



## 1. Aim of Policy

The aim of this policy is to ensure the safeguarding of our learners and staff by outlining clear procedures and ensuring that all staff, stakeholders, visitors and learners are clear about their responsibilities. This Policy document uses the words **abuse**, **responsibility** and **threatens**.

'**Abuse**' is when someone does something to you, that makes you feel bad or hurts you.

'**Responsibility**' means something you need to do.

'**Threatens**' means when someone makes you feel like they are going to hurt or abuse you.

In our safeguarding approach we will focus on:

- Risk assessment, risk management and the implementation of safeguarding & Prevent systems
- Recruitment, selection and employment procedures
- Dealing with allegations, suspicions of abuse and radicalisation effectively and sensitively
- Training, implementation and the support of safeguarding & Prevent practices, policies and procedures
- Evaluation, timely revision and action

We value the six principles of Adult Safeguarding:

Empowerment  
Prevention  
Proportionality  
Protection  
Partnership  
Accountability

So that:

- Everyone has a right to work/learn in an environment that has taken and will take all possible steps to maintain a safe environment.
- Everyone has a responsibility to contribute to ensuring we provide a safe work/learning environment.
- Where someone is or is at risk of harm, we must take steps to ensure they (person at risk of harm) is removed from immediate danger.

## 2. What is abuse?

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take a number of forms:

- a) **Physical abuse** e.g. hitting, pushing, shaking, inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment
- b) **Sexual abuse** e.g. involvement in any sexual activity against his/her will, exposure to pornography, voyeurism and exhibitionism
- c) **Emotional/psychological abuse** e.g. intimidation or humiliation
- d) **Financial or Material abuse** e.g. theft or exerting improper pressure to sign over money from pensions or savings etc.
- e) **Neglect or acts of omission** e.g. being left in wet or soiled clothing, or malnutrition
- f) **Discriminatory abuse** e.g. racial, sexual or religious harassment

- g) **Personal exploitation** – involves denying an individual's rights or forcing him/her to perform tasks that are against his/her will
- h) **Violation of rights** e.g. preventing an individual speaking his/her thoughts and opinions
- i) **Institutional abuse** e.g. failure to provide a choice of meals or failure to ensure privacy or dignity

### 3. Definition of an adult at risk (vulnerable adult) according to the Care Act 2014

An adult at risk is a person aged 18 or over who:

- is living in residential accommodation, such as a care home or a residential special school;
- is living in sheltered housing;
- is receiving domiciliary care in his or her own home;
- is receiving any form of health care; is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999;
- is in contact with probation services;
- is receiving a welfare service of a description to be prescribed in regulations;
- is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care (age-related needs includes needs associated with frailty, illness, disability or mental capacity);
- is receiving direct payments from a local authority/HSS body in lieu of social care services
- requires assistance in the conduct of his or her own affairs.

In all of the above settings and situations adults need to be able to trust the people caring for them or supporting them and/or providing them with services.

The Care Act acknowledges the wider aspects of adult safeguarding and makes key links with:

- Domestic abuse/violence
  - Modern Day Slavery (Human Trafficking)
  - Forced Marriage
  - Honour-based violence
  - Female Genital Mutilation
- (Section 42 must be met for these to become adult safeguarding issues)

Where an adult meets all section 42 criteria, the criteria are:

- a. The adult has needs for care and support (whether or not the authority is meeting any of those needs).
- b. The adult is experiencing, or at risk of, abuse or neglect.
- c. As a result of those needs, the adult is unable to protect himself or herself against the abuse or neglect or the risk of it.

We acknowledge and promote these wider aspects of adult safeguarding and always promote an individual's 'wellbeing'. We ensure a person's wellbeing is at the centre of our delivery services and understand our general duty of care where wellbeing relates; for example, by supporting:

- Physical and mental health and emotional wellbeing of the individual
- Personal dignity (including the treatment of the individual with respect)
- Protection from abuse or neglect
- Professional and personal relationships including family
- Social and economic wellbeing
- The individual's contribution to society

- Participation in education, training and work

The characteristics of adult abuse can take a number of forms and cause victims to suffer pain, fear and distress reaching well beyond the time of the actual incident(s). Victims may be too afraid or embarrassed to raise any complaint. They may be reluctant to discuss their concerns with other people or unsure who to trust or approach with their worries.

There may be some situations where victims are unaware that they are being abused or have difficulty in communicating this information to others.

#### **4. Other areas of concern**

##### **4.1 Prevent duty**

The Counter-Terrorism and Security Act 2015 (section 21) and the increased awareness since the government's published Prevent Strategy in 2010, has seen a heightened awareness of the specific need to safeguard vulnerable adults from radicalisation and violent extremism. We are committed to safeguarding any communication that would promote extremism in any form, including, but not restricted to:

- Islamist ideology
- Far right/Neo Nazi/White Supremacist ideology
- Extremist animal right movements etc.

We support the aim to reduce and prevent violent extremism through our Safeguarding policy and procedures, to provide staff training to be aware of the signs or indicators of radicalisation and have the confidence to report their concerns to their line manager or Safeguarding Officer.

All safeguarding concerns with regards to radicalisation and extremist views should be recorded in writing using **Appendix 1** to the Safeguarding team, who will liaise with the agreed referral and Channel process.

Promotion of Prevent is conducted through teaching, learning and promotional activities to reinforce our commitment to British Values, Equality and Diversity and Safeguarding. Learners are encouraged to challenge extremist views within focus groups and themed activities whilst providing a safe environment to do so.

Think Employment will not allow the promotion of particular political views in the teaching of any subject but will promote a balanced political viewpoint as far as is reasonably practicable. Think Employment has in place a policy and process to assess the risk against promoting extremist views in order to safeguard individuals from being drawn into terrorism.

##### **4.2 Offenders**

We recognise that at times we have offenders doing some training/learning with us and may be eligible for the multi-agency public protection arrangements (MAPPA). MAPPA's arrangements are about managing the risk posed by the most serious sexual and violent offenders. The agencies involved in assessing the risks are the Police, Probation and Prison Services, as well as, depending on the case, Social Services, Trusts, Jobcentre Plus and Education Authorities among others.

Should we have any MAPPA-eligible offenders coming to our centre, the relevant agencies will contact us to inform us of the risk assessment prior to their visit. They should be in contact with the safeguarding team (section 8). However, should they mistakenly contact any other members of staff, they should be redirected to the safeguarding team. The safeguarding team will then assess

if we have adequate support to accommodate the MAPPA-eligible offender. If they feel that we are able to satisfy the arrangements as described by the agencies in charge of the offender, they will discuss them with the appropriate staff, and on a confidential basis, and will keep a record. One member of staff will then be allocated to the offender, but this member of staff will be supported by the safeguarding team.

### **4.3 Remote learning and online assessment**

We recognise that safeguarding learners when doing learning remotely has its own challenges compared to onsite learning. Although learners are not physically present, we still have a duty of care and we need to be vigilant with potential safeguarding issues, including mental health issues. There are some methods we can use to evaluate the learner's situation:

- How well do the learners progress through their online courses? Learners accessing their courses regularly are less likely to pose a concern compared to those accessing it more erratically or suddenly stopping. If there is little or no progression, the learners need to be contacted by phone first – email if no response. The online course has a facility to create reports to identify progression.
- Reviews are good to ascertain how the learners are doing and if they have any issues. Learners should have a review every 4 weeks as a minimum.
- Are there any concerning signs when learners submit their work? Some qualifications require the completion of assignments and the type of information provided in the assignments could give some clues as to how the learners feel or clues about potential radicalisation.
- Online tutorials or equivalent (through an online platform such as Zoom) also give an opportunity to have a discussion with the learners and to check their visual aspect if using a webcam. Learners should be encouraged to use their webcams.
- Learners may also use the “support request” section of the online session log to flag safeguarding issues. Any support request notifications must be checked.
- A phone discussion with the learners is also a good indication of the learner's current mental state or situation – paying particular attention to the tone used, for example.

Remote invigilation requires the use of a webcam and a sound system. The learner must be at all time visible and audible to the invigilator. If the learner is suddenly out of sight, the invigilator needs to ask the learner for an explanation. If there is no response, the invigilator phones the learner if the latter has a landline (mobile phone should be off). If there is no response, the invigilator contacts the emergency number as supplied by the learner. The last recourse is contacting the emergency – 999. The invigilator needs to check any changes on their screen while attempting contact.

## **5. Our Promise:**

We will:-

1. Comply with the requirement of the relevant legislation and will work in cooperation with other agencies to ensure the safety and welfare of our learners and employees.
2. Recognise that some learners by virtue of their age, disability or illness may be vulnerable to, be experiencing, or have experienced abuse.
3. Pass on concerns or allegations of abuse promptly to the appropriate agency.
4. Not knowingly employ any person who has a conviction for the abuse of a child or a vulnerable adult and will carry out relevant checks. Where such checks reveal any form of criminal conviction, this will be reviewed by the Managing Director and with the employee if necessary, taking into account the nature of the conviction, length of time since it occurred, employment history and any other relevant factors.
5. Provide an open and well publicised complaints procedure so that learners/volunteers/staff can voice concerns about unacceptable and/or abusive behaviour towards them or others.

6. Reserve the right to refuse to enrol any person who has a conviction for the abuse of a child or a vulnerable adult.
7. Promptly act upon and report any allegation of abuse that may be made against a member of staff/volunteer.
8. Always act to protect its learners and employees/volunteers from abuse or exploitation.
9. Work with the appropriate referral and support agencies.
10. Publicise this policy widely and will provide all staff with adequate training in how to implement it.

## **6. Roles and Responsibilities**

### **6.1 Senior Management** will ensure that:

- Think Employment has a safeguarding policy and procedures in place, which reflect the local safeguarding board standards and recommendations and is made available to staff, learners, awarding bodies and funders.
- All staff undertake relevant safeguarding training/development relevant to their role on an annual basis or after significant legislative changes or changes in good practice/protocols.
- Think Employment has a safer recruitment procedure to validate past employment and valid references are taken. All learner-facing staff have a valid DBS Check and remove access to Think Employment systems/databases when they leave our employment.
- All allegations of abuse against staff, learners and volunteers are fully and sensitively investigated
- Designated Safeguarding staff is in place with a formal process in place in their absence.
- Revisions are made immediately when deficiencies or weaknesses regarding safeguarding arrangements are identified.
- Ensure any outside services or activities that are provided to our learners/staff have appropriate procedures and policies in place with regards to safeguarding.
- Risk assessments are undertaken on a regular basis in conjunction with the Safeguarding Officer to continually ensure the robustness of our policies, procedures and practices.

### **6.2 The Safeguarding Team** will ensure that:

- All policies and procedures in place relevant to Safeguarding are communicated effectively to learners through appropriate methods and practices.
- The review and monitoring of the procedures are effective and undertake regular review to ensure their implementation. The Safeguarding Officer will, with the support of the IQA, develop, review and implement the safeguarding training plan.
- All records associated with the safeguarding concerns are securely and appropriately recorded and stored. Information will be on a 'need to know basis' internally and externally but will always adhere to the Safeguarding legislation.
- Risk assessments are undertaken on a regular basis in conjunction with the Senior Management Team to continually ensure the robustness of our policies, procedures and practices.

## 7. Allegations and Investigations

### 7.1 Responding to an allegation (Five 'R's)

It is our understanding that all staff and volunteers within Think Employment may at some point come into contact with an individual who is at risk of, or have experienced, exploitation, abuse or harm. No member or staff or volunteer should take any form of independent action but should always follow the company's policy and procedure unless in a case where the individual is in immediate danger or crisis and the individual needs urgent medical or police attention, which should only be done in consultation with relevant management to ensure the individual is safe.

**Recognise** – The first step is to recognise potential signs of abuse and potential safeguarding concerns. Staff and volunteers are trained to identify these.

**Respond** – All complaints, allegations or suspicions must be taken seriously and handled sensitively. The safety and welfare of the adult at risk are paramount at all times.

Promises of confidentiality should not be given under any circumstances, as this cannot be guaranteed due to our duty of care to the individual is to report or refer to the relevant agencies for appropriate safeguarding interventions.

**Record** – Leading questions should not be asked and a full record of any conversation with the person at risk must be recorded. **Appendix 1** should be used to record the information; however, due to the immediacy of recording the conversation, please use an appropriate method <https://forms.zoho.eu/thinkemployment/form/Safeguardingnoticetoreportconcernsonstaff> .

Summarising of the conversation should not be undertaken but rather a factual in terms of **what** the individual has reported in the individual's own words.

**Report** – Any suspicion, allegation or incident of abuse or harm must be immediately reported to the Safeguarding Officer as soon as possible and **in any event within two hours**.

**Refer** – The Safeguarding Officer will refer the matter to the police or local social care department for adults at risk where information is available to indicate that the adult is at risk of, is suffering from or is at immediate risk of harm or abuse. This will be recorded in the safeguarding log (only accessible to the safeguarding team) and referrals made within 24 hours of the event.

### 7.2 Allegations made against a staff member or volunteer of Think Employment

Any suspicion, allegation or actual abuse and/or harm caused by a staff member or volunteer of Think Employment must be reported immediately to a Senior Management team member or the Safeguarding Officer within 2 hours of raising the initial concern. The Company's Employee handbook guidance will then be followed.

## 8. Reporting Contact

### Safeguarding Lead

**Debbie Kay - 07879 473 647**  
[debbie.kay@thinkemployment.com](mailto:debbie.kay@thinkemployment.com)

### In the absence of the Safeguarding Lead

**Stephane Jeannin – 07795 675 303**  
[stephane.jeannin@thinkemployment.com](mailto:stephane.jeannin@thinkemployment.com)

**Remember:** If the person is in immediate danger, call the emergency services (999) (do not jeopardise your own safety)

## 9. Policies & Procedures

This Safeguarding policy should be read in conjunction with:

- Safer Recruitment Policy
- Equality, Diversity\_Inclusion Policy
- External Speakers Policy
- Complaints & Praise Policy

## 10. Legislation

This policy is informed by, and adheres to the local Multi-Agency Adult Protection Policy and Procedures, and to the following legislation:

- Safeguarding Vulnerable Groups Act (SVGA) 2006
- The Care Act 2014
- Mental Health Act 2007
- Deprivation of Liberty Safeguards
- Disclosure & Barring Service 2013
- Public Interest Disclosure Act 1998
- Care Standards Act 2014
- Sexual Offences Act 2003
- Protection of Freedoms Bill

## 11. Review of the policy

A Senior Manager will review this policy annually or more frequently where there are significant changes in circumstances.

<b>To be disseminated to:</b> Staff, volunteers, stakeholders, visitors		<b>Policy Ref:</b> 008
<b>Authorised by:</b> Head of Quality Lead IQA Head of Central Support	<b>Issue Date:</b> September 2008	<b>Review Due:</b> Dec 2021
<b>Amendments:</b> Sept 2018 - Updated Feb 2019 – Legislation updated. Roles / Responsibilities included. Care Act principles added. Four ‘R’s added. Dec 2019 – Included ‘Safer recruitment policy’ in section 9, flowchart amended to make clearer. Flowchart updated to reflect new online reporting facility. Nov 2020 – Added “recognise” to section 7.1; added MAPPA; replaced Appendix 2 with safeguarding log; added remote learning and online assessment. May 2021 – Replaced Equality & Diversity Policy with Equality, Diversity_Inclusion Policy.		

## Staff - Safeguarding Process

Cause for concern to be reported through online form at <https://forms.zoho.eu/thinkemployment/form/Safeguardingnoticetoreportconcernsonstaff>  
Or using Appendix 1 .

Safeguarding team make informed decision to refer to Adult Social Care and/or Police **OR** referral to Adult Social Care is not required, then relevant action, including to support service, takes place.

### Referral to Adult Social Services made:-

Within 1 working day, Adult Social Care and / or Police make decision about the type of response required. Safeguarding Team informed.

Adult person in need of immediate protection.

No formal assessment required.

**Appropriate emergency action taken by Adult Social Care and/or Police.**

**Appropriate protection action plan.**

**Identify if Adult in need and other appropriate services.**

**Company to consider support assessment accessing wider support services.**

The Safeguarding team will keep the adult-at-risk's situation under review to ensure the adult person's circumstances improve. The adult person's best interests must always come first.

In cases that involve an allegation against a member of staff, please refer to Senior Management in the first instance or the Safeguarding Lead / Officer.

Note: if you are concerned about the safety and welfare of an adult learner (aged 18 and over) please contact your Safeguarding Team for information, guidance and support.



# Appendix 1 – Staff Report Form

(email to the Safeguarding Team on completion)

Is the adult-at-risk aware of the safeguarding concern?      Yes                              No

*If No, why not?*

Is the adult-at-risk involved with any other agencies?      Yes                              No

Not Known

*If Yes, please provide details:*

## Tell us about the concern(s) being raised

<b>Location of alleged incident/concern</b> (please give details):	<b>Date and Time of alleged incident/concern:</b>  Date:  Time:
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**What type of abuse is suspected? (Tick all that apply):**

<input type="checkbox"/> <i>Neglect</i>	<input type="checkbox"/> <i>Psychological</i>	<input type="checkbox"/> <i>Financial &amp; material</i>	<input type="checkbox"/> <i>Physical</i>	<input type="checkbox"/> <i>Sexual</i>
<input type="checkbox"/> <i>Discriminatory</i>	<input type="checkbox"/> <i>Organisational</i>	<input type="checkbox"/> <i>Modern slavery</i>	<input type="checkbox"/> <i>Self-neglect</i>	<input type="checkbox"/> <i>Domestic abuse</i>

**And do you consider this abuse is also:**

<input type="checkbox"/> <i>Hate Crime</i>	<input type="checkbox"/> <i>Sexual exploitation</i>	
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**Do you consider this to be a PREVENT situation?**

Yes	No	
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If Yes, why?

## Tell us about the alleged incident/concern(s) being raised

### Factual details of the alleged incident/concern:

*This should be **concise** and include a clear factual outline of the concern being raised with details of times, dates, people and places where appropriate.*

*Remember to:-*

- *Describe what happened;*
- *Make it clear what is fact and what is opinion;*
- *Record whether there were any witnesses to the incident; who they were and how they can be contacted.*

(Please use a separate sheet if required)

**Tell us what actions have been taken to reduce the risk of harm or abuse to the adult-at-risk.**

**Tell us what actions have been taken to ensure the safety of the adult-at-risk.**

**Where is the adult-at-risk now? (Include where they are in relation to the person alleged to have caused harm)**

**Is anyone else at risk of abuse?** Yes No Not Known  
*If so give name(s) and details*

**In your opinion, does the adult-at-risk have the mental capacity to understand the risks within this safeguarding concern?**

Yes No Not Known

**If you are concerned about the welfare of the adult-at-risk, have you contacted their GP or the ambulance service?** Yes No

If No, why not

**If you think that a crime has been committed, have the police been contacted?**

Yes No

If yes, what was the outcome?

If no, why not?

Police Crime / Reference No:

**Details of the person raising the concern:**

**Name:**

**Job Title:**

**Who raised the concern with you?**

**Date Completed:**