



# **SAFEGUARDING & PREVENT DUTY POLICY**

Designated Safeguarding Lead: Dave Ireson – 07899973650

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This policy has been reviewed following the Department of Education publication of Keeping Children Safe in Education 2019 and the Ofsted Inspecting safeguarding in early years, education and skills settings guidance for inspectors, September 2016, documents. These documents and guidance enables Envisage staff to update their safeguarding knowledge and understanding and following mandatory safeguarding guidance. It provides awareness of developing themes based on recent safeguarding case studies that include FGM, domestic violence, peer on peer abuse and grooming.

## **Safeguarding Policy**

### **Policy Statement**

Envisage is fully committed to ensuring that all delivery, assessment and engagement with children, young people and vulnerable adults enables learners, customers and visitors to be fully protected from abuse, neglect or significant harm. Staff recognise and accept their responsibility to develop the awareness of the risks and issues involved in safeguarding. The company is committed to working with existing local safeguarding or adult safeguarding boards and other health and social care partnerships to ensure the safeguarding of its learners.

### **Definition**

For the purpose of this policy and procedure, children are defined in the Children Act of 1989 as a person under the age of 18 years.

The Care Act 2014 defines a 'vulnerable adult' as a person aged 18 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. This includes

- Supported or receiving a community social care, primary care and/or mental health service
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of his/her affairs
- Discriminatory abuse in terms covering the protected characteristics of gender reassignment, age, disability, marriage and civil partnership, sex, race, religion or belief, pregnancy and maternity
- Receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions
- At risk of domestic violence and/or abuse
- At risk of radicalisation and extremism from language and changes in personal behaviour that can be influenced from peer-to-peer and online extremism content
- At risk of human trafficking and modern slavery in any cuts and bruises, and discussion about limited freedom

### **Accountability and Responsibility**

Envisage Designated Safeguarding Lead is Dave Ireson who is supported by Laura Shepherd as the Safeguarding Officer. Safeguarding and Prevent issues and incidents are reported through Envisage monthly management meetings as a standing agenda item. All incidents and near-misses are recorded and reported in Safeguarding Management Reports. The incidents are reported to prime contractors, the ESFA, local authority Safeguarding Boards and local statutory agencies as and when required.

The Single Central Record (SCR) covering staff recruitment and Enhanced Disclosure and Barring Service (DBS) checks. The Designated Safeguarding Lead holds and maintains the SCR for Envisage.

Envisage produce a Safeguarding Annual Report that provides information for the Envisage Self-Assessment Report (SAR) and the resulting Quality Improvement Plan (QIP) which are both validated by a panel including external education and

training consultants. Both the SAR and the QIP are uploaded to the ESFA portal and used by Ofsted to monitor learner health and safety, the quality of learning and delivery performance.

All incidents and learner or customer disclosures follow the safeguarding reporting process that results in actions and potentially referral or guidance with external safeguarding agencies and partners.

## **Training**

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help Envisage team members to:

- analyse their own practice against established good practice, to ensure their practice is not likely to result in allegations being made
- recognise their responsibilities and report any concerns about suspected poor practice or possible abuse
- respond to concerns expressed by a child or vulnerable adult work safely & effectively with children and vulnerable adults

Appropriate training will be actioned to enable individuals to recognise their responsibilities with regard to good practice and reporting of suspected poor practice or concerns of potential abuse and how to work safely and effectively with children and vulnerable adults.

## **Enhanced Disclosure & Barring Service (DBS)**

Envisage is responsible in ensuring safe staff recruitment and employment practices. All existing and new Envisage staff undergo DBS checks prior to employment and this is renewed every 3 years. The staff DBS information is kept and maintained securely in the Single Central Record which checked/audited on annual basis.

## **Review**

Envisage's management team will review the Safeguarding and Prevent Policy annually, with updates and revisions made in-year if required through any incident, issue or Ofsted/DfE good practice guidance. Safeguarding and Prevent reports and policy updates will use an analysis of learner/customer incidents and any near-miss data along with consultation with feedback from learners, customers, staff and other stakeholders to inform any policy and process enhancements. The Quality Improvement Plan will identify any Safeguarding and Prevent developments and associated SMART actions.

Very useful reference guides for staff can be found from the following:

- MindEd  
<https://www.minded.org.uk/>
- NSPCC  
<https://www.nspcc.org.uk/search/?query=safeguarding>

Based on a report issued by the Department for Education (September 2019) **Keeping Children Safe in Education** the Staying Safe Handbook issued to all staff includes information on specific safeguarding measures and these are as follows:

- Child sexual exploitation
- Bullying including cyber bullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) and recognition of the mandatory duty to report known cases (2016)
- Forced marriage
- Gangs and youth violence
- Gender based violence
- Mental health
- Private fostering
- Radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking

**Useful contact numbers:**

Designated Safeguarding Lead: Dave Ireson	07899973650
Safeguarding Officer: Laura Shepherd	07729733649
Safeguarding Officer: Adam Stancey	07956525620
Safeguarding Sheffield Children Advisory Service	0114 2053535
Adult Access Sheffield Safeguarding Team	0114 2734908
Rotherham Adult & Children's Safeguarding Team	01709 822330
Child Line	0800 1111
Barnardo's	0113 393 3200
NSPCC Child Protection Helpline	0808 800 5000
South Yorkshire Police	0114 220 2020

## **Prevent Duty – Policy Statement**

### **The Prevent Duty**

The duty to actively promote 'Fundamental British Values has been live from 1<sup>st</sup> July 2015. This was first set out by the government in the 'Prevent' Strategy in 2011.

The Counter Terrorism and Security Act 2015 has introduced the Prevent Duty for various bodies including all FE colleges, adult education providers and independent learning providers with SFA funding or with over 250 students enrolled.

The Prevent Duty has “due regard to the need to prevent people from being drawn into terrorism” Anti-Terrorism and Security Act 2015: Schedule 3, Section 21. This has been reviewed in December 2021.

### **What is our responsibility?**

- To assess the risks of people being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- All staff to actively promote British values.
- To raise awareness of the Prevent duty and British values to all staff and learners.
- To establish a reporting procedure for all concerns relating to people being drawn into terrorism.

### **What is Extremism?**

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

### **What is radicalisation?**

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

### **What are British Values?**

British Values are defined as “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs”; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in The Equality Act 2010.

### **Vulnerability / risk indicators**

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people / young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

The following factors may increase an individual's vulnerability:

- Identity crisis – Being distanced from cultural and or religious heritage and uncomfortable with their place in the society around them.

- Personal crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- Personal circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet aspirations – Perceptions of injustice; feelings of failure; rejection of civic life.
- Criminality – Experiences of imprisonment; poor resettlement / reintegration, previous involvement with criminal groups.

### Relevant Documents

This policy should be read in conjunction with:

- HM Government Prevent Duty website information  
<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>
- Department of Education Guidance  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/744673/Work\\_Based\\_Learners\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744673/Work_Based_Learners_Guidance.pdf)
- Education and Training Foundation  
<https://preventforfeandtraining.org.uk/>
- Prevent and Channel fact sheet.  
[Prevent and Channel factsheet - 2023 - Home Office in the media \(blog.gov.uk\)](https://www.blog.gov.uk/2023/06/prevent-and-channel-factsheet-2023/)

### Procedures for reporting concerns

If any Prevent incidents, disclosures or issues arise from behaviour, language, electronic communication and observation concerns in respect of terrorism, radicalisation and/or extremism, they must be reported to the Designated Safeguarding Officer and/or the Safeguarding Officer immediately and within 3 hours of the incident, disclosure and issue coming to light (This is the same procedure as Safeguarding).

### Key contact details:

- Designated Safeguarding Lead: Dave Ireson – 07899973650 [david@envisagettraining.co.uk](mailto:david@envisagettraining.co.uk)
- Safeguarding Officer: Laura Shepherd – 07729733649 [laura@envisagettraining.co.uk](mailto:laura@envisagettraining.co.uk)
- Safeguarding Officer: Adam Stancey – 07956525620 [adam@envisagettraining.co.uk](mailto:adam@envisagettraining.co.uk)
- Sheffield Safeguarding Children Advisory Service Tel: 0114 2053535/3554
- Adult or Children’s Safeguarding at Rotherham Metropolitan Borough Council Telephone 01709 336080
- Brendan Pakenham (SYP), Prevent Officer – 07769131474

[Brendan.pakenham@southyorks.pnn.police.uk](mailto:Brendan.pakenham@southyorks.pnn.police.uk)

- Joanne Batty (SYP) Prevent Officer – 07770823772  
[Joanne.batty@southyorks.pnn.police.uk](mailto:Joanne.batty@southyorks.pnn.police.uk)

### **Staff responsibilities**

- Envisage staff undertake training in the Prevent Duty from the Designated Safeguarding Lead and the Safeguarding Officer and have used online training to develop awareness and understanding of their Prevent duty.
- Envisage staff are aware of when and how to refer any Prevent concerns and disclosures about learners, customers and colleagues to the DSL and/or the Safeguarding Officer.
- Envisage staff and managers reinforce British values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” into their professional practice in delivering education and training.

### **Online safety**

Learners and customers must adhere to appropriate internet usage whilst undertaking education and training. Any learner, customer and staff digital and web-browsing behaviour or actions that are inappropriate and could cause a Safeguarding and/or a Prevent Duty breach will be reported and will result in formal investigation that could lead to disciplinary action. This can include use of texting/sexting, use of social media platforms and websites that involve:

- Defamatory material
- Offensive, vulgar or obscene material
- Any racist or sexist material
- Any material that could constitute bullying or harassment (such as on the grounds of sex, including sexual orientation, race of disability or any protected characteristic)
- Any material that could be otherwise considered illegal, or perceived as falling into one of the above categories
- Sites or material that may promote or encourage radicalisation and extremist views



## Staff Behaviour Policy

### Code of Behaviour – for all staff

#### You must **not**:

- Staff **should not** spend excessive amounts of time alone with children and vulnerable adults, away from others. Meetings with individual children and vulnerable adults should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff or should be aware of the meeting
- Staff are **advised not to** make unnecessary physical contact with children and vulnerable adults. However, there may be occasions when physical contact is unavoidable, e.g., providing comfort at times of distress. In all such cases contact should only take place with the consent of the child
- It is **not good practice** to take children and vulnerable adults alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardians)
- Staff **should not** meet children and vulnerable adults outside of the work environment
- Staff **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should record the facts and report these to the Safeguarding Officer

#### Staff should **never**:

- Initiate or engage in sexually provocative conversations or activity
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature for children and vulnerable adults that they can do themselves
- Allow any allegations made by a child or vulnerable adult go without being reported and addressed
- Trivialise or exaggerate child or vulnerable adult abuse issues
- Make promises to keep any disclosure confidential from relevant authorities
- Staff **should not** show favouritism to any one child or vulnerable adult, nor should they issue or threaten any form of physical punishment
- Staff should never engage with learners on social media through personal accounts or accept learners as friends on social media sites

#### You must:

- Staff **must respect** children and vulnerable adults' rights to privacy and encourage children and vulnerable adults to feel comfortable enough to report attitudes or behaviour they do not like
- Staff **will be expected** to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff and children and vulnerable adults **must** be declared

- All staff **should be aware** of the procedure for reporting concerns or incidents, and should familiarise themselves with the contact details of the Safeguarding Officer
- If a member of staff finds himself or herself the subject of inappropriate affection or attention from a child or vulnerable adult **they should** make others aware of this
- If a member of staff has any concerns relating to the welfare of a child or vulnerable adult in their care, be it concerns about actions/behaviours of another staff member or concerns based on any conversation with the child or vulnerable adult; particularly where the child or vulnerable adult makes an allegation, they should report this to a Safeguarding Officer.
- Ensure social media privacy settings are in place to ensure learners cannot access personal information about you

### **Procedure for responding to an allegation of child abuse**

This procedure must be followed whenever an **allegation** is made that a child or vulnerable adult has been abused or when there is a **suspicion** that a child or vulnerable has been abused.

Do not make promises regarding confidentiality. Explain to the person **at the outset** that you will need to report the disclosure and share the information with Envisage's Safeguarding Officer. The Safeguarding Officer will, where possible respect the wishes of the individual; however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

The member of staff or learner who has concerns about possible abuse or neglect contacts their line manager and Safeguarding Officer as soon as possible for advice and support. A record of the incident or concern should be made on the Incident Record. If the complainant is the child or vulnerable adult him/herself, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and court proceedings.

The Safeguarding Officer must report the matter to the local authority Adult or Children's Safeguarding Team as a matter of urgency whether or not they feel this action is justified in the particular circumstances of the case. The matter will be reported over the telephone to the duty social worker (or such other person as required by the local Area Adult or Children's Safeguarding Partnership. In the unlikely event that social services cannot be reached contact the relevant police safeguarding team for the geographic area.

A written record of the report will be retained by the Designated Safeguarding Lead. The written record will note the date and time of the report and must include the name and position of the person to whom the matter is reported. The Safeguarding Lead will discuss with the local Area Adult or Children's Safeguarding Board/Partnership what action will be taken to inform the parents/guardian of the child or vulnerable adult and a note of that conversation should be made.

## **Staff Allegations**

In the event there is any suspicion, allegation or apparent abuse of a child or vulnerable adult by a member of staff the matter should be reported to the Designated Safeguarding Lead or and Envisage manager as soon as possible and result in the following steps:

- The Designated Safeguarding Lead will lead on the investigation
- Take such steps as they consider necessary to ensure the safety of the child or vulnerable adult in question
- Liaise with the person who reported the original concern and ensure that a report of the matter is completed
- Report the matter to the Rotherham/Sheffield Metropolitan Borough Council adult or children's' Safeguarding team as per any with serious safeguarding disclosures and/or issues

Any suspicion, allegation or actual abuse of a child/vulnerable adult by a member of staff must be reported to the Envisage partners as soon as possible. On being notified of any such matter, the Envisage partners shall:

- Take such steps as he/she considers necessary to ensure the safety of the child/vulnerable adult in question and any other who might be at risk
- Report the matter to Rotherham/Sheffield Metropolitan Borough Council children's' or adult Safeguarding team as per any with serious safeguarding disclosures and/or issues and also inform Rotherham Children or Adult Local Safeguarding Board.
- A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the Local Authority Social Services Department within 24 hours.
- Ensure that the person who reported the original concern completes a report of the matter.

The team member may be suspended pending further investigation.  
Rotherham Adult Safeguarding link;

<http://www.rsab.org.uk/>

## **Whistleblowing**

Envisage's Whistleblowing Policy provides staff with procedures and principles of how staff can raise any workplace and staffing concerns free from bullying or other intimidation. Envisage managers are supportive of staff communicating concerns and issues in safe and supportive manner and the Whistleblowing process is clearly outlined in the policy. The policy provides a procedure for raising, investigating and resolving concerns and supporting staff through the process.

## **Specific safeguarding issues**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on

its own website [www.nspcc.org.uk](http://www.nspcc.org.uk) Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- **Child sexual exploitation (CSE)** <https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>
- **Bullying including cyber bullying** <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- **Domestic Violence** <https://www.gov.uk/domestic-violence-and-abuse>
- **Drugs** <https://www.gov.uk/government/publications/drugs-advice-for-schools>
- **Fabricated or induced illness** <https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>
- **Faith abuse** <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>
- **Female genital mutilation** <https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack>
- **Forced marriage** <https://www.gov.uk/forced-marriage>
- **Gangs and youth violence** [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/226293/Advice to Schools and Colleges on Gangs.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/226293/Advice_to_Schools_and_Colleges_on_Gangs.pdf)
- **Gender based violence** <https://www.gov.uk/government/policies/ending-violence-against-women-and-girls-in-the-uk>
- **Mental health** <https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>
- **Private fostering** <https://www.gov.uk/government/publications/children-act-1989-private-fostering>
- **Radicalisation** <https://www.gov.uk/government/publications/channel-guidance>
- **Sexting** <http://ceop.police.uk/>
- **Teenage relationship abuse** <https://www.gov.uk/government/collections/this-is-abuse-campaign>
- **Trafficking** <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

<b>Envisage Safeguarding&amp; Prevent Duty</b>		Authorised name: David Ireson
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**Safeguarding and Prevent Incident reporting form**



Please use this form to record incidents or concerns of abuse or neglect of children and vulnerable adults. It is important that we maintain records to pass to local safeguarding agencies such as Social Services and the Police. This anonymised data will also be used by Envisage to produce Safeguarding and Prevent management reports and will contribute to Envisage Self Assess and Quality Improvement Plans.

Name of Child or vulnerable adult. Full contact details if possible:
Concern:
Date, time and location:
Action taken:
Follow up from Safeguarding Team:

Name (print): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Once completed, please pass to the Envisage Designated Safeguarding Lead or Safeguarding Officer:

Dave Ireson - 07899973650

Laura Shepherd - 07729733649