Safeguarding, Child Protection & Vulnerable Adults Policy

This Policy is intended to cover all Board Members, Employees, Volunteers, Learners, Partner organisations and Employers.

1. **Objectives**

   1.1. To ensure that all children, young people and vulnerable adults who are involved in activities, training, events and placements organised by Develop are properly safeguarded.
   1.2. To ensure that all Develop employees and volunteers are aware of and are undertaking full and correct safeguarding procedures, inclusive of the identification, recording and reporting of suspected cases of abuse, extremism and radicalisation.
   1.3. To ensure that Develop remains up to date with legislation and practice relating to safeguarding.
   1.4. To raise awareness and actively promote the principles of safeguarding and wellbeing throughout Develop activities.
   1.5. To work in partnership with children, young people, vulnerable adults, their parents, carers and other agencies & key stakeholders.

2. **Scope**

   2.1. To cover all activities carried out by Develop.
   2.2. To cover all activities carried out by learners, volunteers, employees and employers; and is extended to all Board members.
   2.3. Develop partners and settings need to provide their own Child Protection / Safeguarding policies.

3. **Key Principles**

   3.1. For the purpose of this document, ‘individual’ or ‘individuals’ refers to all individuals working with, or in contact with, children, young people or vulnerable adults at any time as part of their employment. This includes staff, volunteers, employers, consultants and learners. All Employers who have learners on learning programmes with Develop are required to comply with the safeguarding policy.
3.2. Develop is firmly committed to safeguarding in all relevant aspects of its employment and business. Develop is committed to both the legal implications of safeguarding policy and the promotion of health and wellbeing in relation to all relevant customers.

3.3. Develop will ensure that all individuals in contact with children, young people or vulnerable adults as part of their employment, be they directly employed by Develop or working with Develop in any other capacity, will have enhanced DBS clearance.

3.4. Referral and reporting procedures will be in place and strictly adhered to in the event of any concerns relating to the abuse of children, young people and vulnerable adults.

3.5. Develop staff will maintain up-to-date knowledge of safeguarding practice and procedures, extended to include the Prevent agenda.

3.6. Develop recognises that the welfare of children, young people and vulnerable adults is paramount and will prioritise their safeguarding accordingly.

3.7. Develop will actively seek to work with all related agencies, companies, bodies and providers in order to promote and maintain the highest standards of safeguarding.

3.8. Develop will comply with all applicable regulations set out in;
   - The Education Act 2002.
   - The Protection of Freedoms Act 2012.
   - Keeping Children Safe in Education 2014.
   - The Counter-Terrorism & Security Act 2015.

4. **Designated Persons**

   - Aimee Sykes – Designated Safeguarding Lead
     [sykesa@developebp.co.uk](mailto:sykesa@developebp.co.uk)
     Tel: 01525 408083 / 07827340284

   - Mark Pike - Chief Executive Officer and Regulated Activity Provider (RAP)
     [pikem@developebp.co.uk](mailto:pikem@developebp.co.uk)
     Tel: 01525 408080

   - Barry George - Chair of Develop Boards
     [barrygeorge@ntlworld.com](mailto:barrygeorge@ntlworld.com)
     Tel: 01525 408080

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5. Roles & Responsibilities

5.1. Designated Member of Staff with lead responsibility for safeguarding & child protection has a key duty for raising awareness across all staff of issues relating to the welfare of children, young people and adults at risk. The post holder is required to have training in safeguarding issues and inter-agency working, receiving refresher training at least every two years or as and when any new issues arise. The designated lead member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral).
- Liaising with the Local Authorities and other appropriate agencies
- Support Centre Managers, liaising with secondary schools that send pupils to Develop, to ensure that appropriate arrangements are made for pupils.
- Liaising with employers and training organisations that receive children or young people from Develop on block placement work experience or long term placements to ensure that appropriate safeguarding policies are put into place.
- Ensuring that staff will receive basic training in safeguarding issues appropriate to their roles and are aware of Develop safeguarding procedures.
- Advising the CEO on efficiency and adequacy of resources and training being available to implement this policy.
- Ensuring arrangements are made to bring this policy to the notice of all employees, volunteers, employers, sub contractors and visitors.
- The policy and its arrangements are regularly reviewed during Develop Safeguarding Quality Improvement Groups.

5.2. Within Develop other designated staff that hold a responsibility for safeguarding and are based at centres. Names of Develop employees are within Appendix A. These designated staff:

- Report to the safeguarding officer with lead responsibility.
- Know how to make an appropriate referral.
- Are available to provide advice and support to staff on issues relating to safeguarding.
- Are available to listen to children, young people, LAC’s and adults at risk studying within Develop.
- Deal with individual cases, including attending case conferences and review meetings as appropriate.

5.3. The designated Chair of Board, Barry George is responsible for liaising with the CEO and Designated Safeguarding Lead over matters regarding safeguarding, including:

- Ensuring Develop has procedures and policies in place which are consistent with guidelines.
- Ensuring the board considers the organisation’s policy on safeguarding each year.
- Ensuring that each year the board is informed of how Develop and its staff have complied with the policy, including, but not limited to a report on the training that staff have undertaken.

The designated Chair of Board is responsible for overseeing the liaison between agencies, e.g. police, social services in connection with allegations against the CEO. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

5.4. CEO has overall responsibility for all matters relating to Safeguarding and will refer any cases of suspected abuse or allegation, to relevant investigating agencies as agreed with the Local Safeguarding Board.

The CEO will:

- Ensure that all employees have knowledge and understanding of safeguarding and that it is taken seriously.
- Ensure that appropriate child protection and safeguarding policies are adopted, implemented and monitored.
- Ensure that, where services or activities are provided by subcontractors or another body, the body concerned has appropriate safeguarding policies and procedures.
- Foster a culture of openness and support.
- Ensure that all employees feel able to raise concerns about poor or unsafe practice and such concerns are handled sensitively and in accordance with the whistle blowing procedures.
• Acknowledge and discuss any concerns about any members of staff.
• Ensure that the development of the use of new and existing media technologies do not expose students to any potential harm.
• Work with the E-learning Coordinator to ensure safeguarding when using digital media and education of students in safe use of the Internet.
• Ensure that Develop has access to the external and internal resources to offer extensive support around Child protection and Safeguarding.
• Monitor the processes for promoting student welfare and safeguarding to ensure that adequate resources are given to it, including staff training.
• Work with the Designated Safeguarding Lead to ensure procedures are in place to ensure that students requiring safeguarding measures are monitored in relation to their situation and progress with their learning.
• Report to the Board at each Board meeting.
• Ensure that all recruitment procedures follow Safer Recruitment Guidance.
• Ensure that students’ safety and welfare is addressed through the curriculum.

CEO is responsible for referring cases of suspected abuse or allegations to the LADO (see Allegations of Abuse Against Staff Policy).

CEO is responsible for dealing with allegations made against members of staff.

6. Child Welfare

6.1 Develop recognises the need to prioritise the welfare of children, young people and vulnerable adults with which it works. These are defined as:

- A child is anyone who has not attained their 19th Birthday.
- A young person is anyone who is 19 but has not attained their 20th Birthday.
- A vulnerable adult is someone who is aged 18 years or over who is, or may be in need of community care services by reason of mental health or other disability, age or illness and is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. Individuals will operate in line with Develop’s full safeguarding policy at all times.

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6.2 Develop considers abuse of any kind, neglect, maltreatment, aggressiveness, intimidation and bullying, all as damaging to the welfare of a child, young person or vulnerable adult.

6.3 Complaints or concerns relating to individuals working with Develop will be reported to the CEO immediately. Develop’s whistle blowing policy or data protection policy do not prevent information sharing with investigating agencies where the information will help to safeguard welfare. Develop will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to, Social Care Services/Police or the appropriate agencies as agreed with the relevant Local Safeguarding Board.

6.4 Individuals will be offered training that will help to make them aware of likely signs of maltreatment and act appropriately, with discretion.

6.5 Children, young people and vulnerable adults will be respected at all times and encouraged to interact in both formal (evaluation and feedback) and informal (spoken word) communication.

6.6 Individuals will maintain appropriate relationships with children, young people and vulnerable adults, reducing physical contact and one-on-one situations to the minimum practicable level.

6.7 Individuals will endeavour to avoid being alone with a child, young person or vulnerable adult whenever possible, and will not offer informal travel or other similar services.

6.8 Develop recognises the right of children, young people, vulnerable adults and/or their parents/guardians, to withdraw from featuring in promotional material, either on video or in photographs. Opt out forms will be prioritised and strictly adhered to in relevant situations.

7 Children who may be particularly vulnerable

7.1 Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. Looked after Children are particularly vulnerable - the most common reason for children becoming looked after is as a result of abuse and/or neglect. Develop will ensure that employees have the skills, knowledge and understanding necessary to keeping Looked After Children safe. In particular, they will ensure that appropriate employees have the information they need in relation to a child’s looked after legal status and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
7.2 To ensure that all children, young person or vulnerable adult working alongside Develop receive appropriate protection, we will give special consideration to those who are:

- Disabled or have Special Educational Needs
- Living in a domestically abusive situation
- Affected by parental substance misuse
- Asylum seekers
- Regularly absent from school
- Attending alternative provision or subject to a managed move
- Living away from home (frequent movers)
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Living a transient lifestyle
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- Involved directly or indirectly in prostitution or child trafficking
- Speakers of another first language
- Children that are subject to a Child Protection Plan
- Children that may be vulnerable to messages of violence and extreme ideologies

8 Definitions

Develop recognises the following as definitions of abuse; physical, emotional, neglect, and sexual with the additional categories of acts of omission, psychological, financial or material, institutional or professional abuse. Someone may abuse or neglect a child or young person by inflicting harm, by failing to act to prevent harm, or by failing to ensure safety and adequate care. Harm may occur intentionally or unintentionally. Children may be abused in a family, an institution or community setting, by those known to them, or, more rarely by a stranger. Examples of abuse are set out below these examples are by no means exhaustive;

8.1 Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Possible signs of physical abuse include:

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
• Injuries which have not received medical attention
• Reluctance to change for, or participate in, games or swimming
• Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
• The child gives inconsistent accounts for the cause of injuries.

8.2 **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Possible signs of emotional abuse include:

• Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
• Obsessions or phobias
• Sudden underachievement or lack of concentration
• Seeking adult attention and not mixing well with other children
• Sleep or speech disorders
• Negative statements about self
• Highly aggressive or cruel to others
• Extreme shyness or passivity
• Running away, stealing and lying.

8.3 **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
Possible signs of sexual abuse include:
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- Sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia.

8.4 **Child Sexual Exploitation:** Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) 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 organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

8.5 **Honour Based Violence:** So-called ‘honour based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including forced marriage, Female Genital Mutilation (FGM) and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and must be reported immediately.

8.6 **Forced Marriage:** A forced marriage is a marriage without the full consent of both parties and where pressure or threats are a factor. This is very different to an arranged marriage, which both people will have agreed to. Emotional pressure from their family might stop them from saying anything to anyone else. The lack of control over their own decisions can lead to depression and self-harm.

Signs and indicators of concern:
- Truancy / absence from school
- Low Motivation
- Lack of Punctuality
- Self-Harm
- Depression
- Isolation
• Attempted Suicide  
• Eating Disorders  
• Brother/Sisters forced to marry or reported missing  
• Family disputes  
• Runaways  
• Domestic violence  
• Substance misuse

While many of these signs and indicators could be linked to their issues, it is important to consider all potential reasons and keep an open mind. Honour Based Abuse and Forced Marriages are a fundamental abuse of human rights. As of 16th June 2014 changes to legislation made Forced Marriages a criminal offence. Remember the ‘One Chance Rule’.

8.7 Female Genital Mutilation: Female genital mutilation (sometimes referred to as female circumcision or ‘cutting’) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. It has been estimated that over 20,000 girls under the age of 15 are at risk of female genital mutilation (FGM) in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM. However, the true extent is unknown, due to the "hidden" nature of the crime.

Females may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to "heal" before they return to school. There are also worries that some girls may have FGM performed in the UK.

Risk Factors:  
• A child talking about a special ceremony  
• A young person talking about being ‘cut’  
• A child belonging to certain communities  
• Planning an extended trip abroad  
• Knowledge of previous siblings

Indicators it may have taken place:  
• Prolonged absence  
• Change in behaviour on returning from an extended holiday  
• Urinary infections  
• Bladder or menstrual problems  
• Describing pain in the groin  
• Avoiding physical activity  
• Appears uncomfortable including when sitting  
• Finds it difficult to sit still  
• Talking about something happening to them or someone hurting them and having to keep a secret

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8.8 **Neglect**: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Possible signs of neglect include:
- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food.

8.9 **Recognising Young People Who May be Affected by Gang Activity**: Gang involvement is a multi-agency issue; partnership working and information sharing is therefore a key to safeguarding children, young people, vulnerable adults at risk of gang-related harm. Children, young people, vulnerable adults are put at risk by gang activity both through participation in and as victims of gang violence. Learners particularly vulnerable to suffering harm in the gang context are those who are:
- Not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe, healthy, enjoy and achieve, make a positive contribution and achieve economic well-being;
- Not involved in gangs, but at risk of becoming victims of gangs;
- Not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members; or
- Gang-involved and at risk of harm through their gang-related activities (e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members).

Victims and offenders are often the same people. When adults treat a young person as just a victim or just an offender, they are not taking into account the complex, cyclical nature of the victim-offender link and the factors that influence young people’s lives.
There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk factors for a person becoming involved in gangs may include:
- Becoming withdrawn from family;
- Sudden loss of interest in education - decline in attendance or academic achievement;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason;
- Sudden change in appearance - dressing in a particular style or ‘uniform’;
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries;
- Graffiti style tags on possessions, school books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Broken off with old friends and hanging around with a new group;
- Increased use of social networking sites;
- Starting to adopt codes of group behavior e.g. ways of talking and hand signs;
- Expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past;
- Being scared when entering certain areas;
- Being concerned by the presence of unknown youths in their neighborhood.

This is not an exhaustive list and should be used as a guide, amended as appropriate in light of local knowledge of the risk factors in a particular area.

8.10 Recognising extremism and radicalisation: The following guidance is written with regard to the Home Office guidance “Channel: Protecting Vulnerable People from Being Drawn into Terrorism” and “Channel: Vulnerability Assessment Framework”.

Engagement: Example needs, susceptibilities, motivations and contextual influences that make individuals vulnerable to engagement with an extremist group, cause or ideology include:
- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- Desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Example indicators that an individual is engaged with an extremist group, cause or ideology include:
- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- attempts to recruit others to the group/cause/ideology
- Communication with others that suggest identification with a group/cause/ideology.

**Intent to cause harm:** Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:
- Over-identification with a group or ideology
- ‘Them and Us’ thinking
- Dehumanisation of the enemy
- Attitudes that justify offending
- Harmful means to an end
- Harmful objectives

Example indicators that an individual has an intention to use violence or other illegal means include:
- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- Using insulting or derogatory names or labels for another group
- Speaking about the imminence of harm from the other group and the importance of action now
• Expressing attitudes that justify offending on behalf of the group, cause or ideology
• Condoning or supporting violence or harm towards others plotting or conspiring with others

**Capability to cause harm:** Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Example indicators that an individual is capable of directly or indirectly causing harm include:

- Having a history of violence
- Being criminally versatile and using criminal networks to support extremist goals
- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)

### 8.11 Hate crime: What are hate incidents?

The Police and Crown Prosecution Service have agreed a common definition of hate incidents. They say something is a hate incident if the victim or anyone else thinks it was motivated by hostility or prejudice based on one of the following things:

- Disability
- Race
- Religion
- Transgender identity
- Sexual orientation.

This means that if you believe something is a hate incident it should be recorded as such by the person you are reporting it to, i.e. Head of Centre, Safeguarding Lead. **Anyone can be the victim of a hate incident.**

Other personal characteristics:

Those people who live by an alternative sub-culture can be subject to hate incidents. These are incidents based on someone’s appearance and include Goths, Emos, Punks and other similar groups.
What type of incidents can be a hate incident?

Hate incidents can take many forms. e.g.

- Verbal abuse like name-calling and offensive jokes
- Harassment
- Bullying or intimidation by children, adults, neighbours or strangers
- Physical attacks such as hitting, punching, pushing, spitting
- Threats of violence
- Hoax calls, abusive phone or text messages, hate mail
- Online abuse for example on Facebook or Twitter
- Displaying or circulating discriminatory literature or posters
- Harm or damage to things such as your home, pet, vehicle
- Graffiti
- Arson
- Throwing rubbish into a garden
- Malicious complaints for example over parking, smells or noise.

When is a hate incident also a hate crime?

When hate incidents become criminal offences they are known as hate crimes. A criminal offence is something which breaks the law of the land. Any criminal offence can be a hate crime if it was carried out because of hostility or prejudice based on disability, race, religion, transgender identity or sexual orientation.

When something is classed as a hate crime, the courts can impose a tougher sentence on the offender under the Criminal Justice Act 2003.

Incidents which are based on other personal characteristics, such as age and belonging to an alternative subculture, are not considered to be hate crimes under the law. These should still be reported, but they will not be prosecuted specifically as hate crimes by the police and the Crown Prosecution Service.

Examples of hate crimes

- Assaults
- Criminal damage
- Harassment
- Murder
- Sexual assault
- Theft
- Fraud
- Burglary
- Hate mail (Malicious Communications Act 1988)
- Causing harassment, alarm or distress (Public Order Act 1988).

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What can you do about a hate incident or crime?

If you've experienced a hate incident or crime you must report it to the Designated Safeguarding Lead, who can report it to the police. You should also report a hate incident or crime even if it wasn't directed at you. For example, if another learner behaves inappropriately.

When reporting the incident or crime you should say whether you think it was because of disability, race, religion, transgender identity, sexual orientation or a combination of these things. This is important because when it gets reported to the police it gets recorded as a hate incident or crime.

It's also important to keep in mind that some hate crimes start as smaller incidents which may escalate into more serious and frequent attacks - so it’s always best to act early.

If you're being repeatedly harassed, should you report all the incidents?

If you've experienced hate crime, it may have been just one isolated incident. But sometimes, you may be repeatedly harassed by the same person or group of people.

8.12 **Further information:** Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. NSPCC offers information for schools on its website [www.nspcc.org.uk](http://www.nspcc.org.uk). Broad government guidance on the issues listed below can also be accessed via the [www.gov.uk](http://www.gov.uk) website:

**Missing Children and Vulnerable Adults**

- children missing education
- children missing from home or care

**Missing children and adults**

**Other**

- Bullying including cyber bullying
- Domestic Violence/Abuse
- Drugs
9 Procedure for dealing with a disclosure and reporting concerns

When a child, young person or vulnerable adult discloses abuse to a member of Develop the employee must report the disclosure to the Designated Safeguarding Lead or Safeguarding Officer immediately, failure to do so may result in disciplinary action. See flow chart appendices.

The member of staff concerned should refer to the following guidance when hearing the allegation of abuse from a child, young person or vulnerable adult. The staff member should listen carefully:

- Allow the person to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Never coach or lead in any way
- Re-assure the person, and let them know that they are glad the person has spoken up and that they were right to do so.
- Always question enough to clarify understanding, but not probe or interrogate
- Notify the person that the disclosure cannot be kept a secret, and you are required to inform someone else.
- Remain calm at all times as this is not an easy thing for them to do.
- Do not show emotions such as to show anger, disgust or disbelief as this may stop the person communicating further. This may be because the person may feel they are upsetting the staff member or may feel the staff member’s negative feelings are directed towards them.
- Let the person know that they are taking the matter very seriously
- Make the learner feel safe and secure without causing them any further anxiety.
- Employees and volunteers are not required by Develop to investigate suspicions where they may suspect that a child, young person or vulnerable adult may be at risk of suffering significant harm.

- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Mental health
- Private fostering
- Radicalisation
- Sexting
- Teenage relationship abuse
- Human trafficking.
They must always refer such concerns to the designated member of staff and never explore concerns or allegations themselves; the designated person will then determine the appropriate course of action.

10. Recording the Disclosure

- Record all concerns on Develop’s Safeguarding and Prevent Report Form.
- Always record in the child’s words no matter how distressing e.g. ‘The child told me…’
- Differentiate between fact, opinion, interpretation, observation and allegation.
- Be accurate with the details you are providing
- Opinions should be clearly stated e.g. ‘I thought this might be because…In my opinion…’
- List any witnesses who may corroborate your testimony.
- Record the date, time and add your signature to the record.
- Pass to the Designated Safeguarding Lead, Safeguarding Officer or CEO without delay informing them if they know any medical attention or requirements for immediate protection.
- Records will be kept of all such incidents and their outcomes and will be held by the Designated Safeguarding Lead/Safeguarding Officer in accordance with the Data Protection Act. Under the law they may be shared with children’s services, the local constabulary, DBS and also Local Safeguarding Boards upon request.

11. Confidentiality

11.1 Develop employees and volunteers will enlighten the child, young person or vulnerable adult at the earliest possible stage of the disclosure that information will be shared with appropriate persons.

11.2 Develop will ensure that all data about students is handled in accordance with the requirements of the Data Protection Act 1998, and any national laws and legislations and local guidance.

11.3 All Develop employees or volunteers who gain access to sensitive information about a learner or the learner’s family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know.

11.4 Develop ensures that confidentiality and trust will be maintained within limits, but staff must act on the basis that the safety of the person disclosing is the overriding concern. The degree of confidentiality will be governed by the need to protect those concerned.

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<td>18/11/2016</td>
<td>Mark Pike</td>
<td>Mark Pike</td>
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</table>
12 Learners awareness of Safeguarding

12.1 Develop will issue all learners with induction materials including a contact card for reporting safeguarding matters. This is to ensure that they are made aware of safeguarding issues.

12.2 Develop assures that all policies and procedures, including those on abuse, bullying and internet safety, are implemented.

12.3 Learners that participate on programmes through Develop are made aware of methods to report concerns to ensure opportunities are not missed.

13 Allegations against members of staff

13.1 Allegations that are made about any employee of Develop (including any volunteers or Board Members) where assault of a learner or otherwise cause of significant harm, the allegation will be dealt with in accordance with national guidance and agreements, as implemented locally.

13.2 The CEO, rather than the Designated Safeguarding Lead will handle such allegations, unless the allegation is against the CEO, where the Chair of Board will handle the response on behalf of Develop.

13.3 The Deputy CEO of Develop may also be involved from a HR position as any serious allegations against a member of staff may require the individual to be suspended pending investigation.

13.4 The CEO (or Chair of Board) will gather information about the allegation, and report these without delay to LADO.

14 Allegations by a Learner Against Another Learner

14.1 If allegations are made by a learner against another learner, the Designated Safeguarding Lead/Safeguarding Officer must be informed and will refer to the relevant organisations, as deemed appropriate.

15 Recruitment and Selection Procedures

15.1 Develop follows safer recruitment principles when recruiting staff and volunteers who will work with children, young people and vulnerable adults. Please see Recruitment of Staff Policy

15.2 In order to ensure that everyone is protected whilst at Develop, we will ensure that our employees and volunteers are carefully selected, screened, trained and supervised.

15.3 Develop has a responsibility to ensure safe recruitment and employment practices. All employees and volunteers are vetted appropriately before commencement of employment/voluntary position, including a Disclosure and Barring Service (DBS) check.
16 Disclosure and Barring Service

16.1 All individuals working with children, young people and vulnerable adults will be made aware of DBS processes and regulations.
16.2 Develop will ensure rapid and efficient interaction with DBS with regard to the discovery of new and relevant information relating to any individual.
16.3 DBS checks and any subsequent queries or concerns will be conducted through official channels and in keeping with the Data Protection Act 1998.
16.4 CEO has overall responsibility for DBS policy.

17 Identification Badges

17.1 Develop have taken the view that it is appropriate for employees to wear ID badges especially when representing Develop and will make their own arrangements for issuing such badges to all staff.

18 Training

18.1 Develop has a duty to promote safeguarding issues and measures to staff and ensure they;
   • Analyse their own practice against established good practice, and assess risk to ensure their practice is likely to protect them from false allegations.
   • Recognise their responsibilities and report any concerns about suspected possible abuse or poor practice.
18.2 The Designated Safeguarding Lead is required to undertake training in safeguarding and inter-agency working, and receives refresher training at least every two years. They will also undertake appropriate training on current safeguarding issues and Legislation.
18.3 Other designated Safeguarding Staff are required to have training in safeguarding and inter-agency working and receive refresher training at least every two years.
18.4 All employees/volunteers working directly with children, young people and adults at risk will undertake appropriate training on safeguarding to raise awareness of current issues and Legislation.
18.5 All employees/volunteers will receive an induction on commencement of service which will include online training of “An Awareness of Child Abuse and Neglect”.
18.6 Safeguarding training is mandatory to all Develop employees/volunteers. Refusal to undertake safeguarding training, will be a matter of gross misconduct, and may lead to dismissal.
19 Health and Safety

19.1 The Health and Safety Manager has overall responsibility for health and safety matters and will work closely with the Safeguarding Officer on all matters relating to Safeguarding

19.2 Develop will ensure the safety of children, young people and vulnerable adults through the following measures:

- Risk assessment will be carried out by qualified individuals in all areas and settings where Develop is responsible.
- Develop practice will be carried out in accordance with Health and Safety at Work, etc Act 1974, the Management of Health and Safety at Work Regulations 1999 and Develop Health and Safety policy.
- Non-qualified individuals will be aware of Health and Safety procedure and refer any concerns or queries directly to qualified personnel.

19.3 Wherever relevant and possible, Develop will promote good health and safety practice when:

- Undertaking excursions, trips or any other activity taking place away from Develop premises.
- Children, young people and vulnerable adults are required to travel alone or unsupervised to and/or from any activity, event or training organised by Develop.
- Develop recognises that Health and Safety is vital to safeguarding children, young people and vulnerable adults and accordingly will ensure that it remains a priority.

20 Monitoring and Evaluation

20.1 Through an annual review of this Policy.
20.2 Through the Safeguarding Quality Improvement Group.
20.3 Through Local Children Safeguarding Board, inter-agency communication, training and feedback.
20.4 This policy is liable to full equality impact assessment annually.

Policy signed by CEO: Mark Pike  Date: 18th November 2016
### Appendix A – Develop Safeguarding Responsibilities/Contact

<table>
<thead>
<tr>
<th>Name</th>
<th>Safeguarding Responsibility</th>
<th>Telephone</th>
<th>Mobile</th>
<th>email</th>
<th>Site</th>
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<tbody>
<tr>
<td>Barry George</td>
<td>Chair of Board</td>
<td>01525 408080</td>
<td></td>
<td><a href="mailto:barrygeorge@ntlworld.com">barrygeorge@ntlworld.com</a></td>
<td>Head Office</td>
</tr>
<tr>
<td>Mark Pike</td>
<td>CEO/RAP</td>
<td>01525 408080</td>
<td></td>
<td><a href="mailto:pikem@developebp.co.uk">pikem@developebp.co.uk</a></td>
<td>Head Office</td>
</tr>
<tr>
<td>Aimee Sykes</td>
<td>Designated Safeguarding Lead</td>
<td>01525 408083</td>
<td>07827340284</td>
<td><a href="mailto:sykesa@developebp.co.uk">sykesa@developebp.co.uk</a></td>
<td>Head Office</td>
</tr>
<tr>
<td>Julie Thompson</td>
<td>Data &amp; Quality Support Coordinator/ Safeguarding Support for DSL</td>
<td>01525 408096</td>
<td>07787257109</td>
<td><a href="mailto:thompsonj@developebp.co.uk">thompsonj@developebp.co.uk</a></td>
<td>Head Office</td>
</tr>
<tr>
<td>Colin Pheysey</td>
<td>Head of Centre/Designated Safeguarding Representative</td>
<td>01582 690954</td>
<td>07827340276</td>
<td><a href="mailto:cpheysey@firstplacetraining.co.uk">cpheysey@firstplacetraining.co.uk</a></td>
<td>Develop Dunstable</td>
</tr>
<tr>
<td>Darshan Ohbi</td>
<td>Head of Centre/Designated Safeguarding Representative</td>
<td>01234 262004</td>
<td>07827340288</td>
<td><a href="mailto:dohbi@firstplacetraining.co.uk">dohbi@firstplacetraining.co.uk</a></td>
<td>Develop Bedford</td>
</tr>
<tr>
<td>Catherine Hegarty</td>
<td>Head of Centre/Designated Safeguarding Representative</td>
<td>01603 516555</td>
<td></td>
<td><a href="mailto:hegartyc@developebp.co.uk">hegartyc@developebp.co.uk</a></td>
<td>Develop Norwich</td>
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## Appendix B – Useful Links for Safeguarding

<table>
<thead>
<tr>
<th>Luton Police Protection Unit</th>
<th>Luton Rapid Intervention &amp; Assessment Team</th>
<th>Luton Safeguarding Children’s Board</th>
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<tr>
<td>01582 394250 (South)</td>
<td>Tel: 01582 547653</td>
<td>Tel: 01582 547590</td>
<td>Tel: 01582 548069</td>
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<tr>
<td>Tel: 01234 846960 (North)</td>
<td>Tel: 01234 718700</td>
<td>Tel: 01234 276512</td>
<td>Tel: 01234 276693</td>
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<td>Tel: 01234 846960 (North)</td>
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<td>Tel: 01603 276313</td>
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<td>Tel: 01296 39650</td>
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<td>Tel: 01908 254373</td>
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<tr>
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<tr>
<td>Tel: 01707 354000</td>
<td>Tel: 0300 123 4043</td>
<td>Tel: 01992 555420</td>
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Dealing with Safeguarding/Prevent Concerns

ALL Staff and Volunteers

You have a statutory and moral duty to ensure the promotion of the welfare of young people and vulnerable adults receiving education and training, this includes reporting concerns.

If you observe, note or have reported to you:

- Worrying or changed behaviour of a learner
- Physical evidence of injury
- Evidence of self-harming or placing themselves in risky situations
- Showing risk taking behaviour
- An allegation of abuse made by a learner / third party
- Disclosures, information or incidents that are of a safeguarding concern

DO NOT TAKE ANY ACTION YOURSELF

Contact your Designated Safeguarding Lead, Aimee Sykes, to discuss your concern on 01525 408083 or 07827340284. If Aimee is unavailable please contact the Safeguarding Representative below.

The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

Your Designated Safeguarding Lead:

Aimee Sykes (sykesa@developebp.co.uk)

Designated Safeguarding Representative in Ampthill:

Mark Pike, CEO – 01525 408082

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DO NOT TAKE ANY ACTION YOURSELF

Contact your Designated Safeguarding Representative to discuss your concern or call Aimee Sykes, Designated Safeguarding Lead, on 01525 408083 or 07827340284 if they are unavailable.

The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

Your Designated Safeguarding Representative:

Darshan Ohbi

Designated Safeguarding Representatives in Ampthill:

Aimee Sykes, Quality & Curriculum Manager – 01525 408083 or 07827340284

Mark Pike, CEO – 01525 408082
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The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

Your Designated Safeguarding Representative:

Colin Pheysey

Designated Safeguarding Representatives in Ampthill:

Aimee Sykes, Quality & Curriculum Manager – 01525 408083 or 07827340284

Mark Pike, CEO – 01525 408082
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The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

Your Designated Safeguarding Representatives:

Catherine Hegarty and John Greenwood

Designated Safeguarding Representatives in Ampthill:

Aimee Sykes, Quality & Curriculum Manager – 01525 408083 or 07827340284

Mark Pike, CEO – 01525 408082