

**PR****FILE**  
Development and Training

**SAFEGUARDING,  
PREVENT AND ONLINE SAFETY  
POLICY**

<b>Person Responsible</b>	<b>Date</b>	<b>Version</b>	<b>Date to be reviewed</b>	<b>Directors sign off</b>
Andrea Keeley	05/06/2021	1	05/06/2022	AW 

## PURPOSE

The purpose of this document is to outline Profile's policy on responding to concerns regarding the safeguarding, welfare and protection of children, young people and vulnerable adults, including those that may be at risk of radicalisation. This policy provides guidance to all staff who may come across concerns of this nature within the context of their work and in line with 'Keeping Children Safe in Education (2020)'. It is designed to provide a basic procedure which should be followed. The aims of this policy are to:

- 🌀 Ensure consistent good practice
- 🌀 Ensure all staff understand their professional duty regarding learners' safety and welfare
- 🌀 Ensure staff know how to help and protect learners that may be at risk of being harmed
- 🌀 Provide clear guidelines for recording and reporting concerns and disclosures
- 🌀 Ensure staff are aware of their duty to share information with the internal safeguarding team and appropriate authorities
- 🌀 Ensure staff understand their responsibility to teach learners about safeguarding, including Prevent

The 'Working together to safeguard children 2018' guide defines safeguarding and promoting the welfare of children. It is defined for the purposes of this guidance as:

- 🌀 Protecting children from maltreatment
- 🌀 Preventing impairment of children's health or development
- 🌀 Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- 🌀 Taking action to enable all children to have the best outcomes

The 'Care Act 2014' defines safeguarding adults as:

Protecting adults right to live in safety and live free from abuse and neglect

[Working together to safeguard children](#)

[Keeping children safe in education](#)

The CHANNEL panel protects vulnerable people from being drawn into terrorism.

[Channel Duty Guidance](#)

## STATEMENT OF COMMITMENT

Profile is committed to ensuring that, in all aspects of its activities, it contributes to the safeguarding of all children, young people and vulnerable adults. Profile will achieve this through effective monitoring of all learners (including their interaction with children, young people and vulnerable adults) and all Profile staff, thereby ensuring that all potentially at-risk groups are in receipt of appropriate levels of care, services and education. Contributing to the safeguarding of children, young people and vulnerable adults is a core part of our business.

It has been agreed by the senior management team that all staff, regardless of role, who work for Profile, will have an enhanced DBS check carried out every 3 years.

## DEFINITION OF ABUSE

Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm, or exploitation of, the person subjected to it.

Abuse can take the form of:

- 🌀 physical abuse – including hitting, pushing, kicking, misuse of restraint or inappropriate sanctions
- 🌀 sexual abuse – including sexual assault or acts to which the adult did not, or could not consent
- 🌀 psychological abuse – including emotional abuse, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse, isolation or withdrawal from services
- 🌀 financial or material abuse – including exploitation and pressure in connection to wills, property, inheritance or financial transactions
- 🌀 neglect or acts of omission – including ignoring medical or physical care needs, withholding of medication or adequate nutrition and failure to provide access to appropriate health, social care or educational services
- 🌀 discriminatory abuse – including racist, sexist and other forms of harassment
- 🌀 abuse caused by poor care or by poor practice – this can take the form of isolated incidents or poor or unsatisfactory professional practice, through to pervasive ill treatment or gross misconduct
- 🌀 peer on peer abuse – this can include, but is not limited to, bullying (including cyber-bullying), gender-based violence, sexual violence, sexual harassment, sexting (the act of sending sexually explicit photos or messages via a mobile device) or upskirting (the act of placing a mobile device beneath a persons' clothing to take a photograph without consent)

## AIMS AND OBJECTIVES

Whilst dealing with learners directly or, where appropriate, when observing their interaction with others, including children, Profile will ensure that appropriate measures and practice to safeguard and promote the welfare of children, young people and vulnerable adults are in place. Profile will bring matters requiring attention to the relevant authorities.

Profile staff must have a good understanding of safeguarding concerns, including potential abuse and neglect of children, young people and vulnerable adults, which may come to light. Wherever we identify risks we will highlight them and seek to ensure that appropriate steps are taken to safeguard the persons concerned.

We will ensure that all Profile's employees, and those who undertake work on our behalf, maintain a proper focus on safeguarding children, young people and vulnerable adults and that this is reflected both in sound individual practice and our internal policies and guidance, following the Education Act 2002 and the Education and Training (Welfare of Children) Act 2021. All permanent and contracted staff must:

- 🌀 give highest priority to children's welfare
- 🌀 recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, young people and vulnerable adults
- 🌀 respond appropriately to disclosure of abuse
- 🌀 respond appropriately to allegations against candidates, Profile staff, other adults, and against themselves
- 🌀 act appropriately whilst undertaking the work of Profile
- 🌀 understand safe practice in carrying out their duties
- 🌀 be alert to the risks which abusers, or potential abusers, may pose
- 🌀 undertake safeguarding training on employment, and regular update training thereafter
- 🌀 contribute as necessary to all stages of Profile's safeguarding processes.

## PROFILE'S RESPONSIBILITIES

If at any time a member of staff witnesses anything which gives rise to a concern that abuse of some kind has taken place, the matter must be reported to Profile's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead within 48 hours -

**Andrea Keeley – Designated Safeguarding Lead**

**Casey Gibbons – Deputy Designated Safeguarding Lead**

Email - [safeguarding@profiledt.co.uk](mailto:safeguarding@profiledt.co.uk)

Profile will ensure that it helps to bring to justice the perpetrators of crimes against children, young people and vulnerable adults by reporting the matter to the appropriate authority immediately.

## **SPECIFIC SAFEGUARDING ISSUES**

All staff must be aware of the signals that children are at risk from or are involved with serious violent crime. Advice can be found in the Home Office's [Preventing youth violence and gang involvement](#) and [Criminal Exploitation of children and vulnerable adults: Count Lines guidance](#)

[Domestic abuse: get help during the coronavirus \(COVID-19\) outbreak](#)

[Mental health and wellbeing](#)

[Anti-bullying information](#)

[Preventing bullying](#)

[Workplace bullying and harassment](#)

[Female genital mutilation \(FGM\)](#)

[Forced marriage](#)

[Child sexual exploitation](#)

[Advice to parents and carers on gangs](#)

[Controlling or coercive behaviour in an intimate or family relationship](#)

[Online safety guidance for education settings](#)

[Safeguarding children in whom illness is fabricated or induced](#)

[Hate](#)

## **SAFER RECRUITMENT**

Profile's recruitment process meets the Children Safeguarding Board/Adult Safeguarding Board guidelines for recruiting staff and associates by

- 🌀 Verifying their identity and their academic or vocational qualifications
- 🌀 Obtaining professional and character references
- 🌀 Checking previous employment history
- 🌀 Ensuring that candidates have the physical and mental capacity for the role for which they are being considered
- 🌀 Interviews are undertaken either face to face or virtually
- 🌀 Mandatory vetting and barring checks are undertaken regularly throughout employment

## **PROCEDURE FOR REPORTING SAFEGUARDING CONCERNS**

When a disclosure is made, it is important to remember the following:

- 🌀 Remain calm and reassure the person that they have done the right thing by speaking up

- 📞 Listen carefully and give the person time to speak
- 📞 Explain that only the professionals who need to know will be informed, never promise confidentiality if the learner is at risk of harm or danger
- 📞 Act immediately, and do not try to address the issue yourself
- 📞 It is not for you to decide whether a suspicion or claim is true; all instances must be taken seriously

Contact Profile's Designated Safeguarding Lead (DSL) (or the Deputy Designated Safeguarding Lead (DDSL) if the DSL is unavailable) within 2 hours of a disclosure or incident, and BEFORE any external agency, unless there is immediate danger

### RESPONDING TO PROTECTION CONCERNS

Whilst delivering work-based learning, Profile staff may encounter protection concerns. The concern might relate to:

- 📞 what is or may be happening (or happened in the past) to a child, young person or vulnerable adult in an organisation where we are delivering training (e.g. in a nursery or school), or
- 📞 what is happening (or happened) outside that organisation (e.g. in the at-risk person's own family).

The concern may be brought to our attention by the child, young person or vulnerable adult themselves, alleged by others or through direct inspection activity and observation. The concerns may therefore be about the behaviour of a:

- 📞 member of staff (e.g. a teacher, social worker or playgroup worker);
- 📞 provider of a service (e.g. a volunteer);
- 📞 peer (e.g. another child, young person or vulnerable adult); or
- 📞 another adult (including another member of Profile staff).

The concern could relate to **actions** or **inaction** (for instance an insufficient response by someone to information regarding the risk of significant harm to a child, young person or vulnerable adult).

The concern may be about a current situation or past events and may be about allegations or disclosures of physical abuse, sexual abuse, emotional abuse or neglect, or a combination of one or more of these categories.

Profile staff may receive this information by one or more means, such as a telephone call, a letter, an email, through observation, discussion, and the examination of documents.

### IMMEDIATE ACTION TO TAKE IF A PROFILE STAFF MEMBER OBSERVES ABUSE WHILST IT IS TAKING PLACE

This could take a number of forms, for instance seeing an adult hit a child, observing a member of staff using inappropriate restraint on a young person or witnessing the neglect of basic care needs of a disabled person.

First of all, Profile staff must do all they can to stop the abuse immediately without putting the child, young person or vulnerable adult or yourself, at undue risk by:-

- 🌀 informing the perpetrator of your concerns;
- 🌀 advising him/her to stop the action immediately;
- 🌀 asking them to move themselves to an area where there is no contact with children, young people and vulnerable adults; and
- 🌀 advising him/her that you will immediately be informing the senior manager on site or elsewhere within the organisation.

If the perpetrator fails to desist, you must take appropriate action to stop the abuse and call for assistance. If the perpetrator does desist, and even if they leave the scene as requested, it is essential that you stay with the child, young person or vulnerable adult until you can transfer them to the care of another responsible adult.

After the incident has ended, Profile staff must:-

- 🌀 report the incident immediately to workplace's senior person on site, and/or elsewhere in the organisation, where appropriate;
- 🌀 take notes of what has been said, what you have heard or seen (if it is not possible to do this at the time, do so immediately afterwards). Keep the notes taken at the time, without amendment, omission or addition, whatever subsequent reports may be written. The notes should be dated and signed. The notes should cover what you saw, who said what, what action you took, and the details of date, time and location and name of child and perpetrator; and
- 🌀 report the incident and provide a copy of the notes made to the Designated Safeguarding Officer.

### **IMMEDIATE ACTION TO TAKE IF YOU RECEIVE AN ALLEGATION OF POSSIBLE HARM TO A CHILD, YOUNG PERSON OR VULNERABLE ADULT.**

On any occasion where Profile staff receive such an allegation, they must: -

- 🌀 stop other activity and focus on what they are being told. Responding to suspicion of abuse takes immediate priority;
- 🌀 never promise confidentiality or agree to "keep it a secret". Explain clearly to the person raising the concern about what you expect will happen next. You can assure them that you will only tell those you have to tell to try to get the matter dealt with. You can and should express support and reassurance to the person giving you the information, that the matter will be dealt with quickly and appropriately;
- 🌀 avoid asking leading questions like "Did he do X to you?" or "How did he hurt the young person" but use open questions like "Can you tell me what

happened?” Leading questions and anything likely to suggest ideas or interpretations could jeopardise subsequent proceedings.

Profile staff should only ask what they need to know to come to a judgement about whether abuse may have taken place and to gather factual details. You do not need full details but do need sufficient information for an informed referral. Details that are appropriate to record are: -

- details of the concern/allegation;
- name, DOB and address of the child or young person;
- details of the service/setting being inspected including contact details of manager on site etc; and
- if possible, additional relevant information regarding the child e.g. ethnicity and details of other agencies involved.

Profile staff should consider whether immediate action is needed to secure the protection of any children, young people or vulnerable adult who may be at risk. Think about who may be at risk, in the light of what you have been told or suspect:

- if Profile staff are onsite with any children, young people or vulnerable adults, who may be at immediate risk, they must consider what action may be necessary to secure their safety. They will need to stay with those who may be at immediate risk until they can be transferred to the care of another responsible adult. Staff will then need to contact the senior staff member onsite so they can take responsibility for further action
- if Profile staff are not onsite with a child, young person or vulnerable adult, discuss how they may make themselves safe. Take into account their wishes about any immediate protection. Check whether anyone else may be at risk and consider what action is necessary to secure their immediate safety.

As in the section above, Profile staff must take and keep notes (including emails) of what has been said. After all information has been recorded, Profile staff must report the matter to the relevant Senior Manager in the workplace to which the allegation refers and to the Safeguarding Officer. If the allegation is regarding the Senior Manager of the workplace, the matter should be referred to the relevant authority (e.g. KCC, local Council, Social Services). On any occasion, if the matter is serious, it should be reported directly to the Police.

Allegations have to be reported within 48 hours.

## PREVENT STRATEGY

### WHAT IS PREVENT?

The Prevent Strategy is a cross-Government policy that forms one of the four strands of CONTEST: the United Kingdom's Strategy for Counter Terrorism. It includes the anti-radicalisation of vulnerable adults and children.

### STRATEGIES FOR PREVENTING EXTREMISM

The Office for Security & Counter Terrorism works to counter the threat from terrorism and their work is detailed in the counter terrorism strategy [CONTEST](#). This strategy is organised around four work streams, each comprising a number of key objectives:

- 🌀 PURSUE: To stop terrorist attacks
- 🌀 PREVENT: To stop people becoming terrorists or supporting terrorism
- 🌀 PROTECT: To strengthen our protection against a terrorist attack
- 🌀 PREPARE: To mitigate the impact of a terrorist attack

The PREVENT programme in the training sector has the following key elements:

- 🌀 to encourage all learners to reach their full potential in a safe and supportive learning environment
- 🌀 to educate learners and employers about the potential of radicalisation and raise awareness of this issue in all organisations we work with
- 🌀 when necessary, raise any concerns with the appropriate authorities

The threat to the UK from international terrorism is substantial. The terrorist threats we now face are more diverse than ever before, dispersed across a wider geographical area and often in countries without effective governance. We therefore face an unpredictable situation.

Dealing with violent extremism has been necessary in the past. Throughout history there have been groups prepared to use violence to achieve their aims. A small minority of these seek to radicalise young people with an ideology which justifies the use of violence through a distorted interpretation of a set of values (often associated with a religion or belief system).

In line with guidance from the Department for Education (DfE), Profile Development and Training Limited has a zero-tolerance of extremist behaviour and ensures that our care, guidance and programmes empower young people to reject violent or extremist behaviour.

Whilst it remains very rare for young people to become involved in extremist activity, they can be exposed to extremist influences or prejudiced views, including via the internet, from an early age. Early intervention is a preferable way of tackling extremism.

Our role, as a training provider, is outlined more specifically in The Department for Children, Schools and Families (DCSF) document 'Learning together to be safe: A toolkit to help schools/educational settings contribute to the prevention of violent extremism.'

## DEFINITION

Extremism can be defined as "holding of extreme opinions: the holding of extreme political or religious views or the taking of extreme actions on the basis of those views".

## AIMS

At Profile Development and Training Ltd, we follow the principles outlined in the DCSF toolkit which seeks to:

- Raise awareness within schools/educational settings of the threat from violent extremist groups and the risks for young people.
- Provide information about what can cause violent extremism, about preventative actions taking place locally and nationally and where we can get additional information and advice.
- Help schools/educational settings understand the positive contribution they can make to empower young people to create communities that are more resilient to extremism and protecting the wellbeing of particular pupils or groups who may be vulnerable to being drawn into violent extremist activity.
- Provide advice on managing risks and responding to incidents locally, nationally or internationally that might have an impact on the school/educational setting community.

Profile Development and Training Limited will use these principles to guide our work in all areas including building on our work in:

- Promoting positive outcomes for all learners.
- Promoting learner wellbeing, equalities and community cohesion.
- Building the resilience of the company, working with partners, to prevent learners becoming the victims or causes of harm.
- Working with other agencies and interested parties to build community networks of support for the company

Profile will signpost employers and learners to relevant online PREVENT training to raise their awareness of potential issues.

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

For those learners who are 16-17, parents are also provided with information and guidance in this subject.

In addition to this all members of the Profile Team will complete relevant annual update training in safeguarding and PREVENT and will raise any concerns with their

Line Manager and the Safeguarding Officer. These issues will be dealt with as a matter of priority for all parties as described above.

## ONLINE SAFETY

Profile believe that children and young people should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

The online world provides everyone with many opportunities, however, it can also present risks and challenges. We have a duty to ensure that all children, young people and adults are protected from potential harm online and are kept safe, whether or not they are using Profile's network and devices.

There are three main areas to consider:

- 🌀 **Content** – being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racist or radical and extremist views
- 🌀 **Contact** – being subjected to harmful online interaction with other users, for example commercial advertising as well as adults posing as children or young adults
- 🌀 **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending, and receiving explicit images or online bullying

All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse. Profile work in partnership with children, young people, their parents, carers and others in their approach to online safety.

All staff are responsible for providing clear and specific directions to our learners on how to behave online when using the internet, social media and mobile phones in a way that keeps them safe and shows respect for others. Our safeguarding policy provides a clear and robust procedure to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or child/young person.

Any child under the age of 18 must have a parent/guardian/carer present BEFORE any audio or visual footage of them is recorded by teaching staff unless consent has been provided beforehand. Written consent will be sought at the start of the programme. Only approved video conferencing software will be used (Microsoft Teams or Zoom).

## Appendix during Covid-19

COVID-19 (commonly known as Coronavirus) has presented a challenge to the normal running of our education provision. On 23<sup>rd</sup> March 2020, the UK Government introduced a national lockdown to help delay the spread of the Coronavirus.

This appendix has been prepared to explain key changes and interim measures being taken within our setting to continue to meet our safeguarding requirements during these extraordinary times.

This is an appendix to the main body of our Safeguarding Policy and will be effective from **23<sup>rd</sup> March 2020** until the setting returns to business as usual, following the COVID-19 pandemic.

It is vital that while our business remains open a suitably trained DSL is available for consultation and advice. Due to staff self-isolating, social-distancing or being physically unavailable for other reasons, it is recognised this may not always be possible. However, a trained DSL or deputy will be available to be contacted via phone or video conferencing if they are working off site.

Where a trained DSL or deputy is not available Profile will have a senior manager who will take responsibility for co-ordinating safeguarding. This person will update and manage access to child protection files, liaise with the offsite DSL (or deputy) and as required liaise with appropriate authorities, and/or carry out statutory assessments.

In the instance of a referral to the Local Authority Designated Officer (LADO) being necessary this will be actioned by the **Manager/DSL/DDS**L within 1 working day of the allegation coming to light.

Contact methods for the LADO will remain the same with all LADO referrals being made via the online referral form. Consultation by phone may be necessary in which case this will be done via

- [Online Referral Form](#)
- Email – [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)