

# Safeguarding Children and Vulnerable Adults Statement and Procedure

Version 10

Completed Date: 30<sup>th</sup> August 2024

Review Date: 30<sup>th</sup> August 2025

## 1. Statement

- 1.1 First Step Education & Training has a statutory and moral duty to ensure that the company functions with a view to safeguarding and promoting the welfare of children/young people and vulnerable adults receiving education and training with the company.
- 1.2 Throughout these policies and procedures, reference is made to “children and young people”. This term is used to mean “those under the age of 18”.
- 1.3 It is also recognised that some adults are vulnerable to abuse. Accordingly, the procedures are also applied to allegations of abuse and the protection of vulnerable adults. Guidance on who is a ‘vulnerable adult’ is taken from ‘No Secrets’ (Department of Health 2000), which defines vulnerable adults as: ‘those adults who are or may be in need of community care services by reason of mental or other disability, age or illnesses.
- 1.4 The definition of vulnerable adults includes (but is not exclusive to) individuals with any of the following:
  - Learning Difficulties
  - Physical Impairments
  - Sensory Impairments
  - Mental Health Needs
  - Age Related frailty
  - Dementia
  - Brain Injuries
  - Drug or Alcohol Problems
- 1.4 The Company will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to the City/County Council’s Department of Children and Young People’s Services, the City/County Council Adult Social Care Service, the police or in cases of radicalisation to the Channel Scheme as appropriate.
- 1.5 The Training Manager and all staff working with children/young people and vulnerable adults will receive training adequate to familiarise them with child/vulnerable adult protection issues and their responsibilities and the Companies procedures and policies, with refresher training at least every three years.



- 1.6 The senior member of the Company Leadership Team with special responsibility for protection issues is the Training Manager. He/she shall be assisted by other members of staff with responsibility of child/vulnerable adult protection. These are known as the Designated Team and their names and titles are set out in section 2 of this policy.
- 1.7 The governing body recognises the following as definitions of abuse:
- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, including a brother or sister, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as fabricated or induced illness by proxy, or Munchausen syndrome by proxy. Bullying can also be a form of physical and emotional abuse. However, it is more often between peers and needs to be dealt with locally by personal tutors with the assistance of Student Services, with cases reported as per the Company Anti Bullying & Harassment Policy.
  - **Psychological/Emotional abuse** is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on him or her emotional development. It may involve conveying to that child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.
  - **Sexual abuse** involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images.
  - **Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.
- 1.8 In respect to vulnerable adults, the local City and County Council Guidelines identify seven forms of abuse. In addition to the four above they also identify:
- **Financial abuse** is defined as the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or deception; or, the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and unreasonable restriction on a person's right to control over their lives to the best of their ability.
  - **Discriminatory abuse** is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation, etc.



- **Institutional abuse** is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of the providers rather than the person requiring the service.

### PREVENT AND CHANNEL

- 1.9 In respect of safeguarding individuals from radicalisation, the Organisation works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate, seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

## 2.DESIGNATED STAFF WITH RESPONSIBILITY FOR CHILD PROTECTION/ VULNERABLE ADULTS

### Senior Staff Members with Lead Responsibility for Child/Vulnerable Adults Protection

- 2.1 The designated senior member of staff with lead responsibility for child/vulnerable adult protection issues is *Training Manager – Jodie Love*.
- 2.2 This person is a senior member of the Company Leadership Team. She has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children, young people and vulnerable adults learning within the Company.
- 2.3 She has received training in child/vulnerable adult protection issues and inter-agency working, as required by the Local Safeguarding Children Board and will receive refresher training at least every three years.
- 2.5 The Training Manager is responsible for overseeing the operation of procedures.

This involves:

- Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the City/County Council's Department of Children and Young People's Services, or other agencies (such as the police, Channel) as appropriate.
- Providing advice and support to other staff on issues relating to child /vulnerable adult protection
- Maintaining a proper record of any child/vulnerable adult protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring that parents/carers of children and young people/vulnerable adults within the Companies are aware of the Companies Child/Vulnerable Adult Protection Policy
- Liaising with the Children and Young People's Services Department of the Local Authority, the Local Safeguarding Children Board and other appropriate agencies
- Liaising with secondary schools which send pupils to the Company to ensure that appropriate arrangements are made for the pupils.
- Liaising with employers and training organisations that receive children or young people/vulnerable adults from the Company on long term placements to ensure that appropriate safeguards are put in place.
- Ensuring that all staff receive basic training in child protection/vulnerable adult issues and are aware of the Company's Child/Vulnerable Adult Protection Procedures
- Convening and chairing regular meetings of the Designated Child Protection & Vulnerable Adult Protection Team.



### Designated Staff Members

2.6 Designated members of staff with responsibility for child protection/ vulnerable adult issues are:

- Training Manager – Jodie Love
- Managing Director – Rob Brown

2.7 These designated staff members:

- report to the Training Board of Governors on child/vulnerable adult protection issues
- are trained and able to receive and make an appropriate child/vulnerable adult protection referral to external agencies
- will be available to provide advice and support to other staff on issues relating to child/vulnerable adult protection
- have particular responsibility to be available to listen to children, young people and vulnerable adults studying with the company
- will deal with individual cases, including attending case conferences and review meetings as appropriate
- have received training in child protection/vulnerable adult issues (currently to level 3) and inter-agency working, as required by the LSCB, and will receive refresher training at least every two years

### 3.DEALING WITH DISCLOSURE OF ABUSE: THE ORGANISATIONS PROCEDURES FOR REPORTING CONCERNS

3.1 The Company has published procedures for reporting cases of suspected abuse of young people or vulnerable adults. (see appendix 1)

3.2 These procedures are issued to all members of staff and all new recruits to the organisation during their induction. Further staff (mandatory) training is provided to all Company staff and renewed every three years.

### 4. RECRUITMENT AND SELECTION PROCEDURES

4.1 The Company has written recruitment and selection procedures. The policy and procedures are designed with the aim of safely recruiting staff and providing a safe environment for children/young people and vulnerable adults to learn in. Key aspects of the procedures and processes are as follows:

- Job descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding and promoting the welfare of learners having due regard to the organisations Child & Vulnerable Adults Protection Policy
- A person specification setting out the key selection criteria for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with children and young adults.
- A standard application form that provides for the collection of information on applicants that enables the organisation to recruit safely.
- Advertising of posts externally as appropriate.
- A requirement for those appointed to produce documentary evidence of academic/vocational qualifications.



- Standard interview questions for lecturer appointments and other key staff who work with children and young adults exploring their suitability in this respect. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicants.
- two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be the applicant's existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no previous work experience e.g. young persons. Where appropriate referees are asked specific questions about an applicant and their role in safeguarding children
- A policy on obtaining a satisfactory Disclosure and Barring Service (DBS) disclosure and 'barred list' check for appropriate positions as a condition of employment at the organisation.



## APPENDIX ONE

### PROCEDURES FOR REPORTING CASES OF SUSPECTED ABUSE INVOLVING CHILDREN/YOUNG PEOPLE OR VULNERABLE ADULTS

#### 1. THE DUTY TO REPORT

1.1 *First Step Education & Training Ltd and all its members of staff have a legal duty to report cases of suspected abuse. If you, as a member of staff, have concerns that a child/young person or vulnerable adult has been mistreated or abused, you MUST report this.*

#### 2. WHAT TO DO IF YOU NOTICE ABUSE

2.1 You may become aware of potential abuse in two main ways:

- you may observe signs in a learner that lead you to suspect that they have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition in the case of a vulnerable adult, they may be experiencing financial, discriminatory or institutional abuse.
  - *the tables below gives examples that may indicate that an individual is being abused. In addition to these a person may be being abused by virtue of their race, gender, age, disability or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.*
- the students themselves may disclose to you that they have been abused.

##### Possible signs of physical abuse include:

- |   |   |
|---|---|
| • Unexplained injuries or burns, particularly if they are recurrent | • Fear of medical help                              |
| • Refusal to discuss injuries                                       | • Aggression/bullying                               |
| • Improbable explanations for injuries                              | • Over compliant behaviour or a 'watchful' attitude |
| • Untreated injuries or lingering illness not attended to           | • Running away                                      |



- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Admission of punishment which appears excessive</li> <li>• Shrinking from physical contact</li> <li>• Fear of returning home or of parents being contacted</li> <li>• Fear of Undressing</li> </ul> | <ul style="list-style-type: none"> <li>• Significant change in behaviour without explanation</li> <li>• Deterioration of work</li> <li>• Unexplained pattern of absence which may serve to hide bruises or other physical injuries</li> </ul> |
|--|---|

**Possible signs of emotional abuse include:**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Continual self-deprecation</li> <li>• Fear of new situations</li> <li>• Inappropriate emotional responses to painful situations</li> <li>• Self-harm or mutilation</li> <li>• Compulsive stealing/scrounging</li> <li>• Drug/solvent abuse</li> </ul> | <ul style="list-style-type: none"> <li>• 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on</li> <li>• Air of detachment – 'don't care' attitude</li> <li>• Social isolation – does not join in and has few friends</li> <li>• Desperate attention-seeking behaviour</li> <li>• Eating problems, including overeating and lack of appetite</li> <li>• Depression, withdrawal</li> </ul> |
|--|---|

**Possible signs of sexual abuse include:**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Bruises, scratches, burns or bite marks on the body</li> <li>• Scratches, abrasions or persistent infections in the anal or genital regions</li> <li>• Sexual awareness inappropriate to the person's age – shown, for example, in drawings, vocabulary, games and so on</li> <li>• Frequent public masturbation</li> <li>• Attempts to teach others about sexual activity</li> </ul> | <ul style="list-style-type: none"> <li>• Promiscuity, prostitution, provocative sexual behaviour</li> <li>• Self-injury, self-destructive behaviour, suicide attempts</li> <li>• Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father</li> <li>• Recoiling from physical contact</li> <li>• Eating disorders</li> <li>• Tiredness, lethargy, listlessness</li> </ul> |
|--|---|



- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Refusing to stay with certain people or to go to certain places</li> <li>• Aggressiveness, anger, anxiety, tearfulness</li> <li>• Withdrawal from friends</li> </ul> | <ul style="list-style-type: none"> <li>• Over-compliant behaviour</li> <li>• Genital discharge/irritation</li> <li>• Sleep disturbance</li> <li>• Unexplained gifts of money</li> <li>• Depression</li> <li>• Changes in behaviour</li> </ul> |
|---|---|

**Possible signs of neglect include:**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Constant hunger</li> <li>• Poor personal hygiene</li> <li>• Inappropriate clothing</li> <li>• Frequent lateness or non-attendance at sessions</li> <li>• Untreated medical problems</li> </ul> | <ul style="list-style-type: none"> <li>• Low self-esteem</li> <li>• Poor social relationships</li> <li>• Compulsive stealing or scrounging</li> <li>• Constant tiredness</li> </ul> |
|---|---|

**Possible signs of financial abuse include:**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Loss of jewellery and personal property</li> <li>• A bill not being paid when money is entrusted to a third party</li> <li>• Unexplained withdrawal of cash</li> </ul> | <ul style="list-style-type: none"> <li>• Lack of money to purchase basic items</li> <li>• Misuse of benefits</li> <li>• Inadequate clothing</li> <li>• Theft of property</li> <li>• Over protection of money or property</li> <li>• Loss of money from a wallet or purse</li> </ul> |
|---|---|

**Possible signs of radicalisation include:**

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• The individual's views become increasingly extreme regarding another section of society or government policy</li> </ul> | <ul style="list-style-type: none"> <li>• They are observed downloading, viewing or sharing extremist propaganda from the web</li> <li>• They become withdrawn and focused on one ideology</li> </ul> |
|--|--|





- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• The individual becomes increasingly intolerant of more moderate views</li><li>• The individual expresses a desire/intent to take part in or support extremist activity</li></ul> | <ul style="list-style-type: none"><li>• The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.</li></ul> |
|--|--|

2.2 If a student discloses to you that they (or indeed another child/young person or vulnerable adult) have been, or are being abused/radicalised

### DO

- **Do** listen very carefully to what they tell you.
- **Do** take what is said seriously and accept what you are told.
- **Do** stay calm and reassure the student that they have done the right thing in talking to you.
- **Do** write down as soon as you can exactly what you have been told.
- **Do** tell them that you must pass this information on but that only those that need to know will be told. Tell them to whom you will report the matter.

### DO NOT

- **Do not** panic.
- **Do not** promise to keep things secret. You have a duty to refer a child/young person or vulnerable adult who is at risk.
- **Do not** lie or say that everything will be fine now that they have told.
- **Do not** criticise the abuser, especially if it is a parent/carer
- **Do not** ask lots of detailed or leading questions such as: 'What did he do next?' Instead, ask open questions such as: 'Anything else to tell me?', 'Yes', or 'And...?'. Do not press for answers the student is unwilling to give.

It is important that the person to whom disclosure is made **does not investigate** or question the person concerned except to clarify what they have heard.

2.3 It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. All written records should be handled confidentially.



2.4 *If a child/young person or vulnerable adult discloses to you that they or another child have been abused/radicalised, or if you suspect from what you observe that they are being abused, you **MUST REPORT THIS**.*

2.5 There are three routes to refer concern about abuse:

- .1 Complete the 'Safeguarding Cause for Concern Form' (appendix 2) and submit to the designated safeguarding lead via the signposted email address – [safeguarding@firststep-training.co.uk](mailto:safeguarding@firststep-training.co.uk)
- .2 Contact the Companies Designated Child/Vulnerable Adult Protection Team directly via phone. Two members of this team are always on duty between the hours of 9.00-5.00, Mon-Fri. These members of staff can be contacted by telephoning the below numbers:

**03300 887020**

The Designated Team consists of:

- Training Manager – Jodie Love
  - 01482 524089
  - 07399 970968
- Managing Director – Robert Brown
  - 01482524002
  - 07961395379

If the disclosure/concern involves a member of staff, contact the Organisation Owner (James Moore)

- James Moore
    - 07818048889
- .3 If, for any reason, you are unable to contact a member of the designated team (for example in the evening or on a residential trip) and the matter is urgent, then contact the Local Authority or the police directly and report the matter to the Training Manager at next available opportunity.

Local Authority Designated Officer

- East Riding – 01482 392138
- Hull – 01482 613515
- Leeds – 01132 478652



- Wakefield – 01924 302155
- North Lincolnshire – 01724 297240
- North East Lincolnshire – 01472 326118
- Lincolnshire – 01522 554668
- Stockport – 01614 745657
- Kirklees – 01484 221000
- York – 01914 5519000
- North Yorkshire – 01609 532477
- Bradford – 01274 435600
- Calderdale - 01422 394156
- Rotherham – 01709 823914
- Barnsley – 01226 772400
- Sheffield – 01142 734450

In all cases, if YOU are concerned, the rule is to pass this on quickly and to seek help and further support, rather than to worry alone or to do nothing.

### 3. THE OPERATION OF THE DESIGNATED TEAM

3.1 When a member of staff refers a case of suspected abuse to a member of the Designated Team, he/she decides whether or not the situation should be referred to the Local Authority or the police, or whether some other course of action is more appropriate. In coming to a decision about what action to take the member of the Designated Team may confer with other members of the team. He/she may also take advice from the organisation's contacts in the Local Authority. If they consider that abuse may have taken place, or that a child/young person or vulnerable adult is at risk of abuse, they will formally notify the Local Authority or police about this.

3.2 At this point the Local Authority take over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the police.

3.3 Involvement in cases of suspected abuse can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone – a colleague, a friend, a partner – they should avoid this to respect the confidentiality of the student concerned.

3.4 Disclosure of, or being the subject of abuse is obviously a very difficult and distressing time for the student, who needs to be offered continuing support in the company.



3.5 A confidential record will be kept of all cases referred to the Designated Team, including details of cases referred to the Local Authority or the police. These written records will be kept securely via a restricted site on the company management system with any paper information held securely by the company.

3.6 The Training Manager – Jodie Love & Managing Director – Rob Brown will be informed where a case has arisen which has been referred to the Local Authority or the policy.



## APPENDIX TWO

## SAFEGUARDING CAUSE FOR CONCERN REPORT FORM

CONFIDENTIAL

## CAUSE FOR CONCERN REFERRAL FORM TO SAFEGUARDING OFFICER

PLEASE COMPLETE IN FULL (with as much information as possible). All information is relevant.

Name of Referee		Date of Referral		Time of Referral	
Name of Child / Young person / Vulnerable Adult		Age			

## Incident details

Date		Time		Location	
------	--	------	--	----------	--

Observation i.e. Behaviour / Injury / Cause for concern

Any Child / Young person's statement / Comments



Action taken – Date / Time, who to be informed

--

Tick where appropriate:

Is the child aware of the referral?	YES		NO	
Are the parents/ carers / school aware of the referral?	YES		NO [State reason why]	
Have they given permission for the referral?	YES		NO	

Details of adult in charge:

Name: .....

Signed: ..... Date: .....

Contact Number: .....

Copy sent/handed to: .....

**TO BE COMPLETED BY DESIGNATED SAFEGUARDING OFFICER**

Follow-up action:

--



Name: .....

Signed: ..... Date: .....

Follow-up of Outcome (IF APPROPRIATE)

