

Safeguarding & Prevent Support Guide

This guide is to help aid provider staff in the implementation and support of safeguarding and Prevent.

The guide includes the following information:

- Introduction to Prevent
- Board of Directors and Management Responsibilities
- Prevent and British Values
- Understanding and defining Safeguarding
- Categories of abuse
- Possible signs of abuse or radicalisation
- Codes of Conduct
- Referral Agencies and contacts - local and sub-regional
- Procedure flow charts - Channel / Safeguarding
- Incident and template form
- HM Government '7 golden rules to information sharing' guide



Introduction to Prevent

The government's strategy for countering terrorism CONTEST strategy is split into 4 areas: Pursue, Protect, Prepare and Prevent. All FE institutions have to comply with the Prevent Duty under the Counter Terrorism Act 2015.

The Prevent strategic objective is to stop people from becoming or supporting terrorists or radicalisation and challenge all forms of terrorism, including the influence from far right extremist groups. The Prevent duty is to protect people from all streams of extremist activity and not solely aimed at one specific group.

The Prevent strategy has 3 key objectives and will specifically:

- Respond to the ideological challenge of terrorism and the threat we face 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 is a risk of radicalisation which we need to address

Within the Home Office Prevent Duty guidance document, it sets out very clear expectations and responsibilities of board members, leaders, managers and staff. Some of these are detailed below:

"We expect active engagement from boards, managers, leaders and staff with other partners including the police and regional Prevent coordinators"

"We expect institutions to demonstrate that they undertake appropriate training and development for boards, leaders, managers and staff"

"Where Ofsted finds a publicly funded provider inadequate action will be taken. In the case of private training providers this is likely to result in their contract being terminated".

Prevent is part of safeguarding learners and all FE providers have a duty to safeguard their learners from all aspects

Prevent duty

of abuse, exploitation and radicalisation. Implementing the Prevent Duty can be a sensitive issue for some learners and communities and it is important to reiterate this is not about spying on learners or staff or about stopping conversations on controversial or sensitive topics. The Prevent Duty is intended to safeguard providers, learners and staff from being exposed to exploitation or radicalisation and to support the discussion and understanding of complex and controversial issues.

NHBC will provide all staff and delivery partners with the support they need to implement the Prevent Duty. This will include annual safeguarding and Prevent health checks and risk assessments, arranging training, awareness sessions for staff and management, developing teaching and support materials, sharing good practice from the sector and ensuring communication is frequent and open.

The next section of this guide will give a more detailed breakdown of the responsibilities and requirements of NHBC and delivery partners in relation to Prevent and Safeguarding.

Board of Directors responsibilities under the Prevent Duty

- Actively engage with partners, including the police and Prevent coordinators
- Undertake appropriate training and development in Prevent Duty
- Nominate a Prevent board member who will oversee the duty and safeguarding
- Exemplify British Values (see appendix 1 for definitions of these) in their conduct
- Be aware that inspection of the Prevent Duty by Ofsted will be judged as part of safeguarding which is included in the leadership and management grade. Implementation and practice of the Prevent Duty will be a limiting grade for a provider.
- Set the providers strategy for Prevent
- Ensure robust procedures are in place to ensure any subcontractors are aware of the Prevent Duty and the subcontractors are not inadvertently funding extremist organisations
- Must comply with the requirements of the Equalities Act 2010 in ensuring that their organisation challenges discrimination and expects learners to comply with this legislation also
- Must ensure that providers challenge racism, islamophobia, tackle hate and prejudice based bullying, harassment and intimidation as part of their commitment to exemplification of British Values
- Need to appreciate the sensitivity of the subject and the need to approach the issues carefully with all learners and communities
- Responsible for ensuring that the Duty and its requirements are communicated to all levels of the organisation - management, teaching staff, support staff, volunteers and learners

Leaders and Managers also have responsibilities under the Prevent Duty

They must ensure:

- They have active engagement with local partners and support groups and regular contact with Prevent Coordinators
- Clear, visible policies and procedures for managing whistleblowing and complaints
- Policies are in place for learners using IT equipment safely, legally and securely
- Prevent compliments the organisations safeguarding and equality acts and covers welfare and safety of learners and staff
- A risk assessment is carried out to address the organisations implementation of Prevent
- Robust procedures for managing subcontractors and their awareness and implementation of Prevent
- Appropriate training of all staff in Prevent
- Staff exemplify British Values in their management, teaching and through general behaviours in the organisation
- That opportunities within curriculum are used to promote British Values to learners
- Robust procedures for sharing information internally and externally about vulnerable individuals
- Have clear Prevent referral process with single point of contacts which are known to all staff and learners
- Pastoral care is at the heart of the provision and sufficient pastoral care is available to all learners who are vulnerable or being exploited



Prevent and British Values

To comply with the Prevent Duty, providers are expected to exemplify British Values in their management, teaching practice and general behaviours. British Values are defined as:

- Rule of Law
- Individual Liberty
- Mutual respect and tolerance of those from other backgrounds, religions, beliefs,
- Democracy
- Compliance with the Equality Act and those protected by it

The protected characteristics in the Equality Act are:

- Age
- Gender reassignment
- Disability
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Tutors will be expected to understand and embed British Values into the apprenticeship delivery journey to ensure learners are aware of them, can evidence and exemplify them and understand what it means to be a successful learner and take part in life and Britain today.

Learners will also be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying and staying safe online.

Training providers are also expected to work with employers to ensure learners are not exposed to risks associated with any of the above and adequate awareness of Prevent and British Values has taken place with workplace mentors, line managers or HR.

Tutors and training providers must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally and internationally. Providers are to operate a safe place for learners to communicate, but provide challenge where views or discussions become offensive, extreme or upsetting to others.

Understanding and defining Safeguarding

Safeguarding is defined as:

- protecting children from maltreatment
- preventing impairment of children's health and 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

Organisations which work with vulnerable groups, including children, must always act in their best interests and ensure they take all reasonable steps to prevent harm to them. Having safeguards in place within an organisation not only protects and promotes the welfare of children but also it enhances the confidence of trustees, staff, volunteers, parents/ carers and the general public.

Working together to safeguard children, young people and vulnerable adults includes:

- Promotion of the welfare of children and vulnerable adults is paramount and must be a basis of our working practices
- Ensuring every child/ young person or vulnerable adult does not only feel safe but are safe in all areas of working practices
- Operating a zero tolerance to bullying by staff and learners
- Having the ability to identify categories of abuse or exploitation and know the support and referral channels available
- Have appropriate policies, procedures and training in place to safeguard learners, staff and organisations
- Have designated members of staff in place to support safeguarding arrangements

Training Organisations must comply with the Safeguarding Vulnerable Groups Act (2006). This act defines two groups of people that it sets out to protect:

- Children (under 18)
- Vulnerable Adults (details below)



The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as:

- Those in residential accommodation provided in connection with care or nursing or in receipt of domiciliary care services
- Those receiving health care
- Those in lawful custody or under the supervision of a probation officer
- Those receiving a welfare service of a prescribed description or direct payments from a social services authority
- Those receiving services, or taking part in activities, aimed at people with disabilities or special needs because of their age or state of health
- Those who need assistance in the conduct of their affairs

The Safeguarding Vulnerable Groups Act aims to prevent unsuitable people from working (either paid or unpaid) with children or vulnerable adults. It does this by vetting all those who wish to do such work vulnerable groups and barring those where the information shows they pose a risk of harm.

To fulfil the Safeguarding Act the terms and conditions of contract with NHBC and the Skills Funding Agency sets out the following requirements:

- THE CONTRACTOR shall adopt recruitment processes that comply with the law and will ensure that children and vulnerable adult learners are protected.
- THE CONTRACTOR will take all necessary actions to comply with current legal safeguarding requirements.
- THE CONTRACTOR must undertake an adequate risk assessment to establish what action is required where their employees have regular contact with Learners under 18 or other vulnerable Learners.
- THE CONTRACTOR must make the necessary checks to ensure that employment that involves regular contact with young people under the age of 18 or other vulnerable learners is not offered to or held by anyone who has been convicted of certain specified offences, or whose name is included on lists of people considered unsuitable for such work held by the Department for Education and the Department of Health. Information must also be sought from the Disclosure and Barring Service.

To comply with this contract clause NHBC set out a number of interventions:

- All staff are DBS checked and details held on a central single record
- All learner employment premises are risk assessed for H&S and safeguarding/ Prevent requirements
- All recruitment processes are in accordance to the "Safer Recruitment" guidance
- Annual contract and quality performance measures are submitted by all delivery partners to NHBC that cover safeguarding, Prevent, Equality and Diversity and other
- Each provider, including NHBC, has an appointed Safeguarding &/or Prevent Champion
- Annual safeguarding training is completed for all staff
- Prevent training is completed for all staff
- H&S and Safeguarding assessments are checked annually during audit
- Staff Safeguarding Code of Conduct produced to help protect staff as well as learners

Categories of abuse

There are different categories of abuse all leaders, managers and staff need to be aware of. These are:

- Physical Abuse
- Emotional / psychological Abuse
- Sexual Abuse
- Severe neglect
- Financial / material abuse
- Exploitation (inc Radicalisation)

Possible signs of abuse

NHBC and all delivery partners and their staff have a legal duty of care for all learners they work with. Part of this duty of care is to report cases of suspected abuse. If any member of staff has concerns over a learner they work with they must report this to the safeguarding / Prevent designated person.

Staff may become aware of potential abuse in three main ways:

- They may observe signs in a learner that lead to a suspicion of a form of abuse
- The learners themselves may disclose that they have been abused
- A whistleblowing claim may be made about a learner by someone who may suspect a form of abuse



There are signs to look out for when working with learners that may indicate abuse, although these signs may not directly indicate a safeguarding issue, it may help tutors or support staff identify differences in behaviours that may need some follow up action.

Physical Abuse:

- Unexplained injuries or burns (inc self-harming)
- Refusal to discuss injuries
- Improbable explanations to injuries
- Untreated injuries or lingering illnesses
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear of returning home or of parents / guardians / spouse being contacted
- Aggression or bullying of other people
- Significant behavioural change
- Deterioration of work (which could have various explanations)
- Unexplained pattern of absences

Emotional / Psychological Abuse:

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional responses
- Self-harm or mutilation
- Compulsive stealing
- Drug / alcohol / solvent abuse
- 'Neurotic' or obsessive behaviour
- Social isolation (which could have various explanations)
- Desperate attention seeking (which could have various explanations)
- Eating problems (which could have various explanations)
- Depression and withdrawal (which could have various explanations)

Sexual Abuse:

- Bruises, burns or bite marks
- Sexual awareness inappropriate to the persons age
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends
- Promiscuity, prostitution, provocative sexual behaviours
- Self-injury, suicide attempts, self-destructive behaviour
- Recoiling from physical contact
- Eating disorder (which could have various explanations)
- Changes in behaviour (which could have various explanations)
- Depression (which could have various explanations)

Severe Neglect:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at work or class
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing
- Constant tiredness

Financial / material:

- Loss of jewellery or personal property
- Unexplained withdrawal of cash
- Lack of money to purchase basic items
- Misuse of benefits
- Inadequate clothing

Exploitation / Radicalisation:

- Unexplained absences from work or class
- Appearing with unexplained gifts or new possessions
- New friends that are older
- Mood swings or changes in emotional well being
- Drug or alcohol misuse
- Individuals views becoming increasingly extreme
- Becoming increasingly intolerant
- Expresses desire / intent to take part in extremist activity
- Downloading, researching or viewing extremist propaganda
- Withdrawn and focused on only one ideology
- Changes in appearance, personality and becoming isolated from friends, family and local community (This needs to be addressed sensitively as it could have various explanations and could happen at different times during the year / religious celebrations)



Code of Conduct

Staff working with young people or vulnerable adults must follow the codes of conduct set out in this document and any additional set out by their own training provider.

You must **NOT**:

- Panic, the process and procedures are in place to support and protect you and your learner(s)
- Make any unnecessary physical contact with a young person or vulnerable adult, however if physical contact is unavoidable e.g providing comfort at times of distress this should only take place with the consent of the learner.
- Take vulnerable adults or young people alone in a car
- Meet vulnerable adults outside the work / training environment
- Engage in sexual provocative conversations or activity
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature that the learners can do themselves
- Make promises to keep any disclosure confidential from the relevant authorities
- Show favouritism to the vulnerable adult
- Lie or say that everything will be ok when you cannot promise that
- Criticise the abuser, especially if it is a parent / carer
- Press for answers the learner is unwilling to give

You **MUST**:

- Listen carefully to what is said
- Take what is said seriously and accept what is told
- respect learners rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviours they do not like
- Act with discretion with regard to their personal situations and relationships.
- Be aware of the procedures for reporting concerns or incidents and familiarise themselves with the contact details of the safeguarding champion and local authority contacts
- Make your safeguarding champion aware of any inappropriate affection or attention from a learner to you
- Report any concerns relating to the welfare of the learner to your safeguarding champion
- Write down as soon as you can exactly what has been said - do not add in anything extra and use only the words used by the learner
- Tell the learner you must pass the information on but only those who need to know and tell them who these people are
- Inform your safeguarding lead and the NHBC safeguarding lead as soon as possible

NHBC and each delivery partner must have a designated person for safeguarding / Prevent. A central record of these people is held at NHBC. The NHBC designated person is detailed in the next section of this guide along with the board of directors' contact and key local contacts.

Challenging extremism

If students make comments which could be regarded as extremist staff should encourage the students:

- to think critically
- to consider whether the evidence they have is accurate and full
- to consider whether they have received a partial and/or unsustainable interpretation of evidence.
- to consider alternative interpretations and views

Staff should use opportunities to challenge extremist narratives through discussion with students. If staff do not feel confident in challenging extremist ideas with their students they should ask for support from the Safeguarding officer.

If students behave in a way which contravenes the equality and diversity aspects of the code of conduct which they have signed then this is a disciplinary issue e.g. refusing to work with a gay student or a student of a different ethnicity. It should be dealt with through normal provider disciplinary processes.

Tutors and training providers must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally and internationally. Providers are to operate a safe place for learners to communicate, but provide challenge where views or discussions become offensive, extreme or upsetting to others.



Safeguarding and Prevent Referral Agencies

NHBC Contacts

Safeguarding and Prevent designated person - Geoff Mann - 07733 014772 - gmann@nhbc.co.uk

Board of directors Prevent designated person - David Campbell - 01908 747806 - dmcampbell@nhbc.co.uk

Prevent Contacts

Confidential Anti-terrorism hotline - 0800 789 321

Safeguarding Contacts

First response team - 0800 137915 - safeguardingadults@buckscc.gov.uk

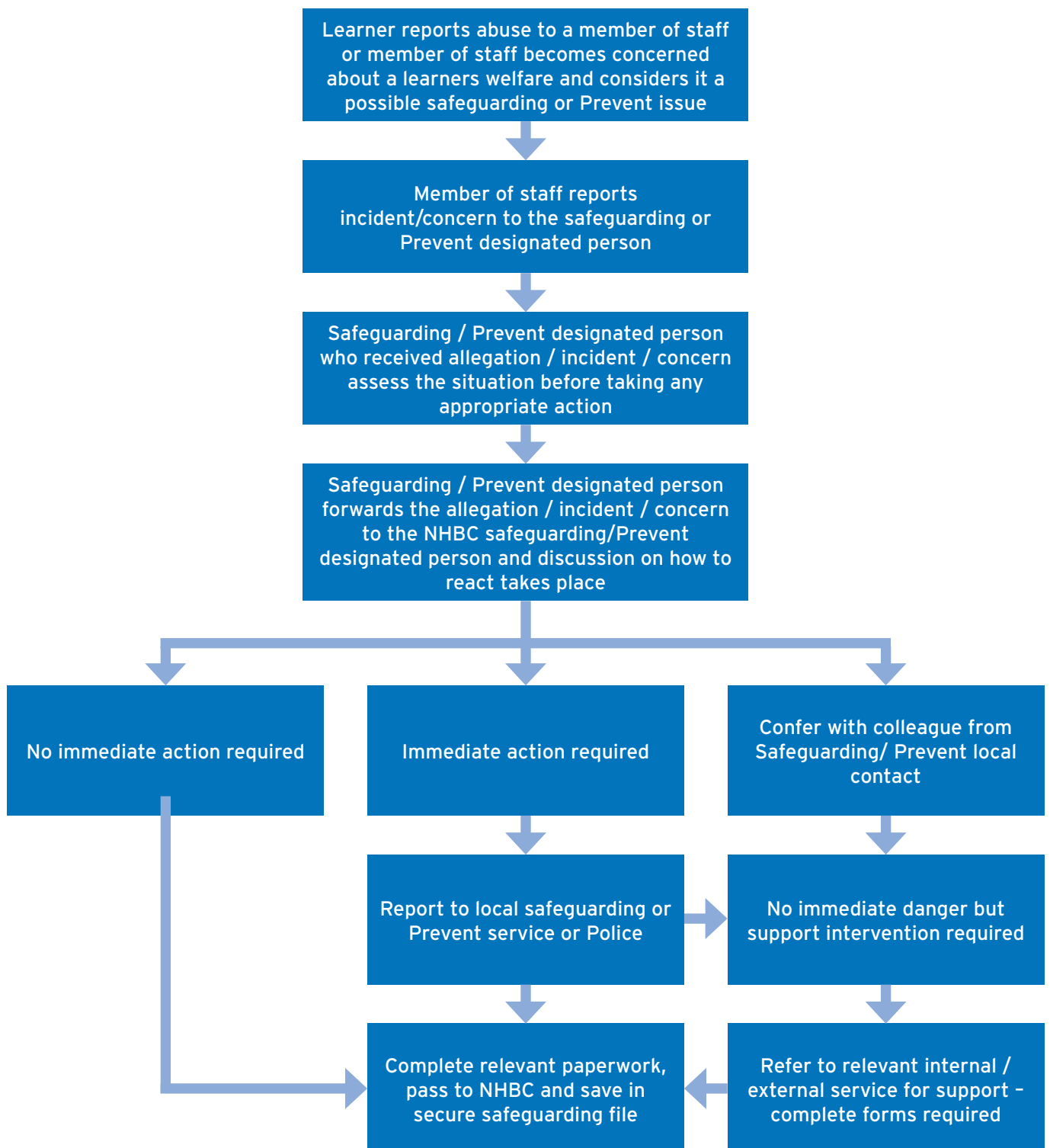


Raising Standards. Protecting Homeowners

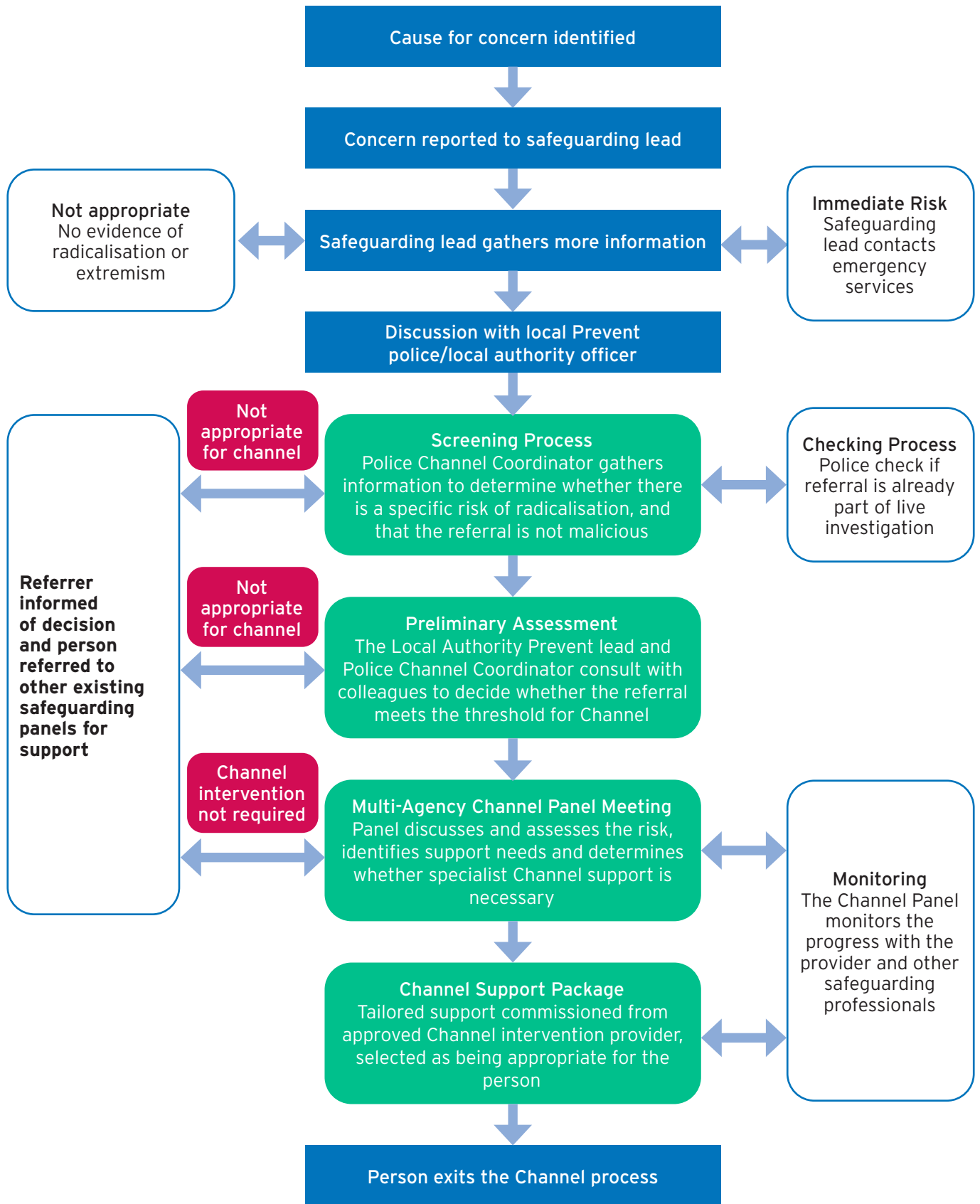
NHBC, NHBC House, Davy Avenue, Knowlhill, Milton Keynes MK5 8FP Phone: 0344 633 1000
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Financial Conduct Authority and the Prudential Regulation Authority.

Procedure Flowcharts

The following flowcharts detail the procedures for reporting a safeguarding / Prevent incident and the Channel process for FE establishments.



The Channel Process within FE Colleges



Safeguarding & Prevent Incident Form

Please use this form to record an incident or concern of abuse, neglect or potential vulnerability of any learner on your training programme. This includes any concerns for those learners who are / may be at risk of radicalisation or extremism. It is vital that NHBC maintain records of any incidents and pass them to the required agencies.

Name & full contact details if possible
Concern or incident
Date, time and location
Action taken

Name:	Signature:	Date:
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Please retain a copy of this form for your records and pass the original copy to NHBC.



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The seven golden rules to sharing information

(Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers)

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.



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