to ensure they know how to protect themselves from the risk of all forms of abuse including radicalisation, extremism, forms of abuse, grooming and bullying.

- Respond appropriately to any disclosure.

- Respond appropriately to any allegation against employees, other adults or themselves.

- Record incidents appropriately, accurately and immediately in accordance with contract specifications.

- Act appropriately during their interactions with service users and understand safe practice in carrying out their duties.

- Share appropriate information in a timely way, with colleagues and the relevant statutory or non-statutory agency, or local authority, where there are concerns about the safety of a child, young person or adult.

- Enable employees to use their professional judgement with confidence to put the needs of the child, young person or adult at the heart of the safeguarding system regularly reviewing the outcomes obtained against any specific plans of action.

- Be alert to the risks which abusers, potential abusers or you may pose.

- Contribute as necessary to CXK's safeguarding and protection processes to ensure that a process of review and continuous improvement is followed.

- Undertake safeguarding training on a regular basis including initial and updated safeguarding to be renewed every 12 to 18 months at various levels including introductory, refresher and delegated leads.

- Document their concerns appropriately using the approved case management or database system, and recording on separate incident forms where appropriate.

- Use lessons learnt from Serious Case Reviews in an effective and appropriate manner so that practice is informed, up-to-date and remains focused on the welfare of children, young people and adults.

- Understand and follow any specific contract requirements relating to safeguarding, for example the use of Pharos in relation to high level incidents on the National Citizen Service.

- Undertake CPD in accordance with emergent themes from central or local government.

- Understand and comply with the duties placed upon CXK by Government strategies including the Prevent Strategy (Counter Terrorism and Security Act 2015)

- Understand and implement relevant Government guidance including:

- *Keeping children safe in education*, Department for Education, July 2015;www.gov.uk/government/publications/keeping-children-safe-in-education--2

- *Working together 2018 to safeguard children, Department for Education,* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683115/Changes_to_statutory_guidance-_Working_Together_to_Safeguard_Children.pdf

5 Safeguarding Responsibilities Overview

5.1 Board of Trustees	• Agree aims and objectives of the safeguarding and ratifying any substantial amendments. • Ensure the provision of sufficient financial and human resources to comply with policy. • Have oversight of CXK's safeguarding activities, monitoring and ensuring their effectiveness on a regular basis. • Have a safeguarding champion at Board level.
5.2 Chief Executive	• Has overall responsibility for safeguarding and promoting the welfare of children, young people and adults; on a day to day basis this is devolved to the designated officer. • Receive reports, identify and understand trends, take appropriate action where necessary. • Ensure any issues are appropriately addressed within partnerships. • Represent CXK at key safeguarding forums across geographical delivery area
5.3 Designated Lead Person(s)	• Be the operational lead on Safeguarding/Child & Adult Protection for the charity. • Update and review annually the Safeguarding/Child & Adult Protection Policy taking into account current legislation, guidance and good practice. • Act as Designated Prevent Officer. Represent the charity on required Safeguarding Board(s), and be trained and competent in safeguarding /child protection issues. • Cascade good practice within the charity including offering advice and guidance to colleagues on all safeguarding issues. • Liaise and support Safeguarding Champions e.g. Child Sexual Exploitation Champion to ensure good practice and training is cascaded effectively throughout the charity. • Represent the charity in local safeguarding arenas. • Provide reports required by any external agency or commissioner. • Attend and contribute to associated events, conferences and training programmes. • Provide regularly updated mandatory training programmes for employees and provide bespoke training for Trustees. • Report allegations of abuse by members of employees to the LADO. • Undertake risk assessment and where appropriate action plans in particular where children, young people or adults have been identified as falling under the Prevent Strategy. • Ensure that CXK follows a path of continuous improvement to ensure that all safeguarding practices are of the highest standard

5.4 Management Team/Designated Managers	• Provide regular and effective line management supervision with safeguarding as a standing item. • Be the first port of call for employees and volunteers to raise concerns and seek advice. • Ensure that the safeguarding risk register is updated regularly • Ensure that safeguarding is a standing item in all team meetings • Ensure that all their employees and volunteers have access to regular safeguarding training and refreshers • Ensure all employees and volunteers undertake an induction on starting employment and understand and follow charity policies and procedures. • Understand consultation and escalation processes within the local authority they and their colleagues work in. • Report appropriately all safeguarding issues both internally and externally. For example, using the CXK incident log (and reporting processes) and following the process as specified in the Prevent Strategy (Sec 26 of the Counter Terrorism and Security Act). • Assist the Designated Person to conduct risk assessment and action plan under the above strategy and ensure effective use of appropriate toolkits e.g. Child Sexual Exploitation. • Contribute to reports compiled about CXK's safeguarding arrangements and their effectiveness, as and when required.
5.5 Employees, Sub Contractors and Volunteers	• Understand their roles and responsibilities with regard to safeguarding and children, young people and adult protection • Share with those accessing the services, children, young people, adults and their family/carers, where appropriate, the safeguarding process and what they should do with any safeguarding concerns. • Follow the process for reporting and recording safeguarding concerns • Make themselves available for training • Regularly update knowledge and understanding, through research, training, supervision, multi-agency working • Identify signs, symptoms and categories of abuse and respond appropriately, including identification of children at risk from Extremism, Child Sexual Exploitation, Female Genital Mutilation, Gang Influence, Missing and Trafficking • Understand threshold levels and services available including those linked to Early Help support and statutory services • Understand consultation and escalation processes within the local authority they work in. • Have knowledge of, and be committed to, upholding children's, young people's and vulnerable adults' rights. • In the case of subcontractors provide information on safeguarding activities as and when required, as per contractual requirements.

5.6 HR department	- Maintain register of employees and volunteer DBS checks. - Administer DBS check requests and safeguarding training register. - Respond appropriately to complaints against employees in respect of Safeguarding.

6 Prevent

Section 26 of the Counter Terrorism and Security Act 2015 forms the basis of the Prevent Duty, which came into force on July 1st 2015. This places a duty on certain bodies, including education and training providers (specified in section 6) to have 'due regard to the need to prevent people from being drawn into terrorism'. The Prevent Duty is not about preventing employees, children, young people and adults from having political and religious views and concerns, but about supporting them to use those concerns or act on them in non-extremist ways.

Please see Appendix 1 – CXK Prevent Strategy & Action Plan

6.1 What is Extremism?

The Government has defined extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs.' This also includes calls for the deaths of persons involved in or associated with the British Armed Forces.

6.2 What are British Values?

British Values are defined as follows:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs.

CXK expects that all employees will encourage service users to respect British Values particularly with regard to the protected characteristics as specified in the Equality Act 2010.

6.3 Requirements Placed Upon CXK by Prevent Strategy

CXK have a legal responsibility to ensure that employees undertake training in the Prevent Duty, are aware of when it is appropriate to refer concerns regarding students, learners and colleagues, and exemplify British Values in their day to day practice. In addition CXK must appoint a Designated Prevent Officer, who is the Designated Safeguarding Officer. In order to be compliant with our duty under this strategy, CXK must ensure that the Prevent Strategy is included in the following aspects of business:

- Training – Safeguarding Training, FMT updates, Understanding Pathways to Extremism and the Prevent Programme online training,
- Due diligence.
- Policies surrounding use of IT equipment and internet usage.
- Whistleblowing and Comments, Compliments and Complaints process.

- Safeguarding arrangements.
- Visitors to CXK premises or to CXK provision (see CXK Visitor Procedure)
- Employee boundaries.

In addition to the above, CXK and sub-contractors must have a clear process to report concerns in the following way:

- Designated Person informed of concerns via the Safeguarding Policy and Process or the Whistleblowing Policy and Process.
- A CXK risk assessment and subsequent action plan must be written, which is shared as required, to be updated when arrangements are known.
- Understanding and buy-in from all parts of the charity, including Board members.

7   Equality and Diversity

7.1   No employee will be treated less favourably or discriminated against or suffer a detriment as a result of age, sex, disability, marital status, colour, race, nationality, ethnic origin, religious beliefs or sexual orientation. As specified in the 2010 Equality Act.

7.2   If any employee feels that they are discriminated against, they should raise the matter with their manager or use the Grievance Policy.

8   Associated CXK Policies & Procedures

- Incident Management Procedure
- Visitors Procedure
- Recruitment Policy
- Lone Working Policy
- Data Protection Policy
- Whistleblowing Policy
- Risk Assessment Procedure
- Health & Safety Policy
- Professional Boundaries Policy
- DBS Policy
- Anti-Bullying Policy
- Comments, Compliments and Complaints Policy
- Grievance Policy

9   Relevant Legislation

- Working Together 2018
- The Children Act 1989
- The Children Act 2004
- The Data Protection Act 1998
- The Protection of Children Act 1999
- The Human Rights Act 1998
- The United Nations Convention for the Rights of the Child
- Mental Capacity Act 2005 (MCA)
- No Secrets 2000
- The Vulnerable Groups Act 2006
- The Care Act 2014
- The Counter Terrorism and Security Act 2015.

10 Other Safeguarding Activities

CXK reserves the right to amend this policy as and when necessary to ensure that we are compliant with current legislation, good practice and statutory government guidance.

Additionally we may add any further process or procedure as an appendix for employees' use. Employees will be informed in full of any and all changes using SharePoint, the e-bulletin and cascade through the Full Management Team.

Other safeguarding activities that all employees are made aware of via induction and regular safeguarding updates and which are linked to training to ensure employees understand and are confident in all relevant processes and procedures include the following:

10.1 Child Sexual Exploitation (CSE)

CXK has a nominated member of staff who is the Champion for Child Sexual Exploitation. They are a part of the Kent group of CSE Champions who work with KSCB to ensure up-to-date training and awareness is assured in theirs and others' agencies. The CXK Champion works with the Lead Designated Officer and managers to ensure all employees know what processes and procedures to follow should they be concerned that a young person is at risk of child exploitation.

Employees are directed to the CXK Safeguarding SharePoint page which has links to a CSE Toolkit and how to use it, and Local Authority Sexual Exploitation procedures and strategies.

In addition, employees have access to up to date guides for young people and their parents/carers as well as the current posters and information linked to current campaigns, for example Operation Willow.

10.2 Missing Children

All CXK employees are made aware via induction and regular updates of safeguarding training of processes and procedures that they are required to follow should they be concerned that a young person is missing.

In the first instance employees must follow the CXK safeguarding procedures which will direct them to taking advice from the Central Duty Team.

10.3 Female Genital Mutilation (FGM)

All CXK employees are made aware via induction and regular updates of safeguarding training of processes and procedures that they are required to follow should they be concerned that a young person is at risk of female genital mutilation.

FGM is illegal in the UK and constitutes a form of child abuse and violence against children and young women that has severe short term and long term physical and psychological consequences. If an employee has reason to believe that a child or young person is at risk of FGM they have a legal responsibility to report this to the police or to social services.

10.4 Trafficking

The National Crime Agency sets out the full [National Referral Mechanism (NRM)](#) for identifying, protecting and supporting victims of human trafficking. This includes the [National Referral Mechanism (NRM) form](#) for potential victims of trafficking and modern slavery.

All CXK employees are made aware via induction and regular updates of safeguarding training issues related to Trafficking.

- Local guidance
- Safeguarding trafficked children toolkit
- Safeguarding unaccompanied children who arrive in Kent
- The context of this work within the Modern Slavery Act 2015

If a CXK employee believes that a client is at risk of Trafficking they have a legal responsibility to report this to the police or to social care.

10.5 Gangs

Children and young people becoming involved in Gangs can be vulnerable to a range of risk taking, grooming and illegal activities. These include:

- Substance misuse
- Child Sexual Exploitation
- Extremist activity
- Other forms of abuse and criminal activity including misuse of weapons

All CXK employees are made aware via induction and regular updates of safeguarding training of processes and procedures that they are required to follow should they be concerned that a young person is involved in risk taking activity related to the membership of or influence of a gang.

In the first instance the employee must follow the CXK safeguarding procedures which will direct them to taking advice from the Central Duty Team. Any illegal activity must be reported via the appropriate channels.

10.6 Online Safety

Online safety is a part of CXK's safeguarding responsibilities and a whole charity approach is outlined in CXK's Internet usage policy and in the CXK professional boundaries and code of conduct.

The term 'online safety' reflects a widening range of issues associated with technology and a user's access to content, contact with others and behavioural issues and a move away from a focus on online safety as an ICT issue.

The Ofsted "Inspecting Safeguarding" document explicitly highlights online safety as part of leaders' and managers' safeguarding responsibility and all employees, in particular those working with clients in a learning environment, are expected to be familiar with and compliant with its content. Key areas are:

- Page 6 and 7, Section 10 and 11 - Definition of Safeguarding
- Page 9, Section 13 - The signs of successful safeguarding arrangements
- Page 12, Section 18 - Inspecting how effectively leaders and governors create a safeguarding culture
- Page 15, Section 34 - Arriving at judgements about safeguarding arrangements
- Page 16, Section 40 - Inspecting or reporting on safeguarding concerns

10.7 Private Fostering

Private fostering is when a child under the age of 16 (18 if disabled) lives with someone, who is not considered a close relative of the person, for 28 days or more in a year. Examples of this include living with:
- A grandparent
- Aunt or uncle
- Sibling
- Step-parent

It is the law that any Local Authority is made aware of all the children who are being privately fostered as the local authority have a duty to ensure that the child is safe and that the private foster carer has support.

Procedures

11 Abuse

11.1 Definitions

Abuse and neglect are forms of maltreatment of a child or adult. Somebody may abuse or neglect a child or adult by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. The Care Act 2014 also recognises self-neglect as a form of abuse in adults.

11.2 Types of Abuse

- Physical
- Sexual
- Psychological/emotional
- Neglect or act of omission
- Discrimination
- Domestic
- Financial
- Institutional
- Deprivation of liberty
- Self-neglect
- Cyber-bullying

11.3 Signs of Abuse

- **Physical** – The victim may have obvious signs such as bruising, bite marks or burns. Other signs to look for are the victim becoming withdrawn, anxious, depressed, and clingy. There will often be a change in their behaviour and they may start missing school or work.

- **Sexual** – The victim may start to avoid certain people or situations. They may become withdrawn and depressed, or in some cases will become sexually active at a young age, promiscuous or use sexual language that is not age appropriate. Other signs that are not easily identified by anyone other than a medical expert would be sexually transmitted diseases, anal or vaginal soreness, or pregnancy.

- **Psychological** – The victim may report that they are being yelled at, mocked, insulted, threatened, ignored and in some cases feeling increasingly isolated. The victim will often have a strong feeling of worthlessness and become self-conscious, withdrawn and depressed.

- **Neglect or act of omission** – Victims will often show signs such as malnutrition, begging, stealing or hoarding food. Poor hygiene, matted hair, dirty skin or body odour. There may be unattended physical or medical problems. In some cases a child may make comments that no one is home to provide care for them. They may appear constantly tired, have frequent lateness or absence from school or work. In some adults, neglect can be self-inflicted, such as self-harming or hoarding.

- **Discrimination** – Victims may feel they are being treated differently because of a physical or learning disability, mental, ill-health or sensory impairment, race, gender, age, religion, cultural background, sexual orientation, political convictions or appearance.

- **Domestic** – The victims of abuse may have obvious signs such as regular bruising, scratches, bite marks or fractures. They may also report that their partner will not let them see family or friends, that they feel controlled, are being told how they can or cannot dress. Victims will also frequently report that their partner belittles or humiliates them in front of others, is keeping them short of money or is using the children within the relationship in a threatening or controlling way.

- **Financial** – Victims of financial abuse will often complain of having no money and will regularly look to borrow money. It may become obvious that they are missing personal possessions and it may appear that they are not living in conditions that reflect their financial resources. Other signs to look for would be the victim losing weight, becoming suspicious of peoples motives, withdrawn, anxious or depressed.

- **Institutional** – Institutional abuse will often occur when a person is living in a care home or children's home. Victims will often report that they are being treated badly by staff, either physically or mentally. They may have little or no control over their finances, and will report that their medication or food is withheld from them by staff.

- **Self-neglect** – Self neglect is an act carried out by an individual to themselves. This may be demonstrated through a person self-harming, lack of personal hygiene, poor health, poor diet, poor living conditions, hoarding or mismanagement of money.

- **Cyber-bullying** – Victims of cyber-bullying may show signs such as becoming withdrawn or shy, or signs of depression. They may be extremely moody or agitated, anxious or overly stressed out, or potentially demonstrate aggressive behaviour. They may suddenly stop using their computer or stop wanting to take part in social activities.

12 Reporting and Recording of Safeguarding Concerns

12.1 Reporting

All staff have a duty to report any actual or suspected safeguarding concerns. The reporting process can be found on SharePoint – Incident Management Procedure.

The stages for reporting and recording safeguarding are as follows:

- **Stage one** – If a member of staff has a concern they must speak to their manager or designated lead immediately. If their manager is not available they should report to their manager's line manager or another manager in a more senior role. If the individual involved is in immediate danger than the member of staff should contact the Emergency Services and Central Duty Team before their manager.

- **Stage two** – The member of staff should present to their manager or designated lead what the concern is. A discussion with the manager or designated lead will identify if a referral to the Central Duty Team is required or not. Whatever action is taken must be recorded on the incident log and relevant service CRM.

- **Stage three** – If identified as an actual safeguarding situation a referral will be made to the Central Duty Team, who then have responsibility to investigate. If the concern is not a situation that requires a referral to Central Duty, then staff will be advised by their manager on how to conclude the concern.

- **Stage Four** – Contract manager to report to the organisation's designated lead who will review the situation and identify any further actions required.

- **Stage five** - All concerns will remain open until the concern has been addressed and closed. The employee has the responsibility to track the concern and update their line manager on any outcomes and when the case has been closed.

- **Stage five** – All safeguarding concerns will be discussed in line management supervision. If the member of staff has been affected by the situation then access to the organisation's counselling service or clinical supervision will be offered.

- **Stage 6 –** If it is agreed that the concern is not one of child protection but rather a child in need of support services, then the employee must discuss this with their line manager and if agreed, seek consent from the parents/carers to make a referral onwards for Early Help from children's social care.

Escalation

All staff must be aware that any safeguarding concern raised must be followed up until the situation has been resolved. If CXK considers that appropriate safeguarding action has not been taken to address the concern then the line manager must discuss the situation with the designated safeguarding lead and decide if the matter needs escalating with the local authority by following the local safeguarding children board procedures for escalation. The escalation process set out in the Incident Management Procedure should be referred to at all times to assist with decisions in relation to reporting and escalation.

Additional Reporting Requirements

Some contracts will have specific reporting requirements regarding safeguarding or incidents. All staff should be made aware of these processes if additional to the CXK process. For instance:

- Staff delivering the National Citizen Service must also follow the Pharos critical incident procedure.

- Staff delivering the Princes Trust Team Programme must follow the Prince's Trust safeguarding reporting procedures

Working in Other Settings

All staff working within community settings must also be aware of the safeguarding policy and procedures for those buildings and organisations and comply with those procedures alongside the CXK policy and procedure.

Any safeguarding concerns that are identified when working in schools must be passed to the school's designated safeguarding lead within the same working day. This action must be recorded and the line manager must also be informed. Responsibility for following up action taken by the school lies with front line worker who will need to update the contract manager. Should CXK consider action taken by the school is not sufficient to safeguard the child then it can make a direct referral to the Central Referral Unit and should inform the school of having taken such action.

12.2 Recording

All concerns must be recorded in writing on the Incident Log (and associated Incident Form). If relevant, a record should be made on the relevant contract CRM system.

Staff should record the safeguarding concern, the actions that have been taken, any associated risks and the conclusion. Records must distinguish between fact, hearsay (i.e. what others have said) and personal opinion.

The line manager of the member of staff who is reporting the concern has the responsibility for ensuring that a record is made and must keep the case open until a case has been resolved.

All client records are secured electronically through secure systems. All IT systems are compliant with the new GDPR regulations introduced in May 2018.

CXK will endeavour to make the file available within 24 hours. Should the parent, carer or family member request access to these files, this can only be allowed where consent from the client, in writing, has been given to CXK's MI manager.

Client records are accessible to CXK employees.

The Incident Log (and associated reports) is only accessible to the CXK management team, including senior managers and the Executive team. The log is saved on the M drive on the main server.

12.3 Allegations against a Staff Member

All members of staff and volunteers are expected to uphold the code of conduct. Staff/volunteers who breach this code of behaviour may be subject to disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority for investigation. All staff, as part of induction, must be made aware of professional boundaries and what is and is not appropriate behaviour when working with beneficiaries. This should include recognising signs of attachment and having a clear understanding between being friendly and being friends. All staff must understand that safeguarding policies are to protect beneficiaries and staff. https://www.kelsi.org.uk/child-protection-and-safeguarding/managing-staff-allegations

The above link should be used for guidance if there are any concerns regarding a member of staff. It is important to understand that the Local Authority Designated Officer (LADO) should be contacted before **any** internal investigation is carried out.

It may be bought to our attention, or we may observe staff acting in ways that we may consider to be unprofessional and that we consider may present a risk to our client group. It could be that they have behaved in a way that has harmed, or may have harmed, a child; or they may have possibly committed a criminal offence against or related to a child or vulnerable adult. This may also apply to an individual's personal life if it is considered that activities undertaken outside of work constitute a risk to children, young people or adults. (Guidance from Working Together 2015).

If this is the case then the following actions must be taken:

- In the first instance the allegation must be discussed with a line manager, the lead designated person or SLT/Executive representative within the same day that the concern comes to light.

- Concerns that cannot be resolved by the above actions must be reported to Human Resources (HR), generally by the lead designated officer or SLT/Executive representative. The Chief Executive must also be informed.

- Where there is a safeguarding allegation then the Local Authority Designated Officer (LADO) should be informed, prior to any internal investigation being carried out by CXK. The LADO can be contacted via the Central Recording Unit (CRU). https://www.kscb.org.uk/procedures/child-in-need-chin

- An internal investigation may need to be carried out by SLT/Executive and the lead designated person. Such a person should be identified by the CEO in consultation with the designated lead as soon after the incident as possible and a plan of action made which includes how the accused person will be supported and how any children will be safeguarded.

- The accused person(s) may be subject to capability and/or disciplinary action by CXK, which could include dismissal and/or formal criminal investigations being instigated. Please see CXK's Disciplinary Process and Procedures.

- Investigations by CXK will take place within seven days. However an investigation by the LADO (local authority) and/or Police may take longer, and will happen prior to CXK instigating any internal procedures.

- It should be noted that just because a particular case does not meet the required threshold for the LADO does not mean that it will not meet the threshold of CXK who may, at their own discretion, decide to terminate an individual's contract because the person's behaviour is one of gross misconduct.

- The role of the LADO applies to safeguarding allegations which apply to adults harming children only.

- If CXK decided to end an employee's contract of employment or terminates the relationship with a volunteer for reasons of harm, risk of harm or because a consideration has made that a person is unsuitable to work with children or vulnerable adults, then the lead designated person will make a referral to Disclosure and Barring Service (DBS) who will consider all the information and decide whether the person should be barred or not from future work with children or vulnerable adults.

- If a staff member/volunteer resigns before the investigatory process is completed, CXK will continue to gather facts; and if they would have dismissed the person a referral will be made to the DBS. CXK will not enter into any 'compromise agreement' whereby the person agrees to resign and the investigation ceases.

- CXK will exercise its duty of care to the employee who is the subject of the allegation throughout the investigatory process by providing the necessary support and advice and help to reintegrate back into the workplace should the allegations be unfounded.

- Full records of the management of allegations will be kept in case of further concerns or request for references.

- These records will be kept until the person reaches retirement age, or for 10 years, whichever is the longest.

12.4 How to Respond to a Disclosure

If you are working with a young person or adult who discloses to you that they or a member of the family has been or is currently being abused, you should use the following process and procedure:

- Tell them you are concerned and may need to discuss the issue further
- Ensure a client-centred approach, and that the person's voice is heard.
- Obtain consent to share if necessary.
- If the child or adult is in immediate danger, call the emergency services
- Inform parents/carers/school or associated professionals, e.g. family worker, if you are sharing with CRU. Consider whether child/person will be put at further risk if their parents are informed.
- Tell your line manager/designated person. You may also want to consult with them in the first instance.
- Document any issues at the first available opportunity.
- Inform your line manager that you have dealt with an issue even if you have dealt with it.

It is very important that the young person or adult is given the opportunity to share information with someone they trust in a comfortable and safe environment. You must also:

- Put the child or adult's welfare first.
- Listen to the child or adult.
- Clarify if necessary. Don't be scared to ask appropriate questions to ensure you are getting the facts right.
- Do not ask leading questions – let them tell you in their own words.
- Don't promise to keep a secret.
- Do not judge or comment on what the child or adult says. Do not make assumptions regarding the accuracy or truth of what is being said to you.
- Staff need to be able to distinguish between fact, hearsay and opinion. Furthermore staff need to ensure that opinions expressed are relevant to the situation, respectful and appropriate in tone.
- Consider the child or adult's privacy.
- Ensure the child or adult feels secure and protected throughout the process. Make sure they are aware of the support that will be available to them, and who will provide this support. If necessary make sure that the child or adult has contact numbers for anyone who has been identified as able to provide support.
- Stay calm and reassure.
- Appear sympathetic.
- Don't investigate.
- Make accurate notes.

All disclosures must be reported and recorded as stated in 12.1-12.2.

12.5 Obtaining consent to share and when consent may not be needed or appropriate

It is always important to obtain consent, but in some cases this may not be appropriate.

CXK's policy ensures that information sharing should be necessary, proportionate, relevant, adequate, accurate, timely and secure.

Confidential information is sensitive, not already in public domain and shared in confidence. Confidential information can be shared when authorised by the person who shared it, or whom it relates to.

Confidential information can be shared - even if not authorised by the person - if justified in the public interest. Sharing this information should be done when there is evidence that the child or adult is suffering or at risk of suffering significant harm, there is reasonable cause to believe the child may be suffering or at risk of suffering significant harm or to prevent significant harm to children or serious harm to adults.

All staff must make sure any person accessing CXK's services is aware of the need to share confidential information where necessary and appropriate. This information should be made available at the first interaction with CXK staff. Information on sharing information is also available on the website through this policy.

If appropriate, and with consent, staff can talk to parents or other family members at the earliest opportunity. Staff need to present the facts of the disclosure, who this will be reported to and what will subsequently happen, such as informing Social Services, the Police, and School etc.

If you are unsure whether consent to share is needed you must seek advice from your line manager, or another manger.

Appendix 1: Prevent Strategy

Introduction and Context

The charity takes the Prevent agenda seriously and ensures that all the charity's employees and sub-contractors complete Prevent training as part of their induction and within Safeguarding training every 12-18 months. Prevent is part of a Government initiative to develop a robust counter terrorism programme – CONTEST. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical- an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

The current threat level from international terrorism in the UK is substantial which means that a terrorist attack is a strong possibility.

The charity's programmes include adult services, youth, education and training services for the 16–25 year age group, and engagement and support work with people from ethnically diverse, and socially and economically disadvantaged areas. The age and profile of our beneficiaries make it crucial to be involved in the Prevent strategy. This strategy and all related policies and procedures apply to all the charities employees and sub-contractors.

All employees and providers have a part to play in fostering shared values and promoting cohesion. Providers should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within providers and other training settings.

This strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the voice of the learner or beneficiary.

2. To break down segregation among different communities, including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners and beneficiaries in playing a full and active role in wider engagement in society.

3. To ensure learners' and beneficiaries' safety, and to ensure that the provision is free from bullying, harassment and discrimination.

4. To provide support for learners and beneficiaries who may be at risk and to provide appropriate sources of advice and guidance.

5. To ensure that beneficiaries, learners, employees and sub-contractors are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives the strategy will concentrate on four areas;

1. Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all beneficiaries, learners, staff and visitors and promotes respect, equality and diversity and understanding.

This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff and beneficiaries' understanding of the issues, and the confidence to deal with them.
- Deepening engagement with local communities.
- Actively working with local schools, local authorities, Police and other agencies.

2. Teaching and Learning

To provide a programme and support which promotes knowledge, skills and understanding to build the resilience of beneficiaries and learners, by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion.
- Promoting wider skill development such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives, and promote British Values and universal rights.
- Encouraging active citizenship/participation and learner voice.

3. Support for Beneficiaries

To ensure that staff are confident to take preventative and responsive steps, working with partner professionals, families and communities.

This will be achieved through:

- Establishing strong and effective support services.
- Listening to what is happening in the provision on offer and in the community.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.

- Helping beneficiaries, learners and staff to know how to access support in the provision and/or through community partners.
- Supporting 'at risk' beneficiaries and learners through safeguarding and crime prevention processes.
- Focussing on narrowing the attainment gap for all beneficiaries and learners.

4. Managing Risks and Responding to Events

To ensure that employees and sub-contractors monitor risks and are ready to deal appropriately with issues which arise.

It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the provision, beneficiaries, learners or employees.
- Understanding and managing potential risks within the provision and from external influences.
- Responding appropriately to events in local, national or international news that may impact on people and communities.
- Ensuring measures are in place to minimise the potential for acts of violent extremist behaviour within the provision (i.e.' Engaging Beneficiaries, Building Resilience, 'Prevent' funded Projects).
- Ensuring plans are in place to respond appropriately to a threat or incident.
- Developing effective ICT security and responsible user policies.

Further Information

http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf
http://www.gov.uk/government/publications/prevent-duty-guidance
http://course.ncalt.com/channel_general_awareness
http://www.gov.uk/government/collections/counter-terrorism-and-security-bill-factsheets

Safeguarding & Prevent Policy

Risk Assessment Checklist

No	Prevent Vulnerability	Action to remove or mitigate vulnerability	Who	When	RAG
1	**Awareness** - Do the following people have a good understanding of Prevent >Board of Governors >Executive team >Staff >Sub-contractors >Safeguarding leads				
2.	**Safeguarding** - Do safeguarding leads recognise Prevent vulnerabilities and what to do if they suspect that someone is being being drawn into terrorism? Do safeguarding policies incorporate Prevent vulnerabilities? Are you using the Early Help Assessment to refer individuals (if appropriate)? Are safeguarding leads aware of Channel?				
3	**IT Systems** - What filtering/firewall systems are in place to prevent individuals from accessing extremist websites? Have they been tested recently, are the filtering systems up-to-date? How do we alert if someone tries to access extremist sites? Do you know what to do if someone does?				

Safeguarding & Prevent Policy

4.	**Security** Are staff (and if appropriate learners or beneficiaries) challenged if they are not wearing ID? How are authorised visitors managed? How are unauthorised visitors identified/stopped? How do you restrict access to sites if required?				
5	**Literature/posters**- Does permission have to be granted for people to distribute leaflets? Do people know who to contact if they come across extremist literature in the course of their work or activities? Do they know what extremist literature looks like? What happens if individuals are handing out leaflets outside a delivery site or venue?				
6	**Funding & resources**- Do you fund community/voluntary/student groups or provide bursary support? How do you know that monies are not funding extremist activities? Do student/external groups book your rooms? How do you monitor if extremist activities are taking place? Do you have a booking form/policy that states extremist activities must not take place?				

Safeguarding & Prevent Policy

8.	**Safe place to discuss terrorism and extremism** – Are staff trained to facilitate discussions on terrorism and extremism? Are there opportunities available to do this i.e. do you run a programme of seminars? Or development? Can external speakers be invited to discuss Prevent? If appropriate, are the charity's beneficiaries or learners given the skills to challenge extremist narratives?				
9.	**Policies & Procedures** - What policies need to change to incorporate Prevent (safeguarding, security & estate management, disciplinary, behavior, room booking, external speakers)				
10	**Information Sharing** Are there information sharing protocols in place? Do the Police know who to contact for any issues? Do employees know who to report a concern or contact at the Police? Do employees know who the Safeguarding/Prevent lead is?				
11	**Local Prevent Structures** Are you linked in with the local Prevent Board or regional Prevent FE/HE group				

	Do you know who your local authority Prevent Co-coordinator is? Awareness of key Police and regional HE/FE lead?				
12	**Tensions** Are you aware of tensions in your student body or beneficiary group (if relevant)? How are you dealing with these tensions? Have these tensions been exploited by any group? What cohesion issues do you have?				
13	**Prevent Messaging** How can Prevent be communicated better? i.e. posters, newsletters, intranet, student and staff handbooks, staff induction, internal literature				
14	**Freedom of Speech** Have you revised and enhanced Codes of Practice on Freedom of Speech? Developed clearer guidelines on balancing freedom speech with the need to protect vulnerable individuals?				
15	**Policy on external speakers** Do you have a risk assessment framework for dealing with requests for external speakers at the charity's sites or venues or as part of the charities provision?				

16	**Staff and volunteers** Are you vigilant to staff members and volunteers potentially radicalising students? Do you have policies and procedures that can handle this?				
17	**Dangerous Substances** Is the organisation aware of and compliant with all relevant legislation in the storage and handling of dangerous substances including chemicals, bacteria, viruses and toxins?				
18	**Dealing with an incident** Does your critical management plan identify a lead person to deal with terrorist related issues? How will you communicate with and reassure local communities, staff and students? Who will deal with the Press? How will you communicate with other partners locally? How will you identify what partnership support you may require?				