



Fire Service College

Safeguarding, Prevent and Wellbeing Procedure





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Section One: Introduction

The Fire Service College (FSC) hosts a wide range of visitors on its site including apprentices, professional course delegates, international delegates, UK Defence Sector, local school groups, community groups and general members of the public.

The FSC is clear in its duty of care to protect all users of its services and facilities. It recognises that children and vulnerable adults are at increased risk of harm and that their protection is of paramount importance.

This procedure sets out the steps that FSC staff and its users should take to raise a concern that may relate to Safeguarding, Prevent or the wellbeing of a site user. It is everyone's responsibility to protect children and vulnerable adults from harm and to respond to Safeguarding and Prevent concerns. Where users of the FSC site and facilities fall outside of Safeguarding duties, we work to ensure a safe and supportive environment that protects their welfare and wellbeing.

The FSC recognises that UK Defence Agencies, Schools, Charity and Community Groups, and other Education Providers have their own safeguarding procedures. In all situations it is paramount that reporting takes place to the FSC DSL, to enable the appropriate steps to be taken.

This procedure should be read together with the Safeguarding, Prevent and Wellbeing Policy.

Procedure Definitions

Child – a child is anyone under the age of 18 years old.

DSL – Designated Safeguarding Lead.

DSO – Designated Safeguarding Officer.

Prevent - The Government first set out the 'Prevent' Strategy in 2011. Under the Prevent Duty, there is a greater awareness needed to safeguard all individuals from extremism, ideologies, and radicalisation and from July 2015 also includes the active promotion of 'Fundamental British Values'.

Safeguarding is the action that is taken to promote the welfare of children and vulnerable adults protecting them from harm.

Safeguarding means:

protecting children and vulnerable adults from abuse and maltreatment.

preventing harm to children's health or development.

ensuring children and vulnerable adults have the provision of safe and effective care.

taking action to enable all children, young people, and vulnerable adults to have the best outcomes.

Vulnerable adult – anyone aged 18 years and over who is or may be, for any reason, unable to take of him or herself. (see page 9 for further definition)

Welfare and Wellbeing – the FSC provides services to a wide range of people who sit outside of Safeguarding. This policy sets out how the FSC looks to ensure these individuals can access appropriate support to keep them safe and protected from harm.



Section Two: Delegate Reporting Process

In the first instance all delegates should escalate their concerns to their Course Lead. If the Course Lead is unavailable, then the delegate may contact either the DSO or the DSL. Please see the useful contacts in Annex 3 of this procedure.

Should this concern be raised out of hours then the delegate may contact their local police authority or refer to the contacts in Annex 3 of this procedure.

If in the extreme case a serious Prevent incident occurs, you can also contact the anti-terrorism hotline number: 0800 789321.

Confidentiality Statement and Information Sharing

The FSC will operate on the premise that all information imparted to a member of staff will be treated in confidence. Delegates may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not make promises on confidentiality which they may be unable to keep.

Furthermore, staff should always make a delegate fully aware of any situation where a duty of care deems that confidentiality cannot and must not be maintained. This would be the case in child and vulnerable adult protection situations. Delegates may disclose information that is difficult for the member of staff to deal with without further advice/support. In such cases, the delegate should be told that the situation will be discussed with a specialist Staff. Any decision to break confidentiality should always be preceded by informing the delegate of what is about to happen and the reason for the decision.

FSC is committed to sharing information for the purposes of Safeguarding and promoting the welfare of children and young people in line with Working Together to Safeguard Children (2018) and considerations of The General Data Protection Act 2018.

Section Three: Staff Reporting

Concerns about Delegates or Site Users

If a staff member has any concern regarding a delegate or site user's safety and welfare, they must take the following action:

- The staff member must inform their DSO, DSL, and line manager of the situation as soon as possible. If no-one in the line-management chain is available, they should go directly to the Director of Learning Delivery and Transformation and/or Director of Operations.
- If the DSO and/or line manager agrees that there is a concern regarding a delegate or site user's safety and welfare, they should escalate their concerns by completing an escalation form and send to the DSO or/and the DSL without delay. In most situations, it will be appropriate to inform the delegate or site user that a referral is going to be made, to explain the reasons for this and to offer to support the delegate or site user through the resulting escalation. If the staff member remains concerned, they are entitled to make a referral to the relevant authorities regardless of whether the DSO, DSL and/or the line manager shares this concern. The DSO/DSL will respond within 24 hours of receiving the escalation form.
- FSC staff should not investigate the matter.
- FSC staff must only gather sufficient information to establish and record that there is concern about risk of harm to the delegate. They are expected to treat any information they receive about a delegate in a discreet and sensitive manner.



All staff should:

- Listen carefully to what the individual is saying.
- Explain that because this is a serious matter, it cannot remain confidential between the staff member and the individual. The staff member should inform the individual that she/he will need to inform their line manager and to talk to a DSO. They must do this before they can decide on what action may be necessary to ensure that the individual is safe and ensure the safety of any other individual who may be in contact with the alleged abuser.
- Keep the individual informed as to any action that is proposed.
- If an allegation of abuse is reported in confidence in most cases consent is needed to pass this information onto external services. Staff should attempt to gain the consent of the individual to make a referral to another agency. In limited circumstances, such as threat to life, the gaining of the consent is not essential. Consideration needs to be given to:
 - the scale of the abuse.
 - the risk of harm to others, including whether minors are at risk such as siblings and offspring.
 - the capacity of the individual to understand the issues of abuse and consent.
- in emergency situations (e.g. where there is the immediate danger to the victim or others around them), immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted immediately.
- where a crime is taking place, has just occurred, or is suspected, the police must be contacted immediately
- If, at any point, there is a risk of immediate serious harm a referral should be made to the police or social services immediately. Anybody can make a referral. If the individual's situation does not appear to be improving the Staff with concerns should press for re-consideration.

Monitoring and Review

The Director of Learning Delivery and Transformation is responsible for implementing and monitoring the Safeguarding and Prevent Policy and Procedure. The number of safeguarding cases will be reviewed annually by the DSL. Reports from monitoring activities will be reviewed by the Director of Learning Delivery and Transformation and presented to FSC Senior Management Team on a bi-weekly basis.

This procedure, together with the associate policy, is made available to all staff delegates and site users. It is reviewed annually by the DSL and the Director of Learning Delivery and Transformation.

Section Four: Handling a disclosure of abuse made by a delegate or site user with whom FSC is working

Staff may observe signs that leads them to suspect that a delegate or site user may have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition, in the case of a vulnerable adult, they may be experiencing financial, discriminatory, or institutional abuse.

Lists of possible signs of abuse are included in Annex 2 for further information.

In addition to these, a person may be being abused by virtue of their race, gender, age, disability, or sexual orientation which would indicate discriminatory abuse. Similarly, any of



the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.

If a delegate or site user, with whom the FSC is working, discloses abuse, or risk of abuse, to a member of staff or volunteer, he or she must take the following action. In the first instance it should be established whether the delegate or site user is legally a child (someone under 18 years old) or vulnerable adult.

It is not the staff member's responsibility to investigate what has happened or to establish whether or not abuse has taken place, however, the following approach should be adopted:

If the person is legally a child, the staff member should:

- Listen carefully to what the young person is saying
- Explain that because this is a serious matter, it cannot remain confidential between the staff member and the individual. The staff member should inform the young person that she/he will need to inform their line manager and to talk to a DSO. They must do this before they can decide on what action may be necessary to ensure that the individual is safe in the future and ensure the safety of any other person who may be in contact with the alleged abuser
- Undertake to keep the individual informed as to any action that is proposed and to support the individual through this.

The worker must inform their line manager and consult with a FSC DSO as soon as possible. If a DSO is unavailable, then the DSL should be contacted as soon as possible. In the event the DSL is not available, a member of the FSC Senior Management Team should be contacted. If in the extreme case a serious Prevent incident occurs, all staff are aware of the anti-terrorism hotline number: 0800 789321. The DSL or in their absence, a member of the FSC Management team will decide whether or not to make a referral to local Children's Services or the Police. All serious allegations of abuse should be referred to Children's Services, however if in any doubt, a consultation should take place with the relevant Children's Services duty team. This is not only to protect the young person themselves but also any other children or young people that the alleged abuser may be in contact with.

If the situation arises out of office hours, the FSC staff member should contact the DSL and appropriate steps of escalation must be taken.

If the concern arises out of office hours and it is not possible to contact any appropriate FSC manager or safeguarding support, and where a delegate or site user has disclosed serious abuse, then a referral should be made directly to local Children's Services or the Police. Rather than placing a delegate or site user at risk by unreasonable delay in the making of a referral, and it proves difficult to get hold of the contact details of the relevant Children's Services, then contact with the Police locally (ideally via a non-emergency number) should be made. Contact with the duty officer of the Child Protection Team should be requested.

When making the referral, the FSC manager or safeguarding support staff should note the name of the person in Children's Services who they have contacted, and the time and date when the referral was made. They will also need to clarify what action Children's Services are proposing to take and the timescale for this. They should also establish how the child/young person's immediate safety is to be ensured.

All telephone referrals should be followed up in writing within 2 working days. All incidents, concerns, and referrals in relation to children and young people and the action that results from these should be recorded.



If the person is a vulnerable adult, the staff member should:

- Listen carefully to what the person is saying
- Explain that because this is a serious matter, it cannot remain confidential between the staff member and the individual. The staff member should inform the individual that she/he will need inform their line manager and to talk to a DSO. They must do this before they can decide on what action may be necessary to ensure that the individual is safe in the future; and ensure the safety of any other person who may be in contact with the alleged abuser
- Undertake to keep the individual informed as to any action that is proposed and to support the individual.

The worker must inform their line manager and consult with a FSC DSO as soon as possible. If a DSO is unavailable, then the DSL should be contacted as soon as possible. In the event the DSL is not available a member of the FSC Senior Management Team should be contacted.

At this stage any disclosure that may or does constitute a criminal offence should be referred by the DSO/DSL to the Police. If necessary, the DSO/DSL should inform and liaise with the relevant LADO. If the individual is at immediate risk, then the Staff Member, DSO, DSL or FSC senior manager should contact the Police immediately

Handling Concerns / Information from Third Parties

Third party information is when anyone (other than those directly involved with FSC) passes on information or expresses their concerns.

Information from a third-party regarding suspicions of child abuse cannot be ignored. If the person imparting the information has concerns, they should be encouraged to contact their local Children's Services themselves, in order to discuss their concerns with a qualified social worker. If they do not wish to do so, it should be explained to them that FSC is obligated to. The concerns should be logged as confidential, and any action taken recorded fully.

In the first instance, it should be established whether the young person is legally a child (someone under 18) or a vulnerable adult

If the Person is legally a Child or a Vulnerable Adult, the worker should clarify with the third party and record the following:

- The nature of their concerns.
- How and why their concerns have arisen.
- Whether they wish to remain anonymous.
- What involvement they are having or have had with the individual.

The worker must inform their line manager and a DSO of the situation as soon as possible. If the concern arises out of office hours and it is not possible to contact any manager or safeguarding support, and where the information relates to serious abuse, rather than placing a child/young person at risk by unreasonable delay in the making of a referral, a referral should be made directly to Children's Services, or the duty officer in the local police child protection team. The FSC staff member should ask to speak to the Children's Services Duty Manager within the Local Authority, explaining that they wish to make a child protection referral. If the situation arises out of office hours, the FSC staff member should contact the local out of hours/emergency social worker. If for any reason the emergency



social worker is not available, then the duty officer in the local police child protection team should be contacted.

When making the referral, the FSC DSO/DSL should note the name of the person in Children's Services who they have contacted and the time and date when the referral was made. The line manager will also need to clarify what action Children's Services are proposing to take and the timescale for this, and also how the child/young person's immediate safety is to be ensured.

All Telephone referrals should be followed up in writing within 48 hours (2 working days).

If the DSL has not already been informed of the situation, they should be contacted as soon as possible (in the absence of the DSL, any member of the FSC Senior Management team should be contacted). Where the third-party information relates to a school child or member of a social group using the FSC, the DSL will need to report this to the appropriate Safeguarding Lead within the relevant organisation. There will need to be a discussion as to how the child or young person and all the staff directly involved in the situation can best be supported for the duration of the investigation.

All incidents, concerns, and referrals in relation to young people and vulnerable adults and the action that results from these should be recorded and stored in a confidential location, whether this relates to a FSC Delegate or not.

FSC staff should not investigate the matter. That is for Children's Services and perhaps the Police. FSC staff must only gather sufficient information to establish that there is concern about risk of harm to a child / vulnerable adult.

If the person is neither a child nor a vulnerable adult, this is not a safeguarding issue. However, consider other lines of support / referral e.g. the Police.

Appendix A provides the reporting process to be taken in the event that a third party discloses abuse or risk of abuse to a member of FSC staff.

Handing Allegations of Abuse Made Against FSC Staff

1. Any allegation of abuse against a FSC member of staff must be taken seriously, both for the sake of the child/young person involved and the member of staff themselves. Allegations of abuse by a member of staff include:

- Anyone behaving in a way that has harmed a child or may have harmed a child/young person.
- Committing a criminal offence against or related to a child/young person.
- Behaving towards a child/young person in a way that indicates she or he is unsuitable to work with young people.

2. When an allegation is being reported, the member of staff receiving the allegation should remain calm and inform the individual that:

- It is a serious matter and will need to be discussed with the appropriate manager in order to decide how the matter will be investigated.
- The individual will be kept informed about the progress of the investigation.

3. The member of staff receiving the allegation should immediately contact the manager of the worker against whom the allegation has been made and the SPOC.

The worker who is the subject of the investigation must NOT be informed of the allegation at this point.



4. The manager of the worker against whom the allegation has been made and the DSL should refer the matter immediately to the Director of Learning Delivery and Transformation or in their absence the Operations Director. This 'responsible senior manager' will decide:
- Whether there are sufficient grounds for taking further action.
 - If there are sufficient grounds for taking further action, the decision as to whether the incident is serious enough to be considered as potential child abuse will be informed by a consultation with the relevant LADO.
 - Whether or not to contact Social Services the police and / or Channel.

The LADO will be kept informed of all decisions taken by FSC in relation to the allegation and the person/s subject to the allegation. If following this consultation with the LADO the allegation does not amount to child abuse, the 'responsible senior manager' in consultation with the DSL will consider whether the case should be dealt with under FSC's disciplinary policy.

5. In cases where there is insufficient information to make this decision, the 'responsible senior manager' will need to decide, as a matter of urgency, what information is needed and how this should be obtained, so that a decision can then be taken as to whether or not this situation should be considered as a matter of potential child abuse.

6. If the 'responsible senior manager,' in consultation with the LADO, decides that the situation should be considered as potential child abuse, she or he should refer the matter to the relevant Children's Services department and request that an emergency planning/strategy meeting be convened to plan the process of the investigation including the interviewing of the member of staff who is the subject of the allegations.

7. The 'responsible senior manager' will also need to decide whether for the duration of the investigation the member of staff should continue in their work, be moved to other duties, or be suspended in accordance with the FSC disciplinary policy and procedures.

In making this decision the 'responsible senior manager' will need to take into account:

- The need to avoid further contact between the individual and the named member of staff.
- The feasibility of the named member of staff continuing to work in their post whilst a child abuse investigation is under way.
- The potential risk to other delegates or users of the FSC site.
- The possibility of the member of staff seeking to interfere with the investigation.

8. The suspension or moving of the member of staff does not indicate an assumption of guilt. The purpose is to facilitate an effective investigation. If the worker is subsequently cleared, there can then be no allegation of a 'cover up'. If a staff member requests to be suspended during the investigation, this should be considered.

9. At this point the 'responsible senior manager' will need to inform the named member of staff that an allegation has been made against him/her and that this matter has been referred to Children's Services to be formally investigated, and that Children's Services (and possibly the police) will be interviewing the member of staff in the near future.

10. To avoid prejudicing the investigation, the details of the allegation should not be discussed prior to the Children's Services interview and the member of staff should be instructed not to discuss this with other Staff.



11. There should be no contact between the alleged perpetrator and the person making the allegation and, if appropriate, no contact with any delegate or site user linked to the FSC.

12. A named manager from the FSC, who is not involved in the line management of the member of staff and who will not be involved in the investigation, should be appointed to offer general support over the period of the investigation.

13. This information should always be given to the member of staff in writing, in addition to any verbal communication. In the event of a suspension from work, these discussions, and the written communication, must also comply with the procedure for suspension set out in the disciplinary Policy and Procedures, and HR advice must be sought.

14. The 'responsible senior manager will, in consultation with the member of staff's line manager, decide what should be said to:

- The individual making the allegation.
- The other staff in the FSC and any other individuals linked to the FSC.

15. Any details of the allegation should only be provided on a strict 'need to know' basis.

16. Once the Children's Services investigation has been completed, the 'responsible senior manager' should decide whether any further action is needed in relation to the information arising from the investigation. Depending on the outcome of the investigation, it may or may not be appropriate at this point to institute FSC's disciplinary procedures. This decision should be conveyed to the member of staff within seven days of the completion of the investigation.

17. Any contact from the media concerning any allegation of abuse should immediately be redirected to the Director of Learning Delivery and Transformation.

Section Four: FSC Staff Safety & Responsibilities

Staff Recruitment

(To include the recruitment of permanent and fixed-term staff; sessional, associate workers and volunteers).

All appointments are made following a face-to-face interview that explores attitudes, motivation, temperament, and personal qualities as well as skills and experience relevant to the role. All managers involved in recruitment have undertaken Safer Recruitment training.

All offers of employment/work are conditional to satisfactory references and an Enhanced DBS check.

All appointments are subject to the Capita Group Recruitment and Screening Policy and processes.

If it is necessary for someone to start work at short notice, before checks are completed, a thorough risk assessment is carried out, documented, and kept confidentially. Until their DBS disclosure is received by FSC, the individual is supervised by a DBS-checked member of staff.

Where candidates are recruited from overseas, extra care is taken in pursuing references and carrying out the relevant checks. Where appropriate, advice from the DBS Overseas Information Service is obtained.



All staff are made of the FSC's Safeguarding, Prevent and Wellbeing policy and procedures, and their obligations regarding safeguarding all site users as part of their induction.

Capita will report to DBS when information highlights member of staff or subcontractor poses a risk to children or vulnerable adults.

Mandatory Training

All Safeguarding training is a mandatory requirement for all staff and will form part of their CPD.

All Safeguarding Champions and DSO's will attend quarterly meetings with the DSL. The DSL must work towards and then hold an Advanced Safeguarding Qualification and refresh this every two year.

Training must be carried out in order for staff to:

- understand the referral/reporting process for providing early help and intervention.
- have a working knowledge of what constitutes as a Safeguarding concern.
- ensure each member of staff has access to and understands FSC Safeguarding, Prevent and Wellbeing Policy.
- be alerted to the specific needs of individuals that may be at risk.
- be able to provide information for detailed, accurate, secure written records of concerns and referrals/reporting.
- obtain access to all resources and attend any relevant or refresher training courses.
- encourage a culture of listening to all individuals.

Site Visits (During COVID-19)

FSC's priority is to protect the welfare of all Staff, delegates, site users, our clients and societies in which we operate.

In response to the spread of COVID-19, we ask all FSC staff to respect Capita Group's guidance on COVID-19, including following best practice for personal hygiene standards, our policies on business travel and business continuity. Staff can keep up to date with these policies by clicking [here](#).

All site visits should only be carried out for the purposes of undertaking essential business as defined within Capita's Covid staff guidance document. Any visits which fall outside of the category of essential business activity must be approved by the Divisional SHE Director, with the required risk assessment generated and signed off by the relevant SHE Director, Site Director and in conjunction with the RA assessor(s). If you have any specific questions or concerns, please speak to your line manager, or email the Capita COVID-19 Support team on coronavirus_support@capita.com

Professional Boundaries

FSC expects staff to protect the professional integrity of themselves and the organisation. The [Capita Code of Conduct](#) details that if professional boundaries and/or policies are breached, this may result in disciplinary procedures.

Allegations of Abuse against FSC Staff

Allegations of abuse, or concerns raised against members of staff, will always be treated seriously. The allegation must always be referred to the DSL who will follow the Safeguarding procedure in the same way as an escalated Safeguarding concern.



The DSL will take the appropriate steps to ensure the safety of the individual, and any others who may be at risk. The DSL will escalate to the Director of Learning Delivery and Transformation in order that FSC procedures may be followed, and an appropriate investigation is carried out.

Where there is a complaint against a member of staff, there may also be criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. Actions should be taken both to protect the individual and the accused member of staff. These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place.



Annex 1: Definitions of Safeguarding and Prevent

What is Safeguarding?

Safeguarding children is defined, according to Keeping Children Safe in Education 2020, as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best life chances. Child abuse is a form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. They may be abused in a family or institutional setting by someone they know, who may be an adult, adults, a child, or children.

Safeguarding Adults is defined as An "Adult at Risk" which is any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself.

Please see Annex 2 for more information surrounding the definition of abuse and signs of abuse.

Mental and Physical Health & Wellbeing

The World Health Organisation (WHO) defines health as 'a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity'. Poor mental health, and physical health could be a wider safeguarding concern. More information on support available can be found in Annex 3 of this policy.

What is Prevent?

The Government first set out the 'Prevent' Strategy in 2011. Under the Prevent Duty, there is a greater awareness needed to safeguard all individuals from extremism, ideologies, and radicalisation and from July 2015 also includes the active promotion of 'Fundamental British Values'. In respect of Safeguarding individuals from radicalisation, FSC works to the 'Prevent' element of the Governments' Counter Terrorism Strategy. This includes links with and/or referral to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system as a result of their actions. FSC will take steps to challenge any views deemed to be extreme and report concerns through the Safeguarding reporting process.

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Terrorism is a by-product of radicalisation. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

Child in Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.



Awareness about safeguarding and Prevent

FSC raises awareness with all site users and delegates about safeguarding and Prevent through its site induction. This must be completed before, or on arrival at the College site. This includes guidance on what to do if a Safeguarding, Prevent or Wellbeing issues is identified and providing information about who they should turn to for help.

All staff are directed to encourage all delegates to respect other people in particular with the protected characteristics set out in the Equality and Diversity Act 2010 and to challenge extremism and be aware of what preventative actions to take

Delegates are provided with the opportunity to talk about safeguarding issues within the learning environment and on a 121 basis. They are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern as well as how any report will be handled.



Annex 2: Types and Signs of Abuse

Definitions of the forms of abuse according to Keeping Children Safe in Education are given below, further information around the following can be found in the Keeping Children Safe in Education 2020 Government Guidance.

Abuse:	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.
Harmful Sexual Behaviour:	Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. Capita recognises that problematic, abusive, and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal). Safeguarding concerns associated with harmful sexual behaviour will normally require intervention from the Police or local safeguarding partnership agency.
Harassment:	Harassment is when a person behaves or acts in a way which makes the victim feel distressed, humiliated, threatened, or fearful of violence. Harassment is often intended to persuade a victim either not to do something that they are entitled or want to do or coerce them to do something that they are not obliged to do. This behaviour may occur as an isolated incident, or it may form part of a pattern of behaviours, taking place on more than one occasion. It can be the same type of behaviour or different types of behaviour on each occasion.
Neglect:	The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
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. 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 such as to cause severe and adverse effects on emotional development.
Sexual Abuse:	Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
Financial Abuse:	The misappropriation of an individual's funds, and/or any other actions that are against their best interests.
Discriminatory Abuse:	This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation, and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment.
Child Sexual Exploitation (CSE):	is a form of child sexual abuse. It occurs where an individual or 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.
Child Criminal Exploitation (CCE):	CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, 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.
Child missing from Education:	(Under the age of 18) All children, regardless of their circumstances, are entitled to a full-time education. A child going missing from education may be an indicator of abuse or neglect. In addition, children who go missing or run away from home or care may be in danger and are vulnerable to crime. Should you find a learner missing you must ensure you contact the emergency services and speak to the Designated Safeguarding Lead
Domestic Abuse:	The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: <ul style="list-style-type: none"> • Psychological. • physical. • sexual. • Financial. • emotional.
County lines Criminal Exploitation:	is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.



<p>Serious Violence:</p>	<p>Staff should be aware of indicators that may signal a person is risk from or involved with serious violent crime. Signs may include:</p> <ul style="list-style-type: none"> • increased absence from learner intervention • visits. • a change in relationships or friendship groups with those who are older. • a significant decline in academic performance. • signs of self-harm or significant change in wellbeing, signs of assault or unexplained injuries. <p>Unexplained gifts or possessions may indicate that they may be involved with or has been approached by an individual associated with gangs.</p>
<p>Honour-based abuse So-called 'honour-based' Abuse</p>	<p>Encompasses incidents or 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. Non-violent forms of abuse may also take place. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. Should you find that you are concerned about a learner that has been subjected to this or have any suspicions then you must report this to the police and raise with the Designated Safeguarding Lead.</p>
<p>Female Genital Mutilation (FGM):</p>	<p>comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Should you find that you are concerned about a learner that has been subjected to this or have any suspicions then you must report this to the police and raise with the Designated Safeguarding Lead.</p>
<p>Peer on Peer Abuse:</p>	<p>The FSC seeks to promote an environment where all Peer on Peer Abuse is taking place this may include but not limited to:</p> <ul style="list-style-type: none"> • Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. FSC recognises that problematic, abusive, and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal). • Allegations against learners should be reported as per Appendix A (Disclosure and Reporting) If harmful sexual behaviour is alleged to have occurred, the DSO/DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be considered but will not be determinative.



	All those involved in such allegations will be treated as being at risk and in need to support and the safeguarding procedures in accordance with this Policy will be followed.
Bullying Incident	should be treated as a safeguarding concern where there is 'reasonable cause to suspect a person(s) is suffering, or likely to suffer, significant harm', for example through violent or sexually abusive behaviour.
Cyber Bullying	Cyber bullying is when one person or a group of people try to threaten, tease, or embarrass someone else by using a mobile phone or the internet.



Annex 3: Contacts

Internal

Gary Marsden – Designated Safeguarding Officer

Email gary.marsden@capita.com

Sasha Dolphin – Designated Safeguarding Officer

Email: sasha.dolphin@capita.com

Collen McCloy – Designated Safeguarding Officer

Email colleen.mccloy@capita.com

Safeguarding Mobile: 07547 769297

Capita Apprenticeships Designated Safeguarding Officers

Safeguarding Contact	Contact Details
Capita Safeguarding Hotline	Telephone: 0370 123 4725 Email: safeguarding@capita.co.uk
Designated Safeguarding Lead	Telephone: 07376 723720 Email: hayley.allison@capita.com

External

Addiction

Young People and Gambling 0808 8020 133

Children of Addicted Parents and People (COAP) [via website only](#)

National Association for Children of Alcoholics 0800 358 3456

Bereavement

Child Bereavement Network [via website only](#)

Child Death Helpline. 0800 282 986

Childhood Bereavement Network 020 7843 6309

Cruse Bereavement Care 0808 808 1677

Grief Encounter [via website only](#)

Bullying

Anti-bullying alliance [via website only](#)

Bullying UK [via website only](#)

Ditch The Label [via website only](#)



Cancer

Macmillan Cancer Support 0808 808 00 00

Children's Charities

Action for Children [via website only](#)

Barnardo's [via website only](#)

Childline 0800 1111

Children's Society [via website only](#)

NSPCC 0808 800 5000

Counselling

British Association for Counselling and Psychotherapy [via website only](#)

Crime

Crime Stoppers 0800 555 111

Fearless (Crime Stoppers for Young People) [via website only](#)

Domestic Abuse

Galop (LGBT) 0800 999 5428

National Domestic Violence Helpline 0808 2000 247

Refuge. 0808 2000 247

Drugs

Talk to Frank [via website only](#)

Faith

Muslim Youth Helpline 0808 808 2008

FGM

Africans Unite Against Child Abuse [via website only](#)

Daughters of Eve [via website only](#)

Forward UK 0208 960 4000

NSPCC FGM Helpline 0800 028 3550

Forced Marriage Karma

Nirvana 0800 5999 247

Housing

Shelter 0808 800 4444

LGBT

Stonewall 0207 593 1850

Looked After Young People

Coram Voice 0808 800 5792

The Care Advice Line. 020 7017 8901

Mental Health

Anxiety UK 03444 775 774

B-eat eating disorders 0808 801 0711

Bipolar UK 0333 323 3880

HeadMeds [via website only](#)

Heads Together [via website only](#)

Kooth [via website only](#)

MindEd for Families [via website only](#)



National Self Harm Network [via website only](#)
 OCD Action 0845 390 6232
 Rethink Mental Illness [via website only](#)
 Samaritans. 116 123 Sane
 0300 304 7000
 Selfharm UK [via website only](#)
 Young Minds [via website only](#)

Online Safety

Child Exploitation Online Protection Centre [via website only](#)
 National Professionals Online Safety Helpline 0344 381 4772
 Net-Aware [via website only](#)
 Safer Internet [via website only](#)
 Think U Know [via website only](#)

Self-Harm

Harmless [via website only](#)
 National Self Harm Network [via website only](#)
 Self-injury support (Girls) 0808 800 8088

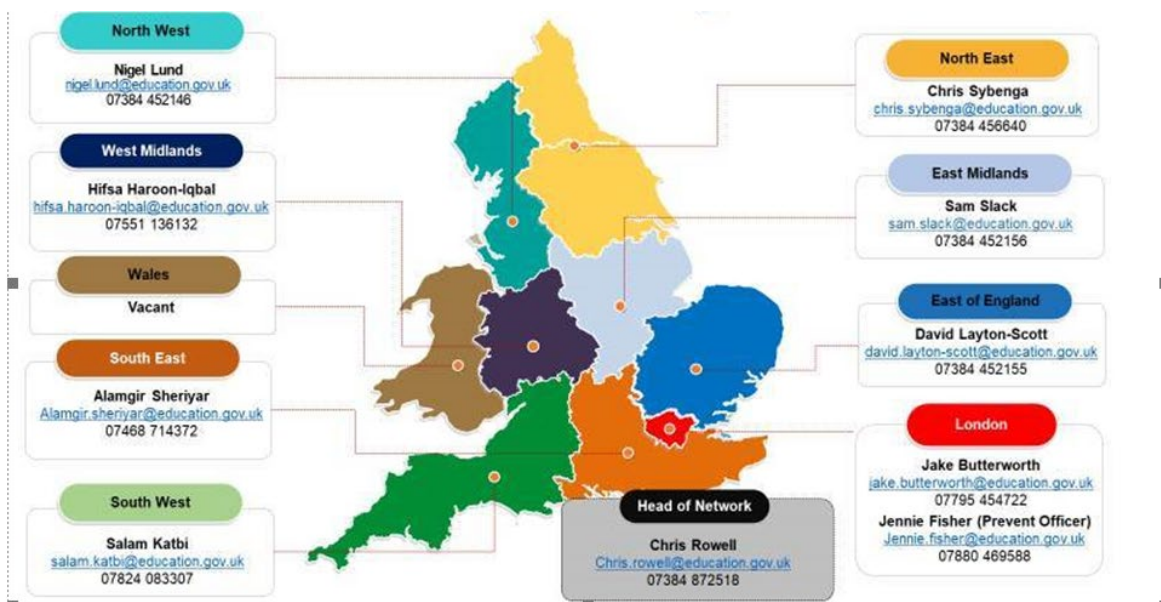
Sexual Abuse

MOSAC (Mothers of Sexually Abused Children) 0800 980 1958
 Stop It Now 0808 1000 900

Sexual Health

Sexual Health Helpline 0300 123 7123
 Brook [via website only](#)

Prevent Regional Coordinators





Annex 4: Organisational Responsibilities

Safer Recruitment of Staff

You must ask anyone you hire to provide a Disclosure Barring Service Check (DBS) to ensure they are safe to work with children and vulnerable adults. This should be rechecked every 3 years.

All staff must undergo safeguarding training during their induction. Safer Recruitment training should be completed every two years. When employing a new Staff, one person interviewing should have completed Safer Recruitment training.

Continued Safeguarding

Staff should regularly renew their safeguarding training, especially if safeguarding legislation changes. The standard renewal period is every two years.

FSC Security

FSC operates several Security features. These includes security access at the main gate, and security cameras across the campus. Security checks are also in place for computer equipment including search terms and security checks. This is to prevent people accessing the Capita Systems and contacting delegates.

Monitoring Attendance

Delegates' attendance is monitored as this might indicate a safeguarding need. Staff also communicate with employers during visits to help employers to identify any issues that arise. Identify reoccurring issues to provide proactive support. The DSL will ensure there is appropriate CPD, and guidance provided to ensure individuals are supported fully. Ensure Data is kept safe and complies with GDPR responsibilities (see IT policy).

The Designated Lead is responsible for ensuring that:

- There are a sufficient number of trained and competent Staff with designated responsibility for safeguarding
- All Staff receive adequate training in order to identify potential safeguarding issues and to respond appropriately to disclosures
- Robust policies are maintained, and all other relevant information and material is effectively communicated to Staff
- Adequate cyber security measures are in place where suitable monitoring and filters are used to protect delegates on Capita technical equipment
- Record keeping is accurate and secure
- Capita operate safe recruitment procedures and ensure that appropriate checks are carried out on all new Staff

Safeguarding Team Responsibilities

The relevant Designated Person shall retain a copy of the report; any notes, memoranda or correspondence dealing with the matter; and any other relevant material. Copies of reports, notes etc. should always be kept secure.

The officer on Duty should respond to concerns or seek support from the Designated/ Deputy Safeguarding Lead in line with procedures indicated within the Flowcharts.

Sharing Information

Sharing of information with learning providers, in the case of apprentice learners, will be undertaken by the DSL/DSO.



Annex 5: Promotion of Safeguarding Through Training

Training Intervention

Individual/Group	Training	Frequency
All new colleagues	Safeguarding Induction Prevent Duty and Channel	During Induction period
All colleagues	Safeguarding refresher Prevent Duty/Channel Part 1 KCSIE Induction www.elearning.prevent.homeoffice.gov.uk Act Awareness Training ETF Safeguarding as appropriate to level	Every 2 years As updated
DSL	Refresher	Every 2 Years
DSO	Refresher for children and vulnerable groups safeguarding	Every 2 years
Recruitment Managers	ETF Safeguarding including Safer Recruitment	Every 3 years
Associate Tutors	Safeguarding Refresher Prevent Duty Chanel	Every 2 years.



Annex 6: Safeguarding Procedure COVID-19 Addendum

This reflects updated advice from the Government on COVID-19 and the measure to be taken by the College to remain operational during this period. It sets out changes to our normal Safeguarding policy in light of the Department for Education's guidance Coronavirus: safeguarding in schools, colleges, and other providers, and should be read in conjunction with that document. Unless stated below, Capita's normal Safeguarding procedure remains in place.

Capita is committed to safeguarding and promoting the welfare of all delegates, site users and Staff within the organisation. This situation remains the same despite the difficult circumstances brought about by the COVID-19 outbreak.

As a result of the changes brought about as a result of the outbreak, the following will apply:

Designated (Deputy) Safeguarding Lead Arrangements

The Designated Safeguarding is available via telephone or through Microsoft Teams during all operational hours.

Delegates with Safeguarding Concerns

Delegates with Safeguarding concerns can make contact with the DSL by telephone or via email. Details are included in the delegate welcome pack.

Vulnerable Delegates

FSC will continue to work with any outside agency as required to ensure the safeguarding of all delegates and FSC site users. Contact will be maintained with any delegate who has expressed concerns regarding mental health to ensure they are aware of support available and to escalate support if required. FSC will continue to work with Local Safeguarding Partners during this period and raise concerns that meet the threshold for referrals.

Delegates on Site

FSC delivers essential training and remains open during the pandemic. To ensure a safe environment the College is operating under strict conditions relating to restricting people on site to essential visitors only, implementing social distancing, the wearing of face mask and the sanitisation of hands. From time-to-time additional measures to limit the spread of COVID-19 may also be implemented.

Remote Learning

All staff will use either Teams or Zoom when delivering to delegates and ensure waiting rooms are in place to safeguard delegates. All staff are to adhere to the Acceptable Use agreements and Online Safety Policy.

Welfare Concerns

All welfare concerns should be reported to the Designated Safeguarding Lead / Deputy Safeguarding Lead using the appropriate safeguarding referral mechanism and appropriate support will be provided to support the individual. Staff are reminded that they need to remain vigilant to the sign of abuse and emotional distress.

Induction and Safer Recruitment

In accordance with Government guidance validation of documents will take place through a live video link and possession of the physical document must be observed by the person completing the validation of the document. Scanned documentation will then be sent to the



person completing the check. This procedure will be in place whilst remote induction is used during the COVID-19 period.

(<https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines>).

Equality and Diversity

Staff and Delegates identified as Vulnerable, Extremely Vulnerable, or likely to be impacted as part of protected group linked to the Equality Act 2010

Capita, including the FSC, is aware that Covid-19 will provide different challenges to different people as we adapt to new ways of working due the pandemic. This impact is likely to the physical and emotional well-being of staff site users and delegates as we make changes to both the physical environment and the way we use technology to support others. We must consider the impact of different groups to try to minimise the impact of Covid-19 to individuals based on their unique circumstances and to promote inclusion for all.

Mental Health Support

Mental support is available to all Staff. This can either be accessed by contacting one of the mental health first aiders or by contacting the confidential support line available through Employee assists. Support and counselling can be accessed through this service. Delegates will be referred to relevant charities to access any support needs they may have.

Equipment and Technology

All staff will use virtual Teams or Zoom to communicate virtually. Videos should be turned on to aid all staff. Immersive technology can be able by individual staff or delegates to ensure they have an environment that supports their communication needs. This includes translate which will provide a transcript of communication. Staff are reminded to avoid jargon and communicate clearly to ensure that this feature can be enabled. Microsoft Teams also has a text feature for any staff member or delegate that may need to communicate in the manner. Health and Safety courses have also been undertaken by Staff to support them with maintaining good posture and a good working environment. All managers are asked to assess if further reasonable adjustments are required and any adjustments identified should be raised with the local, SHE representative who will provide additional support and guidance. Employees with a poor internet connection should seek support from Capita's IT support service who may be able to provide practical advice and solutions.

Communication

Meetings should be held with all staff within the business to support their emotional well-being. Regular communication will be maintained with staff as the return to the office from home working during the pandemic. All staff returning to site will undertake a site induction to understand the measures being taken to keep everyone safe from COVID-19.

Other Considerations

All other circumstances will be assessed, and actions identified as they arise to ensure that Capita continues to feel a welcoming environment to all.

Staff attending work-place settings should familiarise themselves with any changes to the environment before attending and follow the risk assessment guidance.