

PREVENT POLICY

Designated safeguarding Lead: Janet Edwards

Safeguarding Officer: Elizabeth Kayembe

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POLICY STATEMENT

Prevent is a strand of the [Government's Counter Terrorism Strategy CONTEST](#) and is about working together to 'prevent' children, young people and adults from being drawn into extremist activity including acts of terrorism. It is about everyone taking responsibility and knowing what to do if they have concerns. Further information is also available at <https://www.gov.uk/government/publications/prevent-duty-guidance>

Oasis Care and Training Agency (OASIS) takes its responsibilities for safeguarding extremely seriously and believes that it is never acceptable for a child, young person, vulnerable adult, or any member of society to experience abuse of any kind. This policy aims to:

- protect and promote the welfare of the young people, young people and vulnerable adults who engage with us
- communicate our approach to safeguarding in a clear and transparent way
- demonstrate compliance with relevant statutory guidelines
- ensure that safeguarding responsibilities are clear, and that people understand how to report concerns they may have about a child, young person or vulnerable adult
- understand the need to safeguard our learners from harm and the risk from radicalisation of any type is no different.

We recognise our responsibility to participate in such work and to safeguard the welfare of people by committing to practice in a way which prevents and protects people from being drawn into terrorism. OASIS reserves the right to modify this policy from time to time at its discretion and in line with legislation.

SCOPE

This policy applies to all employees, volunteers, workers, visitors and all other third parties who, through their involvement with OASIS work with young people or vulnerable adults.

RELATED LEGISLATION & GUIDANCE

- The Young people Act 1989
- The Young people Act 2004
- Working Together to Safeguard Young people 2018
- What to do if you are worried a child is being abused 2015
- Keeping Young people Safe in Education (KCSIE) September 2022
- Protection of Freedoms Act 2012
- Care Act 2014
- Keeping Learners Safe 2015
- Safeguarding Young people: Working Together Under the Young people Act 2004 a Disqualification under the Childcare Act 2006 (2018)
- Counter Terrorism and Security Act 2015

- Prevent Duty Guidance for England and Wales (2015)
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015
- Multi-agency guidance on FGM (2016)
- Modern Slavery Act (2015)
- Information sharing advice for practitioners providing safeguarding services (2018)
- Young people missing in Education (2016)
- Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect young people from child sexual exploitation (2017)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), 2016)
- Sexual violence and sexual harassment between young people in schools and colleges (2018)
- General Data Protection Act (2018)
- Specific roles and responsibilities concerning Safeguarding.

RELATED POLICIES, PROCEDURES, AND TEMPLATES

- Safer Recruitment Policy
- DBS Policy
- Safeguarding Policy

ACT EARLY

Launched in November 2020, the new [ACT Early campaign](#) is available to give help and advice to those who might be at risk of radicalisation. The [ACT Early website](#) has two short films aimed at the general public, and concerned friends and family:

<https://actearly.uk/support/reach-out-for-help/>

<https://actearly.uk/working-together/how-we-help/>

The website provides an introduction to Prevent and to the work of Prevent officers, improving understanding and encouraging individuals to seek advice or help at an earlier stage where appropriate.

CHANNEL

Like child protection, [Channel is a multi-agency safeguarding programme](#) run in England and Wales. It works to support vulnerable people from being drawn into terrorism and offers support such as:

- mentoring
- counselling
- assistance with employment

Channel is about early intervention to protect vulnerable people from being drawn into committing terrorist-related activity and addresses all types of extremism. Participation in Channel is voluntary. It is up to an individual, or their parents for children aged 17 and under, to decide whether to take up the support it offers. Channel does not lead to a criminal record.

For Channel referrals or for more information please contact:

Prevent Team at Southwark

prevent@southwark.gov.uk

Prevent Education Officer for Southwark

Charlotte Kathe

charlotte.kathe@southwark.gov.uk

PRINCIPLES

Safeguarding

We all have a shared responsibility to identify young people and young people who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. This is an inherent part of OASIS's culture, as we adopt a culture of vigilance in relation to all of our stakeholders and the communities that we engage with.

We aim to embed a culture of safeguarding across OASIS by communicating practical guidelines to support the principles and aims of this policy, reinforced by training for all employees and volunteers to ensure that our approach is robust and reflects best practice standards. Everyone should aim to ensure the welfare of young people, young people and vulnerable adults first and foremost, checking your approach with one of our internal Safeguarding contacts if you are unsure how to handle a safeguarding issue.

Prevent

Preventing people from being drawn into terrorism, extremism and radicalised ideology has never been more important. As a provider of education and training programmes for people, particularly young people, from ethnically diverse, and socially and economically disadvantaged areas it is essential that OASIS is involved in the Prevent Strategy.

OASIS will promote and reinforce values of openness and respect, tolerance, cohesion and equality of opportunity and treatment by:

- creating space for free and open debate; and by listening, valuing and respecting the learner voice
- breaking down barriers and supporting inter-faith and inter-cultural dialogue and understanding and by engaging all learners in playing a full and active role in wider engagement in society
- making sure that OASIS is free from bullying, harassment and discrimination
- Supporting learners who may be at risk by providing appropriate sources of advice and guidance
- making sure that staff and learners are aware of their roles and responsibilities in preventing violent extremism
- promoting British values
- OASIS recognises:
 - The welfare of any child, young person or vulnerable adult is paramount and ensure all feel safe
 - We aim to create a culture of vigilance in relation to our safeguarding approach, while continually developing our knowledge and practice accordingly
 - Everyone, regardless of their age, background, ability, culture, disability, gender, language, religious beliefs and sexual identity has the right to protection from abuse
 - We will take all suspicions and allegations of abuse and/or poor practice seriously and will respond to them swiftly and appropriately
 - Where there is a possibility of abuse or neglect by a person or persons, everyone has a responsibility to report their concerns to the appropriate person
 - It is not the responsibility of anyone working/volunteering at OASIS to decide whether or not abuse has taken place; it is their duty to act on any concerns by reporting them to the appropriate person

- We will support people who report their concerns about abuse in good faith and will investigate their concerns, referring to the appropriate people where necessary
- We will take all actions within our power to enable any child, young person or vulnerable adult to have the best outcomes
- We recognise that safeguarding is not just about protecting any child, young person or vulnerable adult from deliberate harm and neglect, but also about broader aspects of care and education such as well-being (including mental health), first aid, special educational needs and/or disabilities, educational visits and online safety.

KEY DEFINITIONS

SAFEGUARDING

Safeguarding describes the actions we take to ensure the safety and well-being of young people, young people and vulnerable adults in our care. The terms abuse and neglect are forms of maltreatment. Both can involve inflicting or failing to act to prevent harm to young people, young people or vulnerable adults. Abuse can be from neglect, physical injury, sexual abuse or emotional abuse or any combination of the following definitions:

The categories of abuse below are produced from external guidelines. A person may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm. There are eight main forms of abuse, although there are variations within these:

- **Physical Abuse**

Deliberate physical harm to young people and vulnerable adults or any other form of harm which causes illness in a child or vulnerable person.

- **Sexual Abuse**

Forcing or manipulating a child or vulnerable adult to take part in sexual activities.

- **Neglect**

This involves the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological need, likely to result in the serious impairment of the child's or vulnerable adult's health or development.

- **Emotional Abuse**

This involves the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's or vulnerable adult's emotional wellbeing and/or development.

- **Psychological Abuse**

This is a form of abuse, characterised by a person subjecting or exposing another person to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

- **Domestic Abuse**

Domestic violence (also named domestic abuse or family violence) is violence or other abuse by one person against another in a domestic setting, such as in marriage or cohabitation.

- **Discriminatory Abuse**

This includes abuse that is racist, sexist, homophobic or is based on age or disability, or any forms of harassment.

- **Financial Abuse**

This is when an unauthorized use of a person's property, money, pension book or other valuables (including changing the person's will to name the abuser as heir), often fraudulently obtaining power of attorney, followed by deprivation of money or other property, or by eviction from own home.

PREVENT

Extremism is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of difference faiths and beliefs. The definition in HM Government Prevent Duty Guidance includes calls for the death of members of our armed forces, whether in this country or overseas.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Some possible signs of radicalisation include:

- increasingly extreme views about another section of society or government policy
- downloading, viewing or sharing extremist propaganda from the internet
- becoming withdrawn and/or increasingly intolerant of more moderate views
- changes in appearance or health (including mental health) and becoming isolated from family, friends, peers or social groups
- expressions of a desire/intent to take part in or support extremist activity

Terrorism is defined in the Terrorism Act 2000 (TACT 2000) as an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

British values are defined as democracy, the rule of law, individual liberty and mutual respect.

Key contacts – Southwark Head Office

Southwark Safeguarding Children Partnership

<https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/>

Southwark Safeguarding Adults Board

<https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/ssab/>

Head of FE and HE regional delivery networks (Prevent and Counter-Extremism)

Chris Rowell Email: chris.rowell@education.gov.uk Telephone: 07384 872 518

London Regional Delivery Network

Jennie Fisher Email: jennie.fisher@education.gov.uk Telephone: 07880 469 588

Local Authority's Designated Officer (LADO)

Eva Simcock - 020 7525 0689, Eva.Simcock@southwark.gov.uk

Southwark Council Prevent Team

prevent@southwark.gov.uk

Southwark Multi Agency Safeguarding Hub (MASH)

Duty - 020 7525 1921, mash@southwark.gov.uk

National Police Prevent advice line
0800 011 3764

Raising awareness of the policy

All new members of staff are made aware of this policy and are given time to read it during their induction period. Where appropriate to their role, staff will receive the appropriate level of training which includes Safeguarding training and Prevent training in respect of the Counter Terrorism and Security Act 2015.

All staff will be trained in the appropriate response to a disclosure and the correct procedure for dealing with concerns. Staff will work proactively to protect people from abuse and neglect and prevent people being placed in an abusive situation.

Ongoing support will also be provided to make sure that staff are informed and confident to take appropriate preventative and responsive steps. Information, advice and guidance for staff will be available and regularly updated through briefings at staff meetings and training interventions.

eLearning Modules

- All staff are required to successfully complete Safeguarding and Prevent eLearning modules every year, while new members of staff will receive this training as part of their induction.

Face to Face Training

- In addition to the eLearning modules, those who work in a regulated activity, will be required to undergo face to face training at a local level.
- This face-to-face training will be carried out by safeguarding leads and will be appropriate to each specific business area.
- Regular safeguarding updates will also be provided to support the face-to-face training, with a special focus on a bi-monthly basis.

E-SAFETY

- OASIS believes that the use of information and communication technologies brings great benefits. However, dealing with potential e-safety issues need to be planned to ensure there is appropriate, effective and safer use of electronic communications across all of OASIS's on-line services and access methods.
- All members of staff will be trained in and receive regular updates in e-safety to recognise and report concerns.
- Children, young people and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal. OASIS, therefore, recognises its responsibility to teach the appropriate behaviours and critical thinking skills to enable students to remain both safe and legal when using the internet and related technologies.
- OASIS has a Code of Conduct for IT facilities policy (including on-line safety) for staff and students which should be considered in line with this policy. Appropriate filters and appropriate monitoring systems are in place. Care is taken to not 'over block' leading to unreasonable restrictions with regards to online teaching and safeguarding.
- Each week, the IT Team monitor the search engine, filtering for any evidence of Prevent or Safeguarding materials. Any findings of concern are forwarded to the relevant Safeguarding Officer who deals with the related concerns.

- Photographs, video and electronic images of students and staff are classed as personal data under the General Data Protection Regulation 2018. OASIS has a separate policy that covers in detail the use of images and should be considered in line with this policy.

GUEST SPEAKERS

OASIS believes that guest speakers can enrich our education programmes and other areas of our business by adding depth and breadth on a range of subjects. This can especially help to prepare our learners and all young people we engage with for life in modern Britain and to further extend their employability and vocational skills.

In relation to this, it is OASIS's policy that guest speakers should:

- o follow the same signing in procedures as other visitors
- o not be left alone with learners, young people, young people or vulnerable adults unless they have a current DBS which we have had sight of and logged
- o have their views countered and balanced by our employees, self-employed contractors or volunteers should they have any extreme views, whether political or religious.

Initiating the Risk Assessment Process

Organisations are required under health and safety legislation to protect people as far as is 'reasonably practicable'. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks.

The Young People & Vulnerable Adults Safeguarding & Prevent risk assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the department):

- Recruitment to a new or existing post which involves working with young people and/or vulnerable adults
- The commencement of new activities or events involving or potentially involving young people and/or vulnerable adults
- Changes being made to activities or events involving or potentially involving young people and/or vulnerable adults.

Once it has been identified that the risk assessment process should be initiated, it is vital that the person responsible for the relevant recruitment campaign, activity or event includes completion of this within the planning process and ensures that it is completed.

Identifying required checks

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with young people and/or vulnerable adults. In addition, the department must consider if any required checks should be treated as essential before employment (that is, that the new employee recruited to the role should not be able to start work until the check is completed).

PRE-EMPLOYMENT CHECKS

All staff have Right to Work in the UK ID checks; DBS checks are carried where relevant to their role.

We are registered with criminal record check provider. Their comprehensive service is registered with both the Disclosure and Barring Service (DBS) and Disclosure Scotland.

There are two types of check available from the DBS. The default check will be the standard, except for people that are identified as requiring an enhanced check.

- Standard – contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not ‘protected’. Protected convictions and cautions are normally old and minor; they are filtered by the DBS so they are not disclosed, and they must not be taken into account by employers. The filtering rules and the list of offences that will never be filtered are now available for you to view on the DBS’s web pages.
- Enhanced – contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with young people or adults in regulated activity (particular types of work with young people and adults).

Following the DBS application, it is the requirement of OASIS that required staff will subscribe to the DBS Update Service. OASIS will reimburse the annual fee for this service via the staff expenses claim process for the duration of their employment with OASIS. With the individual’s permission, routine status checks will be carried out on an annual basis.

PORTABILITY

DBS checks are not portable. Any DBS check that has not been carried out by OASIS will not be accepted as meeting our requirements for a post-holder.

Exceptions to this are as follows:

- Where an individual has subscribed to the DBS Update Service – this means that their DBS check will be kept up-to-date and they can take this with them from role to role, where the same level and type of check is needed. With the individual’s permission, representatives from OASIS will be able to go online to do a free, instant check (known as a status check) to confirm their DBS Certificate is still up to date.
- Where a DBS check or basic disclosure has been carried out within the last 12 months by OASIS for a post with comparable duties – individual cases will need to be discussed with the group’s Designated Safeguarding Lead’s agreement provided that another check is not required.

DISCLOSURE OF A CRIMINAL RECORD

Where a criminal conviction is disclosed by an applicant or through a DBS check/basic disclosure, OASIS’s Designated Safeguarding Lead and HR will assess and discuss using current guidelines and policy. Possible outcomes include amended duties, redeployment, withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal.

ROLES & RESPONSIBILITIES

Employees, self-employed and volunteers

- All employees are required to familiarise themselves with this policy and procedure and follow this at all times
- If you have concerns about the welfare of a child, young person or vulnerable adult and believe that they may be at risk of, you must share that concern confidentially with a local safeguarding lead immediately
- Any information shared should always be accurate, up to date and shared appropriately and securely with only the person or people who need to know and limited to information relevant for the purpose. If you have any doubts about when to share safeguarding information, discuss the situation with a safeguarding lead
- Everyone must complete their required Safeguarding Awareness and Prevent Training to help increase their knowledge of safeguarding and prevent issues
- Everyone working in a regulated activity must read and familiarise themselves with the statutory guidance Keeping Young people Safe in Education (September 2021)

- If you feel that you could benefit from further training on safeguarding or child protection, then please contact your Safeguarding Lead

Line Managers

- Support and encourage the completion of required Safeguarding Awareness and Prevent Training
- Ensure all direct reports working in a regulated activity have read and familiarised themselves with the statutory guidance Keeping Young people Safe in Education (September 2021)
- Adopt OASIS's culture of vigilance and lead by example

Senior Management Team

The Executive Director, Programme Director and Senior Management Team are responsible for understanding the nature of the threat and the risks of extremism and radicalisation within OASIS. They will ensure that OASIS effectively manage risks and is able to deal appropriately with issues of radicalisation and extremism by:

- o creating an ethos which upholds core values of shared responsibility and wellbeing for all, while promoting respect, equality and diversity and understanding
- o adopting stringent and transparent safeguarding/prevent duty practices which recognise, support and protect individuals who might be susceptible to radicalisation
- o sharing information about safeguarding/prevent duty and good practice with other key stakeholders and external agencies
- o providing training opportunities for staff and volunteers to enable them to continually update their safeguarding and prevent knowledge
- o sharing information and concerns with agencies who need to know and ensuring we involve learners, parents, staff and others in an appropriate way
- o providing effective management for staff and volunteers through supervision, support and training
- o ensuring plans are in place to minimise the potential for acts of violent extremism.

Designated Safeguarding / Prevent Lead

The designated lead is Janet Edwards, the main point of contact for Safeguarding and Prevent, who will support the Senior Management Team to fulfil their responsibilities and to ensure that:

- o this policy is implemented across the organisation
- o they develop and work with partners and support networks to make sure up to date information and resources are received, shared with relevant agencies (e.g., LADO, London only) and the Local Safeguarding Boards
- o any concerns are shared in order to minimise the risk of people becoming involved in terrorism
- o appropriate training is in place that is relevant and regularly reviewed and updated
- o practices are reported on for the Senior Management Team and the Board of Directors on a quarterly basis
- o reviews the implementation and effectiveness of the policy on an annual basis

Additional responsibilities

- Take lead responsibility for managing child protection issues and cases in their centre.
- Provide advice and support to other staff, making referrals to and liaising with external parties as necessary, such as the local authority and other agencies, like the DBS or Police.

- Ensure that appropriate information is available at the time of a referral and that the referral is confirmed in writing, under confidential cover as quickly as possible (e.g., within a working day).
- Liaise with the local designated officer over safeguarding issues and in all cases where allegations relate to an employee or member of staff.
- Keep the Safeguarding & Prevent Risk Register updated at all times with all concerns, no matter how major or minor the concern
- Deal with the aftermath of an incident in the organisation.
- Attend regular training and networking events relating to safeguarding issues.
- Ensure the effective and consistent communication and embedding of safeguarding policies within their operation/team.
- Ensure that learners/service users and their parents/guardians/carers know where to go if they need support or have concerns about the behaviour of an employee, contractor or volunteer.
- Provide regular briefings and updates at staff meetings to ensure that all staff are kept up to date and regularly reminded of their responsibilities.
- Have an awareness of vulnerable service users within their operation.
- Ensure all staff know how to raise concerns about people who are vulnerable or at risk of abuse
- Ensure all staff know how to assess the risk of individuals being drawn into terrorism and understand how to identify those who may be at risk of radicalisation and what to do to support them.

HR Department

- Monitors and records the DBS process for employees, casuals, volunteers and self-employed contractors
- Ensures that Safeguarding and Prevent training is provided and completion is monitored
- Provides advice and guidance to managers on safeguarding issues in relation to recruitment, employees and volunteers

Training and Learning Staff

Teaching and learning staff will be involved in the delivery of a learning and apprenticeship curriculum which promotes knowledge, skills and understanding to build the resilience of learners, promote British values and enable them to challenge extremist views.

This will include:

- embedding equality, diversity and inclusion, wellbeing and community cohesion
- promoting wider skill development such as social and emotional aspects of learning and the strengthening of critical thinking skills
- recognising local needs, challenging extremist narratives, stereotypes and anti-social behaviour and by promoting universal rights
- encouraging active citizenship and participation
- promoting values of openness, respect, facilitating opportunities to contribute, challenge and debate
- responding appropriately to events in local, national or international news that may impact on learners and communities making sure that learners are supported and listened to and are helped to access support internally and/ or through community partner.

REVIEW

This policy will be reviewed on an annual basis or following changes to ESFA or Government updates, as well as statutory guidance in relation to Covid-19 and company risk assessment policies and processes. The policy will also be updated to remedy any deficiencies or weakness in regard to child and adults at risk protection arrangements that are identified without delay.

Signed **Date 01/03/2024**



Mohamed Yusuf

Executive Director

APPENDIX A

The Procedure

Dealing with reported suspicions and allegations

Concerns for the safety and wellbeing of young people and vulnerable adults could arise in a variety of ways and in a range of situations. For example, a child/vulnerable adult may report or show signs of abuse, someone may hint that a child/vulnerable adult is at risk or that a colleague is an abuser, or someone may witness abuse.

According to the Department for Education and Skills, there are eight main types of abuse, which are outlined above. It is not always easy to recognise a situation where abuse may occur or has taken place and employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or vulnerable adult. It is important that the recipient of any complaint or accusation that a child or vulnerable adult has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

To ensure that all of the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.

It is impossible to promise complete confidentiality when a concern is raised, or an accusation made. This is because OASIS owes a duty of care to anyone employed by them and their associates/contractors in relevant positions, and that cannot be fulfilled unless OASIS takes action on the basis of information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external, should be informed.

Where an individual suspects or is informed that a child or vulnerable adult has been, is being or could be harmed as a result of taking place in an activity/event or through contact with anyone employed by OASIS and their associates/contractors in relevant positions, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must make immediate contact with the Designated Safeguarding Lead for guidance and assistance on the action that must be taken. Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111).

Where a complaint of abuse is reported, the Designated Safeguarding Lead Janet Edwards, will consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. This may include invoking OASIS's employee disciplinary procedures.

In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), staff should make referrals to the police, social services or other appropriate authorities themselves prior to consulting with the group's Designated Safeguarding Lead. In such cases, a criminal investigation may follow.

OASIS has a duty to refer an individual to the DBS if they have been removed from working in regulated activity with young people and/or adults because they caused harm to young people/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

All cases for possible referral must be raised with the Designated Safeguarding Lead in the first instance as soon as harm or a risk of harm is identified. The Designated Safeguarding Lead should complete the DBS referral form found on the DBS's web pages.

The completed form must then be provided to the Programme Director for review and a final decision on whether the referral is required.

APPENDIX B

Code of Practice

When working with young people and/or vulnerable adults, staff, trainers, assessors and associates are expected to take account of the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities
- Wherever possible, work in an open environment with young people where they can be seen by others
- Avoid unnecessary physical contact
- Avoid taking a child or vulnerable adult alone in a car on journeys, however short
- Avoid taking a child or vulnerable adult to the toilet, unless another adult is present, or another adult is aware (this may include a parent, group leader or other responsible person)
- In a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have
- Avoid showing favouritism towards particular participants
- Report incidents of alleged abuse to the Designated Safeguarding Lead and ensure that any allegations are recorded
- Report any concerns about poor practice to the Designated Safeguarding Lead
- Report any accidents to the designated person in the department for recording and investigation where required
- Avoid personal relationships with a child or vulnerable adult
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”
- Staff, trainers, assessors and associates should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet
- Only OASIS’s official social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly, and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with young people or vulnerable adults. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g., LOL)
- Do not make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted
- Participate in training available to you to support you in your work with young people and vulnerable adults
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening

- Do not take young people or vulnerable adults to your home
- Maintain confidentiality about sensitive information
- Where it is necessary for staff, trainers, assessors and associates to take photographs or video images of young people or vulnerable adults, written consent must be obtained (from parents/guardians in the case of young people) before these images are taken in order to comply with the Data Protection Act 1998. Personal details and photos which clearly identify an individual must only be published where they (or their parent/guardian) have given specific agreement.

APPENDIX C

RISK ASSESSMENT AND ACTION PLAN

Risk	Mitigation	Contingency	Owner	Progress	RAG
OASIS staff are unaware of the procedures in relation to highlighting concerns for learner well-being	OASIS staff are trained as part of their induction and annually (or as deemed necessary due to changes in legislation)	Intervention by Designated Safeguarding Leads/IQA highlighted through OTLAs, quality assurance to ensure Prevent is embedded in each contact point with the learner	DSLs, IQA team	Ongoing - no issues to date	Green
Prevent is not embedded during the learner contact process	Monthly safeguarding updates provided through the learner e-portfolio system and learner handbook contain information regarding Prevent, radicalisation and extremism.	Audit learner files to ensure this is undertaken on reviews and visits by tutors. Proof to be gathered to evidence learner is aware of information.	Tutors, Quality Manager	Ongoing - no issues to date	Green
Learners are radicalised by internal (workplace) or external factors	Embedded as part of the review and visits undertaken by the tutor	Above points will highlight if this has not taken place and therefore create an intervention.	Tutors, DSLs, IQA	Ongoing - no issues to date	Green
OASIS is not aware of regional Prevent- related issues that could impact learners and/or employers	DSLs attend local focus groups, to support one another and share good practice with facing the challenges of implementing the Prevent duty with learners.	Share relevant information with tutors through meetings and emails to develop their knowledge of concerns to be aware of.	DSLs	Ongoing - no issues to date	Green
Learners are exposed to messaging supportive of terrorism which contradicts British values	Learners are advised by tutors of the whistleblowing process and how OASIS can support. Learners are signposted to our Designated Safeguarding Leads	Additional support given to learners to build a greater understanding of what British values represent and this is embedded in sessions with learners.	Tutors, DSLs, IQA team	Ongoing - no issues to date	Green

OASIS is not linked with partners that can support with complex issues	OASIS has a Prevent Policy that incorporates the key links to external organisations that can support with all issues.	Not applicable as these links are in place.	Senior Management Team	Incorporated into the Prevent policy	Green
OASIS places learners within settings that may increase their exposure to radicalisation	Pre-vetting of all settings takes place as a matter of course through the apprenticeship recruitment process	In the unlikely event of pre-vetting not taking place, this would be picked up during the learner sign-up stage and monitored on an ongoing basis through tutor reviews	Tutors, Business Development Team	Ongoing - no issues to date. Incorporated into the apprenticeship recruitment process	Green
Learners are exposed to literature within OASIS and the workplace that promotes extremism	Learners are made aware of the whistleblowing process and our Designated Safeguarding Leads during the sign-up process, and ongoing through interaction with tutors	To be reiterated at each contact point with learners regarding channels of communication and safety established.	Tutors, IQA	Ongoing - no issues to date	Green
Learner data is made available to external contacts that do not hold the values of Prevent	OASIS comply with the requirements of GDPR and do not knowingly share data with external organisations without prior consent or legal duty	Any breaches would be reported to the appropriate body	All OASIS staff, GDPR representative	Ongoing - no issues to date	Green

APPENDIX D

RISK ASSESSMENT FORM							
Name of individual:				Who has completed the risk assessment?		Date:	
Activity/Task/ Situation	What are the risks?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom	Action by when	Completed

Agreed by:	
Date:	

Version	Purpose/Change	Date	Author	Classification	Review Date
1.1	KCSE 2022	03/03/2023	Janet Edwards	Internal	March 2024