

Safeguarding & Prevent Policy

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Signature of authority:



Mr Craig Wordsworth - Director

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Safeguarding Policy & Procedure

How CPA Promote and Gain Engagement for their Policies and Procedures

Everyone at CPA should be aware that this policy and procedure, require to be followed to ensure that we all carry out our duties in a professional manner that complies to codes of practices, which are drawn out within this policy.

Everyone at CPA should be aware of, and respond appropriately to all reports and concerns, including those outside of the organisation, and or online.

At CPA we will use the following strategies to communicate, promote and our policies and procedures to Staff, learners, employers, and visitors.

- Inductions, by discussing expectations of behaviours, actions required to meet this policy and procedure. This is to Ensure that individuals understand their responsibilities and expectations to be able to effectively adhere to them.
- Staff training which can be undertaken internally or externally as appropriate to gain an in-depth understanding of their requirements and responsibilities. Training will be recorded on each member of staff CPD record to gain a reflective account and recorded on the staff training database, this information can then be reflected upon at any stage including appraisals, standardisation meetings and when training frameworks are developed. With new members of staff, they will be enrolled onto training at the start of their employment to provide them with sufficient training hosted by both internal and external hosts.
- The safeguarding policy and procedure will require to be fully read and understood by all CPA members of staff. Declarations of understanding and commitment will be obtained and kept on record.
- This Policy and procedure will also be available on the staff intranet so staff can reflect upon their responsibilities as drawn out in this policy.
- Electronic communication, to inform staff of specific/annual changes to this policy and procedure.
- Standardisation meetings will always have safeguarding as a key/main point topic to be discussed this will include key changes/updates/training how these can be effectively implemented
- Safeguarding team meetings of which the DSL and DSO's will discuss any further requirements and expectations to constantly deliver a high-quality level of safeguarding.
- Ensuring supporting information is available on our website for learners, employers, and visitors
- Progress reviews, that reflect any content or discussion that have taken place regarding key policies, such as safeguarding, Prevent, FBV's and equality and diversity.
- This policy and procedure will be adhered to when writing and producing learning materials where appropriate and relevant.
- Posters around the training centre and classrooms to reflect expected behaviours and reporting procedures. This also will model the core values of the business and that expected by staff, learners, and visitors.
- Behavioural charters for learners and staff expectations displayed in learning environments again to model the core values of the business and that expected by staff, learners, and visitors

- Any key changes in this policy and procedures will influence continuous professional development and will be signposted during appraisals.
- Staff monitoring by SMT and ensuring this policy and procedure are carried out consistently by staff, learners, guest speakers and visitors.
- Policies and procedures are reviewed a maximum term of 12 months, otherwise when key governmental practices and procedures are announced, such as updates to KCSIE.
- Gain feedback from staff, learners and discuss effectiveness and how this policy and procedures can be improved, this will always be welcomed at any stage and the SMT will always engage with feedback obtained. Feedback can be obtained by:
Online survey links, Appraisals, standardisation meeting, Emails, following audits, observations or direct with the SMT.
- Safer recruitment, advertising for post will promote safeguarding and prevent to ensure any new potential applicants understand what CPA will expect from them, and to ensure the safer recruitment process will be followed.
- CPA will Always have high expectations of professional standards of all its staff, learners and visitors.

Construction and Plant Assessments (CPA) are committed to promoting the welfare of children and vulnerable adults who have contact with our organisation, as defined in the Children's Act and the Safeguarding of Vulnerable Adults. We believe that it is the duty of all staff members to play an active role in ensuring this.

We will ensure that this commitment to safeguarding applies to all areas of our provision, including our role as an employer.

All staff members are required to be aware of their duty to report all concerns, the guidance for identifying child and/or sexual abuse, what to do if a learner makes an allegation, and issues regarding confidentiality.

Construction and Plant Assessments (CPA) safeguarding policy and procedure is available to all staff and learners. (through the staff intranet and the CP Assessments website) this is included and forms part of the service level agreement. CPA's policies and procedures are updated annually or when changes are required in line with government guidance. All staff must sign to recognise and implement any changes to the policy from the date these changes become effective. This will also be recorded on the staff members CPD record. Construction and Plant Assessments are committed to meeting the governments Keeping Children Safe in Education framework. (KCSIE)

Principals

Construction and Plant Assessments believe that children and vulnerable adults are given the right support, training, and encouragement, so they can realise their true potential and make a valuable contribution to their local community. All children / vulnerable adults, regardless of age, disability, gender, race, religious belief and sexual orientation or identity have the right to protection from all types of harm and abuse.

CPA's Safeguarding policy and procedure is based on the following principles:

- An ethos that promotes a positive, supportive, and secure environment where learners feel valued and equipping learners with the skills needed to keep them safe, and so they can make educated decisions in the future.

- Liaison with other agencies that support learners, such as social/children's services, Early Help Schemes.
- All allegations and suspicions of abuse are taken seriously and responded to swiftly and appropriately.

There are five main elements to the policy:

- Ensuring that Construction and Plant Assessments practice safe recruitment in checking the suitability of staff and volunteers to work with young people.
- Raising awareness of safeguarding and child protection issues amongst staff.
- Developing and implementing procedures for identifying and reporting cases or suspected cases, of child abuse.
- Supporting the young person/vulnerable adult who has been abused.
- Establishing a safe environment in which young people can learn and develop, where they are able to talk and be listened to.

Definitions

The following definitions apply throughout the Safeguarding policy and associated procedures:

Child or Children

The Children Act 1989/2004 defines a child as a person under eighteen for most purposes.

Vulnerable Adult or Adults

The Safeguarding of Vulnerable Adults Scheme defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- A substantial learning or physical disability.
- A physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs.
- A significant reduction in physical or mental capacity.

Forms of Abuse

The Children Act 1989/2004 defines four types of abuse: physical, emotional, and sexual and neglect, however for completeness we have included bullying.

Physical Abuse

Physical abuse may take many forms e.g., hitting, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

Emotional Abuse

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- Conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person.
- Imposing developmentally inappropriate expectations.
- Causing the child or vulnerable adult to feel frightened or in danger – e.g., witnessing domestic violence.
- Exploitation or corruption of children or vulnerable adults.

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative and non-penetrative acts. Please refer to pages 14-31 : Harmful Sexual Behaviours.

It may also include non-contact activities, such as looking at, or being involved in the production of pornographic materials, watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

Neglect

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

Bullying

Bullying involves deliberate hostility and aggression towards a person, physical pushing kicking, hitting pinching, verbal name calling sarcasm, spreading rumours, teasing, ridicule, humiliation and ignoring individuals, racial taunts, graffiti and gestures, sexual and abusive comments, and unwanted physical contact. Construction and Plant Assessments should identify and deter any form of bullying behaviour. Bullying can escalate rapidly and can damage children or vulnerable adults significantly.

Duty to Report

All members of the staff at Construction and Plant Assessments, including full time, part-time, self-employed, voluntary staff and sub-contractors are responsible for reporting all safeguarding matters to the safeguarding team and recording all information on the company safeguarding incident reporting form.

Through inductions and the continuous promotion by staff all our learners are educated on how to raise concerns by reporting these too staff members, safeguarding team and via our website. We actively share how learners can report information around the building on posters.

All Staff

All staff that come into contact with children and vulnerable adults in their everyday work has a duty to safeguard and promote the welfare of children and vulnerable adults. Staff

will be trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.

Staff are expected to:

- Attend safeguarding training as required.
- Familiarise themselves with, and adhere to, the Safeguarding Policy and associated procedures.
- Safeguard and promote the welfare of children and vulnerable adults.
- Complete a safeguarding incident to record all safeguarding concerns
- Alert the Designated Safeguarding Officer/team if they have concerns about a child or vulnerable adult.

Designated Safeguarding Officer:

David Russell

Deputy Safeguarding Officers:

Craig Wordsworth (Director)

Lindsey Russell

Designated Safeguarding Officers are responsible for providing support, advice, and expertise on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend training as appropriate, liaise with the Managing Director, in other areas where necessary, and make referrals to external agencies. Other aspects of their role include:

- Obtaining information from staff, employers, volunteers, children, parents, or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information.
- Assessing information quickly and carefully and asking for further information where appropriate.
- Consulting with a statutory child protection agency e.g., the local Children's Safeguarding Partnership / Social Services department, to clarify doubts or worries.
- Making referrals to Children's Safeguarding Partnership / Social Services or the police without delay.
- Updating the Safeguarding section of the Intranet/internet to ensure correctness and currency of information.

Designated Safeguarding Officers have contact telephone numbers for the local Area Safeguarding Children's Board/partnership and other statutory agencies where required.

The Senior Management Team

The Managing Directors are responsible for ensuring that:

- Construction and Plant Assessments Safeguarding policy and procedures are fully implemented and followed by staff.
- Safeguarding Officers have sufficient time and resources to carry out their roles.
- All staff feel able to raise concerns about the safety of children and vulnerable adults.
- Concerns are dealt with sensitively, effectively and in a timely manner.

Information Sharing and Confidentiality

Construction and Plant Assessments staff should never give absolute guarantees of confidentiality to children and vulnerable adults wishing to tell them about something serious. They should however guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the correct action is taken to protect the child/vulnerable adult.

Record Keeping

Any member of staff receiving a disclosure of abuse from a child/vulnerable adult, or noticing signs or symptoms of possible abuse, should complete a safeguarding incident form and make notes as soon as possible, writing down exactly what was said, using the child/vulnerable adult's own words. All notes should be timed, dated, and signed. All records of a child protection nature should be passed to the Safeguarding team.

Managing a Disclosure

All staff working in direct contact with learners must be alert to the signs of abuse. Anyone who suspects that abuse is taking place inside or outside of the setting, or to whom a learner discloses issues relating to safeguarding, should contact the Safeguarding team immediately.

Staff who are not Safeguarding Officers, but who are approached with concerns about a child or vulnerable adult, must bring the concerns raised to the attention of the Safeguarding team immediately.

All staff to whom a learner discloses issues that may be related to safeguarding must keep written records of concerns. Such records must be kept securely, separate from the main learner files and in locked locations.

The Safeguarding team will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or vulnerable adult protection matters, including attendance at case conferences.

Allegations Against Staff

Allegations of abuse, or concerns raised against members of Construction and Plant Assessments staff, will always be treated seriously. The allegation must always be referred to the Designated Safeguarding Officer who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations.

The Designated Safeguarding Officer will take the appropriate steps to ensure the safety of the child or vulnerable adult, and any others who may be at risk. The Designated Safeguarding Officer will also inform the Director, Craig Wordsworth, in order that Construction and Plant Assessments procedures are followed, and a Disciplinary Investigation is carried out.

If the allegation or concern is against one of the Designated Safeguarding Officers, it should be reported to the Director, Craig Wordsworth.

Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. Any allegations made against a member of staff must and will be reported to the Local Authority Designated Officer (LADO).

Whistleblowing

Construction and Plant Assessments recognise that children and vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. (p&p014)

Reporting

Construction and Plant Assessments has a legal duty to make reports and provide relevant information to Disclosure and Barring Service. where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for submitting a barring referral lies with the Director.

Where an individual is the subject to a barring referral, the individual will be given the opportunity to provide 'representations' as to why they feel it would be inappropriate or disproportionate for DBS to include them on one or both of the Barred Lists.

DBS will consider the individual's representations before making a final barring decision. Further information about barring representations can be found in the [barring referrals: making representations guidance](#).

Reporting Process

In the event of a safeguarding concern, you are required to complete the safeguarding incident reporting form (P&P10a) following the instructions at top of the form. Once complete this needs to be either handed in or emailed to the safeguarding team ASAP. Follow the chart on the next page.

The safeguarding team can be contacted during office hours on 01709 868181 and out of office hours on 07939 975 839.

David Russell

Email: david.russell@cpassessments.co.uk

Craig Wordsworth

Email: craig.wordsworth@yahoo.co.uk

Lindsey Russell

Email: lindsey.russell@cpassessments.co.uk

A business card is handed out to all learners containing the safeguarding contact details and a QR code which takes them direct to the online reporting form. Learners can also email the safeguarding team directly: safeguarding@cpassessments.co.uk



By doing the above you have fulfilled your obligations. You should not discuss the issue any further with the learner once the referral has been done.

Investigation

The Safeguarding team will and must follow procedures set under either the Local Authority Children’s Safeguarding Partnership or Adult Safeguarding Partnership. This will identify the level of need ranging from universal to a social care referral. In an event of a learner being in immediate danger Construction and Plant Assessments will contact the relevant emergency services and social care.

The safeguarding team are supported by their Area Early Help Co-ordinator, who will supply additional support and guidance where necessary.

Construction and Plant Assessments maintain relationships with local universal support services for referrals to support our learners.

Please Note: for 16–18-year-old learner ‘s parents/guardians/carers must be involved to plan support and referrals, unless not safe to do so, advice from the local safeguarding partnership should be obtained.

Prevention

Construction and Plant Assessments recognise that as a provider of learning we play a significant part in the prevention of harm to our learners by providing them with good lines of communication with trusted adults and an ethos of protection, both in learning and at work.

Construction and Plant Assessments will:

- Establish and maintain an environment where children/vulnerable adults feel secure, are encouraged to talk, and are always listened to.
- Ensure learners know who to speak to in learning and at work if they are worried or experiencing difficulties.
- Include in the learning programme development opportunities that equip children/vulnerable adults with the skills they need to recognise and stay safe from abuse.
- Clearly communicate this policy and associated procedures to learners and employers at induction and throughout the learning programme.

Safer Recruitment and Selection of Staff

Construction and Plant Assessments comply with safer recruitment practices to ensure that staff are fit to work in our learning environments with children and vulnerable adults. We also reserve the right to refuse to employ staff who we believe may pose a risk to our learners.

Construction and Plant Assessments has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made on appointment: (See DBS policy to support this annex)

- Documentary evidence checks to confirm nationality, residency and "right to work" status.
- Enhanced DBS Disclosure; *
- Documentary evidence of qualifications.
- Satisfactory completion of the probationary period as defined in their letter of appointment.

*The Further Education (Providers of Education) England Regulations 2006 place a duty on colleges and work-based learning providers to undertake an Enhanced Data Barring Service Disclosure for all new staff providing education, training or care to children, young people, or vulnerable adults. An Enhanced Disclosure is carried out for staff that regularly cares for, supervises, train or are in sole charge of children or vulnerable adults.

Staff Training and Development

All staff must undertake training on the subject of safeguarding and Construction and Plant Assessments procedures. This Safeguarding Policy, procedure and accompanying guidance will be issued to all new staff as part of their induction and supported by training and assessment to ensure the appropriate skills and knowledge have been achieved.

Designated Safeguarding staff are required to undertake a minimum of 3 training events per year as part of their safeguarding CPD.

Staff that are responsible for the delivery of education or that have regular contact with learners are expected to take part in a minimum of 1 training event for CPD.

For further information please refer to our CPD policy. (p&p 052)

Supporting Staff

Construction and Plant Assessments are aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with our Designated Safeguarding Officer. Those staff requiring additional support have access to a free, confidential counselling service, which will be arranged by CPA.

Resignations

If, during an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, Construction and Plant Assessments is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

E-Safety

Construction and Plant Assessments e-safety and IT policies recognise that internet safety is the whole organisations responsibility (staff, learners, employers).

Children and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some children and vulnerable adults may find themselves in activities which are inappropriate or possibly illegal.

We therefore recognise our responsibility to educate our learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

CPA work with Cutler IT to manage our IT systems, appropriate filters in place to comply with: Child Sexual Abuse Material (CSAM) and Counter Terrorism Internet Referral unit (CTIRU)

Staff/learner usage is monitored by Cutler IT and in the event of misuse, Cutler IT will report this directly to the Director and DSL.

Learners will always be supervised by a member of CPA staff whilst using computers and tablets to ensure responsible usage is adhered to. any inappropriate activity will be reported directly to the safeguarding team.

Equality and Diversity

All children and vulnerable adults have the right to be safeguarded from harm and exploitation whatever their race, religion, gender, sexuality, age, or disability. This policy relates to Construction and Plant Assessments legal obligation to protect children who are suffering forms of abuse as defined in the Children Act 1989/2004 and the Equality Act 2010 and is therefore in line with the organisation's equality and diversity policy.

Prevention of Violent Extremism – Radicalisation

Construction and Plant Assessments seeks to protect its learners against the messages of all violent extremism including, but not restricted to extreme political and religious groups, including some Animal Rights and Far Right Groups.

We recognise that young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity. Our DSO will provide training and information aimed to reduce the risk of radicalisation and support those who may be at risk.

Construction and Plant Assessments promotes an open culture to raise awareness of the signs radicalisation and to the give them confidence to report their concerns via the safeguarding reporting procedures and will provide appropriate support through its own staff or by referral to external agencies, to any learner in danger of radicalisation.

Relevant Policies

Construction and Plant Assessments acknowledge that their legal responsibility for safeguarding the welfare of children and vulnerable adults goes beyond basic child protection procedures. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies and documents, for instance:

- Harmful Sexual Behaviour (p&p 001 : pages 14 – 31)
- Recruitment and Selection (p&p 055)
- Health & Safety (p&p 032)
- Equality and Diversity (p&p 007)
- Social Media Policy (p&p 006)
- E-Safety Policy (p&p 011)
- Staff Handbook
- DBS Policy (p&p 003)
- CPD Policy (p&p 052)
- Safeguarding in Practice (p&p 056)
- Safeguarding Risk Assessment (p&p 001 : pages 33 – 48)
- Prevent Policy Risk Assessment (p&p 001 : pages 33 – 48)

Monitoring and Review

Construction and Plant Assessments will undertake an annual review of the Safeguarding policy and procedures to reflect new legislation and amendments to current legislation.

Policy & Procedure on Harmful Sexual Behaviours (HSB)

for Staff, Learners, Employers, & Visitors

How CPA Promote and Gain Engagement for their Policies and Procedures

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- CPA will Always have high expectations of professional standards of all its staff, learners, and visitors.

Section 1 - Context

This policy recognises the previous lack of formal documentation detailing CPA's position on Harmful Sexual Behaviours and seeks to redress this by committing CPA to taking action as detailed in this document.

These experiences can happen to a person of any gender or sexuality and be perpetrated by a person or people of any gender or sexuality.

- In the year ending March 2019, the police recorded 73,260 sexual offences where there are data to identify the victim was a child. Around one-quarter (27%) of these were rape offences.⁷ These totals are likely to be a significant underrepresentation of the true number of offences against young people in this age group.

- Police recorded crime data (England and Wales) for year ending March 2020 indicated that 51.9% of female victims and 62.4% of male victims of sexual offences were aged between 5 and 19.
- NSPCC's how safe are our children report 2020/9 found that girls are particularly vulnerable to sexual abuse, accounting for around 90% of victims of recorded rape offences against 13- to 15-year-olds in England, Wales, and Scotland.
- The Women and Equalities committee (WEC) state that a number of large-scale surveys found that girls are consistently reporting high levels of sexual harassment and sexual violence in schools and colleges.
- Girlguiding's Girls' 2021 Research briefing: It happens all the time found that 67% of girls and young women aged 13-18 surveyed have experienced sexual harassment at school from another student, and that 29% first experienced sexual harassment when they were just 11-13 years old.
- Almost a quarter (24%) of female students and 4% of male students at mixed-sex schools have been subjected to unwanted physical touching of a sexual nature while at school.

(Taken from sexual violence & harassment between children in schools and colleges)

This policy is written in recognition that HSB can happen at Construction & Plant Assessments (CPA). This document defines such abuses, what we expect of our staff, learners, and visitors and how we will respond when these serious issues are experienced. This policy is part of a broader series of actions that have the aim of eradicating such abuse, educating learners/staff and visitors that HSB is NOT acceptable, and CPA have a zero tolerance to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for our learners, staff, visitors, and employers.

CPA has a duty of care towards its learners, employers, staff, and visitors to prevent and respond to these issues. It is vital that we are clear on what kinds of behaviours and cultures are unacceptable and what can be done if they are witnessed or experienced. CPA will seek to safeguard ALL.

Learners at CPA are expected to seek enthusiastic consent when interacting with others. Consent is clearly and legally defined as someone agreeing by choice and having the freedom and capacity to make that choice.

These issues are complex and may not always be obvious or follow an easily recognisable pattern, both in how they are seen and how they can be resolved. For example, the way these violations are experienced is not always as a lone person's behaviour towards another.

CPA's safeguarding team are responsible for reviewing this policy on a regular basis, informed by any data collected that is relevant to the policy and will make any changes to the policy such as updating information, procedures, names, formatting, or hyperlinks.

CPA recognise that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported. All staff are expected to be vigilant in their approach and always promote HSB's as in section 8 Legal responsibilities and obligations, CPA are aware of their obligations under the Human Rights Act 1999, and the European convention on human rights article 3, 8, 14, protocol 1 article 2 as found in the following links:

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

https://www.echr.coe.int/documents/convention_eng.pdf

Section 2 - Definitions of HSB

Sexual Violence is any unwanted sexual act or activity. There are many different kinds of sexual violence that exist on a continuum, including but not restricted to: rape, sexual assault, child sexual abuse, sexual harassment, coercion, gaslighting (manipulating by psychological means), rape and assault within marriage / relationships, female genital mutilation, trafficking, and sexual exploitation, forced marriage and so-called honour-based violence and ritual abuse, which can also be forms of domestic violence. Sexual violence can be psychological and/or physical.

Sexual Harassment is unwanted and unwelcome words, conduct, or behaviour of a sexual nature that has the purpose or effect of creating an intimidating, embarrassing, hostile, degrading, humiliating or offensive environment for the recipient. It is a misuse of personal or institutional power and often based on a person's gender.

For the purpose of this policy whether or not the harasser intended to be offensive is irrelevant. The limit of acceptable behaviour as described by this policy is up to the recipient to decide. A single incident or persistent behaviour can amount to harassment.

Sexual harassment can range from behaviour that seems obvious to anyone or subtler behaviour less obvious to either the person responsible for the behaviour or to the recipient.

Often the impact is not felt or witnessed immediately. The impact may go beyond the recipient to people who see or hear what happens or who try to offer support.

Sexual Harassment can include but is not limited to catcalling, following, making unnecessary and unwanted physical contact, sexual jokes, and comments, giving unwelcome personal gifts, wolf-whistling, leering, derogatory comments, unwelcome comments about a person's body or clothing, asking unwelcome questions about a person's

sex life and/or sexuality, engaging in unwelcome sexual propositions, invitations, and flirtation, making somebody feel uncomfortable through displaying or sharing sexual material.

Sexual harassment does not necessarily occur face to face and can be in the form of emails, visual images (such as sexually explicit pictures on walls in a shared environment), social media, telephone, text messages and image based sexual abuse such as revenge porn and up skirting.

Stalking is unwanted, repeated, obsessive and/or controlling behaviours that make someone distressed or scared. There are many ways stalking can be perpetrated; it is most likely to be someone the recipient already knows well such as an ex-partner

Domestic Violence can be any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, frighten, isolate, or create dependence.

Sexual Misconduct

The term sexual misconduct describes misuses of power usually enacted by academic, professional, contracted, and temporary staff in their relations with students (on some occasions it can also occur in relations with other staff members and between students who have unequal institutional power). Sexual misconduct can include harassment, assault, grooming, bullying, sexual invitations, comments and non-verbal communication with sexual content or overtones, creation of atmospheres of discomfort, and promised resources in exchange for sexual access. The term 'sexual harassment' captures only some of the possible abuses of power that may occur. Sexual misconduct more specifically raises

issues of unequal relationships, consent, and the prevention of equal access to education, opportunities, and career progression. Intimate relationships between staff and learners are prohibited.

Consent

The definition of consent as defined in the Sexual Offences Act 2003 is agreeing by choice and having the freedom and capacity to make that choice.

Freedom to consent - a person is free to make a choice if nothing bad would happen to them if they said no.

For example, a person is not free to choose if:

- they are being threatened with violence (both by the perpetrator and/or by someone else)
- they feared for the continuation or assessment of their studies if they refused
- they are being blackmailed using images or social sabotage

Similarly, someone may not feel free to make a choice if there is a power imbalance; this could be due to age, status, position and/or authority or dependency (e.g., drug/alcohol use, financial control).

Capacity to Consent is about whether someone is physically and/or mentally able to make a choice and to understand the consequences of that choice.

For example, a person does not have the capacity to give consent if:

- they are drunk or under the influence of drugs - this means someone may still be physically able to have sex, but they may not be able to consent
- they are asleep or unconscious
- a person may also not have capacity to give consent if they have a disability or impairment, including learning difficulty, physical disability, or mental health condition.

An Active Bystander is someone who not only witnesses a situation but takes steps to speak up or step in to keep a situation from escalating or to disrupt a problematic situation when it is safe to do so.

Intersectionality

Experiences of sexual violence, sexual harassment, stalking, domestic violence and/or sexual misconduct may intersect with other forms of discrimination and harassment.

The implementation of this policy must be relevant to people with intersectional experiences by ensuring those who are most marginalised are supported and that unconscious bias is considered and challenged.

To find out more about CPA's approach to equality, diversity, and inclusion, refer to Equality & Diversity P&P 007.

Section 3 - Expectations

Do not perpetrate sexual HSB of any nature including, sexual name calling, online sexual bullying, sexual image sharing, sexual assault, and rape.

Perpetrating HSB as outlined in the definitions section of this policy is never acceptable under any circumstances and may constitute a criminal offence. Perpetrating this behaviour is harmful to others' health and wellbeing.

The behaviour listed in this policy can be perpetrated in person or online. Learners at CPA are expected to adhere to this policy while using online interaction.

All reports of HSB will be taken seriously. Any CPA learners found behaving in this way will be dealt with under the appropriate internal disciplinary procedures, Refer to P&P18.

The Reporting Party, the Responding Party and any Witnesses will be treated fairly, with dignity and confidentiality throughout any process and may access relevant support services available to them.

All members of staff, learners and visitors are expected to gain consent when interacting with others as stated in section 2.

Act Appropriately in the Work/Study Environment

There are many sexualised behaviours that are never appropriate in a work/study environment. There are many possible power dynamics that people should be conscious of: gender, race, sexuality, gender identity, disability, age are some of the factors covered in the Equality Act 2010 that may intersect with how power is held by some people over others.

Learners at CPA's are expected to recognise this in their interpersonal work/study relationships. Other factors may include class and if a position of authority is held.

Be an Active Bystander

The bystander effect is a social psychological phenomenon that occurs when the presence of others discourages an individual from intervening in a situation. This compounds people's experiences by normalising and accepting inappropriate behaviour. All members of staff, learners and visitors have a responsibility to do or say something if they witness sexual violence, sexual harassment, stalking, domestic violence and/or sexual misconduct and it is safe to intervene.

Respond in a Thoughtful and Supportive Way to Disclosures

If someone tells you they have experienced any HSB's you should respond in good faith with the assumption that they are telling the truth.

If anyone experiences any form of HSB's, you can speak to a member of the safeguarding team who will listen non-judgementally and act appropriately.

Section 4 - Support

CPA's is committed to providing support for all learners directly or indirectly affected by any of these issues. CPA's will provide signpost information on support/resources available and offer interim measures as appropriate. This may involve local authority safeguarding partnerships - early help procedures.

Support resources are available to members of staff, employers, learners, or visitors regardless of their choice to proceed to a report either to CPA or the Police. Support is available even if the perpetrator is not a member of the CPA community. These are also available on our website, for staff on the SharePoint intranet or given directly by a member of the safeguarding team.

In cases where those involved are members of the CPA Community, support for the Reporting Party and Responding Party will be separate; one member of staff will not provide support to both parties, as this may cause conflict to the case and gain bias views. In the case of recent sexual violence (within the last 7 days) and if appropriate the Reporting Party may be signposted to a Sexual Assault Referral Centre (SARC) or other external independent support agencies. CPA is committed to supporting survivors to remain in their employment and/or studies.

Information about external support services can be found on our website for learners, parents, carers, employers, and staff support can be found on the SharePoint intranet.

Section 5 - Disclosures & Reporting

CPA's encourages members of staff, employers, visitors, and learners to inform anyone if they have experienced HSB's. CPA understands the importance of minimising the number of times a Reporting Party has to disclose information. It is often not in the best interest of the person disclosing to have to recount potentially traumatic experiences. This process seeks to limit the burden on the Reporting Party and provide them with a number of options for seeking support and resolution.

This policy makes a distinction between a disclosure, a report, and a complaint **A Disclosure** is when someone informs another that they have experienced HSB's. This may be the only step a Reporting Party takes and it may not be clear from the beginning of a conversation that a disclosure is about to occur. Disclosures should be recorded (this can be done anonymously or with details, depending on the wishes of the person disclosing). While action may not be taken at this stage, as a result of disclosures there may be some cases where CPA has a duty of care to act, usually in cases where someone is at immediate risk of harm or under our safeguarding policy (P&P 001). Anyone disclosing will be kept informed where it is appropriate to do so.

A Report is when someone informs CPA online or directly to a member of staff working for CPA, that they have experienced HSB and would like CPA to act. A disclosure therefore becomes a report if the person wants action to be taken as a result of the disclosure. The report will **generate a case**. A member of the safeguarding team will review cases and (considering the wishes of the Reporting Party) decide the most appropriate course of action for the case. CPA may be limited in what action it could take if the person reported is not a member of the CPA community.

CPA will take any disclosure or report in good faith that the person reporting is telling the truth and, on this basis, will refer the Reporting Party onto the relevant support services. The Reporting Party may be asked to provide further information for CPA to take the most effective action.

Depending on the seriousness of the case, emergency service will be contacted. Via 111, 101 or 999.

A Complaint is rarely the suitable method for processing reports of HSB's, however any complaint will be dealt with seriously and in accordance with the procedure. (P&P 19)

False Reports

It is extremely rare for people to lie about HSB, and it should be noted that there is much misrepresentation on this matter. CPA takes allegations of false reports very seriously. Anyone identified as falsely reporting can expect to be investigated in line with the relevant disciplinary procedure. (P&P18) Furthermore, alleging that a report is false when it is not undermines our commitment to eliminating HSB and will be taken into consideration during disciplinary investigations.

Retaliation

CPA recognises the possibility of retaliation against individuals who report HSB's and/or against those who are involved in informal or formal stages of the relevant disciplinary procedures. Any retaliation will be dealt with in and of itself under the relevant disciplinary procedures. (P&P18)

Section 6 - Confidentiality & Information Sharing

CPA recognises the importance of privacy in cases where HSB's has taken place in accordance with data protection and GDPR, as sensitive information.

Discretion will be maintained at all times and information will only be shared with relevant staff on a need-to-know basis. Confidentiality is about treating the information given with due consideration for its personal and sensitive content, limiting who has access to the information and ensuring it is stored securely.

Confidentiality for the person disclosing and anyone named in a report will be maintained as far as possible unless otherwise agreed; however, there may be circumstances – e.g., danger of physical assault or investigation – that means CPA staff are required to disclose certain information to additional personnel or to third parties on a 'need to know' basis: this is consistent with CPA meeting its Duty of Care obligation.

In circumstances where confidentiality cannot be maintained CPA staff should always seek the permission of the person disclosing to share information provided and should document the decision to share without permission and the reasons for this as well as informing the individual of the decision to share the information without their permission. CPA staff should not report to external authorities such as psychological services or the police without permission from the person disclosing unless someone is at risk of serious harm to themselves or others. Normally this risk assessment will be made by the safeguarding team.

If legal proceedings take place members of staff (including external support) could be called to court as a witness, and/or obliged to provide evidence. Therefore, accurate and appropriate record-keeping is needed by all staff who receive disclosures. Training is to be given to all members of staff to ensure all record-keeping limits the possibility of it being misused at any point in the future.

When the Responding Party is named or identifiable, CPA will seek to take appropriate action on the report. This will normally include notifying the person as soon as is reasonably practical. There are exceptions to this approach, specifically where it may not be safe or appropriate to inform a Responding Party.

If a witness reports on behalf of someone else in an identifiable and contactable way, CPA will contact them to offer support and seek their views on taking any further action. Any sensitive information disclosed will be held by the safeguarding team, subject to and held in accordance with the provisions of the Data Protection and GDPR policy (P&P 09) Monitoring data (with personal information such as, names and email addresses removed) will be reported annually to the senior management team, for improving CPA's prevention and response to HSB's.

Section 7 – CPA Procedures

For responding to sexual violence, harassment and/or misconduct.

These procedures detailed what you can do if you experience HSB's, and how best to respond if you received a disclosure from someone who has experienced the above or witnessed something taking place. This section also details how these matters can be reported to CPA and how CPA will respond to such reports. It also highlights the relevant disciplinary procedures that will be followed if formal action is to be taken. Due to the sensitive nature of information detailed in disclosures and reports about HSB's, the procedures will be carried out accordingly.

- 7.1 What you can do if you experience HSB's
- 7.2 What to do when receiving a disclosure
- 7.3 What to do if you witness something taking place
- 7.4 Reporting HSB's
- 7.5 How CPA responds to reports
- 7.6 Investigations
- 7.7 About these procedures
- 7.8 Procedures for information management and privacy

7.1 What you can do if you Experience HSB's

It is important to remember that what you have experienced is not your fault and what you do next is your choice. There are several internal and external support services for learners and staff which can be signposted for you, of which can be accessed irrespective of whether you choose to report what has happened to you. You can report to CPA anonymously or with your contact details (so you get a response) online through the CPA website. You can also report in person to any member of staff or the safeguarding team. Information about how CPA will respond and what action can be taken should you choose to make a report can be found in Procedure 7.5. You can find out more about how the information you provide to CPA will be used in Procedure 7.8 on information management and privacy. You can decide if you would like to contact the police or not. There is advice available on what those processes will be involved should you choose to report to the police.

7.2 What to do When Receiving a Disclosure

People who experience HSB's are most likely to tell someone they are already close to and trust if anyone at all. Therefore, it is important that all members of staff, of CPA have an informed response to such disclosures. Here are some steps to follow when receiving a disclosure:

A: Listen Non-Judgementally and Do Not Try to be a Saviour

When someone has experienced a violation that has affected their ability to act independently, the best way to support them is to listen and empower them to make choices for themselves.

Remind yourself that the person has responded in the best way they can considering the resources they have. This means that we need to leave behind our own judgements about what we would have done in their position.

Reflect back what is being disclosed and when responding avoid using the words like 'should', 'ought' or 'must' and instead use phrases such as 'did you know there are a, b, c support services, 'these resources may be helpful' or 'you have the options to do x or y'.

B: Documenting

CPA is keen to build a better understanding of when and where people experience HSB. To do this, CPA ask that staff record disclosures and reports that they receive on the CPA incident/safeguarding form. (P&P10a) Disclosures can be recorded without any personal details if the person disclosing does not feel comfortable with that and there is no risk of harm to anyone. If the subject of the incident is identifiable, we will normally contact them to offer support and seek their views on taking any further action.

C: Signpost

Members of staff must report incidents of HSB's to the safeguarding team as soon as possible, of which the safeguarding team will signpost appropriate support for their needs. Staff will ensure they inform the reporting person that the information will only be shared on a need-to-know basis.

D: What to do if someone who Discloses to you is in Crisis

If the person disclosing informs you that they or the person(s) they are disclosing information about is at risk of hurting themselves or others it may be appropriate to escalate the situation to:

- *In emergencies where someone is at risk or in danger call 999*
- *Contacting the safeguarding team on 01709 868181*
- *Contacting our, out of hours Designated Safeguarding Team on 07939 975 839.*

7.3 What to do if you Witness Something Taking Place

If you are witnessing sexual violence or harassment taking place, and it is an emergency (for example there is a risk of someone being hurt) and you are on site, you should report this immediately to a member of staff and where possible call 999.

If you are witnessing sexual harassment where you do not consider it to be an emergency, you should delegate this to any member of staff or if safe to do so, you can intervene.

Possible ways of intervening include:

- Direct Action – telling the perpetrator that their behaviour is unacceptable
- Distraction – distract either the perpetrator or the target to defuse the situation
- Delay – it is always worth checking in with the target of the behaviour after it has taken place; it is validating for them to know that another person believes what has happened and is not acceptable. You must report what you have witnessed after that incident has occurred. You can do this as stated in 7.1. If the subject of the incident is identifiable and contactable CPA will contact them to offer support and seek their views on taking any further action

7.4 Reporting Harmful Sexual Behaviours

Who Can Report:

Any member of staff, employer, learner, or visitor can report HSB's to CPA. It can be about someone at CPA or someone external. CPA will offer support services and/or external referral to the Reporting Party irrespective of who the report is about.

Examples of
limited to:

possible reports include but are not

Student Reporting Staff	Anyone Reporting a Culture	Student Reporting Student	Staff Reporting Student
Staff Reporting Staff	Visitor Reporting Staff	Visitor Reporting Student	Student Reporting a Visitor
Staff Reporting a Visitor	Visitor Reporting a Visitor	Former Student Reporting Staff	Former Student Reporting Student

What Methods of Reporting are There?

Online

Reports can be made online through CPA's website. This is a secure and confidential method for informing CPA either anonymously or with contact details about any experience of HSB.

Written or E-mail

Using either the incident/safeguarding form (P&P 10a) or if not available giving appropriate details via e-mail to safeguarding@cpassessments.co.uk

Member of Staff:

If you would prefer to speak to someone in person you can contact:

- Your manager
- Member of the safeguarding team
- Directors

Learners

- Member of the safeguarding team
- Email Safeguarding team – safeguarding@cpassessments.co.uk
- Tutor or preferred member of staff
- Employer
- Online

Visitors

- Member of the safeguarding team
- Director

Employers

- Member of the safeguarding team
- Director
- Your apprentices allocated tutor

7.5 How CPA Responds to Reports

As detailed in *section 5* of the policy CPA will take any report in good faith while also recognising that this is not a determination of guilt and that therefore the Responding Party must be treated fairly, up to and during any investigation that may take place. All people involved have a right to access support services and representation. Parties involved in the same case will be supported by different members of staff in support services.

The Safeguarding Team will review all cases of HSB's that have been reported to us.

The Safeguarding Team:

Designated Safeguarding Lead: David Russell

Deputy Safeguarding Officer: Craig Wordsworth (Director)

Deputy Safeguarding Officer: Lindsey Russell

If the safeguarding team is not available then reports should be made to the Senior Managers, David Wordsworth, or Craig Wordsworth.

The safeguarding team, work where appropriate with local authority safeguarding boards, social services, emergency services and other external agencies to offer support and ensure that cases will be handled in accordance with local authority legislation. CPA will also work with parents/carers and ensure a consistent approach is taken to information sharing unless they are the responding party. Actions taken will depend on the circumstances of each case.

Precautionary action may lead to suspension prior to an investigation, actions may be taken where it is considered necessary to protect CPA, any of its learners, employers, or visitors. The Safeguarding Team will review cases and ensure the appropriate next steps are initiated as soon as possible and within five working days of receiving the report.

Actions that may be taken by the Safeguarding Team include but are not limited to and in no order are:

A: If the Responding Party is a Learner(s)

- Take appropriate action - for example a conversation about appropriate behaviour
- Refer to a service to take relevant action - for example to move someone to another part of the building
- Refer to the learner disciplinary procedures
- Refer to the learner's employer
- Report to the emergency services where appropriate

B: If the Responding Party is a Staff Member(s)

- Refer to the safeguarding team and/or director to deal with the issue locally and take appropriate action - for example a conversation about appropriate behaviour or follow the disciplinary policy (P&P 33)
- Refer to a service to take relevant action (for example the staff member is required to attend training)
- Refer to the local authority designated officer, following local authority guidelines
- Report to the emergency services where appropriate

C: If the Responding Party is a Visitor/Employer

- Refer to the safeguarding team or director
- Refer to the relevant third-party employer
- Take appropriate action centrally which may include banning the person from CPA
- Report to the emergency services where appropriate

D : Informing the Responding Party :

The Responding Party will be informed as soon as reasonably practical after consideration of the following:

- The general right for the Responding Party to know that information is held
- The immediate safety of the Reporting Party, such as risk of violence or retaliation
- The immediate safety of the Responding Party
- Whether there is a substantial risk that the Responding Party would make efforts to interfere with or undermine an investigation, either criminal or internal
- Whether a reasonable request has been received from the police or other authority with statutory or investigatory powers for the information to be withheld
- Whether informing the responding party would seriously impair the achievements of Report and Support
- Following guidance from the local authority safeguarding team

Any delay to informing the Responding Party will last only as long as is necessary to mitigate the risks which justified not informing them as soon as reasonably practical.

The Reporting Party, Responding Party or any witnesses may be referred to relevant support services such as:

- Safeguarding Team
- Specialist external support service
- Early Help or local authority safeguarding team
- Social Care

All reports will be:

- Risk Assessed
- Reviewed for any immediate action that may need to be taken
- Referred to external services - Early Help, Social Care (where appropriate)
- Referred to emergency services (where appropriate)

Where possible and appropriate the Reporting Party will be informed about what action has been taken.

Anonymous Reports

These are intended to build a picture of issues where people do not feel able to reveal personal information but would like CPA to be aware something has taken place. Therefore, it is unlikely that specific or formal action will be taken as a result on an anonymous report. However, trends will be monitored to understand what organisational work needs to take place to address such issues from occurring again.

7.6 About these Procedures

CPA review these procedures on a regular basis and no less frequently than once per annum. The Senior Management Team have overall responsibility for ensuring they are up to date and that they operationally guide CPA's response to disclosures and reports. The procedures will be subject to change to ensure they stay compliant and relevant to the needs of CPA. Minor changes such as updating formatting or hyperlinks can be authorised by the Senior Management Team who may authorise any major changes to the procedures.

7.7 Procedures for Information Management and Privacy

This is in line with CPA's policies and procedures. (P&P 41,42,43)

Detail in these reports includes:

1. Who they are reporting on behalf of (optional)
2. Details of the person reporting or on behalf of - Email, contact number, address, (optional)
3. What is their connection to CPA (optional)
4. Reporting of incident details/information, this could include dates, times, names, locations

Each report will be submitted to the safeguarding team via an email which will include a submission date and the details of the report.

Protecting Sensitive Information

This will be carried out in line with our data protection, GDPR and privacy policy.

(P&P 41,42,43)

Information Storage

The system resides on a secure server and is backed up by Cuter IT services.

Retention, Anonymisation & Deletion

Information that is downloaded, is to be transferred to the secure shared drive, in the safeguarding section in a file specified for the case, this information will then be secure, and backed up to ensure retention of records.

Once the records have been fully resolved by all parties, and if the person has left CPA provisions, the information will be archived for a minimum of 6 years, unless otherwise advised.

Third party records, such as police and early help, will be in accordance with their internal procedures.

7.8 Updating Practices

CPA will monitor to understand what organisational work needs to take place to address issues, failures, or improvements to ensure they comply with official guidance.

All staff, Learners, employers, and visitors should feel able to raise concerns about poor or unsafe practice and potential failures in CPA's safeguarding regime and know that such concerns will be taken seriously by the safeguarding team and the senior leadership team.

7.9 Whistleblowing

Appropriate whistleblowing procedures are in place for such concerns to be raised with the senior management team or

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed; other whistleblowing channels are open to them: general guidance on whistleblowing can be found on (P&P 14)

Section 8 Promotion and Prevention of HSB's

Everyone at CPA should be aware that, sexual violence and sexual abuse can happen anywhere, and all staff working with young adults are advised to maintain an attitude of 'it could happen here'. Everyone at CPA should be aware of, and respond appropriately to all reports and concerns, including those outside of the organisation, and or online.

It is always best practice to prevent HSB's taking place and educate learners, staff, employers, and visitors where appropriate that HSB's of any kind can cause problematic developmental damage to a person/s life.

At CPA we will use the following strategies to educate Staff, learners, employers, and visitors of the dangers of HSB and what CPA consistently expects.

- Induction, by signposting this policy and procedures and discussing expectations of behaviours
- Ensuring supporting information is available on our website
- Reviews, that reflect any content or discussion that have taken place in regard to HSB's
- HSB's will be embedded into learning materials where appropriate and relevant
- Posters around the training centre and classrooms to reflect expected behaviours and what will not be tolerated.
- Posters around the building to notify reporting procedures including QR code which directs to online reporting
- Supplying information to employers (through our website)
- Ensuring employers understand how to access support
- Behavioural charter
- HSB's included in Staff training/CPD which can be internal or externally sourced.
- Staff SharePoint intranet, which will have resources, reporting forms, support agencies which are available
- Staff standardisation meetings
- Updating policies and procedures and informing Staff of any changes.
- Staff monitoring and ensuring this policy/procedure is carried out consistently by learners, guest speakers, visitors, and even other members of staff.
- Always have high expectations of professional standards
- Remember CPA will not tolerate HSB's at any time.



Action Plan

Action Required:	
Plan Completed By:	
Date:	

Reason for action required:	Agreed actions to take place:	Actions to be completed by whom and date:

Outcome/reflection of actions taken:	
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Safeguarding / Prevent Policy & Risk Assessment

Preventing Violent and Non-Violent Extremism and Radicalisation

The purpose of this Policy is to:

- Ensure awareness of Prevent within Construction & Plant Assessments (CPA)
- Provide a clear framework to structure and inform our response to Safeguarding concerns, including a supportive referral process for those who may be susceptible to the message of extremism
- Embed British Values into the curriculum and ways of working
- Recognise current practise which contributes to the Prevent agenda
- Identify continuous areas for improvement

Who Does this Policy Apply To?

The Prevent Policy applies to everyone working at or attending CPA. It confers responsibilities on all CPA staff, IT consultants, learners, contractors, visitors, consultants, and those working under self-employed arrangements.

Policy Statement

The aim of the Prevent Policy is to create and maintain a safe, healthy, and supportive learning and working environment for our learners, staff, employers, and visitors alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners. We further recognise that if we fail to challenge extremist views we are failing to protect our learners from potential harm. As such the Prevent agenda will be addressed as a safeguarding concern. CPA has adopted the Prevent Duty in accordance with legislative requirements. However, we will endeavour to incorporate the relevant duties so as not to:

- Stifle legitimate discussions, debate, or learner engagement activities in the local community; or
- Stereotype, label or single out individuals based on their origins, ethnicity, faith and beliefs or any other characteristics protected under the Equality Act 2010.

Why do we need this policy?

Background Information

Prevent is one of 4 strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

Prevent happens before any criminal activity takes place by recognising, supporting, and protecting people who might be susceptible to radicalisation.

The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet, and health.

The Government has created a system of 'threat level' which represents the likelihood of a terrorist attack in the near future. The current threat level from international terrorism in the UK is substantial, which means that a terrorist attack is likely.

Our Prevent Policy has five key objectives:

1. To promote and reinforce shared values, including British Values to create space for free and open debate; and to listen and support the learner voice.
2. To breakdown segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding; and to engage all learners in playing a full and active role in wider engagement in society.
3. To ensure learner safety and that CPA is free from bullying, harassment, and discrimination.
4. To provide support for students who may be at risk of radicalisation, and appropriate sources of advice and guidance.
5. To ensure that students and staff are aware of their roles and responsibilities in preventing violent and non-violent extremism.

Definitions

The following are commonly agreed definitions within the Prevent agenda:

- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious, or ideological.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.

Aims

Leadership and Values

To create and maintain CPA's ethos that upholds core values of shared responsibility and wellbeing for all learners, staff, employers, and visitors whilst promoting respect, equality and diversity and understanding.

This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff and learner understanding of the issues and confidence to deal with them through mandatory staff training, specialist tutorials, awareness campaigns and community engagement activities.
- Deepening engagement with local communities and faith groups.

Teaching and Learning

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Embedding British Values, equality, diversity and inclusion, wellbeing, and community cohesion throughout the curriculum.
- Promoting wider skills development such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives, and promote universal rights.
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values.
- Use of external programmes or groups to support learning while ensuring that the input supports CPA's goals and values.
- Encouraging active citizenship and learner voice.

Learner Support

To ensure that staff take preventative and responsive steps, working with partner professionals, families, and communities.

This will be achieved through:

- Strong, effective, and responsive learner's support.
- Developing strong community links and being aware of what is happening in the locality, including within the CPA's own community.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Recognising factors that may increase risk to a learner, i.e., vulnerability, disadvantage, or hardship, and implementing early risk management strategies.
- Ensuring that learners and staff know how to access support within CPA and/or via partners.
- Supporting learners with problem solving and repair of harm.
- Supporting 'at risk' learners through safeguarding and crime prevention processes.
- Focusing on narrowing the attainment gap between the different groups of learners.

- Working collaboratively to promote support for learners across all areas of the CPA, including those learners in off-site provision.

Roles and Responsibilities

Whilst this is a standalone policy, it is integral to our Safeguarding Policy and should be applied as an extension to CPA's current and established safeguarding procedures.

Senior Management Team

All SMT members have a legal responsibility under the Prevent Duty to make sure they have undertaken training in the Prevent Duty. Additionally, the SMT must ensure that:

- all CPA staff have undertaken training in the Prevent Duty.
- all CPA staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Officer.
- all CPA staff exemplify British Values into their values.
- policies and procedures to implement the Prevent Duty are in place and acted on where appropriate.

Prevent Lead for CPA

David Russell is the Prevent Lead and Designated Safeguarding Officer, with responsibility for ensuring that our Prevent Strategy is implemented across the CPA and that any concerns are shared with the relevant organisations, in order to minimise the risk of our learners becoming involved with terrorism.

Designated Safeguarding Officer and SMT

The DSO and SMT meet termly, and any concerns raised under the Prevent agenda or changes to the Duty that affect CPA are discussed within this meeting.

All Staff

All staff at CPA have a responsibility to:

- create and support an ethos that upholds the CPA's mission, vision and values including British Values, to create an environment of respect, equality and diversity and inclusion.
- attend Prevent training to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns.
- report any concerns around extremism or radicalisation via the safeguarding reporting form
- report and remove any literature displayed around CPA that could cause offense or promote extremist views.
- support the development of staff and learner understanding of the issues around extremism and radicalisation through activities such as training, awareness campaigns and tutorials.
- participate in engagement with local communities, schools, and external organisations as appropriate.

Managing Risks and Responding to Events

CPA will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the CPA.
- Identifying, understanding, and managing potential risks within CPA from external influences.
- Responding appropriately to events reported via local, national, or international news that may impact on students and communities.
- Ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within CPA.
- Ensuring measures are in place to respond appropriately to a threat or incident within CPA.
- Continuously developing effective ICT security.
- Ensuring compliance with related policies.

Links to CPA Values and other CPA Policies

This policy should be used in conjunction with the following policies and procedures:

- Safeguarding Policy (p&p 001 : pages 2 – 13)
- Equality & Diversity
- Health and Safety Policy
- Learner Anti-Bullying Policy
- E-Safety Policy
- Whistleblowing Policy
- Data Protection Policy
- Harmful Sexual Behaviour Policy (p&p 001 : pages 14 – 31)
- Recruitment and Selection Policy (Safer Recruitment)

Policy Summary our Commitment to Meeting the Prevent Duty can be Summarised as Follows:

P – Promotion of Equality and Diversity and positive relationships between staff and learners

R – Referral of any concerns via Safeguarding staff to relevant authorities

E – Embedding British Values and education for learners on all courses

V – Vetting guest speakers and removal of any posters or other materials of an extremist nature

E – Environment – a safe and secure site with CCTV, sufficient security procedures and online filters

N – News monitoring for any concerns in the locality

T – Training of staff to raise awareness of the signs and risks.

Please see PREVENT risk assessment as follows –

Safeguarding / Prevent Duty Risk Assessment/Action Plan

<u>No</u>	<u>Prevent Vulnerability/Risk Area</u>	<u>Risk Y/N</u>	<u>Action Taken/Already in Place to Mitigate/Address Risk</u>	<u>Owner</u>	<u>When</u>	<u>RAG</u>
1	<p><u>LEADERSHIP</u></p> <p>Do the following people, if applicable, have a good understanding of their own and institutional responsibilities in relation to the “Prevent Duty” and safeguarding responsibilities.</p> <ul style="list-style-type: none"> ➤ SMT ➤ Staff (all) ➤ Safeguarding Team 	Y	All staff have refreshed prevent training in Jan 21, using ETF E-learning, Home-office E-learning for channel, referrals, and understanding of Prevent factors. KCSIE has been read and understood by all staff (part1) inc Sept 21 update, KCSIE full by SMT and DSL’s Teaching staff who have responsibility to positively promote and monitor have sessions with DSL on CPA policies/procedures for Prevent/Safeguarding to ensure best practice is being followed.	DR	This needs to be constantly revised with new members of staff	G
2	<p><u>Partnership</u></p> <ul style="list-style-type: none"> • Is there active engagement from the Directors SMT, Managers and Leaders? • Does the institution have an identified single point of contact (SPOC) in relation to Prevent? • Does the institution engage appropriate authorities and co-coordinators to ensure that local and national prevent issues are notified? 	Y Y Y	<p>Prevent has been discussed in meetings with tutors and management team, also training given by partners.</p> <p>Safeguarding Team DSL/DSO David Russell/ Lindsey Russell / Craig Wordsworth Christopher Sybenga regional prevent coordinator Rachael Long (DMBC)racheal.long@doncaster.gov.uk 01302 737469 Tim Wright Sheffield coordinator 01142 2734076 ***** referral person. Contact DSL/DSO is listed to receive notifications and bulletins from G7 - Prevent regional FE Coordinator (northeast) Christopher Sybenga, Regional workshop meeting attended addressing regional threats.</p>	DR DR DR	<p>Last meeting date with Tutors</p> <p>07/12/2021</p>	A

<u>No</u>	<u>Prevent Vulnerability/Risk Area</u>	<u>Risk Y/N</u>	<u>Action taken/already in place to mitigate/address risk</u>	<u>Owner</u>	<u>When</u>	<u>RAG</u>
3	<p><u>Staff Training</u> Do all staff have sufficient knowledge and confidence to:</p> <ul style="list-style-type: none"> • exemplify British Values in their management, teaching and through general behaviours in the institution • understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism. • have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response 	<p>Y</p> <p>Y</p>	<p>All staff had meeting to discuss British values, on how to embed into lessons, include in SOW and lesson plans</p> <p>All training staff have knowledge and confidence for fundamental British values , posters have been developed to support delivery</p> <p>Key members of staff have received prevent training, this training has been disseminated to the other members of the team to ensure they understand responsibilities and reporting channels. Ongoing training will be required to be implemented to ensure up to date information and full understanding and confidence. Staff intranet as key source of information and CPD</p>	<p>DR</p> <p>ALL</p> <p>DR, CW Providers</p> <p>DR/LR</p>	<p>Last 14/03/19</p> <p>Date when posters implemented</p> <p>01/12/2021</p>	<p>G</p> <p>A</p>
4	<p><u>Welfare, Pastoral and Chaplaincy Support</u></p> <ul style="list-style-type: none"> • Are there adequate arrangements and resources in place that provide pastoral care and support as required by the institution? • Does the institution have chaplaincy provision or is this support signposted locally or brought in? 	<p>Y</p>	<p>DR/LR/CW are assigned for support, with support from partners and other recognised organisations and safeguarding.</p> <p>Religious support discussed on induction with each individual, Areas can be made available when required for religious support.</p>	<p>DR,CW</p>	<p>Rev OCT18</p>	<p>A</p>

<u>No</u>	<u>Prevent Vulnerability/Risk Area</u>	<u>Risk Y/N</u>	<u>Action taken/already in place to mitigate/address risk</u>	<u>Owner</u>	<u>When</u>	<u>RAG</u>
5	<p><u>Speakers and Events</u></p> <ul style="list-style-type: none"> • Is there an effective policy/framework for managing speaker requests? • Is it well communicated to staff/student, apprentice or trainees and complied with? • Is there a policy/framework for managing on site events i.e., charity events? • Are off site events which are supported, endorsed, funded, or organised through the institution (including student, apprentice, or trainees' Union if applicable) subject to policy/framework? 	<p>Y</p> <p>Y</p> <p>Y</p>	<p>CPA have developed a guest speaker policy and procedure, which is in place and has been standardised within the organisation. Our Guest speakers are usually from supporting manufactures to assist with training. When attending the guest speaker will be chaperoned constantly throughout their visit, to ensure no private interaction. The content that the guest speaker will be using is pre checked to ensure fit for purpose and poses no threat to CPA policies and procedures or is against FBV's. P&P15</p> <p>Events that are off site will be risk assessed individually and recorded separately.</p>	CW/LR/DR	Last revision July 2021	G

6	<p><u>Safety Online/Cyber Security</u></p> <ul style="list-style-type: none"> • Does the institution have a policy relating to online safety of learner's use of IT and does it contain a specific reference and inclusion of the Prevent Duty? • Does the institution employ filtering/firewall systems to prevent staff/learners, apprentice, or trainees/visitors from accessing extremist websites and material? • Does this also include the use of using their own devices via Wi-Fi? • Does the system alert to serious and/or repeated breaches or attempted breaches of the policy? 	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>Yes P&P11, Cutler IT manage IT systems to ensure they work effectively, and safely. Reporting system in place to keep systems up to date. IT systems are only accessible by learners in supervised areas by vocational tutor. Filters are in place to ensure inappropriate content cannot be viewed by learners or staff, these filters are in accordance with CSAM and CTIRU. Keyword search tests from safeguarding team are performed to test the system and reported to Cutler IT if any breaches.</p> <p>CPA have Cyber essentials</p> <p>Testing room is under constant CCTV, computers in NRSWA room are on secure network (all computers do not have web cam facilities).</p> <p>Tablets are not issued to learners for home or private use, and only used on secure network and under supervision from tutor. Guest WIFI cannot connect to server and is restricted. All staff are aware not to share passwords, and computers are to be logged off when unattended.</p> <p>For remote delivery, tutors relate rules of behaviour and use of technology which can affect others (backgrounds, Conduct, sharing images, audio) See COVID risk assessment.</p> <p>Tablets that are loaned to learners are pin coded for 30mins to 1 hour, no personal information is stored on these devices, and periodically are checked and memory wiped. Learners are educated not to store usernames and passwords on any device.</p> <p>December 2021 – security to access inappropriate content was further restricted.</p>	DR, LR ,CW	07/12/2021	A
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No	<u>Prevent Vulnerability/Risk Area</u>	<u>Risk Y/N</u>	<u>Action Taken/Already in Place to Mitigate/Address Risk</u>	<u>Owner</u>	<u>When</u>	<u>RAG</u>
7	<u>Subcontracting</u> <ul style="list-style-type: none"> Do all subcontracts include an agreement to comply with the Prevent Duty? Have all staff from subcontracted organisations who come into contact with your students, apprentices or trainees undergone training. DBS requirements 	N/A	All staff/tutors have undergone adequate training regards responsibilities under prevent Single central record in place and all staff have up to date DBS.	N/A		G
8	<u>Employers of Apprentices and Trainees</u> <ul style="list-style-type: none"> Have all employers signed an agreement to comply with the Prevent Duty. Is there a designated individual with safeguarding and prevent responsibilities? Has the designated individual been trained in what to do if they identify a Prevent concern? 		<p>Covered in apprenticeship agreements. Supported by business development manager and safeguarding team. Website gives clear information.</p> <p>DR is Designated Safeguarding Officer. CW responsibilities for safe recruitment.</p> <p>DR, CW, LR attended suitable courses and undertaken DSO training including prevent training, Foundation training for prevent undertaken, home office training on channel referrals.</p> <p>26/01/2022 training with Racheal long DMBC</p>	<p>DR,DW</p> <p>CW, DR</p> <p>DR, CW, LR</p>	Ongoing	A

9	<p>Site Security</p> <ul style="list-style-type: none"> • Are there effective arrangements in place to manage access to the site by visitors and non-student, apprentice, or trainees/staff? • Is there a policy regarding the wearing of ID on site? Is it enforced? • Are dangerous substances kept and stored on site? • Is there a policy in place to manage the storage, transport, handling, and audit of such substances? • Is there a policy covering the distribution (including electronic) of leaflets or other publicising material? • Does the institution intervene where off site activities are identified or are likely to impact upon staff and/or student, apprentice, or trainees? i.e., leafleting, protest etc.? 	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>N/A</p>	<p>The rear door entrance to unit 6 requires a magnetic release to exit & buzzer door system for visitors. Visitors are required to make an appointment prior to visit to control the number of people in the building.</p> <p>Front entrance is covered by CCTV and visible to all in the main office, in addition to this there is a large viewing window to the warehouse to observe the learner entrance.</p> <p>Staff are to challenge any unknown visitors to establish reason/intent for their visit. Unknown people can be a threat to site security and learners/staff using the building.</p> <p>Staff communication - all fire doors to be kept closed at all times. The COSHH roller storage cupboard in the flooring department should be down/locked when not in use. The main roller doors on the flooring & construction site to be closed when learners are not outside conducting practical work.</p> <p>At all times, staff, visitors to wear lanyards or visible ID on site.</p> <p>Tutors sign learners in using Myapp, other visitors are required to sign in and be presented a visitor pass and chaperoned at all times.</p> <p>RAMS in place for storage and access of all materials and substances.</p> <p>Protests are unlikely because of the block release structure, however SMT would be responsible to intervene and check intent/content.</p>	<p>ALL</p> <p>SD</p> <p>SD</p> <p>DW</p>	<p>Ongoing</p>	<p>A</p>
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10	<p>Safeguarding</p> <ul style="list-style-type: none"> Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies? Do Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism? Does the institution utilise Channel as a support mechanism in cases of radicalisation and extremism? Does the institution have a policy regarding referral to Channel identifying a recognised pathway and threshold for referral? 	Y	Yes, and/also all policies are currently under review.	DR,DW, CW	Ongoing	A
		Y	Recorded in CPD file DR achieved DSO L3 Attended 3 workshops within last year LR to attend DCSP for Lv3	All DR,LR DR,LR CW		
		Y	Yes, and/also all policies are currently under review.	DR,DW, CW		
			This will be evidenced after Racheal Long : Prevent and Channel Training 26/01/2022			

11	<p><u>Local and regional prevent concerns</u></p> <p>Britain First even though they are not a terrorist group they promote extremist views against multiculturalism.</p> <p>Online safety and Online threats have definitely grown especially over the pandemic where young vulnerable people have been radicalised.</p> <p>National Action – Right wing extremist and Neo Nazi terrorist group</p> <p>ALM Al-Muhajiroun proscribed terrorist organisation follows extreme fundamentalist interpretation of Islam, reject FBV's and democracy, large online threat.</p> <p>Locally is gang related crimes which expose knife, gun, drug and even hate crimes (PSB)</p> <p>Self-initiated terrorism, in the past these have been committed by those with an Islamist and right-wing ideology.</p>	<p>We work with all the national the FE co-ordinators such as Chris Sybenga in the North East to keep informed and review the prevent plan/assessment.</p> <p>We also have close contact with all the other FE co-ordinators across the country, to ensure awareness of local, regional and national threats.</p> <p>Safeguarding team to attend regular training and keep updated by the local prevent co-ordinators so concerns can be relayed to staff.</p> <p>Symbols the organisation display should be recognised internally</p> <p>Police reports from the FE co-ordinators should be used to keep information relevant</p>			
12	<p><u>Communications</u></p> <ul style="list-style-type: none"> Is the relationship established with the regional prevent coordinator? Are staff, learners, apprentices, or trainees made aware of the Prevent Duty, current risks, and appropriate activities in this area? 	<p>Chris Sybenga for Regional:- (chris.sybenga@education.gov.uk) Tel 07384 456640</p> <p>Rachael Long for Doncaster:- rachael.long@doncaster.gov.uk Tel 01302 737469</p> <p>DR is indicated in induction books, handbooks, and policies</p> <p>Posters up in center, prevent covered in induction and when required in reviews and lessons.</p>	<p>DR,CW</p> <p>DR</p> <p>Tutors</p>	<p>Ongoing</p>	<p>G</p>

13	<p><u>Incident Management</u></p> <ul style="list-style-type: none"> Does the institution have incident logs and action plans to record any prevent related incidents? Is a suitably trained and informed person identified to lead on the response to such an incident? Does the IT management understand their responsibility under prevent? Does the institution have effective arrangements in place to identify and respond to tensions on or off site which might impact upon staff, student, apprentice, or trainee and/or public safety? Are effective arrangements in place to ensure that staff and student, apprentice or trainees are appraised of tensions and provide advice where appropriate? 	<p>Y</p> <p>Y</p> <p>Y</p> <p>N/A</p>	<p>Report forms for prevent / safeguarding in place for staff and learners to forward information to DSO, support from providers has been made apparent, channel.</p> <p>Incident logs and action plans in place, all staff understand responsibility to complete and forward to the safeguarding team immediately. If any learners/staff have established tensions this will follow the same reporting process. All safeguarding team are appropriately trained on prevent and staff have undergone prevent awareness.</p> <p>Cutler IT have placed appropriate filters and understand their responsibilities to restrict access from the main server onwards.</p>	<p>Provider SMT</p>	<p>Oct 2021</p>	<p>A</p>
14	<p><u>Staff and Volunteers</u></p> <ul style="list-style-type: none"> Does awareness training extend to sub-contracted staff and volunteers? Is the institution vigilant to the radicalisation of staff by sub-contracted staff and volunteers? 	<p>N/A</p>	<p>CPA does not subcontract any of its provisions.</p>	<p>N/A</p>	<p>N/A</p>	<p>G</p>

15	<p><u>Freedom of Expression</u></p> <ul style="list-style-type: none"> • Does the institution have a Freedom of Speech/Expression policy? • Does this policy recognise and incorporate the risks associated with radicalisation and extremism? • Is the need to protect vulnerable individuals covered within this policy? 	Y	Policies are annually under review	SMT	Next rev Mar 22	A
16	<p><u>Fundraising</u></p> <ul style="list-style-type: none"> • Does the institution have a fundraising policy 	N/A	No current fundraising events taking place for CPA	N/A	N/A	G

17a	<p><u>Recruitment of New Learners - Risk Management</u></p> <p>What precautions does CPA undertake in relation to taking on new apprentices to ensure that current learners on program are not put at risk.</p>	<p>For apprentices that are recruited through the recruitment process that CPA undertake for the employer, all potential learners are interviewed by LJ/LR - DSO any concerns are discussed with DR - DSL</p> <p>For learners that come direct from employers' learners are interviewed on a one-to-one basis. (induction stage) Questions are open but follow the guidance of:</p> <ol style="list-style-type: none"> 1. Highlight FBV's and ask their thoughts on each element 2. What have you been up to prior to being enrolled onto this apprenticeship? 3. What are your hobbies and interests? And what other activities do you get up to when not working? 4. Have you got a good support network at home or with groups of friends? 5. Apart from work have you got any other personal goals in life you would like to achieve (big and small) 	DR	Ongoing - last revised Aug 2021	G
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17b	<p><u>Recruitment of New Staff - Risk Management</u></p> <p>What precautions does CPA undertake in relation to taking on new staff members - safer recruitment</p>	Y	<p>Policy and procedures in place CW assigned as safer recruitment lead - NSPCC training undertaken Application form for potential new staff members include safeguarding declarations, previous employments, previous dismissals, work entitlements, Previous professional learning, references to be requested Job profiles for each post which promotes CPA safeguarding and staff behaviour. Interview questions and scoring matrix established, safer recruitment led to be present for every interview. Interviews are to be face to face basis so clear judgements can be made and explored. Induction for new members of staff are undertaken prior to starting post which includes safeguarding P&P's Enhanced disclosure checks complete prior to starting with CPA. New teachers and where appropriate will be observed and supported to ensure clear practices are in line with CPA P&P's.</p>	DSL, DSO's CW Curriculum lead	Ongoing But last revised Jan 2022	G
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18	<p><u>Accommodation</u> We are aware that some employers because of their location and the lack of training availability nationwide will use local accommodations/hotels.</p> <p>Young people/children are a potential risk factor as will not have a responsible adult present with them. Even though parents and employers will be in close contact, CPA must have available reporting channels outside of business hours.</p>	<p>We are aware of our duty of care that each learner must be able to contact and report safeguarding concerns out of hours.</p> <p>CPA have an out of hours contact number of which a member of the safeguarding team will always have in possession to take calls out of hours.</p> <p>All learners are given and informed to take down the safeguarding numbers at the induction stage</p> <p>Members of the safeguarding team will have contact details on signature strip of email</p> <p>Safeguarding cards have the number present of which each learner is to be given and the support we offer.</p> <p>Website advertises this number and online reporting</p> <p>CPA will inform employers of local reputable hotels with food and drink provisions to prevent need to leave site.</p>			
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