

COMMUNITY SYSTEMS

Safeguarding/Wellbeing/ Prevent Policy



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Reviewed by:	Farida Mirza
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Introduction	<p>Community Systems is fully committed to creating and maintaining a safe and secure environment for all users (learners, staff and visitors) and to ensuring that the needs of all users are at the centre of everything we do. We ensure that all learners and staff work and learn in a safe and supportive environment.</p> <p>The Company and its entire staff have a duty of care towards its learners / staff / visitors and a need to recognise that they have a fundamental right to be protected from harm.</p> <p>We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for people and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views, we are failing to protect people and to promote equality and diversity.</p> <p>People’s physical and mental welling is essential to their achieving their potential and Community Systems is fully committed to empowering people.</p>
Scope	<p>Community Systems currently only provides services to adults aged 19 or over. We do not have plans to work with those under this age or to provide activities that are regulated as defined under the Safeguarding Vulnerable Groups Act (2006) and its amendments in the Protection of Freedoms Act 2012. Any changes to our service in respect to the definitions in these acts will trigger a full review of policies.</p> <p>This policy has been amended to include new duties and procedures to meet requirements set out in the Counter-Terrorism and Security Act (2015) – The PREVENT strategy - and the provisions of the Modern Slavery Act 2015</p>
Definitions	<i>Extremism</i>

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When operating this policy, the Company uses the following accepted Governmental definition of extremism.

- Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs;
- calls for the death of members of our armed forces, whether in this country or overseas’.

The Duties inherent under the new Prevent include:

British values

These are defined as: 'Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.'

Mutual respect and tolerance includes encouraging students to respect other people with particular regard to the protected characteristics of the Equality Act [2010]

Vulnerable Adults

For adults aged 18 years and over, the term 'vulnerable adult' is no longer in use and has been amended under Protection of Freedoms Act (2012). In general terms, an adult (a person aged 18 or over) is classed as vulnerable when they are receiving one of the following services:

- Health care
- Relevant personal care
- Social care work
- Assistance in relation to general household matters by reason of age, illness or disability
- Relevant assistance in the conduct of their own affairs
- Conveying (due to age, illness or disability in prescribed circumstances)

Abuse

The following definitions of abuse are recognised in "Care and Support Statutory Guidance" issued under the Care Act 2014 and "Keeping children safe in education" statutory guidance for schools and colleges:

Physical abuse including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child/adult.

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Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

Sexual abuse including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. (This would include up-skirting.)

Neglect including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating

Self-neglect – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Psychological/emotional including emotional abuse, threats of harm and abandonment, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation. It may involve serious bullying (including cyberbullying), causing a person to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

Financial or material abuse including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Discriminatory abuse including bullying and harassment based on an individual's age, sex, disability, religion, race or ethnicity, or sexual orientation.

Institutional abuse including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organization

Modern slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and

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force individuals into a life of abuse, servitude and inhumane treatment.

Forced marriage including but not limited to arranging the marriage of, or marrying, someone under the age of consent; taking someone overseas to force them to marry; marrying someone who lacks the mental capacity to consent to marriage; and/or being forced to sponsor someone through a UK visa.

Mate Hate Crime - is 'any criminal offence that is motivated by hostility or prejudice based upon a person's disability' and is done by someone known to the disabled person.

Female Genital Mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for nonmedical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child.

Online (Digital) abuse – includes online bullying or harassment, online hate crime, image-based abuse, online fraud and online grooming. The online world changes quickly and new risks are constantly appearing. It is important that staff and students have the skills to recognise risks and keep themselves safe.

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Policy Strategy

The Company will employ various overarching strategies to control the risk of abuse, radicalization and extremism and ensure people's wellbeing. These include:

- Embedding the principles of safeguarding and Prevent into management expectations and professional practice.
- Ensuring full compliance with the Disclosure and Barring Service (DBS) requirements under the Safeguarding Vulnerable Groups Act (2006) and Protection of Freedoms Act (2012). Communication with all users about the nature of abuse and the Services Safeguarding activity and ensure the information is in accessible formats for everyone to have access to
- Awareness raising training and full training for all service employees
- Risk Assessment in place for all where appropriate
- Monitoring reporting of safeguarding incidents and actions taken

Policy Statements (Extremism)

There is no place for extremist views of any kind in our Organisation, whether from internal sources – owners, clients, learners, staff, referrers, partners or external sources - stakeholder community, external agencies or individuals. Our learners and staff see our Centres as safe places where they can explore issues safely and where our tutors encourage and facilitate this – we have a duty to ensure this happens.

As an educational establishment we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our learners.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and dealt with appropriately.

As part of wider safeguarding responsibilities company staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of the organisation, such as in their homes or community groups, especially where learners have not actively sought these out.

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- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Reports of changes in behaviour, friendship or actions and requests for assistance
- Partner colleges, local authority services, and police reports of issues affecting learners in other settings
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

Policy Statements (Prevent)

The Managing Director of Community Systems is responsible for: ensuring the provider Prevent duty strategy rests with them and for scrutinising the implementation of the Prevent duty.

The management team and Quality Ambassador will oversee, monitor and review the effectiveness of the targeted strategies and the services responsibilities for safeguarding.

The Safeguarding Lead will be the main point of contact for all safeguarding reporting, issues, concerns and queries and will liaise with the management team. There will also be liaison with external stakeholders to ensure best practice and a broad knowledge base exists within the service.

All staff, should:

- undertake appropriate Prevent duty training
- understand the risk of radicalisation
- implement the Duty effectively
- know how to refer an individual who is vulnerable within your organisation.

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Safeguarding Procedures

The Company will:

Ensure that all new applicants for posts within the Company are checked in compliance with the Disclosure and Barring Service (DBS) requirements under the Safeguarding Vulnerable Groups Act (2006) and Protection of Freedoms Act (2012).

Outside of these requirements all staff will provide a self declaration and update this annually.

Ensure a central record is kept of all Staff DBS and self declarations with annual updating of information and data cleansing exercises.

Ensure that staff are aware of this policy and provide them with procedures for responding to situations in which they believe a learner has been abused, is in danger or potential danger of abuse or is at risk of radicalisation.

Provide up to date contacts for reporting both internally and externally (Local Authority, Prime Contractors, Channel)

Ensure that accurate records of all incidents are kept and maintained in a secure place. Ensure incidents are monitored if ongoing issues occur.

Ensure that all members of staff undergo appropriate training and development in relation to their work with learners and clients on an ongoing basis and have a full understanding of safeguarding and its prevention for everyone. Staff training will be recorded on their CPD record.

Community Systems is committed to providing a safe and secure environment for all users whether learners, staff or visitors. We will promote the health and well-being of all users through:

- Health & Safety: making sure all health and safety information is communicated at induction, through the learner handbook, displayed in classrooms and throughout centres
- Evacuation Procedures: make sure that all users are aware of evacuation procedures from any room/building they may be in and vulnerable adults have practiced evacuation routes
- Risk Assessments: Ensure that risk assessments are in place throughout and that these are accessible to appropriate staff and kept up-to-date. These include off site visits, events and projects,

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work experience. Risk Assessments currently form part of each lesson plan.

- Subject specific health and safety information. Ensure this is covered in Tutor / staff supervision and learners ILP's and client information these included COSHH.
- Guidelines for behaviour in lessons: All learners sign a compliance to health and Safety on their ILP and all learners / client should respect each other and listen to each other. Guidelines on confidentiality and privacy may be drawn up on some courses, and these should be respected and observed. We will challenge firmly bullying, harassment and discriminatory behaviour from anyone towards anyone. This includes up-skirting.

Through induction, learner handbook and centre information posters and leaflets, inform learners about safeguarding and feeling safe issues and ensure they know who to contact if safeguarding issues arise.

Contribute to a co-ordinated approach to Prevent and vulnerable adults protection by developing effective liaison with other agencies and support services.

Review this policy and associated procedures annually and whenever there are substantial changes in legislation.

Ensure that all photographic imagery is taken within guidelines and has full permission from the person (in writing) for its use in publicity material.

Ensure that all staff are fully compliant with the Company's ICT usage policy and are reminded of protecting their personal profile outside of the Company's systems (i.e. Facebook)

Through promotion of British values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will foster and encourage learners and staff to respect one another and to respect and tolerate difference.

Embed within the service an ethos of safe and acceptable behaviour so that learners and staff know and understand what safe and acceptable behaviour is in the context of extremism and radicalization and mental wellbeing.

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Policy Statements (Modern Slavery)

Section 54 of the Modern Slavery Act 2015 requires some organisations to prepare a slavery and human trafficking statement for each financial year, setting out the steps that the organisation has taken during the year to ensure that slavery and human trafficking is not taking place in its supply chains or its own business (or setting out that it has taken no such steps).

An employer is covered by the duty to prepare a statement under s.54 if it:

is a body corporate or partnership, wherever incorporated or formed; carries on a business, or part of a business, in any part of the UK; supplies goods and services; and has a total turnover of at least £36 million per year.

Whilst Community Systems does not fall under this definition we are aware of the duties under this act and also that some of our partners may be covered by this duty.

Community systems is committed to raising awareness of modern slavery and the signs to spot potential victims through staff training and signage. We will promote awareness to learners through curriculum elements around general safeguarding and British values. We will report all suspicions of modern slavery to our contract holders and via the [modern slavery website](#) using our standard safeguard reporting procedures.

Confidentiality

We fully understand the right of our learners to confidentiality, however we would actively encourage them to share their situations with an appropriate agency to gain help. We would support them to share the situation or issue if required. In some instances of harm, illegality or duties under Prevent we would be unable to maintain confidentiality, we would advise the learner of the boundaries of confidentiality. If there were no harm or legal issues and the learner decided not to share the situation with another agency we would respect this. We would monitor the situation to ensure there were no developments in the future that suggested there may be harm or illegality.

Reporting Procedures

Allegations or Suspicions

All complaints, allegations or suspicions must be taken seriously and referred to their line manager immediately who will advise the Safeguarding Lead. Staff and learners are encouraged to use the **5R's** in relation to any incidents

Recognise, Respond, Report, Record and Refer

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It is the responsibility of **all** staff and learners to **RECOGNISE** and **RESPOND**, **REPORT** and **RECORD** all disclosures confidentially and immediately to their line manager or the Deputy Operations Manager, who will inform the Safeguarding Lead. **REFERRAL** may need immediate action therefore can be made by Centre Manager or other member of Senior Management Team. The safeguarding lead will keep a record in the safeguarding log.

This procedure must be followed whenever an allegation is made that a learner or member of staff has been abused or when there is a suspicion that a person has been abused or is in danger.

The suspicion or allegation may involve other family members, learners in the Service, employees of the Service or other persons.

Reporting Allegations or Suspicions

Information relating to allegations of abuse may be communicated directly to members of staff by the learner her/himself or from other 'third party' sources. All complaints, allegations or suspicions of abuse must be taken seriously. Staff should respond with tact and sensitivity to any person who confides in them, recognising that it requires courage and/or desperation to share such painful and personal concerns.

Staff who receives such reports should not give any promises of confidentiality as the matter may develop in such a way that these cannot be honoured.

If the complainant is the learner themselves questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. (These can cause problems for subsequent investigations and any court proceedings.)

Staff who receive reports of alleged abuse should make a written record (email is acceptable) as soon as possible of the nature of the allegation and any other relevant information.

Some learners with learning difficulties or disabilities may need different treatment in relation to questioning and should be appropriately supported at all times, but the principles remain the same.

Details of the suspicions or allegations of abuse should be reported to the Lead or Deputy. The Safeguarding Lead or Deputy will review the situation within 24 hours to determine further action eg:

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- Whether to contact the parents/carers/social worker in the case of children up to 18 years old or a vulnerable adult
- Whether to consult other agencies
- Whether to alert emergency services
- Whether an adult protection alert is appropriate

The Safeguarding Lead or Deputy should keep a written record of the date and time the report is made, and further records of all actions undertaken. If the Safeguarding Lead or Deputy are not available, the staff member who has reported the situation should consult their immediate line manager for further action.

Allegations against an employee of the Service (including volunteers/interns)

Where an allegation or suspicion of abuse is made against a Service employee this must be reported to the Sue Cooper, Community Systems HR Manager as soon as possible. If allegations made against a Service employee are investigated and founded, this could constitute gross misconduct and the employee will be dealt with under the Companies Disciplinary Procedure.

Key Roles and responsibilities

To ensure that staff understand their role in learner wellbeing and safeguarding we have mandatory induction and annual refresher training. In addition to this, it is a standing item in individual supervision, team and management meeting. This ensures there is a common shared approach to our learners' wellbeing and learners remain safe.

Managing Director (Claire Thraves) – overall responsibility

The Managing Director (Claire Thraves) - overall responsibility for ensuring the provider Prevent duty strategy rests with them and for scrutinising the implementation of the Prevent duty.

The Safeguarding Panel (SMT) will oversee, monitor and review the effectiveness of the targeted strategies and the services responsibilities for safeguarding.

The Safeguarding Lead Deputy Operations Manager (Farida Mirza) will be the main point of contact for all safeguarding reporting, issues, concerns and queries and will liaise with the panel and leadership. The lead will also liaise external stakeholders to ensure best practice and a broad knowledge base exists within the service.

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All staff must:

- undertake appropriate Prevent duty training identified by leaders and managers
- understand their Prevent related responsibilities, especially in the context of Safeguarding. This will ensure the welfare of learners, staff, volunteers and visitors.
- understand the risk of radicalisation
- implement the Duty effectively
- report any suspicions of modern slavery
- know how to refer an individual who is vulnerable within your organisation
- share information about vulnerable individuals within the organisation and externally as required in accordance with provider information sharing agreements and data protection legislation
- exemplify British values such as tolerance and mutual respect for faiths and beliefs.
- implement the teaching of British values when opportunities arise within the curriculum
- challenge extremist ideas as they arise in their work

Key Reporting contacts

Emergencies

call 999

Internal first line of contact

Farida Mirza (Deputy Operations Manager) 07908 483 768
Any other SMT member

Police

999 for emergencies
101 general concerns
0800 789 321 Anti-Terrorist Hotline

Brent Local Authority

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Contact the Safeguarding adults team

If you are worried that someone is at risk of harm or is being abused, report it as soon as possible.

To discuss your concerns between Monday - Friday, 9am - 5pm

Phone: [0208 937 4098](tel:02089374098)

Phone: [0208 937 4099](tel:02089374099)

Outside office hours, contact our emergency duty team

Phone: [0208 863 5250](tel:02088635250)

Online: [Use our online enquiry form](#)

Partnership contacts:

Royal Borough of Greenwich

Adam Browne PREVENT Co-ordinator 07791 701 077

adam.browne@royalgreenwich.gov.uk

Secure Email

adam.browne@royalgreenwich.gov.uk.cjism.net

Royal Borough of Greenwich

Louise Severyn-kosinska -kosinska@royalgreenwich.gov.uk>;
Safeguarding Lead for ACL 020 8921 6835

United College Group

Diana Brown Designated Safeguarding Lead 020 8208 5129 / 07860
75 40 40

E diana.brown@cnwl.ac.uk

HE & FE Regional Prevent Coordinators

Jennie fisher 07880 469588

jennie.fisher@education.gov.uk

Reporting suspicions of modern slavery

Suspicions of modern slavery will be reported to Prime contractors' safeguarding leads and via the modern slavery website or 0800 0121 700.

Online safety links

Content linked to terrorism can be reported to

<https://www.gov.uk/report-terrorism>

You can anonymously and confidentially report child sexual abuse content, criminally obscene adult content and non-photographic child sexual abuse images via

<https://www.iwf.org.uk/>

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	<p>If someone has been a victim of revenge pornography, this helpline can provide advice and get images removed https://revengepornhelpline.org.uk/</p> <p>Reporting indecent or offensive content on Twitter https://support.twitter.com/articles/15789</p> <p>Reporting indecent or offensive content on YouTube https://www.youtube.com/intl/en-GB/yt/about/policies/#reporting-and-enforcement DSO –</p> <p>Reporting indecent or offensive content on Facebook https://www.facebook.com/help/contact/274459462613911</p> <p>Reporting indecent or offensive content on Instagram https://help.instagram.com/519598734752872</p> <p>Hate crime including online content can be reported via www.report-it.org.uk</p> <p>Harmful or upsetting content can be reported to https://reportharmfulcontent.com</p> <p>If you have been the victim of fraud contact https://www.cifas.org.uk</p> <p>or if you wish to report any form of cybercrime contact www.actionfraud.police.uk/</p>
Related policies	<p>Health and Safety policy Data protection and information sharing policies. Recruitment Policy Bullying and Harassment Equality and Diversity Policy Modern Slavery Statement</p>