



Dove Nest Group

Safeguarding and Prevent

Policy

DOVE NEST GROUP POLICIES AND PROCEDURES

Document Control

Document Reference	DNG SPP 2.1 2018
Title of document	Safeguarding and Prevent Policy
Authors name(s)	Jacob Miniwin
Authors job title(s)	Psychologist
Document status	Live
Supersedes	-
Approved by	Vince Hannant
Date of approval	18.7.18
Publication/issue date	18.7.18
Review date	Annually
Distribution	Company Shared Drive

AUTHORISATION

Approved

Signed:



CEO

Vince Hannant

Date 18.7.18

DOVE NEST GROUP POLICIES AND PROCEDURES

Contents

Introduction	4
1. Aims.....	4
2. Scope of Policy and Responsibilities.....	5
3. Key Safeguarding Principles	7
4. Prevention.....	8
5. What is Safeguarding?.....	9
6. Adult at Risk.....	9
7. Children	9
8. What is abuse	10
9. Types of Abuse	11
10. Signs and Patterns of Abuse	14
11. The Prevent Duty	15
12. British Values	18
13. Reporting Procedure for Safeguarding and Prevent	19
14. Designated Persons	21
15. Safeguarding Information and Data	22
16. Duty to refer Information.....	23
Appendix 1 – Supplementary guidance on safeguarding and prevent issues	25

DOVE NEST GROUP POLICIES AND PROCEDURES

Introduction

This Safeguarding & Prevent Policy represents the commitment of Dove Nest Management Training and Development Limited (“the Company”) to safeguarding the welfare and protection of all children, young people and adults at risk, who have contact with the organisation and aligns our approach to ‘Keeping Children Safe in Education (DfE, 2016)’.

1. Aims

- 1.1 The objective of this Policy is to prevent and reduce the risk of significant harm to children and adults from abuse or other types of exploitation, including radicalisation, whilst supporting individuals in maintaining control over their lives and in making informed choices without coercion. The Company seeks to achieve these aims by:
- outlining the Company’s safeguarding structure
 - establishing common procedures that enable children and adults at risk to receive the protection and support they are entitled to;
 - providing a consistent framework for signposting and making referrals to external support agencies;
 - recognising and taking action to prevent safeguarding issues, including radicalisation;
 - defining the responsibilities of the Company and its employees in responding to safeguarding and prevent concerns/allegations;
 - providing common values, principles and practice that underpin the protection of children and adults at risk;
 - defining the different types of abuse, signs, symptoms and indicators;
 - setting standards of practice that safeguard children and adults at risk.
- 1.2 The Company is committed to providing an environment where everyone is respected and valued, and can feel safe and secure. This includes employees, and the customers and learners who access our facilities and services, as well as the employers and partners we work with.
- 1.3 The Company seeks to ensure that its Policy and procedures comply with statutory duties, reflects guidance and good practice in safeguarding children and adults at risk, and that safeguarding arrangements are proportionate and appropriate.

DOVE NEST GROUP POLICIES AND PROCEDURES

- 1.4 The Company is committed to ensuring that children, young people and adults are given the right support, training and encouragement to realise their true potential and make a valuable contribution to their local community and society generally. All individuals, regardless of age, disability, gender, race, marital status, religion or belief, sexual orientation or identity have the right to protection from all types of harm and abuse. The Company actively works to ensure that all customers and learners are given equal access to its services and the support offered, providing an environment that is free from any form of discrimination and one in which safeguarding concerns are appropriately addressed.
- 1.5 The Company promotes this Policy to ensure that the appropriate action can be taken when an individual is suspected by staff of being subject to, or at risk of abuse from parents, carers, any adult, including any employee, or other individuals, either at work or in placement with other organisations.
- 1.6 The Company acknowledges that members of staff are not specialists in recognising where abuse may occur or has already taken place; however the Company expects all staff to adopt and support this Policy to the best of their ability. The Company will support this by providing training for staff in the organisation's procedures for identifying, responding to and reporting abuse and radicalisation. The Company expects all members of staff to be sensitive and alert to the issue of abuse.
- 1.7 The Company has a statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". The purpose of this policy is to define how the Company and its subcontractors can effectively meet this duty. The Prevent Strategy is part of the Government's overall counter-terrorism strategy, known as CONTEST. The aim of Prevent specifically is to stop people becoming drawn into terrorism.
- 1.9 The three specific strategic objectives under Prevent are:
- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
 - Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - Work with sectors and institutions where there are risks of radicalisation that we need to address

(Prevent Duty Guidance in England and Wales; March 2015)

2. Scope of Policy and Responsibilities

2.1 This Policy applies to:

- Learners and customers.

DOVE NEST GROUP POLICIES AND PROCEDURES

- Employees (individuals who work – or have applied to work for the Company either on a permanent, temporary, or contractual basis); and forms part of any employment or service contract.
- Employers (organisations that work in partnership with the Company and employ learners as part of their workforce)
- Employers who offer work placements to learners or customers
- Suppliers (external partners who provide training or employability services on our behalf);
- External stakeholders and visitors

The contents of this Policy are to be regarded by any person as implied, collateral or express terms to any employment or service contract made with the Company.

- 2.2 Any employee who does not comply with this Policy may face disciplinary sanctions which, depending on the severity of the breach, may result in dismissal from the Company. It is the responsibility of all employees to ensure they are familiar with the contents of this Policy and follow the procedures and guidelines laid out herein.
- 2.3 The Company believes that everyone has a moral responsibility to safeguard and promote each individual's welfare and protection from abuse or radicalisation/extremism. This Policy therefore also applies to all customers, learners and other stakeholders of the Company including any person to whom the Company provides a service.
- 2.4 The Company believes that safeguarding is everybody's business, with employees playing a key role in preventing, identifying and reporting safeguarding and Prevent Duty issues. The Company's role in safeguarding is to provide the vision and direction and ensure that the legal and procedural framework, including powers and duties, is clear, and proportionate, whilst ensuring operational flexibility. This framework will be sufficient to enable employees to take appropriate and timely safeguarding action.
- 2.5 The Company recognises its particular responsibility to safeguard the wellbeing of children and adults engaged in the delivery of services offered by the Company by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse of children and adults or where an individual is at risk of being drawn into extremist or radical ideology.
- 2.6 The Company recognises that it has a duty to help employees, customers and learners recognise their responsibilities (through guidance, support and training), understand changes in behaviour, minimise risk and avoid situations (where possible) where abuse or neglect might be alleged or where it is thought a vulnerable individual may be being groomed.

DOVE NEST GROUP POLICIES AND PROCEDURES

- 2.7 It is not the responsibility of the Company to decide whether or not abuse or radicalisation has taken place. The Company has a responsibility to act if there is cause for concern, in order that the appropriate agencies can investigate and take any necessary action to protect an individual.
- 2.8 All employees are expected to attend awareness training sessions, participate in online learning modules and become familiar with this document and to apply it in practice. The Company has a strategy to ensure staff awareness, continuous training and updating on legislation in relation to this and monitoring arrangements to ensure the effectiveness of our Safeguarding and Prevent Policy and procedures.
- 2.9 The Company reserves the right to amend and update this Policy at any time.

3. Key Safeguarding Principles

- 3.1 The key principles set out below are integral to this Policy and can be used to measure existing safeguarding arrangements and to measure future improvements. The principles are not in order of priority; they are all of equal importance but with an emphasis on the importance of prevention and ensuring proportionate responses:
- Empowerment – presumption of person led decisions and informed consent. We give individuals the right information about how to recognise abuse or radicalisation and what they can do to keep themselves safe. We give them clear and straightforward information about how to report causes for concern, abuse and crime and what support we can give. We consult them before we take any action. Where someone lacks capacity to make a decision, we always act in his or her best interests.
 - Prevention – it is better to take action before harm occurs. We help identify and report signs of radicalisation and extremism, abuse and suspected criminal offences. We train staff how to recognise signs and take action to prevent abuse occurring. In all our work, we consider how to make people safer.
 - Proportionality – proportionate and least intrusive response appropriate to the risk presented. We discuss with the individual and where appropriate, with partner agencies what to do where there is risk of significant harm before we take a decision. Risk is an element of many situations and should be part of any wider assessment.
 - Protection – support and representation for those in greatest need. We have effective ways of assessing and managing risk. Our complaints and reporting arrangements for abuse and suspected criminal offences operate effectively.

DOVE NEST GROUP POLICIES AND PROCEDURES

- Partnership – local solutions through services working with communities. We encourage sharing information locally. We have multi-agency partnership arrangements in place and staff are trained to understand how to use these. We foster a “one” team approach that places the welfare of individuals before the “needs” of the system.
- Accountability -accountability and transparency in delivering safeguarding. The roles of all employees are clear, together with the lines of accountability. Staff are trained to understand what is expected of them and others, and recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.
- Responsibility for working with employers – support in the workplace. We work closely with employers to ensure that they understand their responsibilities within safeguarding and prevent and that their practice mirrors the Company approach. Employers receive guidance on safeguarding and are aware of who to contact and how.

4. Prevention

- 4.1 Whilst Safeguarding procedures focus on responding to incidents of abuse and radicalisation, its prevention must always be the primary objective. The Company and its employees have a role in preventing abuse and radicalisation.
- 4.2 The Company and its employees can help prevent abuse and radicalisation, by encouraging people they are concerned about to recognise risks, to seek support and to access services they need. This might be by helping people to access information and advice or to understand their rights and responsibilities.
- 4.3 Prevention involves a safe and appropriately skilled workforce where practice is consistent, there is good communication between members of staff, employees have the skills, experience and aptitude to work with particular client groups and all employees have read and understood the Company’s Safeguarding and Prevent Policy.
- 4.5 The Company encourages prevention through a safeguarding culture where customers and learners are the primary concern; employees are attuned to risks of neglect, harm, abuse and radicalisation and understand their roles and responsibilities around safeguarding.

DOVE NEST GROUP POLICIES AND PROCEDURES

5. What is Safeguarding?

- 5.1 Safeguarding is the term that describes the function of protecting adults and children from abuse or neglect. It is an important shared priority and a key responsibility of the Company and its employees.
- 5.2 Safeguarding relates to the need to protect certain people who may be in vulnerable circumstances. These are people who may be at risk of abuse or neglect, due to the actions (or lack of action) of another person. In these cases, it is critical that we work together to identify people at risk, and put in place interventions to help prevent abuse or neglect, and to protect people.

6. Adult at Risk

- 6.1. An adult at risk is defined as a person aged 18 years or over:

“who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against... harm or exploitation” (Department of Health, 2000, No Secrets)

- 6.2. An adult at risk may therefore be a person who, for example:

- is an older person who is frail due to ill health, physical disability or cognitive impairment;
- has a learning disability;
- has a physical disability and/or a sensory impairment;
- has mental health needs including dementia or a personality disorder;
- has a long-term illness/condition;
- misuses substances or alcohol;
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse;
- lacks the mental capacity to make particular decisions and is in need of care and support.

This list is not exhaustive.

7. Children

DOVE NEST GROUP POLICIES AND PROCEDURES

- 7.1. A child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. For individuals with learning disabilities we also include those who are 18 years old.
- 7.2. This Policy has been developed in keeping with the new statutory guidance for working with children and families in England – 'Keeping Children Safe in Education, (DfE, 2016).'
- 7.3. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
- protecting children from maltreatment;
 - preventing impairment of children's health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
- 7.4. This Policy aims to help employees understand what they need to do, and what they can expect of one another, to safeguard children. It focuses on core legal requirements and it makes clear what the Company and its employees should do to keep children safe. In doing so, it seeks to emphasise that effective safeguarding systems are those where:
- the child's needs are paramount, and the needs and wishes of each child should be put first, so that every child receives the support they need before a problem escalates;
 - all employees who come into contact with children and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children;
 - the Company, where necessary, shares appropriate information with external agencies in a timely way and can discuss any concerns about an individual child;
 - all employees contribute to whatever actions are needed to safeguard and promote a child's welfare.

8. What is abuse

- 8.1. Abuse and neglect are forms of maltreatment; it can be due to an individual inflicting harm or failing to prevent harm.
- 8.2. An individual may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.
- 8.3. Harm is the term used to justify intervention within the safeguarding adult's procedures.

9. Types of Abuse

9.1. It is generally accepted that there are six main forms of abuse as defined by the Department of Health and as set out below, it is often the case that multiple issues will overlap:

- Physical abuse – may involve hitting, slapping, pushing, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, restraint, or inappropriate sanctions or otherwise causing physical harm to an individual;
- Sexual abuse – involves forcing or enticing a child, young person or adult to take part in sexual activities, whether or not they are aware of what is happening. This may include 'rape and sexual assault or sexual acts to which the individual has not consented, or could not consent or was pressured into consenting'. Sexual abuse also includes forcing a person to look at pornographic materials;
- Emotional abuse – the persistent emotional ill treatment of an individual such as to cause severe and persistent adverse effects on the individual's emotional development and well-being. This may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks;
- Neglect and acts of omission – the persistent failure to meet an individual's basic physical and / or psychological needs, likely to result in the serious impairment of the individual's health or development. This may include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition;
- Financial or material abuse – may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
- Discriminatory abuse – may include abuse, bullying or harassment based for example on an individual's age, sex, disability, religion, race or ethnicity or sexual orientation. The Company will endeavour to identify and deter any form of discriminatory behaviour. Bullying and harassment can escalate rapidly and can damage individuals significantly.

9.2. Other forms of abuse include:-

DOVE NEST GROUP POLICIES AND PROCEDURES

- Child sexual exploitation (CSE) – exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities. Sexual exploitation can take many forms, ranging from the seemingly “consensual” relationship where sex is exchanged for affection or gifts to serious crime by gangs and groups.
- Cyberbullying – this can be done via text messages or the internet (social media sites) and is usually prejudged against particular groups. It can result in the intimidation of a person through the threat of violence or by isolating them either physically or on- line.
- Domestic Violence – any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. Witnessing domestic abuse is child abuse, and teenagers can suffer abuse in their relationships.
- Drugs – this could relate to alcohol, tobacco, illegal drugs, medicines, new psychoactive substances (legal highs) and volatile substances.
- Fabricated or induced illness – there are 3 ways in which the carer of a child will fabricate or induce an illness in a child:-
 - o Fabrication of signs and symptoms – fabricating a past medical history;
 - o Fabrication of signs and symptoms and falsifying hospital charts and records, including letters and documents;
 - o Induction of illness by a variety of means.
- Faith Abuse – this includes belief in concepts such as witchcraft and spirit possession, demons or the devil, acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eyes or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children making them more compliant when they are being trafficked for domestic slavery or sexual exploitation.
- Forced Marriage – a forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities cannot) consent to the marriage and duress is involved.
- Gangs and Youth Violence – “Street gangs” for whom crime and violence are a core part of their identity, although “delinquent peer groups” can also lead to increased antisocial behaviour and youth offending. Although some group gatherings can lead to increased antisocial behaviour, it should not be confused with the serious violence of a gang culture/activity.

DOVE NEST GROUP POLICIES AND PROCEDURES

- Private Fostering – a private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 by someone other than a parent or close relative with the intention that it should last for 28 days or more.
- Female Genital Mutilation (FGM) – FGM comprises all procedures involving the partial or total removal of the female external genitals or other injury to the female genital organs for non-medical reasons. This can range from a symbolic prick to the vagina to a fairly extensive removal and narrowing of the vagina opening and in the UK all forms are prevalent. It can be known as “female genital cutting” or “female circumcision” and some communities tend to use local names for referring to this practice including “sunna”.
- Gender based violence/violence against women and girls (VAWG) – refers to violence, physical, sexual or otherwise, stalking and harassment and female genital mutilation.
- Sexting – “Sexting” is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Young people may also call it cybersex or send a “nude” picture or selfie of themselves partially clothed.
- Teenage Relationship Abuse – can be emotional, physical, sexual or financial abuse, where teenagers are isolated from their friends, being controlled with what they wear, checking up on them all the time, being forced to have sex, being forced to watch pornography against their will, forcing others to buy them things.
- Trafficking – “Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. This could be the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
- Mental Health – good or positive mental health is more than the absence or management of mental health problems; it is the foundation for wellbeing and effective functioning for wellbeing and effective functioning both for individuals and for their communities.
- Honour Based Violence - Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is

DOVE NEST GROUP POLICIES AND PROCEDURES

often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture

- Breast Ironing - refers to the practice of massaging or pounding young girls' breasts with heated objects to suppress or reverse the growth of breasts. Breast ironing is often performed by mothers or female relatives of victims misguidedly wishing to protect their young relatives from rape, unwanted sexual advances, early sex, and pregnancies, all of which they fear would result from the appearance that a girl has reached the age of puberty.
- Radicalisation - Radicalisation is defined by the UK Government within this context as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups."

10. Signs and Patterns of Abuse

10.1. The most likely ways that a suspicion or concern will be raised is by:

- An individual "disclosing" abuse;
- Bruising or evidence of physical hurt; which may or may not be accompanied by a change in behaviour;
- The conduct of a member of staff or another individual.

10.2. Incidents of abuse may be multiple, either to one person in a continuing relationship or service context – or to more than one person at a time.

10.3. Patterns of abuse and abusing vary and reflect very different dynamics. These include:

- serial abusing in which the perpetrator seeks out and 'grooms' vulnerable individuals. Sexual abuse usually falls into this pattern as do forms of financial abuse and radicalisation;
- long-term abuse in the context of an on-going family relationship such as domestic violence;
- opportunistic abuse such as theft;
- situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour;
- neglect of a person's needs because those around him or her are not able to be responsible for their care, for example, if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems;

DOVE NEST GROUP POLICIES AND PROCEDURES

- institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and insufficient knowledge base within the provider or service;
- unacceptable 'treatments' or programmes with sanctions or punishments such as withholding food and drink, seclusion, unnecessary and unauthorised use of control and restraint, or over-medication;
- failure to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice;
- failure to access key services such as health care and dentistry;
- misappropriation of benefits and/or use of the person's money by other members of the household;
- fraud or intimidation in connection with wills property or other assets.

10.4. Rules of customer learner protection:

- Recognise – be familiar with signs and indicators, have a listening culture, be vigilant.
- Respond – be sensitive and empathetic, ask direct questions, do not promise to keep anything to yourself.
- Record – know the Company's recording process, know what to record and where, know where to send information and how.
- Report – know who to report to internally, know how to get hold of them
- Refer – this is the role of the DSO, others should only contact authorities if there is an emergency or immediate danger.

11. The Prevent Duty

11.1. Section 26 of the Counter-Terrorism and Security Act 2015 ('CTSA Act') places a duty on the Company, in the exercise of its functions, to have "due regard to the need to prevent people from being drawn into terrorism". This is known as the Prevent Duty.

11.2. The term "due regard" as used in the CTSA Act means that the Company should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when it considers all the other factors relevant to how it carries out its usual functions and activities.

11.3. Terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them.

11.4. The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and

DOVE NEST GROUP POLICIES AND PROCEDURES

tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces.”

- 11.5. The most significant and publicised threat is currently Islamic State and associated groups. However, there are wider groups outside of this such as those associated with the Far Right. The Prevent Strategy is concerned non-violent extremist groups as these can create an atmosphere in which terrorist ideology can grow.
- 11.6. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.
- 11.7. The Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also made clear that preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people moving from extremist (albeit legal) groups into terrorist- related activity.
- 11.8. The Company has implemented its Prevent-related responsibilities in a proportionate and risk-based way. All employees should demonstrate an awareness and understanding of the risk of radicalisation. The risk will vary greatly and can change rapidly; but no area, institution or body is risk free. The Prevent Duty is not about preventing individuals from having political and religious views and concerns, but about supporting our customers and learners to use those concerns or act on them in a non-extremist way.
- 11.9. Prevent is an important element within our safeguarding policy and processes. Prevent is focused on safeguarding customers and learners and encourages a learning environment where issues can be raised and discussed safely.
- 11.10. The Company’s Senior Management Team drive our Prevent strategy by:
 - Ensuring all staff, including Directors and Senior Managers receive awareness training on Prevent

Home Office Training for managers and delivery staff:
<https://www.elearning.prevent.homeoffice.gov.uk/m/screen1>
Channel Training for managers:
http://course.ncalt.com/Channel_General_Awareness/01/index.html

DOVE NEST GROUP POLICIES AND PROCEDURES

- Providing training to ensure staff understand their safeguarding responsibilities and processes and policy to outline how to make a referral to the Channel team
- Providing staff training and guidance on how to recognise potential signs that a customer/learner may be becoming involved with extremist organisations
- Creating a single point of contact for Prevent and Safeguarding related issues
- Maintaining links with the local Prevent Coordinators
- Ensuring British Values are promoted and are embedded within employability and skills programmes
- Maintaining IT policies that are robust and can deal effectively with potential online risks from extremist organisations, through appropriate use of firewalls and monitoring usage
- Ensuring our rigorous risk assessment process is in place and utilised which ensures Prevent is fully considered, including visitors and external speakers
- Ensuring our subcontract providers have appropriate policies in place to meet their duties under Prevent

11.11. Employees have a responsibility to understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. In particular, all employees should be aware of the following terms and the relationship between extremism and terrorism:

- ‘Having due regard’ – means that we should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when we consider all the other factors relevant to how we carry out our functions.
- ‘Extremism’ – defined in the Prevent strategy as 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. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.
- ‘Interventions’ – are projects intended to divert people who are drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).
- ‘Non-violent extremism’ – is extremism, as defined above, which is not accompanied by violence.
- ‘Prevention’ – means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.

DOVE NEST GROUP POLICIES AND PROCEDURES

- 'Radicalisation' – refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 'Safeguarding' – is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in this context) from being drawn into terrorist-related activity.
- 'Terrorism' – as defined by the Terrorism Act 2000, an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 'Terrorist -related offences' – are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
- 'Vulnerability' – describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent the word describes factors and characteristics associated with being susceptible to radicalisation.

11.13. The Prevent duty does not and must not involve any covert activity against people or communities. The Company may however need to share personal information to ensure, for example, that a person at risk of radicalisation is given the appropriate support. Information sharing is assessed on a case-by-case basis and is governed by legislation and the following principles:

- Necessity and Proportionality – personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgment of the risks to an individual or the public;
- Consent – wherever possible the consent of the person concerned should be obtained before sharing any information about them;
- Power to share – the sharing of data by the Company requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 1998 and Human Rights Act 1998;
- Confidentiality – the Company should be aware of any confidentiality obligations that exist.

12. British Values

12.1. The Company actively promotes the fundamental British values of:

DOVE NEST GROUP POLICIES AND PROCEDURES

- Democracy – an understanding of how citizens can influence making through the democratic process;
- The rule of law – an appreciation that living under the rule of law protects individual citizens and is essential for wellbeing and safety;
- Individual liberty – an understanding that the freedom to choose and hold other faiths and beliefs is protected in law;
- Mutual respect – an acceptance that other people having different faiths or beliefs (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour;
- Tolerance of those with different faiths and beliefs – an understanding of the importance of identifying and combatting discrimination.

12.2. Actively promoting these values means challenging opinions or behaviours that are contrary to fundamental British values. Employees should not promote, or tolerate to be promoted, views or theories as fact which are contrary to established scientific or historical evidence and explanation. The aim is to improve safeguarding and standards of spiritual, moral, social and cultural development, and to strengthen barriers to extremism.

12.3. The British Values and Prevent duty to relate to the Equality Act 2010 as we seek to:

- Eliminate unlawful discrimination, harassment or victimisation;
- Advance equality of opportunity between people who share a protected characteristic, and those who do not;
- Foster good relations between people who share a protected characteristic, and those who do not.

13. Reporting Procedure for Safeguarding and Prevent

13.1. Remember – safeguarding is the term that describes the function of protecting adults and children from abuse, neglect and radicalisation. All suspicions or allegations will be taken seriously. Employees should be aware that the needs of the adult or child at risk are paramount and must always act in the best interests of the adult or child at risk. If in doubt a referral to the Designated Safeguarding Person (DSP) must be made.

13.2. If a customer, learner or employee makes a safeguarding disclosure about an employee of the Company, this must be referred immediately to a Safeguarding Designated Person without delay. Any instances involving staff will be dealt with through the relevant Company policies and procedures.

13.3. If any customer, learner or employee makes a disclosure to any member of staff highlighting a safeguarding issue – i.e. a suspicion of abuse or neglect – or there is a reasonable belief of a safeguarding issue, it should be reported immediately, in the first instance, to the line manager. It is

DOVE NEST GROUP POLICIES AND PROCEDURES

imperative that under no circumstances should any staff member agree to keep a disclosure confidential.

13.4. The line manager will assess the situation and, if the line manager considers that there has been or is reasonably likely to be an incident of abuse or neglect, will report the matter to the Designated Person using the Safeguarding Cause for Concern Form.

13.5. When assessing any (potential) safeguarding issue, the criteria to be used are as follows:

- what the actual risks are – the likelihood and seriousness of an incident occurring (or reoccurring);
- the views of the adult or child at risk in relation to the risk of harm;
- the person's ability to protect themselves;
- the factors that increase or reduce the risk of harm.

13.6. When referring a safeguarding matter to the Designated Person, the line manager must, in the first instance, email the Safeguarding Cause for Concern Form immediately to the Safeguarding Designated Person, followed by a telephone call to confirm receipt and discuss the matter.

13.7. The Designated Person will then review the Safeguarding Cause for Concern Form and assess (see 13.5) whether the matter needs to be referred on to an appropriate agency or authority or if support is required where it is not deemed to be a safeguarding concern.

13.8. If an incident of abuse is considered to be a criminal offence then the matter will be referred to the Police immediately. Examples of when action may be considered a criminal offence include: assault, whether physical or psychological, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.

13.9. Other incidents of abuse will be reported by the Designated Person to Adult Social Services, the Local Safeguarding Children Boards (LSCBs) and/or Local Authority Designated Officer (LADO) as appropriate. The Designated Person will complete the Safeguarding Risk Assessment Form and file securely. The Designated Safeguarding Person will work with MASH teams, the Police, Samaritans and Channel as appropriate.

13.10. For all employees working within the National Citizen Service (NCS) contract, any safeguarding issue or incident should be reported without delay to the line manager who will then notify the Designated Safeguarding Person and Tim Pattenden – Head of Performance & Operations. The incident will then be reported to Pharos Response as per the NCS Crisis & Incident Reporting Guide.

DOVE NEST GROUP POLICIES AND PROCEDURES

Prevent Communication Process

- Concern raised about staff member, learner or customer welfare in terms of potential risk of radicalisation
- Immediately discuss concerns with line manager or one of designated members of staff
- Make a written record using the Safeguarding Expression of Concern form, as soon as practicable after concerns are raised and hand to line manager or one of designated members of staff
- Once reviewed the designated person may feel that no further safeguarding action should be taken, however it may be appropriate to offer the learner or customer some ongoing support
- If concerns continue then the designated member of staff refers to local Prevent Coordinator following up in writing within 48 hours
- Prevent Coordinator acknowledges receipt of referral and decides on next course of action.
Note: The Company may be asked to participate with a multi-agency approach under Channel but will be guided by Prevent team.

14. Designated Persons

14.1. The Company has designated persons who are ultimately responsible for all safeguarding issues within the Company:

Lead Designated Safeguarding Person:

Jo Whinham – jo.whinham@dovenest.co.uk

Deputy Safeguarding Coordinators:

Colin Hodgson – colin.hodgson@dovenest.co.uk

Vince Hannant – vince.hannant@dovenest.co.uk

The Chairperson also acts as a Designated Person; however, all safeguarding matters are dealt with foremost by the Lead Designated Person.

Out of Hours:

The Company does not operate outside of 8.30am – 5pm Monday to Friday, however, should there be any cause for concern outside of office hours, please contact Vince Hannant.

In the event of any emergency please call emergency services on 999.

14.2. The role of the Designated Person is to take lead responsibility for managing safeguarding and prevent issues. This involves providing advice and support to other staff, making referrals to, and liaising with, the local authority and working with other agencies. The Designated Person is a member of the Senior Management Team and takes responsibility for the Company's safeguarding practice, policy, procedures and professional development.

DOVE NEST GROUP POLICIES AND PROCEDURES

14.3. The Designated Safeguarding Person receives all referrals and reports. The Designated Person is ultimately responsible for deciding action to be taken and retains all documentary safeguarding reports.

15. Safeguarding Information and Data

15.1. The Company will manage its employees', customers' and learners' information in line with statutory and contractual requirements and in accordance with the organisation's own values of being straightforward, accessible, and professional. As the Company handles sensitive personal information about people, it must ensure that there is no unauthorised access, loss, misuse, modification or disclosure of this information, in accordance with the General Data Protection Regulation policy.

15.2. The General Data Protection Regulation does not prevent an employer from carrying out effective vetting controls but balances the employer's needs and the applicant's right to respect for his or her private life. The important considerations are (i) that checks are carried out uniformly on a non-discriminatory basis and (ii) that the data subject's rights regarding their data, where relevant, are respected.

15.3. All relevant documentation will be kept securely locked and a clear desk Policy must be in place at all times by those involved in handling personal information. Any documents that contain personal data and require disposal should be securely shredded, and any related documents that need to be emailed must be encrypted following the proper encryption process.

15.4. When safeguarding children or adults at risk, there may be a need to disclose personal or sensitive information to someone from another organisation. The Company will only do this where the law permits, and where disclosure is considered to be in the best interests (safeguarding) of the person, including the prevention of a crime and on a need to know basis.

15.5. Wherever abuse is alleged or suspected, the Company will seek to share information between relevant professionals in exploring how to protect the individual concerned or others. People who are subject to abuse or allegations of abuse and their families have a right to expect that confidences will be respected and their privacy protected. But where their "vital interests" (that is questions of life or death), "best interests", or the public interest are involved, establishing the facts through information sharing takes precedence.

15.6. Information can be shared in certain circumstances with other people or agencies in compliance with the General Data Protection Regulation, 2018. Data can be shared with third parties "in the vital interest of the data subject" or "in the public interest" (e.g. in the interest of the client or others in the same setting). Examples of when this may be appropriate will be if there is a need to seek information from another agency, or there is a potential risk to others from the alleged

DOVE NEST GROUP POLICIES AND PROCEDURES

abuser. Any information relating to the accusation/suspicion of abuse should and can be shared with the Social Services department or Police investigating the case.

15.7. If personal or sensitive information is to be shared, this will be done (where possible) with the person's agreement. In the absence of such, assessment of their best interests may still justify further enquiries, while questions involving the public interest may justify overriding their views. Where adults lack capacity to safeguard themselves, others will need to make decisions for them in accordance with the Code of Practice and in the person's best interests. The rights of "whistle-blowers" and of alleged perpetrators of abuse will also be respected.

15.8. Information shared will always be on a "need to know" basis, i.e. such which is necessary to achieve the objective of safeguarding adults and children at risk. Care will be taken to ensure the quality of the information shared, e.g. names, addresses and dates of birth are accurately recorded.

16. Duty to refer Information

16.1. The Safeguarding schemes and this Policy impose a duty on the Company to refer relevant information about individuals where this may affect their suitability to perform a regulated activity.

16.2. The Company is required to make a referral to the DBS where an employee has been cautioned or convicted of a 'relevant offence' (for example, a sexual or violent offence). The Company is also required to make a referral where employees are dismissed or removed from a regulated activity because they have engaged in 'relevant conduct' (for example, endangering someone or engaging in violent or inappropriate sexual conduct) in relation to children and/or adults at risk. A referral must also be made where the individual has satisfied the 'harm test' (for example, where there has been no relevant conduct but a risk of harm exists). The duty to refer information on an individual remains where he or she would have, or may have, been dismissed, or removed from such work, had he or she not resigned.

16.3. If the Company suspects that a crime has been committed, it will also notify the police.

16.4. Referrals should be made as soon as the conduct, or allegation, becomes known. The Company will investigate the matter as soon as possible to establish the facts and to gather evidence. As the DBS itself has no investigatory powers, it is important that the Company gathers as much relevant evidence as possible to help determine if the allegations are substantiated, even if the individual has left employment. This will assist the DBS in reaching any subsequent barring decision.

16.5. The DBS will consider the facts of each case, including any evidence that has been provided, and reach a decision on whether or not it is appropriate to bar that individual from working in a regulated activity with children and/or vulnerable adults. The individual may have an opportunity to

DOVE NEST GROUP POLICIES AND PROCEDURES

make representations before a barring decision is made but in serious cases the DBS may automatically decide to bar the individual. This may, for example happen where the individual has committed sexual or violent offences against children or adults.

DOVE NEST GROUP POLICIES AND PROCEDURES

Appendix 1 – Supplementary guidance on safeguarding and prevent issues

Department for Education guidance

Safeguarding children who may have been trafficked

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

Safeguarding children and young people affected by gang activity

<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-who-may-be-affected-by-gang-activity>

Multi-agency statutory guidance on female genital mutilation

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Child abuse linked to faith or belief: national action plan

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

Use of reasonable force in schools

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Safeguarding children and young people from sexual exploitation

<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-from-sexual-exploitation-supplementary-guidance>

Safeguarding children in whom illness is fabricated or induced

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

DOVE NEST GROUP POLICIES AND PROCEDURES

Preventing and tackling bullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Keeping children safe in education

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Information sharing advice for safeguarding practitioners

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Safeguarding disabled children

<https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>

National service framework: children, young people and maternity services

<https://www.gov.uk/government/publications/national-service-framework-children-young-people-and-maternity-services>

Child abuse concerns: guide for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Guidance issued by other government departments and agencies

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Stop forced marriage

<https://www.gov.uk/stop-forced-marriage>

Violence against women and girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

DOVE NEST GROUP POLICIES AND PROCEDURES

Working together to safeguard children

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Tgether_to_Safeguard_Children.pdf

Guidance for health professionals on domestic violence

<https://www.gov.uk/government/publications/guidance-for-health-professionals-on-domestic-violence>

NHS National Treatment Agency: Guidance on development of Local Protocols between drug and Alcohol Treatment Services and Local Safeguarding and Family Services

<http://www.nta.nhs.uk/uploads/supportinginformation.pdf>

Disclosure & Barring Service

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Child protection and the dental team

<https://www.bda.org/childprotection>

Ministry of Justice: Multi Agency Public Protection Arrangements guidance

<http://www.justice.gov.uk/downloads/offenders/mappa/mappa-guidance-2012-part1.pdf>

Prison, probation and rehabilitation: Public Protection Manual

<https://www.gov.uk/government/collections/prison-probation-and-rehabilitation-public-protection-manual>

Ministry of Justice: Probation service guidance on conducting serious further offence

<http://www.justice.gov.uk/downloads/offenders/probation-instructions/pi-10-2011-review-further-offences.doc>

Missing Children and Adults strategy

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

DOVE NEST GROUP POLICIES AND PROCEDURES

Recognised, Valued and Supported: next steps for the carer's strategy

<https://www.gov.uk/government/publications/recognised-valued-and-supported-next-steps-for-the-carers-strategy>

Department of Health: Mental Health Act 1983 Code of Practice: Guidance on the visiting of psychiatric patients by children

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_4012153.pdf

Guidance issued by external organisations

BAAF: Private fostering

http://www.privatefostering.org.uk/?gclid=CLvorZLL_qcCFUIkfAod9Tsatg

Royal College of Paediatrics and Child Health: Safeguarding Children and Young people: roles and competencies for health care staff - Intercollegiate document, September 2010

http://www.rcpch.ac.uk/sites/default/files/asset_library/Education%20Department/Safeguarding/Safeguarding%20Children%20and%20Young%20people%202010G.pdf

General Medical Council: Protecting children and young people: doctors' responsibilities

http://www.gmc-uk.org/guidance/ethical_guidance/13257.asp

Royal College of Nursing: Looked after children - Knowledge, skills and competences of health care staff (Intercollegiate role framework)

https://www2.rcn.org.uk/_data/assets/pdf_file/0019/451342/RCN_and_RCPCH_LAC_competences_v1.0_WEB_Final.pdf

NICE: Child maltreatment: when to suspect maltreatment in under 18s

<https://www.nice.org.uk/guidance/CG89/>

DOVE NEST GROUP POLICIES AND PROCEDURES

Supplementary guidance to support assessing the needs of children

Child abuse concerns: guide for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Safeguarding children

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

Prevent Duty

Counter-Terrorism and Security Act 2015

<http://www.legislation.gov.uk/ukpga/2015/6/contents>

Prevent duty guidance

<https://www.gov.uk/government/publications/prevent-duty-guidance>

'Channel' guidance

<https://www.gov.uk/government/publications/channel-guidance>