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| November 2023 | Mohamed Yusuf<br>Executive Director | November 2024    | 06      |

## Safeguarding Policy

### Safeguarding Team

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Oasis Care and Training Agency (OASIS) fully recognises its responsibility for the protection of children and adults at risk and for safeguarding and promoting welfare to all learners and staff. OASIS is committed to providing a secure environment for learners, and staff where learners feel safe and are kept safe. All staff at OASIS are aware and have explained that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

OASIS aims to create and maintain a safe environment for all learners / apprentices, staff, volunteers, contractors and visitors to our training centre or delivery premises.

### SCOPE

The policy applies to all staff at OASIS.

### 1. OBJECTIVES OF THE POLICY

- To promote an environment that is safe, where staff and learners treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff, teaching, and non-teaching, of the need to safeguard young people and adults at risk and of their rights and responsibilities in identifying and reporting possible cases of abuse or neglect. It is not the responsibility of OASIS to investigate the abuse.
- To provide a systematic means of supporting young people and adults at risk, known or thought to be at risk of harm.
- To ensure that appropriate risk assessments are undertaken by OASIS and other managers to ensure that learners are safeguarded.
- To ensure that relevant safeguarding information about a young person or adult at risk is disseminated to appropriate staff within the centre on a 'need to know basis'.



- To ensure that partner organisations who support the delivery of our programmes have appropriate safeguarding and child protection policies and procedures in place.
- To involve learners in the decisions on safeguarding concerns and ensure they are shared with relevant agencies (e.g., LADO) and the Safeguarding Children Partnerships.

#### **Safeguarding Children Partnership**

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

[helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)

[CSCP@croydon.gov.uk](mailto:CSCP@croydon.gov.uk)

[Mash@towerhamlets.gov.uk](mailto:Mash@towerhamlets.gov.uk)

[safeguardingpartnership@lewisham.gov.uk](mailto:safeguardingpartnership@lewisham.gov.uk)

[LADO@walthamforest.gov.uk](mailto:LADO@walthamforest.gov.uk)

[Brent.SCF@brent.gov.uk](mailto:Brent.SCF@brent.gov.uk)

[children@ealing.gov.uk](mailto:children@ealing.gov.uk)

[Mash@Newham.gov.uk](mailto:Mash@Newham.gov.uk)

[CSCP@camden.gov.uk](mailto:CSCP@camden.gov.uk)

[iscp@islington.gov.uk](mailto:iscp@islington.gov.uk)

#### **Safeguarding Adults Board**



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

[safeguardingadults@lambeth.gov.uk](mailto:safeguardingadults@lambeth.gov.uk)

[Croydon.AdultSupport@croydon.gov.uk](mailto:Croydon.AdultSupport@croydon.gov.uk)

[enquiry@towerhamletsconnect.org](mailto:enquiry@towerhamletsconnect.org)

[gateway@lewisham.gov.uk](mailto:gateway@lewisham.gov.uk)

[safeadults@walthamforest.gov.uk](mailto:safeadults@walthamforest.gov.uk)

[brent.lsab@brent.gov.uk](mailto:brent.lsab@brent.gov.uk)

[nsab@newham.gov.uk](mailto:nsab@newham.gov.uk)

[sscallcentre@ealing.gov.uk](mailto:sscallcentre@ealing.gov.uk).

- To ensure that all staff who have access to young people or adults at risk have been checked for their suitability through safer recruitment procedures.
- To ensure all staff will receive appropriate training over a period of time including an introduction at all staff inductions.
- The Executive Director will be responsible for the implementation of the child and adults at risk protection policy and procedures.

## **2. Overview of our commitment to Safeguarding**

OASIS is committed to safeguarding and creating a culture of safety. OASIS takes its Safeguarding and Prevent duties seriously and has robust measures in place. Safeguarding all our learners is a key priority and we pride ourselves on ensuring that all learners feel safe throughout our branches.

There is a Safeguarding team member based at each branch. The Board of Governors has a nominated governor with safeguarding responsibility, who the DSL reports to ensure the Board is aware of any significant safeguarding issues and how the OASIS is dealing with them.

Throughout these policy and procedures, reference is made to 'children and young people' and recognises that some adults are also vulnerable to abuse and therefore the policy and procedures should be applied with to allegations of abuse and to the protection of adults at risk. The Lord Chancellor's Department defined a vulnerable adult or an adult at risk as a person "who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect themselves, against significant harm or exploitation".



We also recognise that a person may be vulnerable due to their specific circumstances at any age, such as mental health or domestic abuse, but may not be vulnerable at other times or permanently; that this can be specific to a period or set of circumstances and may change. There are also learners who may not

fall into the category of either a 'young person' or a 'vulnerable adult' but may require safeguarding at a particular time due to a potentially dangerous situation, set of circumstances or an act/act carried out against them.

## **DEFINITIONS**

### **Safeguarding:**

Preventative or precautionary planning and measures against potential harm or damage to someone.

### **Child Protection:**

The policy and procedures in place to protect and/or remove a child from harm or risk of harm.

### **Abuse:**

Any treatment that causes harm. This can include physical, sexual, emotional abuse, and/or neglect.

### **Child protection issue:**

An issue raising concern about harm or risk of harm to a child or young person.

### **Child:**

A child is defined in law as a person under the age of 18 years.

### **Adult at risk:**

An adult aged 18 and over who is unable to protect themselves from abuse and neglect, due to a care and support need which is permanent or temporary which is either met or not met by the local authority.

### **Young Person:**

A person aged up to 25 years old.

### **Staff:**

'Staff' means all employees, full-time and fractional, and all agency, franchise, contract, and volunteer staff working for SS group of companies.

### **DSL:**

Designated Safeguarding Lead.

### **LADO:**

Local Authority Designated Officer (London only)



Keeping Children Safe in Education 2023 refers to safeguarding against all forms of abuse and neglect but makes specific references to sexual harassment and sexual violence, child sexual exploitation (CSE), child criminal exploitation (CCE), female genital mutilation (FGM), mental health, Child on Child abuse and online abuse. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

- **Abuse (in the home, community, online or other)**

A form of maltreatment of a child/young adult. Somebody may abuse or neglect a child or vulnerable 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 others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

- **Physical abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child/young adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **Emotional abuse**

The persistent emotional maltreatment of a child/vulnerable young adult, such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of



another. It may involve serious bullying (including cyberbullying / online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse**

Involves forcing or enticing a child/ vulnerable young adult to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. (See Child on Child Abuse)

- **Neglect**

The persistent failure to meet a child's/ vulnerable young adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's/ vulnerable young adult's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child/ vulnerable young adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's/ vulnerable young adult's basic emotional needs.

- **Domestic Abuse**

The definition of Domestic Abuse is any incident or pattern or incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who have, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but not limited to psychological, physical, sexual, financial, and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

- **Child-on-child sexual violence and sexual harassment**



May occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, and in all likelihood, it will adversely affect their educational attainment. OASIS takes all victims seriously and they will be offered appropriate support.

OASIS has a zero-tolerance stance on sexual violence and sexual harassment. OASIS will manage such incidents in the same way as all safeguarding and/or criminal acts and will follow the Sexual Violence and Sexual Harassment between children in schools and colleges guidance (Department for Education 2018)

- **Child Criminal Exploitation (CCE):**

CCE is where an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity, such as (a) in exchange for something the victim wants or needs, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through verbal coercion or the use of technology. CCE can involve children being used to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, financial abuse or to threaten another young people.

County lines is a term used to describe gangs and organised crime networks involved in exporting illegal drugs into one or more areas of the country using dedicated mobile phones or other form of “deal line”. Exploitation is an integral part of the county lines model with children and vulnerable adults exploited to move (and store) drugs and money.

- **Child Sexual Exploitation (CSE):**

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person under the age of 18 years, including 16 and 17 year-olds, who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person’s immediate knowledge e.g., through others copying videos or images they have created and posted on social media, nudes, or semi-nudes.

- **‘Honour-Based’ Abuse (HBA):**

So-called “honour-based abuse” encompasses crimes which have been committed to protect or defend the honour of the family and/or the community’, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such.

- **Forced Marriage:**



The difference between a forced marriage and an arranged marriage is important to understand. The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a 'forced' and an 'arranged' marriage. In arranged marriages, the families of both spouses may take a leading role in choosing the marriage partner, but the choice of whether or not to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. Forced marriage is illegal and there are clear Government and legal guidelines on what to do if this is suspected.

If a learner suddenly leaves their training or indicates unhappiness at a planned marriage, this must be reported immediately. All such cases must be urgently referred to the Designated Safeguarding Lead (DSL).

- **Female Genital Mutilation (FGM):**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Victims of FGM are likely to come from a community that is known to practice FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Any staff member who receives a disclosure from a learner that they have been the subject of FGM now has a duty to report the matter to the Police directly. The member of staff must first inform the DSL and the police should be contacted.

- **Prevent, Radicalisation and Extremism:**

The Prevent Strategy was launched by the Government in 2007 and seeks to stop people becoming terrorists or supporting terrorism. It is also aimed at those in danger of being radicalised either from a religious or political perspective. It is the preventative strand of the Government's counter-terrorism strategy, CONTEST. The objectives of the Prevent Strategy are to:

- Respond to the ideological challenge of terrorism and the threat from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

If there are concerns that a learner is becoming radicalised or involved in an organisation which could ultimately harm the learner and the community, this needs to be reported to the DSL immediately. OASIS has appropriate links with the borough 'Prevent' Coordinator in instances where referrals are necessary.

### **Child on Child Abuse**

Dealing with Allegations of Abuse: Child-on-Child Abuse, OASIS actively works to minimise the risk of Child-on-Child abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse.

OASIS ensures, through regular training, that staff are alert to any signs of it and are confident in challenging unacceptable behaviour immediately and following procedures.



In line with KCSiE 2023, OASIS should ensure that both victim and perpetrator and any others involved are well supported.

OASIS recognises that learners are vulnerable to abuse by their peers. There are many forms of Child-on-Child abuse. It can be physical, emotional, sexual and/or financial and can impact any young person, although the characteristics/experiences of some can be exploited by their peers, making them more vulnerable to abuse than others. Clearly, abuse should never be tolerated or passed off as “banter” or “part of growing up” and such abuse is subject to the same child protection procedures as abuse by adults.

While bullying, fighting and harassment between young people are not generally seen as child protection issues, a learner’s behaviour may be regarded as abusive if: There is a large difference in power (for example, age, size, ability, development) between the young people concerned; or The perpetrator has repeatedly tried to harm one or more other children; or There are concerns about the intention of the alleged perpetrator. Examples of child-on-child abuse that may be regarded as safeguarding concerns include, but are not limited to, (online) bullying, gender-based violence, sexual assaults, and ‘sexting’, sharing of nudes and semi nudes without consent. OASIS procedures to minimise the risk of child-on-child abuse include:

- Vigilance – staff and learners have a clear method of making referrals via Safeguarding Concern documentation and/or directly to the DSL Referrals – where concerns about learners are raised by staff or other learners, these are fully investigated. Where necessary, Oasis’s Disciplinary procedure is enacted.

All staff should Be vigilant to child-on-child abuse and be aware of the potential uses of information technology for bullying and abusive behaviour between young people, including the sharing of nudes and semi-nudes.

Be aware of the added vulnerability of young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children or young people.

Be aware that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to others.

Be aware of appropriate actions. Where concerns have been raised regarding [online] bullying, fighting and harassment, staff should follow the disciplinary procedures identified in OASIS’s Anti Bullying and Harassment Policy. However, where there are concerns raised or disclosures of abuse (such as, but not limited to, gender-based violence, sexual harassment, sexual assaults, and ‘sexting’).

**Other types of abuse to which OASIS adheres to and ensures all children, young people and vulnerable adults are protected from.**

**Financial Abuse** - where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone’s pension, or just the constant borrowing of money and never returning it.

**Significant Harm** - some children may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.



**Upskirting** -The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

OASIS is committed to safeguarding against all aspects of abuse and neglect and expects everyone who works as part of our training provision to share this commitment and create a culture of vigilance, ensuring that it:

- Provides a safe and secure environment in which its learners can learn, and staff can work.
- Promotes the welfare and well-being of learners.
- Identifies learners who are suffering, or who are likely to suffer, significant harm.
- Takes prompt and appropriate action to protect its learners.
- Provides appropriate training for all staff
- Provides education for learners so that they are taught when to recognise when they or others are at risk and how to get early help when they need it.

OASIS recognise the importance of considering wider environmental factors which may be a threat to a learner's safety and welfare. OASIS assesses the risks, issues and themes in local communities and works closely with local authority safeguarding and Prevent teams when considering the wellbeing and safety of its learners.

OASIS recognise that when a learner has a social worker, it is likely to be an indicator that the learner is more at risk than other learners. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. Staff are aware of the vulnerabilities of Looked After Children and Care Leavers and are supported plan carefully to support and provide appropriate interventions for Looked After Children and Care Leavers.

**OASIS operates in all safeguarding matters with reference and regard to the following:**

- **Keeping Children Safe in Education (KCSiE) September 2023**
- **Working together to safeguard children 2023**
- **Keeping Children Safe in Education (KCSiE) September 2022**
- **Children's Act 1989 and 2004**
- **Working Together to Safeguard Children 2018**
- **Data Protection Act 1998 and General Data Protection Regulation 2018**
- **Education Act 2002**
- **Safeguarding Vulnerable Groups Act 2006**
- **Equality Act 2010**
- **Safeguarding Children & Safer Recruitment in Education DCSF 2010**
- **The Children and Families Act 2014**

- **Prevent Duty Guidance for Further Education Institutions in England and Wales 2016**
- **Vetting and Barring Guidance (ISA) – July 2016**
- **Working Together to Safeguard Children February 2018**
- **Sexual Violence and Sexual Harassment between Children in School and Colleges 2018**
- **The Care Act 2014**
- **Counter- Terrorism and Security Act 2015**
- **UN Convention on the Rights of the Child**
- **Sexual Offences Act 2003**
- **Protection of Freedom Act 2012**

### **3. INDIVIDUALS POTENTIALLY AT GREATER RISK OF HARM**

OASIS recognise that whilst all individuals should be protected there are some groups who are potentially at greater risk of harm and, in some cases, may find it difficult to communicate what is happening to them.

**Children, young people or vulnerable adults with SEN and disabilities, and/or physical health issues** can face additional safeguarding challenges, both in terms of their vulnerability and also in terms of being able to report abuse.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the disability or medical condition without further exploration.

Staff should also be aware that these individuals may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners. Similarly, staff should be aware of the potential for learners with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

#### **Children, young people or vulnerable adults requiring mental health support.**

Mental health problems can, in some cases, be an indicator that an individual has suffered or is at risk of suffering abuse, neglect or exploitation.

OASIS will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system.

#### **Looked After Children (LACs)**

OASIS recognise that learners in the care system, looked after children (LACs) and care leavers (CLs) may potentially be more vulnerable or more at risk than other learners. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. Staff are aware of the vulnerabilities of Looked After Children and Care Leavers and plan carefully to support and provide appropriate interventions for Looked After Children and Care Leavers. OASIS liaises with social workers and local authorities to monitor the progress of Looked After Children and Care Leavers where there are concerns about their attendance, progress, or safety.

#### **Early Help (or early intervention)**

All members of staff should be prepared to identify learners who may benefit from Early Help. Early help means providing support as soon as a problem emerges at any point in a learner's life. Staff are trained and know how to respond to a learner who discloses abuse or concerns. Any learner may benefit from Early Help, but all staff should be

particularly alert to the potential need for early help for a learner who has additional vulnerabilities.

### **Children who are lesbian, gay, bi, or trans (LGBTQ+)**

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavor to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

## **4. PROMOTING SAFEGUARDING AND THE WELFARE OF LEARNERS**

OASIS has a zero-tolerance approach to abuse of any kind. The safeguarding agenda involves the protection of children and adults at risk but also requires providers to promote and encourage the welfare of learners as a preventative measure to harm. This is achieved at OASIS by:

- A culture of vigilance that is taken seriously by senior managers and included within meeting agendas.
- Safeguarding training is included within staff and learner inductions and reinforced in both handbooks.
- Embed into the curriculum including relevant focus topics such as online safety, lone working, self-care and stress management, fraudulent activity and scams, harassment at work, financial abuse, the prevent agenda and health and safety.
- Embed into the curriculum the promotion of equality and diversity and British Values to reinforce the acceptance of a diverse community and following the expectations of a British citizen.

## **5. PREVENT**

### **Overview of our commitment to our Prevent Duty**

Under the Counter-Terrorism and Security Act 2015 OASIS is required to “have due regard to the need to prevent people from being drawn into terrorism, violent extremism and non-violent extremism, particularly that which can create an atmosphere conducive to terrorism and can popularize views which terrorists exploit”. OASIS recognises its responsibilities under the Prevent duty, facilitates Prevent training, has a Prevent Risk Assessment and Action Plan.

Prevent is one of the four elements of CONTEST, the government’s counter-terrorism strategy. OASIS fulfils its statutory responsibilities by ensuring that all staff recognise that protecting individuals from extremism and radicalisation is a key pillar of our safeguarding duties.

PREVENT refers to specific elements of the Government's overarching Anti-Terrorist strategy defined under the section 26 (10) of the Counter Terrorism and Security Act 2015 as part of CONTEST) and includes appropriate references to Channel and other measures.



OASIS ensures that learners are taught to recognise the dangers posed by the activities of extremist groups and to understand how to recognise and protect themselves from the activities of those seeking to radicalise vulnerable people.

OASIS recognises that some concerns which are identified around incidents of potential extremist behaviours will have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations where concerns are raised about individuals at risk of being drawn into violent extremism. PREVENT officers from the relevant Police Force will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, other appropriate and targeted support will be considered for the individual.

This system, the CHANNEL process, is utilised where necessary and appropriate by OASIS to provide learners with access to a confidential and voluntary process where support options can be offered.

Staff should report Prevent concerns in the same way as other safeguarding concerns – for all Prevent concerns please refer to the **Designated Safeguarding Lead, Safeguarding Officers, and the Commercial Training Director immediately.**

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed, and proportionate referrals. Further sources for advice and training can be accessed through the Prevent update for Further Education (FE) and Higher Education (HE) providers in London via Jennie Fisher (She /Her pronouns) FE/HE Regional Prevent Co-Ordinator for London, Counter-Extremism Division

### **Channel is the safeguarding panel which supports Prevent.**

Led by the Local Authority, it is a programme which focuses on supporting people at an early stage who could be drawn into terrorism. It ensures people of any age, faith, ethnicity, or background receive support before their vulnerabilities are exploited by those wanting them to embrace terrorism or any illegal extremist activity.

- Channel is a confidential and voluntary process that allows individuals to have the final say of accepting support or not.
- The type of support that is provided is decided upon by the individual referred and partners who will work with them. This ensures that any support that is provided is tailored to the person's needs.
- These support options are vast and include support with education, employment, housing, mental health, and any other necessary challenges.
- Ideological support is also common, which may include discussion with credible ideological experts and faith leaders.
- Individuals who are referred to Prevent or receive support from Channel are not criminalised and will not receive a criminal record unless a criminal offence is committed.

### **Procedures in the Event of a Disclosure or Suspicion of Abuse**

- All complaints, allegations or suspicions must be taken seriously when there is a possibility that abuse, or



considerable harm may be involved.

- Staff should remain calm and reassuring throughout any discussions with a learner who is disclosing abuse, suspected abuse or issues which may (or may not) be below the threshold of the definition of abuse. Learners (or anyone making the disclosure) should always be reassured and believed. The disclosure should always be reporting via the OASIS's reporting system, and if advice required discussed with a member of the Safeguarding team.
- Under no circumstances should staff promise confidentiality to a learner who is declaring abuse or suspected abuse. Under no circumstances should staff make decisions whether the disclosure is under the threshold but should always refer to the safeguarding team. The staff member should explain that if what the learner wishes to say or has said relates to the learner's own safety or that of another person, then the staff member will have to inform the OASIS's Designated Safeguarding Officer.

When dealing with a disclosure, the following communication and recording method should be followed:

#### **Receive**

- ✓ What is said.
- ✓ Accept what is said.
- ✓ Listen without displaying shock, disbelief, or opinion.

#### **Reassure**

- ✓ The Learner
- ✓ Acknowledge their courage in reporting it.
- ✓ Do not promise confidentiality.
- ✓ Remind them that they are not to blame – avoid criticism of the alleged perpetrator.
- ✓ Do not promise that "Everything will be alright now" (it may not be)
- ✓ Try to remain neutral.

#### **React**

- ✓ Respond to the student but do not interrogate.
- ✓ Avoid leading questions but ask open ended ones.
- ✓ Seek clarification from the student.
- ✓ Explain the next steps.

#### **Record**

- ✓ Make notes as soon as possible – on to Concern Form– during the interview if possible.
- ✓ Use the student's own words – do not assume – ask e.g. "Please tell me what xxxx means?"
- ✓ Describe observable behaviour and appearance.
- ✓ Do not destroy any original notes – these should be given to the senior manager or police dealing with the case.

#### **Support**



Consider what support needs of the learner and contact the relevant safeguarding staff. Such incidents can be stressful and time-consuming. If dealing with such a situation the member of staff should feel free to speak to a manager, a member of the Senior Management Team (SMT) or someone from HR or indeed any colleague with whom you feel comfortable discussing the matter, If necessary, the designated safeguarding officer will take responsibility for the matter and will take all necessary actions.

**\*\*** It is strongly recommended that during any disclosure interview you stick to the following line of questioning:

- Name and date of birth of learner
- Date, time, and location of incident
- Names of people present and relationship (if any) to learner.
- A description of the incident / events
- Finish by asking the learner: is there anything else you wish to tell me?

## **6. LEARNINIG ABOUT PREVENT**

Extremism is defined in HM Government guidance as: “Vocal or active opposition to fundamental British values...” including calls for the death of specific people or groups. British Values are defined as:

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

OASIS receives and delivers training to all staff to ensure that they have sufficient knowledge of British Values, Prevent and radicalisation and exemplify British Values in their work.

Lessons, interactions with learners and in their general behaviours. British Values are promoted to learners through teaching of the curriculum and enrichment.

## **7. SAFER RECRUITMENT AND SELECTION PROCEDURES**

OASIS takes appropriate measures to ensure the appointment of new staff is in line with a safer recruitment practice<sup>2</sup> which includes scrutinising applicants, verifying identity and qualifications, obtaining professional and character references, checking previous employment history and ensuring they have the health and physical capacity for the job.

We will prevent people who pose risks to children, young people and vulnerable adults from working at our company by making sure that all individuals working in any capacity at OASIS have been subjected to relevant safeguarding checks and risk assessment in line with Keeping Children Safe in Education 2023.

[Part Three: Safer Recruitment: KCSiE 2023](#)



We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working at the company. The single central record must cover the following people: all staff, agency and third-party and supply staff who work at OASIS Centre.

Applicants seeking employment under the Skilled Worker Route (replaces existing *Tier 2 route*) for education, health or social care sectors will be required to provide a criminal record certificate. Guidance will be checked regularly for any updates<sup>3</sup>

Every job description and person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. The company website will echo this within our 'work for us' section.

We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 5 years and will ask a min of 2 safeguarding questions. Training on safeguarding current practice must be completed within 2 weeks of starting with the organisation and must be updated every 2 years.

We have a procedure in place to manage allegations against members of staff, supply staff and volunteers. There is an agreed staff behaviour policy code of conduct) which is compliant with 'Safer Working Practices', and includes - acceptable use of technologies, staff/learner relationships and communications including the use of social media.

### **Procedures**

These procedures aim to ensure that:

- potential abusers are deterred from joining the project and the risk of harm to children, young people and vulnerable adults in our care is therefore reduced.
- applicants are well informed about posts and about child protection and safeguarding issues.
- children, young people and vulnerable adults and their parents and carers can have confidence in our staff, whether paid or voluntary
- OASIS can make a fair assessment of the applicants' suitability for the post.
- OASIS complies with regulations and agrees good practice.

### **Recruitment publicity/adverts<sup>4</sup>**

From the outset, job and volunteer applicants will be informed if the role that they are interested in involves contact with children, young people and vulnerable adults and associated checking procedures. This will enable them to make an informed choice as to whether to pursue their interest and, in the case of potential job applicants, apply for the post, being aware of the checking procedures with which they will be asked to comply.

The pack for job applicants will contain the job profile and selection criteria, such as the skills, knowledge and experience required to perform the job. The pack for volunteer applicants will contain details about the responsibilities of the volunteer role and the selection criteria, such as the skills and personal traits required to perform the tasks. Information on the company's safeguarding and recruitment of ex-offenders' policies will also be sent where relevant.

### **Application details**

Job and volunteer applicants will be asked to supply their full name, current and recent addresses, date of birth and a full account of their employment history alongside any voluntary experience. Job applicants will be asked to give details of posts held and reasons for leaving or intending to leave. This information will be collected on application and self-declaration forms. All forms must be signed and dated confirming that the information supplied is true.

### **Recruitment of staff with criminal convictions**



The Rehabilitation of Offenders Act 1974 (ROA) entitles all employers to consider unspent convictions when determining whether an applicant is suitable for the role applied for. OASIS will not discriminate unfairly against applicants with a criminal record. Having a criminal record will not necessarily bar an applicant from working for OASIS, the nature of a disclosed conviction and its relevance to the post in question, will be considered.

Where a conviction has been disclosed in an individual's application for a post at the company, a discussion will take place regarding the offence and its relevance to the position. Failure to reveal information relating to convictions could lead to withdrawal of an offer of employment.

OASIS uses the Disclosure and Barring Service (DBS) to obtain information to enable it to assess the suitability of applicants for employment in positions of trust. The company complies fully with the DBS code of practice and does not discriminate unfairly against any subject of a DBS disclosure on the basis of conviction or other information revealed.

The only circumstances in which an employer may not legally recruit a person with a certain type of offending history, is where the offending history has led to the individual being barred from regulated activity with either [children](#), [adults](#) or both. If you are recruiting for a role that is defined as regulated activity with children or adults, it is your responsibility to check the barred status of your employees and you may not employ a person who has been barred from working with the relevant group.

OASIS complies with the DBS code regarding the secure storage, handling, use, retention & disposal of DBS disclosures and disclosure information and with its obligations under the Data Protection Act.

The Executive Director will decide as to whether any information disclosed is relevant to the role. Applicants will have the opportunity to speak to the Executive Director in confidence about this aspect of the recruitment process should they wish to.

Staff and volunteers whose work are likely to involve occasional contact with children, young people and vulnerable adults will also be asked to complete a self-declaration (as described above) in relation to any convictions, cautions or disqualifications from working with children, young people and vulnerable adults. Completed self-declarations from these individuals should be returned in a sealed envelope marked private and confidential to the Executive Director.

## Shortlisting

Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK.

For example:

- if they have a criminal history
- whether they are included on the barred list
- whether they are prohibited from teaching
- whether they are prohibited from taking part in the management of an independent school
- information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted.
- if they are known to the police and children's social care
- have they been disqualified from providing childcare (see paras 245-249); and,



- any relevant overseas information.

This information will only be requested from applicants who have been shortlisted. The information will not be requested on the application form to decide who should be shortlisted.

Applicants will be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

Additionally, as a part of Oasis Care and Training Agency's shortlisting process, we will conduct an online search as a component of our due diligence on the shortlisted candidates. This measure aims to identify any publicly available incidents or issues that may have occurred, which we may wish to discuss with the applicant during the interview. Oasis Care and Training Agency will notify shortlisted candidates that online searches may be carried out as part of our due diligence checks. The KCSiE 2023 guidance emphasises that "schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks."

To carry out online searches effectively as part of due diligence on potential candidates, the following steps will be taken:

**Start with Basic Searches:** Begin by entering the candidate's name into popular search engines like Google. This initial search can provide basic information about the candidate and any publicly available content associated with them.

**Enhance the Search:** Refine your search by including additional details such as the candidate's full name, location, and current employer. This can help narrow down the search results to find more relevant information.

**Record Details of the Search:** Keep detailed records of the online search process, including the names of sites and platforms visited, as well as the date and time of each search. This documentation ensures transparency and accountability in the due diligence process.

**Address Legitimate Concerns:** If any information gathered through the online search raises legitimate concerns, such as criminal records or inappropriate behavior, be prepared to address these directly with the candidate during the interview.

## **Interviews for job applicants**

Shortlisted candidates for roles involving regular work with children, young people and vulnerable adults will be interviewed following satisfactory clearance through the above procedures. Interviews will be conducted by a panel, one member of which will have been trained in child protection and safeguarding issues. Structured questions will be agreed.

OASIS will use a range of selection techniques to identify the most suitable person for the post.

These will include:

- finding out what attracted the candidate to the post being applied for and their motivation for working with children, young people or vulnerable adults.
- exploring their skills and asking for examples of experience of working with children, young people or vulnerable adults which are relevant to the role; and



- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.

The interviews will be used to explore potential areas of concern to determine the applicant's suitability to work with children, young people and vulnerable adults. Areas that may be concerning and lead to further probing include:

- implication that adults and children are equal
- lack of recognition and/or understanding of the vulnerability of children
- inappropriate idealisation of children
- inadequate understanding of appropriate boundaries between adults and children; and,
- indicators of negative safeguarding behaviours.

Any information about past disciplinary action or allegations should be considered in the circumstances of the individual case.

The remainder of the interview will focus on the job profile, person specification and the application form and will include discussion of the company's Safeguarding Policy.

### **Verification of Identity**

Job and volunteer applicants for regulated roles or safeguarding positions must provide the following:

- personal details, current and former names, current address, and national insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment, and voluntary work) including reasons for any gaps in employment.
- qualifications, the awarding body, and date of award (original documents)
- details of referees/references (see below for further information); and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

### **Pre-employment checks**

The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: **16-19 Academies, Special Post-16 institutions and Independent Training Providers**<sup>5</sup>.

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks.

- verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. The best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children).
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then advice on the GOV.UK website will be followed.
- if the person has lived or worked outside the UK, make any further checks considered appropriate and,
- verify professional qualifications, as appropriate.



- Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

## **References**

At least two references will be required in respect of both job and volunteer applicants for regulated positions. OASIS reserves the right to repeat references for volunteers who periodically work for them in regulated roles every three years. Referees will be informed that the role is exempt from the provisions of the Rehabilitation of Offenders Act and asked for their views on the candidate's ability to undertake work with children, young people and vulnerable adults including whether they have any knowledge of an applicant's previous convictions or know of any other reasons why the candidate is unsuitable to work with children, young people and vulnerable adults.

It will be made clear on the application form or in guidance notes that OASIS will contact any previous employers or voluntary organisations mentioned on the form.

## **Job applicants**

References will be taken up once a provisional offer of employment has been made. One referee should be the candidate's present or last employer if they have been working.

## **Volunteers**

References from family members will not be accepted. Where possible, referees should be a person in authority from either a current or recent employer, school or voluntary group with which the prospective volunteer has been involved. One referee should have first-hand knowledge of the potential volunteer's previous contact with children, young people and vulnerable adults.

## **Existing Staff**

If there are concerns about an existing staff member's suitability to work with children, OASIS will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at OASIS moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity will be carried out.

## **8. TRAINING**

### **INDUCTION – What staff needs to know**

Copies of policies and a copy of Part one of KCSIE 2023, alongside OASIS safeguarding policy will be provided to all staff at induction.

Staff induction will include:

Staff members familiarising themselves with the safeguarding systems implemented within OASIS. These systems should be thoroughly explained during induction. This encompasses:

Understanding the child protection policy, which should include procedures for addressing child-on-child abuse alongside other relevant aspects.



Familiarity with the behaviour policy, which should incorporate strategies for preventing various forms of bullying such as cyberbullying, prejudice-based, and discriminatory bullying.

Adherence to the staff behaviour policy, also known as a code of conduct, which should encompass handling low-level concerns, addressing allegations against staff, and facilitating whistleblowing.

Awareness of the safeguarding response protocols for children who go missing from education.

Understanding the roles and responsibilities of the designated safeguarding lead, including the identification of the designated safeguarding lead and any deputies.

Every staff member must undergo suitable safeguarding and child protection training, including online safety, as part of their induction process. This training should cover various aspects, including understanding expectations and applicable roles and responsibilities concerning filtering and monitoring.

- **Continuous Professional Development**

**Regular Training Updates:** Safeguarding training should be regularly updated to ensure that staff members are kept abreast of any changes in policies, procedures, or legislation related to safeguarding and child protection. The training will be regularly updated and will be in line with any advice from local safeguarding partners. This will involve scheduling refresher courses or workshops to reinforce key concepts and address any emerging issues.

**Communication of Updates:** Updates on safeguarding and child protection, including online safety, should be communicated to staff members through various channels such as email, e-bulletins, staff meetings, or dedicated training sessions. This ensures that all staff members receive consistent and timely information to enhance their understanding and skills.

**Annual Safeguarding Updates:** At a minimum, all staff members should receive safeguarding updates at least annually. These updates can cover a range of topics, including new guidance or best practices, case studies, and relevant legislative changes. This helps to reinforce existing knowledge and address any gaps in understanding.

**Online Safety Training:** Given the increasing importance of online safety, staff members should also receive training specifically focused on this area. This might include identifying online risks, supporting students in navigating the digital world safely, and responding to incidents of online bullying or exploitation. As part of their safeguarding and online safety training, staff need to understand their expectations, roles and responsibilities around filtering and monitoring systems

## **STAFF DEVELOPMENT**

OASIS ensure that all staff are familiar with our policies and procedures linked to safeguarding, including the safeguarding policy statement, email and internet policy and procedure, social media guidelines, data protection policy and procedures, safer recruitment procedures, incident reporting procedures, staff code of conduct and health and safety policy and procedures.

All staff receive at least annual updates with regular updates through a variety of communication methods, such as manager and team meetings, emails, staff intranet, newsletters, leaflets, posters and sharing of other key documents. These updates cover additional contextual and other safeguarding matters such as violent crime, child sexual and criminal exploitation (including county lines), radicalisation and extremism and Prevent, Peer on peer abuse, modern



slavery, bullying including online and prejudice, abuse regarding race, disability, homophobic/ transphobic, risks associated using technology, HBA, FGM, FII, domestic abuse, sexual violence and harassment and online safety. This list is not exhaustive however reflects the breadth of topics that are covered in staff training and updates. Any local or national issues arising from Serious case reviews are included into staff training.

DSL and DDSLs attend DSL training every two years and update their knowledge, skills and understanding of relevant safeguarding issues including Prevent on a regular basis.

## **9. LEARNING ABOUT SAFEGUARDING**

OASIS takes all welfare concerns very seriously and encourages its learners to talk to us about anything that worries them. OASIS will always act in the best interest of the child, young person, or vulnerable adult.

All learners receive information on policies, procedures, and OASIS's safeguarding arrangements during their induction and then regularly throughout the year. Learners are to be informed that there is a senior member of staff with responsibility for safeguarding, and other members of staff with safeguarding responsibilities and learners know who they are.

Learners are informed of whom they might talk to, both in and out of learners, their right to be listened to and heard and what steps can be taken to protect them from harm. Learners are also responsible for complying with all OASIS's policies and procedures that are designed to keep OASIS a safe and secure place in which to learn.

Throughout teaching and learning opportunities, enrichment activities learners are taught to understand safeguarding and what it means to them, recognise when they are at risk and how to get help when they need it, including keeping safe outside of OASIS and keeping safe online.

### **Mental Health**

All staff should be aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect, or exploitation.

We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are however well placed to observe learners' behaviour and identify those who may be experiencing a mental health problem, episode or be at risk of developing one.

If staff have a mental health concern about a child, young person or adult at risk that is also a safeguarding concern, immediate action should be taken using OASIS's reporting system which include making a direct referral to OASIS's Safeguarding Team.

## **10. ONLINE SAFETY**

OASIS ensure that all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. The increasing use of the internet and digital technology has presented huge opportunities, both to enrich the learning environment for all learners and also allowing them to expand their personal horizons. However, children, young people and vulnerable adults are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Individuals can also abuse their peers online, this can take the form of



abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

OASIS reviews its approach to online safety annually and its response to the growing dangers faced by children, young people, and vulnerable adults, through safeguarding training, awareness raising activities aimed at learners as well as policies and procedures as set out by OASIS and issues as identified in KCSiE 2023.

The range of issues classified within online safety is considerable, but can be categorised into four key areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example:

pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

- Contact: being subjected to harmful online interaction with other users; for example:

peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

### **Filtering and monitoring**

All staff must receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The designated safeguarding lead takes responsibility for understanding the filtering and monitoring systems and processes in place on all OASISs devices and networks in line with guidance from the Department for Education's new filtering and monitoring standards (DfE, 2023b) and the DfE's Cyber security standards for schools and colleges (DfE 2023c).

OASIS has an obligation to ensure that they keep up to date with all current guidance and changes throughout the year. The Governors should receive safeguarding training which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. The Governors will consider the number of and age range of learners, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The Governors will review annually the standards and discuss with the Head of IT and service providers what needs to be done to support OASIS in meeting this standard.

OASIS has had due regard to the additional information and support set out in KCSiE 2023 and has a whole organisational approach to online safety and a clear policy on use of communications technology.

OASIS will endeavour to both filter and monitor all internet usage within OASIS. In addition to policies and procedures relating to online safety. Oasiss filtering and monitoring policy is explicit in its obligation to ensure learners, apprentices, staff and visitors are accessing our online platforms safely. The filtering and monitoring policy sets out in detail and takes into consideration guidance from the Department for Education published filtering and monitoring standards which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually



- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs.

#### [Cyber Security Standards for Schools and Colleges](#)

### **Sexual Harassment and Sexual Violence**

OASIS has a zero-tolerance policy on sexual harassment in any form, including online and social media, such as 'sexting' and the sharing of unsolicited images and online bullying.

OASIS is committed to supporting learners who experience any form of sexual violence or sexual abuse, including online abuse.

All staff receive training and are sensitive to the needs of victims and respect their right to be taken seriously.

In line with KCSIE (Sept 2023) victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'. Victims are to be taken seriously and not have their character or past scrutinised as part of the process (sometimes known as 'victim shaming').

All reports of sexual violence, assault or rape are to be reported to the police, as they are a criminal offence and it is the police who investigate, not OASIS.

OASIS ensures that learners are made aware that some forms of online activity such as non-consensual sharing of images and videos are not 'abusive' but are in fact illegal. The advice of the UK Council for Internet Safety (UKCIS 2020) is followed by the DSLs in supporting learners from the risks of online abuse and in managing incidents.

OASIS recognises that teaching children and young people about safeguarding issues can prevent harm by providing them with the skills, attributes, and knowledge they need to identify risks, including those encountered online and to access help when they need it.

OASIS actively works to minimise the risk of Child-on-Child abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse. In no circumstances is it ever acceptable for abuse to be passed off as 'just banter' or 'just having a laugh'.

Staff are alert to any signs of it and are confident in challenging unacceptable behaviour immediately and following OASIS's processes. In line with KCSIE 2023, both alleged victim and alleged perpetrator and any others involved are supported.

### **Procedures in the Event of a Sexual Harassment, Sexual Assault or Rape Disclosure**

OASIS has a zero-tolerance policy on sexual harassment in any form, including online and social media, such as 'sexting' and the sharing of unsolicited images. OASIS is committed to supporting learners who experience any form of sexual abuse, including online abuse.

All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE (Sept 2023) victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'.

OASIS takes the report of any sexual abuse, assault, or rape extremely seriously and supporting learners who have been the victims of such crimes quickly, effectively, and sensitively is of paramount importance to OASIS.

Victims are to be taken seriously and not have their character or past scrutinised as part of the process (sometimes



known as 'victim shaming').

All reports of sexual violence, assault or rape are to be reported to the police, as they are a criminal offence, and it is the police who investigate not OASIS.

**Staff are aware they must follow all reporting procedures, as set out above, including in the cases of disclosures of Sexual Assault or Rape, the additional steps of:**

- For all serious cases and disclosures, including rape, sexual assault, violence, and criminal act, call the DSL or Safeguarding Officers immediately (as well as record as URGENT on OASIS Cause for Concern Safeguarding Reporting Record)
- The DSL or Safeguarding Officers must call the police immediately
  - The Police must be notified of sexual allegations.
- SMT and the Safeguarding Governor must be made aware
- Support for the learner (or learner if Child on Child abuse) must be put in place or offer

## **KEY SAFEGUARDING PRINCIPLES**

- All children, young people and adults at risk have the right to be safeguarded from harm and exploitation so all complaints, allegations or suspicions must be taken seriously.
- The procedures laid out in this document must be followed whenever an allegation is made that a learner has been abused.
- Absolute promises of confidentiality should not be given as the matter may develop in such a way that these might not be able to be honoured.
- If the complaint comes directly from the learner, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must always be avoided.
- A full record of any discussions must be made immediately after any conversations with the learner and referred to the DSL that same day.
- OASIS have a responsibility to provide a safe environment and minimise risks of harm to learners' welfare.

## **MANAGEMENT OF SAFEGUARDING**

OASIS has a whole organisational approach to safeguarding, which is embedded within all areas of service and programme delivery, and is at the heart of our policies, procedures, and practices.

## **STAFF ROLES AND 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 Children Safe in Education Part One, (September 2023)
- 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 Part 1 of the statutory guidance Keeping Children Safe in Education (September 2023)
- Adopt OASIS's culture of vigilance and lead by example.

#### Senior Management Team

- The 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:
  - creating an ethos which upholds core values of shared responsibility and wellbeing for all, while promoting respect, equality and diversity and understanding
  - adopting stringent and transparent safeguarding/prevent duty practices which recognise, support and protect individuals who might be susceptible to radicalisation.
  - sharing information about safeguarding/prevent duty and good practice with other key stakeholders and external agencies.
  - providing training opportunities for staff and volunteers to enable them to continually update their safeguarding and prevent knowledge.
  - sharing information and concerns with agencies who need to know and ensuring we involve learners, parents, staff and others in an appropriate way.
  - providing effective management for staff and volunteers through supervision, support and training
  - ensuring plans are in place to minimise the potential for acts of violent extremism.
  - ensuring standards for filtering and monitoring are met, including procuring filtering and monitoring systems. documenting decisions on what is blocked or allowed and why reviewing the effectiveness of your provision overseeing reports.

#### Designated Safeguarding / Prevent Lead

- The designated lead Janet Edwards is the single point of contact for Safeguarding and Prevent, to support the Senior Management Team to fulfil their responsibilities and to ensure that:
  - this policy is implemented across the organisation.
  - any concerns are shared with the relevant organisations in order to minimise the risk of people becoming involved in terrorism.
  - appropriate training is in place that is relevant and regularly reviewed and updated.
  - develop and work with partners and support networks to ensure up to date information and resources are received, acted on and cascaded.
  - practices are reported on for the SMT and the Board of Trustees on a quarterly basis.

- reviews the implementation and effectiveness of the policy on an annual basis.
- take lead responsibility for managing child protection issues and cases in their centre or team.
- 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.
- be aware of the Local Safeguarding Children's Board (SAFEGUARDING CHILDRENS PARTNERSHIP) and Safeguarding Adults Board (SAB) be familiar with local referral procedures.
- 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 support during COVID (send questionnaires, called learners, maintained contact) – reviewed on an ongoing basis.
- 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 that all staff know how to raise concerns about people who are vulnerable or at risk of abuse and neglect.
- ensure that all staff know how to assess the risk of children being drawn into terrorism and understand how to identify individual children who may be at risk of radicalisation and what to do to support them.
- Lead responsibility for safeguarding and online safety, which could include overseeing and acting on: filtering and monitoring reports, safeguarding concerns and checks to filtering and monitoring systems

#### **HR Department**

- Abdi Muse- HR Manager monitors and records the DBS process for employees, casuals, volunteers and self-employed contractors.
- Ensures Safeguarding and Prevent training is provided and monitored.
- Provides advice and guidance to managers on safeguarding issues in relation to recruitment, employees, and volunteers.
- To carry out online searches in relation to candidates at the short-listing stage for employment

#### **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 and 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.

### USE OF EXTERNAL AGENCIES AND SPEAKERS

At OASIS we encourage the use of external agencies or speakers to enrich the experiences of our learners; however, we will positively vet those external agencies, individuals, or speakers who we engage to provide such learning opportunities or experiences for our learners.

Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, our values and ethos. OASIS will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to learners are consistent with the ethos of the Company and do not marginalise any communities, groups, or individuals.
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies.
- Activities are matched to the needs of learners.
- Activities are carefully evaluated by OASIS to ensure that they are effective.

We recognise, however, that the ethos of our Company and learning is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this. Therefore, by delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help learners develop the critical thinking skills needed to engage in informed debate.

### WHISTLE BLOWING

Whistle blowing protects all staff, contractors, and learners from fear of victimisation or discrimination when raising serious concerns. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the company's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

OASIS has appropriate whistleblowing procedures in place and concerns should be raised with the Executive Director who will conduct any internal investigations in line with the organisation's procedures. Anyone who raises a genuine concern will have significant legal protection under the Employment Rights Act 1996 – Part IVA, Part V and Part X and the Public Interest Disclosure Act 1998.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them: 19

general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)



the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled. Staff can call 0800 028 0285 –line is available from 8:00 AM to 8:00 PM, Monday to Friday and [email:help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **ALLEGATIONS AGAINST A STAFF MEMBER OR VOLUNTEER**

OASIS has robust processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff, volunteers, and contractors).

Where concerns are about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, they should speak to the DSL. If the concerns/allegations are about the DSL, speak to the CEO. OASIS will consult with the Local Authority Designated Officer (LADO) regarding allegations against staff. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children, young people and vulnerable adults is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at OASIS and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action at OASIS and/or liaise with the police and/or children's social care services as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the individual involved about the allegation as soon as possible if they do not already know (following agreement with social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against employees (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality



restrictions removed in respect of a teacher will be advised to seek legal advice.

Keep the parents or carers of the individual involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

### **CONFIDENTIALITY**

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the learner is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The learner must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need-to-know basis. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

OASIS is committed to protecting the rights and privacy of individuals, including learners, staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018 and complies with the requirements of the Data Protection Act 1998 that allows for disclosure of personal data where this is necessary to protect the vital interests of the learners.

### **LONE WORKING**

OASIS recognises it has a responsibility for the health, safety and welfare of all workers including contractors and those who are self-employed. The specific risks involved with lone working are assessed in consultation with employees and recorded in an annual risk assessment. Actions to reduce and control risks will include:

- Managers at OASIS use a system that clearly identifies where all employees are located on each day, contact details, times of sessions, list of learners in the group.
- Employees are accompanied to any new venues on the first day of delivery by another member of OASIS.
- The venue is aware of the employee's visit, number of learners expected and have contact details of managers at OASIS.
- The employee and on duty Designated Safeguarding Lead have each other's contact details.
- The employee is aware of the domestic and health and safety arrangements at the venue.
- High risk learners are assessed, and team teaching/coaching is considered.
- Vulnerable employees such as those with disabilities, medical conditions, pregnancy or English as a second language will require further measures put in place.
- The staff induction and handbook include expectations and procedures for lone workers.
- Managers at OASIS will periodically monitor lone workers through visits, observations and other contact via phone, text and email.

### **WEARING OF ID PASSES**

In order to ensure that anyone accessing OASIS is provided with a safe environment, it is a requirement that all staff, learners and visitors visibly wear ID badges on OASIS lanyards provided in all areas of OASIS, both inside and outside OASIS environment.

- No company services will be provided to any person not wearing their lanyard and ID pass.



- All teaching staff are required to check that their learners' ID passes are worn at the start and at the end of all teaching sessions.
- Any learner who has forgotten or lost their ID pass must get a temporary ID from Customer Services. If any learner records three temporary ID pass requests in any one term this will be recorded on Promonitor for LDCs and tutors to take appropriate action with the learner.

## **LAC AND CARE LEAVERS**

OASIS will work in close collaboration with the Virtual Schools and Children's Social Services to ensure that all Looked After Children (and previously LAC) are identified and offered appropriate support mechanisms. The Designated Member of Staff for LAC learners is the Safeguarding Lead Janet Edwards.

## **PARTNERSHIP AND INFORMATION SHARING**

OASIS will work in conjunction with the local authority and any other external agencies such as the Police to ensure information is passed appropriately where there are safeguarding concerns. Information sharing protocols are well established, which includes reference to 'Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers' supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy.

The Counterterrorism and Securities Act (2015) places additional responsibilities on Further Education Companies to include working with multi-agencies as part of the Channel process.

## **RECORD KEEPING**

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing.

- All safeguarding concerns are either identified by, or referred through to, the Designated Safeguarding Lead by members of staff, learners, (either self-referring or bringing concerns about peers), parents/carers, employers or volunteers.
- The Safeguarding Lead will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency.
- All cases are recorded in a secure area on the company intranet.
- A quarterly and annual Safeguarding Report is devised for SMT with detailed analysis of safeguarding disclosures which feeds into planning for training needs and preventative work with learners.

Good record keeping is also essential (particularly where malicious or false reporting is identified) and all information is kept confidential and stored securely. Records should include:

a clear and comprehensive summary of the concern

details of how the concern was followed up and resolved.

a note of any action taken, decisions reached and the outcome.

Any concerns or advice regarding record keeping will be discussed with the designated safeguarding lead (or deputy).

Information will be gathered, recorded, and stored in accordance with the following policies:



- GDPR / Data Protection Policy
- Confidentiality Policy

## **COMPLAINTS**

If staff or learners have a complaint about this safeguarding policy, they should refer to the organisation's complaints policy. If a member of staff or learner feels the organisation or other external agencies are not handling a safeguarding concern appropriately, they should contact the Local Authority Safeguarding Board.

## **MONITORING AND REVIEW OF THE POLICY**

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.

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and people from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between themselves and all other users of OASIS. Staff behaviour should demonstrate integrity, maturity, and good judgement.

**Signed**                      **Date 01/11/2023**

**Mohamed Yusuf**

**Executive Director**

## **APPENDIX A**

### **SAFEGUARDING PROCEDURES**

Procedure for Staff dealing with learners / apprentices:

- Under 18 years old in OASIS who are not enrolled as Learners – e.g., work placements from school or visitors to open days etc.
- Adults at risk of harm

If in doubt, contact the Safeguarding team for advice.



### **Learners 16-17 years old**

Where a Learner aged under 18 years old divulges information or staff become concerned that the young person is at risk of abuse, the following action will be taken:

- Staff will advise the learner that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse.
- A written record of the concern will be made where possible.
- Referral to a member of the Safeguarding Team will be made immediately and in a conversation with the Safeguarding Officer.
- Learner's wishes regarding action to be taken will be noted where possible. However, the learner will be made aware that this will not affect the final decision to make a referral.
- There is no need to involve other members of staff (including line managers) as this reduces confidentiality.
- Make learner aware of services within OASIS which may be able to help them address the situation and offer support.
- Where possible the Safeguarding Officer will consult the learner regarding the report and their wishes and inform them of action which has or will be taken. However, depending upon the circumstance, this may not always be possible.
- Where action is decided upon which necessitates contacting Children's Services or Company procedures for referral will be followed within 24 hours of Safeguarding Team receiving the referral.
- Confidential records will be kept of all discussions relating to protection from abuse matters and will be stored electronically in a confidential manner.
- The Safeguarding Lead will be informed immediately of any referrals received/made.

### **Children who are absent from education**

All staff members must be vigilant and aware of the potential safeguarding concerns associated with children being absent from their placement(apprenticeships)s. Repeated or prolonged absences can serve as a crucial indicator of various safeguarding risks. These risks may include abuse and neglect, such as sexual abuse or exploitation, as well as involvement in criminal activities like county lines operations. Additionally, absenteeism from placements can indicate underlying mental health issues, substance abuse risks, or susceptibility to harmful practices such as female genital mutilation, "honour"-based abuse, or forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of OASISs absence procedures and children missing education procedures.

### **Use of OASIS premises for non-teaching activities:**

This KCSiE 2023 guidance pertains to situations where OASIS may opt for supervision to ensure that the activities being supervised does not fall under regulated activity, which it otherwise would if not supervised. In such instances, the law highlights three key points:

Supervision by an individual engaged in regulated activity is required.

Supervision must be regular and consistent, occurring on a day-to-day basis. The level of supervision must be deemed reasonable under the circumstances to ensure the protection of children.



Within the statutory duty, the level of supervision may vary depending on various factors in each case. OASIS should consider the following factors when determining the specific level of supervision required for an individual case:

The ages of the children, (apprentices under 18 years of age)

The number of children the individual is responsible for.

The presence or absence of other workers assisting.

The nature of the individual's work and the level of interaction with children.

The vulnerability of the children; more vulnerable children may require more supervision, potentially leading OASIS to opt for workers engaged in regulated activity.

The ratio of workers to be supervised by each supervising worker.

[https://assets.publishing.service.gov.uk/media/5a74930d40f0b616bcb17959/supervision\\_of\\_activity\\_with\\_children\\_when\\_regulated\\_activity\\_when\\_unsupervised.pdf](https://assets.publishing.service.gov.uk/media/5a74930d40f0b616bcb17959/supervision_of_activity_with_children_when_regulated_activity_when_unsupervised.pdf)

Statutory guidance: Regulated Activity (children) -

## **APPRENTICES**

Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding. Placement Officers/Assessors will carry out Health & Safety and Safeguarding/ Prevent risk assessment, which will include safeguarding discussion as part of workplace reviews. Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details.

## **NEXT STEPS**

Taking into account all the information available, the Designated Safeguarding Lead and Team will decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Social Services.
- Make a referral to Social Services (any member of staff can make a referral to social services, and this must be reported to the Safeguarding Lead)
- Report the incident to a designated Social Worker.
- Report the matter to the police if a crime is suspected.
- If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

The Designated Safeguarding Lead will keep the member(s) of staff who raised the concerns informed of the progress/ outcome of the case where possible.

## **APPENDIX B**

### **SAFEGUARDING POLICY COVID-19 ADDENDUM**

#### **DfE coronavirus helpline**



The Department for Education COVID-19 helpline is available to answer questions. Staff, parents and young people can contact this helpline as follows:

Email: [DfE.coronavirushelpline@education.gov.uk](mailto:DfE.coronavirushelpline@education.gov.uk) Telephone: 0800 046 8687

*(Lines are open Monday to Friday from 8am to 6pm and weekends 10am to 4pm.)*

## **OUR COMMITMENT DURING COVID-19**

### **OASIS commitment to safeguarding includes:**

- ensuring all staff, visitors and volunteers in understand their responsibility to safeguard learners, particularly in this crisis where revised procedures may be in operation.
- having in place relevant safeguarding arrangements which are designed to take account of all possible safeguarding issues and any unusual or unforeseen concerns which could be raised during the COVID 19 situation and learners returning to the centre.
- reflecting that staff may identify new safeguarding concerns about individual learners as they see them in person following partial company or employer closures.
- ensuring all safeguarding concerns are investigated and acted upon, and an immediate risk assessment is undertaken to keep learners safe, with a Near Miss Register complete as appropriate.
- continuing to adhere to safe recruitment practices.
- having appropriate arrangements in place to ensure we continue to work closely with other agencies and share information with other professionals in line with statutory requirements, whilst adhering to government guidance on social distancing and safe working
- having a culture in our academy of listening to learners and taking account of their wishes and feelings by keeping regular, appropriate contact with learners through our systems of communication
- providing appropriate support for staff
- maintaining clear policies for dealing with allegations against people who work with young people and vulnerable adults.
- maintaining clear whistleblowing procedures
- fulfilling all statutory responsibilities in respect of safeguarding and promoting the welfare of all learners
- ensuring that there is a qualified first aider on site and the appropriate ratio levels are fulfilled with regards to first aid.

## **REPORTING A CONCERN**

Where staff have a concern about a young person or vulnerable adult, they should continue to follow the process outlined in the company Safeguarding Policy, this includes making a report, which can be done remotely.

In the unlikely event that a member of staff cannot access the staff portal from home, they should email the Designated Safeguarding Lead, or Reserve Safeguarding Officer. This will ensure that the concern is received.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with young people and vulnerable adults in the company, they



should contact the Designated Safeguarding Lead.

## ONLINE SAFETY

OASIS will continue to provide a safe environment, including online. This includes the use of an online filtering and monitoring systems.

Recently published guidance from the Department for Education, as well as organisations such as UK Safer Internet Centre on safe remote learning, can help plan online lessons and/or activities safely. Staff will take into account these steps when considering virtual learning. The starting point for online teaching will be that the same principles as set out in the company's staff code of conduct. This policy includes acceptable use of technologies, staff / learner relationships and communication including the use of social media. The policy will apply equally to any existing or new online and distance learning arrangements which are introduced. Where it might be appropriate for OASIS to consider developing the use of further online learning tools and systems, this will be in line with privacy and data protection/GDPR requirements and clear guidelines will be issued to staff and learners.

It is important that all staff who interact with young people and vulnerable adults, including online, continue to look out for signs that they may be at risk, and this will also include monitoring attendance. Any such concerns will be dealt with as per the Safeguarding Policy and where appropriate referrals should still be made, including as required, the police.

The following will be considered when delivering remote virtual lessons, especially where webcams are involved:

- Staff must only use approved platforms specified by SMT to communicate with learners.
- Staff and learners must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms
- Language must be professional and appropriate, including any family members in the background.
- Staff and learners must only use company issued accounts such as email, ZOOM, Teams and Skype for Business.
- Online sessions should be by appointment only, arranged via Outlook Calendar.
- Any recording, visual or audio, must only be stored on the company network.
- Educational, pastoral, or disciplinary concerns should continue to be recorded and/or passed to the Managing Director.

## SUPPORTING YOUNG PEOPLE AND VULNERABLE ADULTS NOT IN CENTRE

OASIS is committed to ensuring the safety and wellbeing of all its learners. The company will share safeguarding messages on its website and social media pages and via email to learners, including support with mental health. We will advise learners of external resources available to support safeguarding of young people, including:

- [SafeCall](#) which offers support to victims of exploitation - young people can contact SafeCall directly or can be referred to SafeCall by professionals.
- the [See, Hear, Respond service](#) provided by Barnardo's to help young people in England who are experiencing harm and increased adversity during lockdown

## MENTAL HEALTH

Other resources include:



- [MindEd](#), which includes e-learning modules about young people's mental health
- the [Every Mind Matters](#) platform which has specific advice for adults and young people on maintaining good mental wellbeing during the coronavirus (COVID-19) outbreak
- the Association of College's (AoC) [coronavirus \(COVID-19\) resource hub](#), which includes advice for learners and staff
- the Education and Training Foundation's [mental health and emotional wellbeing](#) advice for FE staff
- [Education Support](#) provide mental health and wellbeing support services to all education staff
- free apps available on the [NHS App Store](#) for mental health and wellbeing support

Whilst a key component of learner induction, we will make sure learners still understand how to report any concerns they have to the Designated Safeguarding Lead, as well as signpost them to other sources of support.

## STAFFING

All existing company staff have had safeguarding training and have read both statutory guidance as well as Government guidelines. The DSL (and deputy) will do what they reasonably can to keep up to date with safeguarding developments from the local Safeguarding Children Partnership (SCP), safeguarding partners, newsletters and professional advice groups.

The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a young person or vulnerable adult. Where new staff are recruited, they continue to be provided with a safeguarding induction.

## SAFEGUARDING INDUCTION AND TRAINING

OASIS will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

New staff and volunteers will continue to receive a safeguarding induction in line with existing policies and the expectations of Keeping Children Safe in Education.

## CONCERNS ABOUT A STAFF MEMBER OR VOLUNTEER

OASIS will continue to follow the principles set out in Keeping Children Safe in Education and the procedures in our Safeguarding Policy.

Staff should continue to act on any concerns they have immediately, whether those concerns are about staff/volunteers working on site or remotely. Staff act on these concerns by contacting the Director, not the DSL or any other member of staff. If investigations need to be carried out during this time, they will be carried out as far as possible on the advice of the LADO and other appropriate agencies. OASIS will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

Day 1 actions:

|    | Action                                                                                                                                                                                                                                                         | Done | Notes |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------|
| 1. | Notify DSL, Executive Director, External Safeguarding specialist and Commercial Training Director – in their absence Safeguarding Officers and Deputy Executive Director. • They will advise whether to notify police, LADO and whether this reaches threshold |      |       |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |  |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 2. | Does the allegation involve ANY (or any suspected) safeguarding risk to learners or other/ vulnerable adults? • The decision needs to be made on whether suspension is required • The decision needs to be made in conjunction with LADO as to whether this can be an internal investigation or meets threshold for police / LADO led investigation • If suspension, Curriculum Lead and Apprenticeship Manager notified for cover arrangements |  |  |
| 3. | Notify the IT Manager at Somtech • Decision if IT account to be locked; equipment impounded if required. • Be prepared for Police requests.                                                                                                                                                                                                                                                                                                     |  |  |
| 4. | Notify Executive Director, Board of Trustees, Commercial Training Director. To draft a statement in case of need b. To monitor media / social media                                                                                                                                                                                                                                                                                             |  |  |
| 5. | If allegation concerns a young person (under 18) or vulnerable learner/adult: • Parents to be made aware by DSL.                                                                                                                                                                                                                                                                                                                                |  |  |
| 6. | Investigation to commence and a proposed timeline to be agreed and shared with the staff member/volunteer and union rep / employee rep.                                                                                                                                                                                                                                                                                                         |  |  |

## RISK ASSESSMENT

### Risk management

**To achieve positive outcomes OASIS aim to use properly designed, effective processes that identify and assess risk; and to evaluate the best and most appropriate measures to reduce the chance of an adverse event occurring.**

**Specifically, we aim for:**

- Managers, practitioners and other staff to be well supported through the provision of guidance, training and practical skills and tools for identifying, assessing and managing risk
- Risk assessment and management to be undertaken and regularly reviewed by staff competent and of a level consistent with the nature and scale of risk
- The organisation to learn through the timely and effective review of incidents and other relevant information, through clear reporting procedures for example
- Clear documentation of information and decisions
- Actions to be implemented through procedures outlined in appropriate policies and guidance.

### Risk Register Guidance

This guidance is intended to supplement and work alongside the new DfE guidance <https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-further-education-provision>). This guidance is not intended to add to workloads, but to simplify them, with the table below enabling the senior management at OASIS to have in place an overview of the COVID-19 specific safeguarding risks and measures in place to mitigate them. The Safeguarding Risk Register also provides a straightforward means of reporting to the Board of Trustees who will wish to understand how COVID -19 safeguarding risks are being managed.



### Step 1: Identify the additional/heightened risks.

These will vary from one organisation to the next, but there will be a great deal of overlap:

risk of access by adults to young people and vulnerable adults (e.g., volunteers) bypassing normal safer recruitment policies and procedures

risk of lack of access to statutory child protection services

risk of child sexual abuse through the virtual learning environment

risk of online peer on peer abuse through the absence of normal face to face contact and heightened use of social media

risks related to youth produced sexual imagery

risk of neglect of young people and vulnerable adults where parents are too ill, anxious, or too burdened with work to be able to care for them

risk of young people and vulnerable adults not having access to usual pastoral and welfare support within the organisation

risk of increased barriers to young people and vulnerable adults reporting concerns to responsible adults

risk of staff members not having access to Designated Safeguarding Leads, or not reporting concerns

risk of distress or anxiety related to health or welfare of family members or friends

risk of anxiety, stress or to mental health posed by isolation, excessive screen time, worries around academic work, exam or qualifications, or simply by exposure to worsening news reports

risk posed by the inability of NHS, private or charitable professionals to provide medical or psychological support for existing or developing health conditions



risk of abuse or stigmatisation on the basis of infection, race or nationality

risk of wider culture slippage posed by the move to the virtual environment.

### **Step 2: Assess the likelihood and the impact of the risks.**

A simple scoring system is recommended, for the likelihood of 1 very unlikely, 2 unlikely, 3 possible, 4 likely and 5 very likely, multiplied by the impact of 1 negligible, 2 minor, 3 moderate, 4 significant and 5 severe.

### **Step 3: Identify measures to mitigate the risks.**

There should always be measures capable of being taken to reduce risk, even if the risk reduction is not total. For each risk, a mitigation measure should be sought which will reduce the risk score. Take, for example, the risk of child sexual abuse through the virtual learning environment. There are multiple mitigation measures which companies can consider taking (separate guidance to follow) which will have the effect of reducing the risk. Obviously, the impact of this risk is **5**, severe. But if the measures introduced can reduce the likelihood to **2** or **3**, that will reduce the risk score. Another example is the risk of abuse or neglect created by increased barriers to reporting concerns; it ought to be possible to reduce the likelihood of that risk from a **4** or **5** to a **2** or **3** through the introduction of online reporting mechanisms for staff members and young people and vulnerable adults.

### **Step 4: Allocate actions and review.**

It follows that each mitigation measure agreed in Step 3 requires an action to implement it. Of equal importance, there is a need to review, regularly, the COVID-19 Safeguarding Risk Register, to check the implementation of agreed measures, to review previous assessments of risk (some will increase; others will decrease) and to identify new and emerging risks.

A template for the risk register is given below at APPENDIX F.

## **APPENDIX C**

### **SAFEGUARDING – KEEPING APPRENTICES SAFE**

#### **Policy Statement**

**OASIS take our responsibility to ensure the safety of our apprentices very seriously. This means that as well as ensuring a positive and enjoyable learning experience, we also ensure that our apprentices' safety and personal well-being are cared for.**

OASIS is committed to:

- Ensuring all staff are trained in safeguarding and are able to access additional information, advice and training when appropriate.



- Providing a safe environment for all apprentices, ensuring appropriate procedures are in place and a safeguarding team is accessible.
- Delivering awareness sessions to apprentices regarding safeguarding and the dangers of radicalisation
- Guaranteeing that employers prioritise the safety of all apprentices.
- Ensuring that apprentices and employers know how to raise any safeguarding concerns.
- Identifying any apprentice who may be suffering or likely to suffer significant harm.
- Taking the appropriate action to ensure our apprentices are safe within the workplace.
- Working with the appropriate agencies to ensure the correct support is provided, if required

OASIS has a 'Designated Safeguarding Lead' who has overall responsibility for the safeguarding of our apprentices. The 'Lead' decides on the appropriate action required when either an apprentice seeks help, or a member of staff or employer raises a concern regarding an apprentice.

OASIS work closely with an external Safeguarding Consultant and also in conjunction with other agencies to ensure adequate arrangements are in place to identify, assess and support any apprentice who is suffering from, or at risk of, any potential harm.

#### **OASIS' Role**

- Ensure apprentices feel safe from the outset by providing a comprehensive induction at the OASIS training centre that makes them aware of all company policies and procedures, who the designated persons are, how to protect themselves and how to report a concern.
- Discuss topics in relation to equality and diversity and safeguarding during each apprenticeship visit and review.
- Ensure learning surrounding these activities is discussed and documented at each visit, along with pastoral checks.
- Provide employers with a guide to welfare to help them understand their own responsibilities under Safeguarding, health and safety and Prevent Agenda
- Carry out a Health and safety vetting and monitoring check during the apprentice's workplace induction; confirms employers' ability to keep the apprentice safe during their employment and help educate them in looking after their own welfare and that of others while at work.
- Apply and monitor safe recruitment practices, with comprehensive pre-appointment checks completed prior to selection.
- Ensure staff working with young and vulnerable people are subject to an enhanced Disclosure and Barring service check.
- Provide safeguarding training for all employees working with apprentices.
- Ensure all staff undertake regular CPD events and standardisation meetings in order to keep updated with legislation and refresh their knowledge.
- Maintain open channels of communication with each employer. Apprentices may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people.

#### **The Employer's Role**

- Take appropriate steps to safeguard apprentices in the workplace.
- Ensure apprentices understand and undertake safeguarding training in their place of work.
- Ensure that any staff working with apprentices and who are in a position of trust are appropriate for the role and do not present any danger or threat.
- Ensure that any employees working with young or vulnerable people have had an appropriate check completed



by the Disclosure and Barring service.

- Ensure the identity of the Safeguarding Lead is known to the apprentice.

## PREVENT

As part of the Counterterrorism and Security Act 2015, FE providers are required to pay 'due regard to the need to prevent individuals from being drawn into terrorism'.

There is no single way of identifying a person who may be vulnerable to extremist ideology, and it is often the culmination of a number of influences. These can include family, friends or relationships they have made online. Extremism can also include non-violent action. All apprentices studying on a programme with OASIS, will access training sessions in which these issues will be covered.

### OASIS' Role

- Provide relevant training for members of staff so that they understand the obligations OASIS has under Prevent Duty and how to manage risks and concerns.
- Have clear procedures in place so that any concerns can immediately be brought to specialist attention.
- Ensure apprentices receive a comprehensive induction, with copies of policies, key personnel, reporting procedures provided in hard copy and discussed to confirm understanding.
- Provide a forum for apprentices to explore these matters.
- Provide a contact for any further information regarding the Prevent Duty.
- Ensure apprentices are able to express views in non- extremist ways and create an environment that encourages respectful free speech.
- Reinforce understanding during reviews, classroom teaching, 1-to-1 mentoring; explore any issues, provide updates on policy, practice and staff.

### The Employer's Role

- Demonstrate a commitment to the principles that underpin the Prevent Duty.
- Seek specialist support if any concerns are raised.

## BRITISH VALUES

An important part of Prevent, is also the promotion of British values. These are the norms that shape our society, and which are enshrined in law, through legislation such as the Equality Act 2010.

British values are described as:

- Democracy
- The rule of law
- Individual liberty and mutual respect
- Tolerance for those with different faiths and beliefs

Apprentices are encouraged to explore ideas in a context where these values are recognised and respected.

### OASIS' Role

- To promote British values throughout an apprentice's programme.
- Provide a dedicated programme of study which defines and explores British values and how they influence our



society.

- Create opportunities for apprentices to apply their learning to relevant situations and contexts.
- Encourage apprentices to respect each other and their differences, including with regard to protected characteristics outlined in the Equality Act 2010.

### The Employer's Role

- Demonstrate a commitment to British values.
- Adhere to the requirements of the Equality Act 2010.

### STAYING SAFE ONLINE

The increasing use of the internet and digital technology has presented huge opportunities, both to enrich the learning environment for apprentices and also allowing them to expand their personal horizons. However, people are able to access and engage with online content in many ways, so they need to have the skills to be able to use the internet safely and develop appropriate online behaviours.

It is paramount that people are aware of ways in which they can protect themselves online and ensure the security of their personal data.

Dangers can include bullying and abuse, revenge porn, grooming, identity theft, and viruses.

An important part of an apprentice's development at OASIS is becoming a critical thinker. Developing this critical mind set will also help apprentices to examine and appraise the validity and authenticity of information online.

### OASIS' Role

- Conduct a risk assessment to assess how apprentices may be at risk of harm using the internet or technology.
- Provide relevant training for apprentices so that they are able to work safely and effectively online.
- Help apprentices to develop an objective attitude to online information and evaluate its authenticity.
- Make sure company staff are trained to identify and deal with concerns about online safety.
- Provide clear guidance on what is and is not an acceptable use of the internet at OASIS.

Apprentices may feel comfortable talking to some people about an issue and not others. Staff at OASIS will endeavour to be as transparent as possible with employers, while respecting the apprentices trust and adhering to confidentiality policies.

### WARNING SIGNS

- Absence – Missing work or not turning up for training/ meetings.
- Changes in appearance.
- Changes in behaviour and character – becoming quiet or loud, aggressive or withdrawn.
- Changes in emotional health – crying, anxiety or low mood.
- Excessive alcohol consumption.
- Physical injuries – cuts or bruises.
- Poor living conditions
- Self-harm.
- Use of drugs.
- Withdrawing from certain activities; reluctance to go online, sudden changes in use of technology.

*It is important to stress that the existence of some of these characteristics is not a definitive sign that anything is*



*wrong.*

#### **OASIS' Role**

- Assess how apprentices may be at risk of harm using the internet or technology.
- Provide relevant training for apprentices so that they are able to work safely and effectively online.
- Help apprentices to develop an objective attitude to online information and evaluate its authenticity.
- Make sure company staff are trained to identify and deal with concerns about online safety.
- Provide clear guidance on what is and is not an acceptable use of the internet at OASIS.

OASIS has also closely monitored safeguarding during COVID, sending questionnaires, maintaining telephone contact with apprentices, which is being reviewed on an ongoing basis.

#### **COMPLAINTS**

If staff or learners have a complaint about this safeguarding policy, they should refer to the organisation's complaints policy. If a member of staff or learner feels the organisation or other external agencies are not handling a safeguarding concern appropriately, they should contact the Local Authority Safeguarding Board.

#### **REVIEW**

This policy is reviewed on an annual basis, or earlier where required, for example in response to legislative changes.

#### **APPENDIX D – for Head Office Use**

**For learners outside of this area, use the LA Form e.g., Slough, Islington, Camden, Tower Hamlets, Lambeth, Croydon, Waltham Forest, Lewisham, Brent, Newham & Ealing**

## Southwark LADO Referral Form

See [Managing referrals under London Safeguarding Children Board Procedures](#) for further information

Date of referral

### THE ADULT BEING REFERRED

#### Has the person:

- |                                                                                                                                                                    |         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| 1. behaved in a way that has harmed a child or may have harmed a child?                                                                                            | Yes/ No |
| 2. possibly committed an offence against or related to a child?                                                                                                    | Yes/ No |
| 3. behaved towards a child or children in a way that indicates that he or she would pose a risk of harm to children if they worked regularly or closely with them? | Yes/ No |

Name of Adult being referred

DOB

Home Address of Adult referred

Telephone Number

Employer's Name and Address

Role

What contact does the person have with children in that role?

Is the person working or volunteering with children in any other capacity?

Is the person aware that a referral has been made to LADO?

[Please signpost to Southwark Council privacy notice](#)

Have there been previous concerns or allegations against the adult?

Is the adult living with children?

### THE REFERRER

Are you the person with lead responsibility for safeguarding in your agency/organisation?

Yes/No

If no, what is the name of your safeguarding lead?

Name and Role

Organisation Name and Address

Telephone Number

Your Email Address

### CHILD/REN DETAILS

|         |  |                                        |
|---------|--|----------------------------------------|
|         |  | Does this child have SEN / Disability? |
| Name    |  |                                        |
| DOB     |  |                                        |
| Address |  |                                        |

### THE REFERRAL

|                                                                                          |                                                                                              |
|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| What is the nature of the harm caused, or posed by, the individual? Delete as applicable | Physical/Emotional/Sexual/Neglect/<br>Inappropriate behaviour in respect of a child/children |
|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|

**Please provide details of incident/s that have given rise to concerns.** Please include times, dates and location; the names of any potential witnesses; nature of any discussions that have taken place; and any decisions that have been made

Please return the completed form securely (**password-protected with password: Qau-lado**)

to [qau.safeguarding@southwark.gov.uk](mailto:qau.safeguarding@southwark.gov.uk)



## APPENDIX E REFERENCES AND RESOURCES

### Local contacts

In Southwark, the LADO role is based within the Quality Assurance Unit.

- Eva Simcock
- QAU duty number - 020 7525 3297
- QAU service manager (LADO) - 020 7525 0689

Detailed procedures and guidance relating to the management of allegations against people who work with children are contained within:

### 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/>

- [London Child Protection Procedures](#)
- [Southwark Children's Handbook](#)
- [Working Together to Safeguard Children 2015](#)
- [Keeping Children Safe in Education](#)

### TOOLKITS

- [Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need](#)

to support young people with special educational needs and disabilities.

- [Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- [Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- [Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation](#), the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

## **ADDITIONAL ADVICE AND SUPPORT**

### **ABUSE**

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website
- [Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper
- [Together we can stop child sexual abuse](#) – HM Government campaign

### **BULLYING**

- [Preventing bullying including cyberbullying](#) - DfE advice

### **CHILDREN MISSING FROM EDUCATION, HOME OR CARE**

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

### **CHILDREN WITH FAMILY MEMBERS IN PRISON**

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

### **CHILD EXPLOITATION**

- [Trafficking: safeguarding children](#) - DfE and HO guidance



- [Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [Modern slavery: how to identify and support victims](#) – HO statutory guidance

## DRUGS

- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association website

## (SO CALLED) “HONOUR BASED ABUSE” INCLUDING FGM AND FORCED MARRIAGE

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

## HEALTH AND WELL-BEING

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

## HOMELESSNESS

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

## PRIVATE FOSTERING

- [Private fostering: local authorities](#) - DfE statutory guidance

## RADICALISATION

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

## VIOLENCE

- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges](#)- DfE advice

## OTHER SOURCES OF HELP AND INFORMATION

- <https://papyrus-uk.org/> organisation which seeks to prevent young suicides
- <https://www.bigwhitewall.co.uk/> support for people with anxiety and depression
- <https://www.kooth.com/> safe, anonymous online support for young people
- <https://youngminds.org.uk/> provides information for parents and carers, as well as young people.
- <https://mindedforfamilies.org.uk/> learning resources for parents and carers about young people's mental health.

| • Types of Abuse                   | Types of Behaviours                                                                                                                                                                                                                                                                                                           |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Physical Abuse</b>              | This includes hitting, slapping, pushing, kicking, restraint and misuse of medication. It can also include inappropriate sanctions.                                                                                                                                                                                           |
| <b>Sexual Abuse</b>                | This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting. |
| <b>Financial or Material Abuse</b> | This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with Wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions or                                  |

|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | benefits.                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Modern Slavery</b>               | This encompasses slavery, human trafficking, forced labour and domestic servitude.                                                                                                                                                                                                                                                                                                                               |
| <b>Domestic Violence and Abuse</b>  | This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called 'honour' based violence.                                                                                                                                                                                                                                |
| <b>Neglect and Acts of Omission</b> | This includes ignoring medical or physical care needs and failing to provide access to appropriate health, social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition and heating.                                                                                                                                               |
| <b>Discriminatory Abuse</b>         | Discrimination is abuse that, centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.                                                                                                                                                                                                               |
| <b>Organisational Abuse</b>         | This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Organisational abuse can range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. |

| <b>Types of Abuse</b> | <b>Types of Behaviours</b> |
|-----------------------|----------------------------|
|-----------------------|----------------------------|

|                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Self-Neglect</b>                      | This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Emotional and Psychological Abuse</b> | This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Cyber Bullying</b>                    | Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it. |
| <b>Forced Marriage</b>                   | This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry.                                                                                                                                                                                          |
| <b>Mate Crime</b>                        | A 'mate crime' is when 'vulnerable people are befriended by members of the community who go on to exploit and take advantage of them' (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years, there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.                                     |

### Radicalisation

The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

## APPENDIX F

### Safeguarding & Prevent Risk Register

| Risk             | L <sub>1</sub> | I <sub>2</sub> | S <sub>3</sub> | Mitigation measures | L | I | S | Action | Person responsible for action |
|------------------|----------------|----------------|----------------|---------------------|---|---|---|--------|-------------------------------|
|                  |                |                |                |                     |   |   |   |        |                               |
|                  |                |                |                |                     |   |   |   |        |                               |
|                  |                |                |                |                     |   |   |   |        |                               |
|                  |                |                |                |                     |   |   |   |        |                               |
|                  |                |                |                |                     |   |   |   |        |                               |
| Author and lead: |                |                |                |                     |   |   |   |        |                               |
| Review date:     |                |                |                |                     |   |   |   |        |                               |

<sup>1</sup> L = likelihood

<sup>2</sup> I = Impact

3 S = Score

## Pre-Employment Check - Online searches

| Search information:                                                                                                                              |                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Full name of candidate as detailed on the application form:                                                                                      |                                                                                                                                                                                                                                                                              |
| Also known as:                                                                                                                                   |                                                                                                                                                                                                                                                                              |
| Date of birth:                                                                                                                                   |                                                                                                                                                                                                                                                                              |
| Email address:                                                                                                                                   |                                                                                                                                                                                                                                                                              |
| Lives in (area):                                                                                                                                 |                                                                                                                                                                                                                                                                              |
| Works in (area):                                                                                                                                 |                                                                                                                                                                                                                                                                              |
| Current place of work:                                                                                                                           |                                                                                                                                                                                                                                                                              |
| Profession/current role:                                                                                                                         |                                                                                                                                                                                                                                                                              |
| Name of platforms visited, date, time:                                                                                                           |                                                                                                                                                                                                                                                                              |
| Search parameter requests from the panel: <i>(where applicable include reference to overseas if this is identified through application form)</i> | <p>Please record any examples of:</p> <ul style="list-style-type: none"> <li>• extremism and hate speech</li> <li>• violent images</li> <li>• nudity</li> <li>• toxic language, swearing and profanity</li> <li>• concerns related to safeguarding and/or conduct</li> </ul> |

## APPENDIX G – KCSiE September 2023 Update

**Part One – What staff needs to know, including understanding the expectations, roles and responsibilities around filtering and monitoring systems**

**Part Two – The management of Safeguarding**

- Designated Safeguarding Lead
- Staff training
- Online Safety Policy including filtering and monitoring
- Information, security and access management
- Children who are absent from Education

**Part Three – Safer recruitment**

- Retention of documents
- The use of online searches

**Part Five - Child-on-child sexual violence and sexual harassment**

[Keeping children safe in education 2023](#)

| Reference No     | Version   | Date              | Author               | Classification      | Review Date       |
|------------------|-----------|-------------------|----------------------|---------------------|-------------------|
| <b>P5</b>        | <b>06</b> | <b>30/10/2023</b> | <b>Janet Edwards</b> | <b>unclassified</b> | <b>01/11/2023</b> |
| <b>P15 – P16</b> | <b>06</b> | <b>30/10/2023</b> | Janet Edwards        | <b>unclassified</b> | <b>01/11/2023</b> |
| <b>P20-27</b>    | <b>06</b> | <b>30/10/2023</b> | Janet Edwards        | <b>unclassified</b> | <b>01/11/2023</b> |
| <b>P33-P34</b>   | <b>06</b> | <b>30/10/2023</b> | Janet Edwards        | <b>unclassified</b> | <b>01/11/2023</b> |
| <b>P55</b>       | <b>06</b> | <b>30/10/2023</b> | Janet Edwards        | <b>unclassified</b> | <b>01/11/2023</b> |