

## SAFEGUARDING AND PREVENT POLICY

Version 3  
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### 1. Introduction

P. Flannery Plant Hire (Oval) Limited is passionate about safeguarding our learners and staff, whilst supporting our clients and communities. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of young people and adults at risk of harm in our care, but also a moral duty. This policy focuses on how we recruit and train our staff, support our learners and deal effectively with allegations against staff and/or learners.

The policy will contribute to the protection, safeguarding and promote welfare by:

- clarifying standards of behaviour for staff and learners
- promotion of an ethos that promotes mutual respect and shared values
- including safeguarding in a robust pastoral system
- encouraging learners to participate
- alerting staff where there are concerns
- developing staff awareness of the risks and vulnerabilities faced by learners
- addressing concerns at the earliest possible stage
- reducing the potential risks that learners face of being exposed to violence, extremism, exploitation, discrimination or victimisation.
- ensuring that on-line safety is promoted within the centres infrastructure through the use of filters and monitoring systems and within pastoral and teaching programmes.

We believe that:

- all young people have the right to be protected from harm, abuse and neglect.
- that every person has the right to an education young people need to be safe and feel safe in the learning environment.
- young people need support that meets their individual needs, including those who may have experienced abuse.
- all young people have the right to express their views, feelings and wishes and voice their own values and beliefs.
- all young people should be encouraged to respect each other's values and support each other.
- all young people have the right to be supported to meet their emotional and social needs as well as their educational needs as this will promote educational achievement.
- Flannery Plant will contribute to the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyberbullying), exploitation, extreme behaviours, discriminatory views and risk-taking behaviours.

The Policy will contribute to learner support by; identifying and protecting the vulnerable early identification of needs and planning to address those needs.

The policy will contribute to the protection of learners by; working in partnership with learners, and other agencies.

Reference is also made throughout to “adults at risk of harm”. Adults at risk of harm are defined as people aged 18 years old and over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health, March 2000). The procedure will be applied with appropriate adaptations to all learners.

This policy has been developed with reference to:

- The Education Act 2002
- The Prevent Duty for England and Wales (2015) under section 26 of the Counter Terrorism and Security Act 2015
- Social Services and Well-being (Wales) act 2014
- Section 5B of the Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
- Dealing with Allegations of Abuse against Teachers and Other staff (2012)
- The violence against women, domestic abuse and sexual violence (Wales) act 2015
- Information Sharing (2018)

## **Management Responsibilities**

The Management ensures that the centre:

- Provides a safe environment for young people and adults at risk of harm to learn in.
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation.
- Take appropriate action to see that learners are kept safe at Flannery premises and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
- Report allegations of modern slavery and / or human trafficking in accordance with the Anti-Modern Slavery Statement and Policy.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agencies.

The Centre manager and all staff working with young people and adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with Flannery procedures and policies and receive refresher training at least every 3 years. A senior member of staff will co-ordinate protection arrangements and will be the Designated Senior Person (DSP). They will be assisted by a Deputy Designated Person who will support and share responsibility for safeguarding.

The centre nominates a member (normally the SLT) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Management team.

Management should ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB. This should include understanding and reflecting local protocols for assessment and the LSCB's threshold document along with supplying information as requested by the LSCB.

## Types of Abuse and Neglect

To ensure that our learners are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. All centre staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

**3.1.1 Abuse:** a form of maltreatment of someone. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. People may be abused in a family or in an institutional or community setting by those known to them or more rarely, by others (for example via the internet). They may be abused by an adult or adults.

**3.1.2 Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm.

**3.1.3 Emotional Abuse:** emotional abuse is the persistent emotional maltreatment of a young person or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people.

**3.1.4 Sexual Abuse:** Sexual abuse involves forcing or enticing a young person or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving looking at or in the production of sexual images, watching sexual activities, encouraging to behave in sexually inappropriate ways or grooming in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Woman can also commit acts of sexual abuse.

**3.1.5 Neglect:** Neglect is the persistent failure to meet basic, physical and/or psychological needs, likely to result in the serious impairment of health or development.

**3.1.6 Domestic Violence:** The Home Office defines domestic violence as "any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality.

This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim".

**3.1.7 Female Genital Mutilation:** This comprises all procedures that involve partial or removal of the external female genitalia or other injury to female genital organs for non-medical reasons. FGM is an extremely harmful practice and is illegal in the UK. Despite being an embedded practice in some cultures, FGM is not a matter which can be decided by personal preference.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should not be examining pupils, but the same definition of what is meant by “discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

3.1.8 ‘Honour-Based’ Violence: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community and can include multiple perpetrators, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBV are abuse (regardless of motivation) and should be handled and escalated as such.

3.1.9 Radicalisation: Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who offer guidance and support with the aim of preventing activity which could be deemed as criminal. Extremism goes beyond terrorism and is defined in the Governments Counter Extremism Strategy as vocal or active opposition to our fundamental values including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. The calls for the death of armed forces is also considered as extremism.

3.1.10 Financial and Material Abuse: This applies largely to adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

3.1.11 At its most serious level, bullying can have a disastrous effect on wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as Flannery operates a zero-tolerance approach. Bullying can take many forms and includes:

- Emotional
- Being excluded, tormented (e.g. hiding things, threatening gestures)
- Physical
- Pushing kicking, punching or any use of aggression and intimidation
- Racial
- Racial taunts, use of racial symbols, graffiti, gestures
- Sexual
- Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti
- Verbal
- Name calling, spreading rumours, teasing
- Cyber

All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

3.1.12 Fabricated and Induced Illness: This is also a type of physical abuse.

Although local authorities are charged with several duties, including the implementation of measures designed to strengthen private fostering notification arrangements, raising awareness of private fostering across partner agencies, ensuring that relevant training practices are developed, reviewing the findings of the annual private fostering report and responding to the findings of OFSTED inspections, all partner agencies of the LSCB, parents and private foster parents have a responsibility and duty to:

- raise awareness of private fostering and the need to notify the local authority of arrangements.
- ensure that private fostering arrangements are satisfactory and compliant with legislation.
- ensure that the private foster parents are suitable and that appropriate advice is being given.
- consider post 16 support for those who are no longer subject to private fostering due to their age.

Sexual Violence and Sexual Harassment: It is important that Flannery staff are aware of sexual violence and the fact that this can, and sometimes does happen. When referring to sexual violence this is a reference to the sexual offences under the Sexual Offences Act 2003:

Rape – A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents

Assault by penetration – A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of his / her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents

Sexual assault – A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

It should be acknowledged that there are learners of different ages, including adults, who will require different considerations and referral may need to be made via different referral routes.

Sexual Harassment, means ‘unwanted conduct of a sexual nature’ that can occur online or off-line. This is likely to violate dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualized environment.

This can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualized names;
- sexual jokes or taunting;
- physical behaviour such as brushing against someone, interfering with someone’s clothes (sexual violence should be considered here along with the experience of the victim), displaying pictures photo’s or drawings of a sexual nature; and
- online sexual harassment, this may be standalone or part of a wider pattern of sexual harassment and/or sexual violence and may include;
- Non-consensual sharing of sexual images and videos
- Sexualised online bullying
- Unwanted sexual comments and messages
- Sexual exploitation, coercion or threats
- ‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

### 3.1.13 Homelessness:

LGBTG+ learners: Some learners may be vulnerable due to their sexual orientation or gender identity, either, because they have been subjected to homophobic, bi-phobic or transphobic bullying, or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness.

Several studies also evidence that LGBTG+ young people may be at increased risk of becoming victims of CSE.

It is important that Flannery is aware of increased risk factors to enable access to the appropriate support for these young people when required.

## 1. Designated Staff with Responsibility for Protection from Abuse

Staff receive basic training in safeguarding issues and are aware of Flannery's safeguarding procedures and safer recruitment practices that are in place.

Flannery works with appropriate partners to safeguard young people and adults at risk of harm. There is liaison with the nominated person as appropriate.

In addition to their formal training, their knowledge and skills should be updated (for example, via e-bulletins, meeting other designated safeguarding leads or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with developments relevant to the role.

The designated senior person will ensure an annual report is provided to Flannery's Senior Management Team setting out how Flannery Plant has discharged its duties.

The deputy designated person(s) is/are appropriately trained and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of learners. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

During term time, the designated safeguarding lead and or a deputy should always be available (during Flannery hours) for staff at Flannery's to discuss any safeguarding concerns. Flannery will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Designated members of staff with responsibility for adult protection issues are:

Aaron Davis - Designated Safeguarding Lead

Jenna Don - Deputy Designated Safeguarding Lead

## 2. Staff Training

All staff members should receive appropriate safeguarding training which is regularly updated. In addition, all staff members should receive safeguarding and updates (via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard effectively.

Management should ensure that all staff members undergo safeguarding training at induction. The training should be regularly updated. Induction and training should be in line with advice from the LSCB.

## 3. Safeguarding Learners who are Vulnerable to Radicalisation

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard young people and adults at risk of harm from violent extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make young people and adults at risk of harm vulnerable to future manipulation and exploitation. Flannery is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting young people from the risk of radicalisation is part of Flannery's safeguarding duty.

With effect from July 2015 in accordance with the Counter Terrorism and Security Act, Flannery has a responsibility to prevent people from being drawn into terrorism. Prevent is a strand of the Government counter terrorism strategy – CONTEST. The UK faces a range of terrorist threats. The Prevent Strategy aims to:

- Respond to the ideological challenge of terrorism and aspects of extremism and the threat faced from those who promote these views.
- Provide practical help to stop people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet, social media and health.

Flannery is required to identify a Prevent Single point of contact (SPOC) who will be the lead within the organization for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. This will normally be the Designated Senior Person. The SPOC for Flannery Plant is Aaron Davis (Head of Skills and Training).

Flannery staff will be alerted to changes in a learner's behaviour or attitude which could indicate that they are in need of help or protection.

When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC.

#### **4. Safeguarding Learners who are Vulnerable to Exploitation, Forced Marriage, Female Genital Mutilation or Trafficking**

The Safeguarding Policy above and Flannery's values and ethos provide the basic platform to ensure young people and adults at risk of harm are given the support to respect themselves and others and protect each other.

Flannery keeps updated on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

Staff are supported and trained to recognise warning signs and symptoms in relation to specific issues and include such issues in their curriculum.

Our safeguarding team knows where to get advice as necessary.

Reporting of Female Genital Mutilation (FGM) –

With effect from October 2015, centres are subject to mandatory reporting in respect of FGM. If a member of staff discovers that an act of FGM appears to have been carried out on a girl aged under 18, that member of staff has a statutory duty to report it to the Police.

When a member of staff has reasons to suspect that an act of FGM has been carried out on a learner s/he will discuss the situation with the Designated Safeguarding Lead who may consult relevant agencies before a decision is made whether the mandatory reporting duty applies.

## 15. Positive mental health promotion

Positive mental health is important for every member of the Flannery community and we recognise that educational establishments play a key role in this. Flannery wants to develop the emotional well-being and resilience of all learners and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors that increase an individual's level of vulnerability and protective factors that can promote or strengthen resiliency.

The more risk factors present in an individual's life, the more supportive interventions are required to support and build resilience. It is vital that we work in partnership with parents to support the well-being of our learners.

## SAFEGUARDING PROCEDURE

How to deal with Suspicions/Concerns of Abuse or Neglect

Wherever possible there should be a conversation with the Designated Safeguarding Lead (or deputy), who will help staff decide what to do next. This **MUST** be recorded in writing as soon as possible following any conversation.

Options include:

- Managing support internally via Flannery's own pastoral processes;
- Early help assessment; or

**IF IN EXCEPTIONAL CIRCUMSTANCES, THE DESIGNATED SAFEGUARDING LEAD (OR DEPUTY) IS NOT AVAILABLE, THIS SHOULD NOT DELAY APPROPRIATE ACTION BEING TAKEN.**

Key things to remember if a young person or adult at risk of harm tells you about possible abuse:

- Never promise confidentiality – you will have to break it and with it the person's trust in you.
- Listen carefully and stay calm – you need to listen without making assumptions or judgments.
- Do not interview the young person or adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words into their mouth.
- Reassure them that by telling you, they have done the right thing.
- Inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter to.
- Find out what the young person or adult at risk of harm would like to happen, but make them aware that you may have to act against their wishes (eg they may ask you not to disclose to anyone else).
- Note the main points carefully.
- Use the Safeguard system to report, if possible, to gather key information and as a record of your discussion.
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the safeguarding team.

At no time should an individual member of staff consider taking photographic evidence of any injuries or marks to a person, this type of behaviour could lead to the staff member being taken into managing allegations procedures



## Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed a young person or adult at risk of harm.
- Possibly committed a criminal offence against or related to a, young person or adult at risk of harm.
- Behaved towards a young person or adult at risk of harm in a way that indicated s/he is unsuitable to work with young people or adults at risk of harm.

### 2.1. Introduction

2.1.1 Flannery recognises that the welfare of the young person is the paramount concern.

2.1.2 Flannery recognises that an allegation of abuse to adults at risk of harm made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

2.1.3 All staff are advised that they must report worries or concerns about other members of staff through the Whistleblowing Policy.

### 2.2 Receiving an Allegation from Adult at Risk of Harm about a Member of Staff

2.2.1 A member of staff who receives an allegation about another member of staff from or adult at risk of harm will follow the guidelines in Section 1 for dealing with disclosure. This will ensure the adult needs are met.

On some occasions the concern may not arise from a direct disclosure. If observations of staff behaviour give rise for concern of inappropriateness, these must be shared directly with the Designated Senior Person.

2.2.2 The allegation about the staff member will be reported immediately to either the Designated Senior Person or a member of Flannery Executive/Senior Management Team (CE/SMT).

### 2.3 Initial Assessment by the designated person

2.3.1 The designated person will make an initial assessment of the allegation,

2.3.2 It is important that the Centre Manager (or designated person) does not investigate the allegation. The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

2.3.3 Other potential outcomes are:

The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the adult at risk of harm. The matter will be addressed through professional development of mentoring or in some cases more appropriate, Flannery's Disciplinary Policy and Procedure.

The allegation can be shown to be false because the facts alleged could not possibly be true, in which case the person concerned will be reassured and supported as appropriate.

## 2.4. Enquiries and Investigations

2.4.1 Adult protection enquiries by Adult Services or the Police are not to be confused with internal, disciplinary enquiries by Flannery.

2.4.2 Flannery will hold in abeyance its internal enquiries which the formal Police. Any internal enquiries will conform to the existing staff disciplinary procedures.

2.4.3 If there is an investigation by an external agency, for example, the Police, the designated person will normally be involved in and contribute to the inter-agency strategy discussions. The Centre manager (or designated person) is responsible for ensuring that Flannery gives every assistance with the agency's enquiries. They will ensure that the appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Centre Manager (or designated person) shall advise the member of staff that s/he may consult with a recognized Trade Union representative or work companion.

2.4.5 Written records of the action taken in connection with the allegation will be kept.

## 2.5 Suspension of Staff

2.5.1 Suspension will not be automatic; a member of staff may be suspended on full pay whilst an investigation is undertaken. In respect of staff other than the Centre Manager, suspension can only be carried out by the Centre Manager or a designated member of Flannery's Management team. In respect of the Centre Manager, suspension can only be carried out by the SLT.

2.5.2 Where a suspension is being considered it is not a disciplinary sanction and does not involve any pre judgment. Consideration will be given to alternatives – e.g. paid leave of absence, agreement to refrain from attending work, change of or withdrawal from specified duties.

2.5.3 Suspension will only occur for a good reason, for example:

Where there is a cause to suspect a adult is at risk of significant harm.

Where the allegations warrant investigation by the Police or potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.

Where necessary for the good and efficient conduct of the investigation.

2.5.4 If suspension is being considered, the member of staff will be encouraged to seek advice and support for example from a Trade Union.

2.5.5 Prior to making the decision to suspend, the Centre Manager or a designated member of the Senior Management Team will interview the member of staff.

2.5.6 The member of staff will be advised to seek the advice and/or assistance of his/her Trade Union and will be informed that they have the right to be accompanied by a representative of a recognised Trade Union or a workplace colleague. The member of staff will be informed that an allegation has been made. It will be made clear that the interview is not a formal disciplinary hearing but solely for raising a serious matter which may lead to further investigation. It may be considered at this time to suspend the member of staff.

2.5.7 During the interview, the member of staff will be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The member of staff will be given the opportunity to consider any information given to him/her at the meeting and prepare a response.

2.5.8 If the Centre manager considers that suspension is necessary, the member of staff shall be informed that s/he is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within five working days.

2.5.9 Where a member of staff is suspended, the Centre Manager will address the following issues:

The SLT will be informed of the suspension

The Management Team will receive a report if a senior member of staff has been suspended pending investigation. The detail given to the Managers will be minimal.

Where the Centre manager has been suspended, the SLT will need to take action to address the management of Flannery.

2.5.10 Senior staff that need to know of the reason for suspension will be informed.

2.5.11 The Centre Manager shall consider carefully and review the decisions as to who is informed of the suspension and investigation.

2.5.12 The suspended member of staff will be given appropriate support during the period of suspension. They will also be provided with information on progress and developments in the case at regular intervals with approval of LADO and the police.

2.5.13 The suspension will remain under review in accordance with Flannery's Disciplinary Procedures.

2.5.14 if it is decided that a member of staff who has been suspended from work can return, Flannery will facilitate their return to work and consider how the member of staff's contract with the young person who made the allegation can be best managed. The DBS will be notified that the suspension has been lifted.

## **2.6 The Disciplinary Investigation**

2.6.1 The disciplinary investigation will be conducted in accordance with the existing Disciplinary Policy and Procedure.

2.6.2 The member of staff will be informed of:

The disciplinary allegation against him/her

His/her entitlement to be represented by a Trade Union representative or work companion.

Flannery's awareness of the personal impact the allegation may have and the support Flannery is able to offer for example, counselling.

2.6.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately and arrangements made for the member of staff to return to work.

2.6.4 The adult at risk of harm, making the allegation, and/or parent will be informed of the outcome of the investigation and proceedings.

## **2.7 Allegations without Foundation**

2.7.1 False allegations may be indicative of problems of abuse elsewhere.

2.7.2 The Designated Senior Person shall:

Inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken.

Reassure them of Flannery's understanding of the personal impact that false allegations may have and the support Flannery will continue to offer.

Inform the alleged victim that the allegation has been made and of the outcome.

Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

## 2.8 Records

2.8.1 Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details will be retained on the member of staff's personal and confidential file.

2.8.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, s/he will be informed about Flannery's statutory duty to inform the DBS.

## 2.9 Recruitment and Selection

2.9.1 Flannery aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. Flannery is committed to safeguarding and promoting the welfare of adults at the risk of harm and expect its staff to share this commitment.

2.9.2 The Disclosure and Barring Service (DBS) was introduced on 1 December 2012 through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedom Act 2012. Its purpose is to reduce the risk of harm to vulnerable adults.

2.9.3 The barred list checks are an additional safeguarding check and part of a wider framework of safer recruitment practices. It enables the increased monitoring and review of criminal record related information and intelligence. It does not remove the need for DBS disclosures, nor does it remove the need to develop and apply robust recruitment procedures, including identity checking, qualifications and references and enquiring into career history.

## 3. Safer Recruitment Training

3.1 All staff who participate in the recruitment process are required by Flannery to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received safer Recruitment Training. Both are arranged by Human Resources. Refresher training is available and all staff will be expected to keep themselves up to date with current practice.

For overseas appointees, additional checks will be made against criminal records information from countries where the individual has lived or worked.

If a candidate is to be employed in regulated activity, but is not currently working, checks will be made, including a full reference, with the School, FE College or Local Authority at which they were most recently employed, to confirm details of their employment and reason for leaving and if there were any safeguarding issues.

## 4. Staff Training

New staff will receive training during induction. All staff, including the Centre Manager will receive training that is updated at least every three years and the DSP will receive training updated at least every two years, including training in the inter-agency procedures.

## 5. Site Security

Visitors to Flannery premises including contractors, are required to sign in and given a badge, which confirms they have permission to be on site. All visitors are expected to observe Flannery's Safeguarding and Health and Safety regulations.

## 6. Online Safety

Cyber-bullying by learners, via texts, emails, sexting and sharing indecent images will be treated as seriously as any other type of bullying and will be managed through Flannery's Bullying and Harassment procedures.

Chat rooms and social networking sites are more obvious sources of inappropriate and harmful behaviour. Any inappropriate behaviour towards other learners attending Flannery's will be managed through the disciplinary procedure.

As Flannery increasingly works online, it is essential that learners are safeguarded from potentially harmful and inappropriate online material. As such, appropriate filters and monitoring systems are in place.

Flannery has a whole Flannery approach to online safety which includes a clear policy on the use of mobile technology at Flannery's. It is acknowledged, however, that whilst it is essential to ensure that appropriate filters and monitoring systems are in place, it is also important that 'over blocking' does not lead to unreasonable restrictions to what learners can be taught with regards to online teaching and safeguarding.

Flannery will ensure that online safety is included in lessons and learners are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum. This may include covering relevant issues through tutorials.

## APPENDIX 1

### GUIDANCE ON PREVENT AND THE CHANNEL PROGRAMME

#### What is Prevent?

Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.

#### What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour, Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

#### What does Channel Work with?

Channel is designed to work individuals of any age who are at risk of being exploited by extremist or terrorist ideologies. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

#### How does Channel Work?

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed.

The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensure those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

#### What does Channel Support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

#### How will the person be involved in this process?

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

What happens with the Referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel coordinator and the local authority, if suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Raising a Concern:

If you believe that someone is vulnerable to being exploited or radicalized, please use the established safeguarding duty or care procedures within your organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate

For referrals to Channel for more information around the process, in the first instance contact your local Prevent Coordinator.

If you don't have a local authority coordinator or would like specific FE.HE guidance, please contact: john.hodt@dudley.gov.uk or Telephone: 01384 81473

### Implementation and Review

This Procedure is effective from 20th December 2024 and will be reviewed in line with all relevant legislation and requirements. Overall implementation of this policy lies with Aaron Davis (Safety & Skills Director).

### Signed:

A.Davis, Safety & Skills Director,

20.12.2024

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**I confirm that I have received, read and understood the Flannery Safeguarding and Prevent Policy**

Name			
Job title			
Signature		Date	