

Safeguarding and Prevent Policy

Linden Safeguarding Statement

Linden Management UK Ltd (Linden) is fully committed to its legal responsibility for safeguarding and The Prevent duty. Its Linden priority to safeguard the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety of its stakeholders, including children and vulnerable adults.

The company recognises its responsibility and acknowledges that it is the duty of Linden's workforce in its entirety to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation or victimisation. Therefore, employees, volunteers, subcontract partners (SCPs) and contractors will show respect and understanding at all times for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation. They will also be aware of and follow current legislation regarding the safeguarding of all stakeholders. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

Linden have applied all relevant updates in response to the Covid-19 pandemic and updated the policy accordingly.

It is Linden's intention to:

- Ensure that all stakeholders are protected from abuse, regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity, or because someone is married or in a civil partnership
- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk
- Promote this and supporting policies through staff development, training and individual CPD.
- Ensure that appropriate supervision is given, where required
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Regularly review and monitor Linden's policies and procedures to ensure our legal, moral and social responsibilities are met
- Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration
- Work in partnership and in accordance with organisations' procedures, where required, including Designated Person in Local Authority, Safeguarding Partners, Safeguarding Adults Boards and the Channel multi-agency panel
- To comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments
- Have Designated Safeguarding and Prevent Officers (DSPOs) in place to advise on and manage any concerns and referrals made

- Ensure that relevant employment and security checks are undertaken, as required
- Ensure that all personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Ensure that personal information is confidential and should only be shared with the permission of the individual concerned (and/or those with parental responsibility), unless the disclosure of confidential information is necessary in order to protect a child or adult at risk from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict “need to know” basis

Policy

This policy has been agreed by Linden’s Strategic Management Board.

Linden’s Senior Management Safeguarding and Prevent Team:

Name	Role
Ryan Bell	Director

Linden’s Lead Designated Safeguarding and Prevent Officers:

Name	Role	Location	Contact Details
Ryan Bell	Lead Designated Safeguarding and Prevent Officer	HO	01777 870887
Johan Wilkinson	Lead Designated Safeguarding and Prevent Officer	HO	01777 870887

Linden’s Designated Safeguarding and Prevent Officers:

Name	Role	Location	Contact Details
Lesley Hamer	Designated Safeguarding and Prevent Officer	HO	01777870887

If you have any concerns, contact the officers or use the email below. Learners should be made aware of this email address.

Linden’s Safeguarding E-mail Address: Safeguarding@lindenmanagement.org.uk

For out of hours emergencies the lead DSO can be contacted contact 07983391620 and this should be followed up with an email.

The links below have been taken from the Working Together to Safeguard Children 2018 guidance document.

For Children and Young People

Childline	0800 1111
Child Exploitation and Online Protection Centre (CEOP)	http://www.thinkuknow.co.uk/ 0870 000 3344
NSPCC Helpline	https://www.nspcc.org.uk/ 0808 800 5000
NSPCC Whistleblowing Helpline	help@nspcc.org.uk 0800 028 0285
Internet Watch Foundation	https://www.iwf.org.uk/
Social Care link for Safeguarding Concerns	https://www.gov.uk/report-child-abuse-to-local-council

The need to refer allegations or concerns about possible risk posed by staff, volunteers, SCPs or contractors to the Designated Local Authority Person (formerly LADO) is a requirement, as detailed in the government guidance *Working Together to Safeguard Children (2018)*.

Note: If you suspect child trafficking is taking place, the Lead DSO must be informed immediately and they will contact CEOP to implement urgent steps to protect the child/children in question.

ESFA has included new safeguarding clauses in the funding agreements and contracts. Whilst the local authority and institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to the SoS, in meeting their general duty, that the right organisations are taking action to keep all pupils and students safe.

Linden must inform ESFA if we are subject of an investigation by the local authority or the police relating to funded learners. In such circumstances the Director of Linden (or senior designated safeguarding lead) to email enquiries.EFA@education.gov.uk

ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the police. If a referral has been made to the Disclosure and Barring Service, LCG are required to inform the ESFA.

Introduction

Linden believes that it is always unacceptable for a child or adult at risk to experience abuse or discrimination of any kind, and recognises its responsibility to safeguard the welfare of all children and adults at risk by a commitment to practice which protects them. Linden have a commitment that no child or adult at risk will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy.

This policy has been developed to describe the responsibilities of employees, associates, volunteers, SCPs and contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this policy is to ensure that Linden fulfils its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

Linden endeavours to safeguard children and adults at risk by:

- Valuing, listening to and respecting them
- Adopting policies, guidelines, a Code of Conduct and behaviour for employees, volunteers, SCPs and contractors
- Training all staff to ensure they are aware of their commitment to uphold the safeguarding and Prevent policy, understanding their responsibilities and monitoring their commitment through quality assurance processes.
- Sharing information about concerns with agencies which need to know, and involving parents and children appropriately
- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers and SCPs with responsibilities for children and adults at risk, including relevant non-delivery roles
- Recruiting staff, associates, volunteers, SCPS and contractors aware of our safeguarding policy and procedures
- Providing all staff, volunteers and SCPs with safeguarding training
- Ensuring that all children, adults at risk, their parents and carers are aware of our safeguarding policy and procedures
- Ensuring that all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding

Linden is committed to be alert to a young person who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups, sexual harassment behaviours
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves

- Has returned home to their family from care
- Is a privately fostered child

Linden aims to be extra vigilant regarding the wellbeing and mental health of all learners during the pandemic. The interim guidance for Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19). All updates will be communicated to Linden staff, ensuring that any amendments are followed. The guidance should be followed alongside:

- statutory guidance Working Together to Safeguard Children;
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; and
- departmental advice COVID-19: safeguarding in schools, colleges and other providers.

Safety measures have been put in practice to ensure the safety and wellbeing of all learners and staff.

Linden is committed to reviewing its policies and good practice annually, unless there is a change to legislation, including EU Directives with immediate effect or if there has been a significant change within the organisation. The Lead DSPO is responsible for updating the policy with support from the management Board.

Linden operates a culture of openness and transparency and embeds the principles of the 4 Rs across all our services, ensuring that all staff, volunteers, SCPs and contractors understand their responsibilities with regard to safeguarding.

The 4 Rs:

Recognise – the signs and indications of abuse

Respond – as soon as possible

Record – everything you have heard, what was said or any actions seen

Refer – to the designated person

Definition

For the purpose of this policy and procedures, children are any persons up to the age of 18 years.

Adult at Risk

An adult at risk is a person who is over the age of 18 years who is, or may be, in need of advisory services by reason of mental or other disability, age or illness, and may be unable to take care of him or herself or unable to protect him or herself from significant harm or serious exploitation. An adult at risk may be a person who:

- Has a physical or sensory disability
- Is physically frail or has a chronic illness
- Has a mental illness or dementia
- Has a learning difficulty
- Misuses drugs and/or alcohol
- Has social and/or emotional issues
- Exhibits challenging behaviours

Statutory guidance and legislation differ in relation to working with these two groups (children and adults at risk). Practitioners are familiar with the differences if they are working across the age groups and take advice from the DSPO, when appropriate.

Legislation and Guidance:

- The Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1992
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Education Act 2011
- Human Rights Act 1998
- Health and Social Care Act 2012
- Domestic Violence, Crime and Victims Act 2012
- Statutory guidance Working Together to Safeguard Children 2018 (previous versions: 1999, 2006, 2010, 2013, 2014 and 2015)
- Keeping Children Safe in Education 2021
- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2015 (updated 2018)
- The Care Standards Act 2014
- The Mental Capacity Act 2005
- The "No Secrets" guidance, which sets out a code of practice for the protection of vulnerable adults
- Equality Act 2010
- Prevent Duty 2015 (scheduled for update)
- Sexual Violence and sexual harassment between children in schools and college Sept 2021

Additional guidance:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

The guidance will be read alongside:

- statutory guidance Working Together to Safeguard Children;
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; and
- departmental advice COVID-19: safeguarding in schools, colleges and other providers
- Preventing and Tackling Bullying
- Teaching online safety in school

All updates and legislation changes will continue to be monitored as we move out of the pandemic. These are communicated to the team, ensuring that safeguarding and Prevent are a safety priority as learning moves between remote and face to face visits.

Linden management continue to be vigilant and pay due regard to the mental health and wellbeing during these uncertain times. Additional measures are in place to share safety information and wellbeing support.

Staff will be made aware of changes to policy and procedure throughout the year.

Definitions and Indicators of Abuse:

Abuse, including neglect, is a form of maltreatment of a child or vulnerable adult. In relation to adults, the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm', which is a term from the Children Act 1989 (updated 2004). Someone may abuse a child or adult at risk by inflicting harm, or by failing to act to prevent harm. Children and adults at risk may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger, for example via the Internet. They may also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2018 (updated 2019) defines four types of abuse: physical, emotional, sexual and neglect. Adults at risk may also be subjected to these forms of abuse (see No Secrets guidance link). Therefore, the wording from Working Together to Safeguard Children 2018 (updated 2019) has been slightly altered to reflect this. Children and adults at risk may be subjected to financial, discriminatory and institutional abuse, and staff should be familiar with indicators of all forms of abuse.

Physical Abuse

Physical abuse may involve:

- Hitting
- Shaking
- Throwing
- Poisoning
- Burning or scalding
- Drowning
- Suffocating or otherwise causing physical harm

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates, illness in a child, young person or vulnerable adult.

Signs may include:

- Unexplained bruises, marks or injuries on any part of the body
- Frequent visits to the GP or A&E
- An injury inconsistent with the explanation offered
- Fear of parents or carers being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached
- Reluctance to get changed, or wearing long sleeves in hot weather
- Depression
- Withdrawal behaviour, or other behaviour change
- Running away from home/residential care
- Distrust of adults, particularly those with whom a close relationship would normally be expected

Emotional Abuse: is the persistent maltreatment of a child or adult at risk which causes severe and persistent adverse effects on the child or vulnerable adult's emotional development

Emotional abuse may involve:

- Conveying to the child or adult at risk that they are worthless and unloved
- Conveying that they are inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child or vulnerable adult opportunities to express their views
- Deliberately silencing them
- Making fun of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on the child or vulnerable adult
- Demanding interactions that are beyond their developmental capability
- Overprotection and limitation of exploration and learning
- Preventing the child or vulnerable adult participating in normal social interaction
- Seeing or hearing the ill-treatment of another child or vulnerable adult
- Serious bullying (including cyber bullying)
- Causing children or adults at risk to frequently feel frightened or in danger
- Exploitation or corruption of children or vulnerable adults

Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, though it may occur alone.

Signs may include:

- A failure to thrive or grow
- Sudden speech disorders
- Developmental delay, either in terms of physical or emotional progresses
- Behavioural change
- Being unable to play or socialise with others
- Fear of making mistakes
- Self-harm
- Fear of parents or carers being approached regarding their behaviour
- Confusion
- Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremists or seeking to recruit others

Sexual Abuse	
Sexual abuse may involve:	Signs may include:
<ul style="list-style-type: none"> • Forcing or enticing the child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or adult at risk is aware of what is happening • Physical contact, including assault by penetration (for example, rape or oral sex) • Non-penetrative acts, such as masturbation • Kissing • Upskirting • Rubbing and touching outside of clothing • Non-contact activities, such as involving children or adults at risk in looking at, or in the production of, pornographic material or watching sexual activities • Encouraging children to behave in sexually inappropriate ways • Grooming a child in preparation for abuse (including via the internet) • Sexual exploitation, coercion and threats • Sexualised online bullying • Harmful sexual harassment <p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted diseases • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy • Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or developmental stage • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self-harm or mutilation, sometimes leading to suicide attempts • Eating problems, such as overeating or anorexia

Neglect: this is the persistent failure to meet the basic physical and/or psychological needs of a child or adult at risk, likely to result in the serious impairment of the child or vulnerable adult’s health or development.

Abuse by Neglect may involve:	Signs may include:
<ul style="list-style-type: none"> • Neglect may occur during pregnancy as a result of material substance abuse • A parent or carer failing to provide adequate food, clothing and shelter • Exclusion from home or abandonment • Failure to protect a child or adult at risk from physical harm or danger • Failure to ensure adequate supervision • Failure to use adequate care takers • Failure to ensure access to appropriate medical care or treatment • Neglect of, or unresponsiveness to, a child or vulnerable adult’s basic emotional needs 	<ul style="list-style-type: none"> • A constant hunger, sometimes stealing food from others • Dirty or smelly • Loss of weight, or being constantly underweight • Inappropriate dress for the weather • Complaining of being tired all the time • Not requesting medical assistance and/or failing to attend appointments • Having few friends • Worsening health conditions • Pressure sores • Mentioning that they’re being left alone or unsupervised • Sore or extreme nappy rash • Lack of response to stimuli or contact • Poor skin condition, or skin infections • Frozen watchfulness • Anxiety • Distress • Child moves away from parent under stress • Little or no distress when separated from primary carer • Inappropriate emotional responses • Language delay

Financial Abuse	
Financial abuse may involve:	Signs may include:
<ul style="list-style-type: none"> • Being overcharged for services • Being tricked into receiving goods or services that they do not want or need • Inappropriate use, exploitation, or misappropriation of property and/or utilities • Theft • Deception • Fraud • Explanation or pressure in connection with wills 	<ul style="list-style-type: none"> • Lack of basic requirements, e.g. food, clothes or shelter • Inability to pay bills • Unexplained withdrawals from accounts • Inconsistency between standard of living and income • Reluctance to take up assistance which is needed • Unusual interest by family or other people in the person's assets • Recent changes in deeds • Power of Attorney obtained when the person lacks capacity to make the decision
Institutional Abuse	
Institutional abuse may involve:	Signs may include:
<ul style="list-style-type: none"> • Service users required to fit in excessively to the routine of the service • More than one individual is being neglected • Everyone is treated in the same way • Other forms of an abuse on an institutional scale 	<ul style="list-style-type: none"> • Inflexible daily routines, e.g. set bedtimes and/or deliberate waking • Dirty clothing and bed linen • Lack of personal clothing and possessions • Inappropriate use of nursing and medical procedures • Lack of individualised care plans and failure to comply with care plans • Inappropriate use of power, control, restriction and confinement • Failure to access health care, dentistry services. Etc. • Inappropriate use of medication • Misuse of residents' finances or communal finances • Dangerous moving or handling practices • Failure to record incidents or concerns

Sexual Exploitation and Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example, a family member, friend or professional. Groomers may be male or female. They could be any age.

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Sexual Violence

Sexual violence are offences under the Sexual Offences Act 2003 described as;

Rape – a person(A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person(B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by penetration – A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault – A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent – A person (A) commits an offence if:s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Sexual Harassment

Sexual harassment means – unwanted conduct of a sexual nature that can occur online and offline and both inside and outside the education setting. This can include; sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names. Sexual jokes or taunting, Physical behaviour such as brushing against someone or interfering with someone's clothes. Online sexual harassment can include consensual and non-consensual sharing of nude and semi-nude images and videos, sharing unwanted explicit content, upskirting, sexualised online bullying, unwanted sexual comments and messages, including on social media, sexual exploitation, coercion and threats.

Harmful Sexual Behaviour

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage, the umbrella term is "harmful sexual behaviour". (HSB)

HSB can in some cases progress on a continuum. Addressing inappropriate behaviour can be an important

intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexting

Sexting means sending sexually explicit messages and/or suggestive images, such as nudes. While the name suggests that this is only done via text message, these types of messages can be via any messaging service, including emails and social media.

This also means that sexts can be sent or received via a number of electronic devices, such as smart phones, computers and tablets.

If a child is under the age of 18, it is illegal for them to take a nude photo of themselves or a friend, as well as distributing them. Even though the age of sexual content is 16, the Protection of Children Act means it is against the law for a child to share a sexual image, even if it is with someone who is also under the age of 18.

Images covered under the law include, but are not limited to, naked pictures, topless photos of girls, any sex acts and sexual images in underwear. If it is found that a child under the age of 18 is in possession of any of these, has been sending them or taking these types of photos, the police can record it as a crime.

Modern Slavery

Modern slavery examples include: forced labour, debt bondage, sexual or criminal exploitation, domestic servitude and trafficking.

Under the Modern Slavery Act 2015 (updated 2018), we are required to ensure we do not have any aspect of modern slavery within our own organisation and within our supply chain; as such, we have to issue a statement, published on our website, which clearly reflects the actions we have taken to prevent and ensure this.

Modern Slavery (s. 1 of the Act) comprises of the following:

1. Slavery, servitude and forced or compulsory labour
2. Human Trafficking (s. 2) – this is the movement of a person for the purposes of being exploited. There is no minimum distance (i.e. it can be from one room to another)

Exploitation can include (in addition to above):

- Sexual exploitation (regardless of age of the individual being exploited)
- Removal of organs
- Securing services by force, threats or deception (in particular, if the individual being exploited is a child or an adult at risk)

Child trafficking is child abuse; children are recruited, moved or transported and then exploited, forced to work or sold. They are often subject to multiple forms of exploitation.

Eating Disorders

Characterised by an abnormal attitude towards food that causes someone to change their eating habits and behaviour (www.nhs.co.uk/eating-disorders). [Anorexia nervosa: when a person tries to keep their weight as low as possible e.g. by starving themselves or exercising excessively. Bulimia: When a person goes through periods of binge eating and is then deliberately sick or uses laxatives to try to control their weight. Binge eating disorder: When a person feels compelled to overeat large amounts of food in a short period of time].

Self-Harm

The idea of self-harm is tied up in stereotypical actions, such as cutting. However, self-harm is actually used to describe a wide range of behaviours, from cutting, burning and pinching to drug and alcohol abuse as well as eating disorders.

It is generally seen as a physical reaction to emotional pain, and can be extremely addictive. This means that it is often more productive to focus on why an individual feels compelled to harm themselves, rather than the means by which they are doing so.

Domestic Violence and Abuse

Domestic violence and abuse is any incident, or pattern of incidents, of controlling, coercive or threatening behaviour, and violence or abuse between those aged 16 years or over who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial and or emotional.

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Identifying cases of Female Genital Mutilation (FGM) and Forced Marriage

There are many different types of abuse but there are some that staff may be less aware of. Female Genital Mutilation (FGM) and Forced Marriage fall into this category. Any indications that a person at risk may be subjected to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision, Linden will do everything that it can to ensure that:

- The DSOs are aware of the issues surrounding FGM and Forced Marriage
- Advice and signposts are available for accessing additional support, e.g. the NSPCC's helpline, ChildLine services, Forced Marriage Unit
- Awareness raising about FGM and Forced Marriage is incorporated in the Linden's safeguarding training

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a person at risk has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care, even if it is against that person's wishes. Linden staff must NOT consult or discuss these concerns with the person's parents or family, or others within the community, if there is an imminent risk, e.g. the person at risk being taken out of the country, police must be informed (999) and the safety of the person at risk must be the prime consideration whilst awaiting the police response.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a person's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the education setting and/or can occur between learners outside the education setting. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare. Young person's social care assessments should consider such factors so it is important that education establishments provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Prevent Duty

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The Prevent Team will, in partnership with other professionals including those involved in Safeguarding,

Terms and Definitions

Radicalisation and/or Extremism may involve:	Signs may include:
<ul style="list-style-type: none"> • An ideology is a set of beliefs. • Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading 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, is intended to influence the government or intimidate the public, and is made with the intention of advancing a political, religious or ideological cause. • Vulnerability describes factors and characteristics associated with being susceptible to radicalization. • Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of British Armed Forces is also included. 	<ul style="list-style-type: none"> • Isolation and identity crisis • Personal crisis and/or circumstances • A misconception and/or rejection of UK foreign policy • A distrust of Western media reporting • Perceptions that UK government policy is discriminatory • Perception that their aspirations for career and lifestyle are undermined by limited employment prospects • Thinks that the 'world owes them a favour' <p>Other factors:</p> <ul style="list-style-type: none"> • Ideology, politics and/or youth rebellion • Provocation and anger (grievance) • Need for protection • Seeking excitement and action • Fascination with, or a morbid interest in, violence, weapons and uniforms • Seeking family and father substitutes • Seeking friends and community, status and identity

investigate further to assess the nature and **extent** of the risk. The relevant local police prevent teams will complete an initial assessment, which will be used to inform the decision as to whether an individual should be referred to Channel.



How does Channel work?

Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Channel is designed to work with individuals of any age, is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures that those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners, including education, health, youth offending teams, police and social services.

What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Raising concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSPO, who can raise concerns to Channel if appropriate.

Risk assessment

Risk is a theme that runs through the entire Channel process, i.e. risk to the individual, risk to the public and risk to partners or organisations providing support to the individual, including any intervention providers. The panel is responsible for managing the risk in relation to the vulnerable individual. Linden Management completed a Prevent Risk Assessment, and this can be viewed on request.

Linden will:

- Undertake risk assessments to address the physical management of the institution's estate, including policies and procedures for events held by staff, learners or visitors, and relationships with external bodies and community groups who may use premises, and/or work in partnership with the institution
- Have clear and visible policies and procedures for managing whistleblowing and complaints
- Have procedures in place to assess subcontracting partners delivering courses to ensure that this does not lead to inadvertently funding extremist organisations
- Consider notifying the Prevent Coordinator and others as necessary and develop a Prevent action plan, if a risk is identified

Welfare, pastoral care, chaplaincy support, prayer and faith facilities

Welfare, pastoral care, chaplaincy support, prayer and faith facilities broadly cover:

- Providing sufficient care, facilities and support for all learners, for example considering multi-faith chaplaincy as another form of welfare support if you have many learners of different faiths, and providing them with prayer facilities

Linden will provide its learners with sufficient support across the areas listed, according to the needs of each particular individual.

External speakers and events

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with Linden, or one of its contracted partners, who has been invited to speak to staff/learners. The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events
- Processes or protocols to demonstrate how information about the speaker is used to make a decision about whether to allow their event to take place or not (risk assessed)
- A requirement for speakers to sign up to the organisation's equality and diversity policy
- Evidence of the final decision made about whether to allow the speaker into the organisation, including the mitigation measures put in place

An event is any event, presentation, visit or initiative organised by a staff group/department or individual that is being held on Linden's premises or where Linden is being represented by a stand on non-Linden premises, e.g. at an exhibition, event or fair. It also includes events where external speakers are streamed live into an event or a pre-recorded film is shown. It also includes activity being held on Linden premises but organised by external clients.

All speakers or visitors should be made aware by the person or group arranging the event that they have a responsibility to abide by the law and Linden's policies, including that they:

- Must not advocate or incite hatred, violence or call for the breaking of the law
- Are not permitted to encourage, glorify or promote any acts of terrorism, including individuals, groups or organisations that support such acts
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony
- Must be mindful of the risk of causing offence to (or seek to avoid insulting) other faiths or groups within a framework of positive debate and challenge
- Are not permitted to raise or gather funds for any external organisation or cause without explicit permission of the organisation

Abuse of Position of Trust

Linden recognises that our staff, volunteers, delivery partners and contractors are in a position of trust with the learners in our care, whether they are children, young people or adults at risk, and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all of those in positions of trust to understand the power this can give them over those they care for and to understand their responsibility.

Linden acknowledges that the principle of equality embedded into the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation, and neither homosexual nor heterosexual relationships are acceptable within a position of trust.

We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years.

Linden recognises the importance that its staff, volunteers, delivery partners and contractors protect the rights and needs of all children, young people and adults at risk on our programmes and in our care.

Anti-Bullying and Harassment

Linden acknowledges that allowing or condoning bullying or harassment may lead to consideration under safeguarding children or vulnerable adult's procedures. All incidents of bullying and harassment, including cyber-bullying, racist, homophobic and gender-related bullying, will be dealt with in accordance with policy. Linden recognises that children and adults at risk with special needs and/or disabilities are more susceptible to being

bullied.



Mate Crime

Mate Crime happens when people with learning disabilities are befriended by someone who uses the relationship to exploit or abuse them. For more information – www.safernet.org.uk

Online Safety and Social Media

Our policies recognise that Internet safety is a whole team/organisation responsibility which includes learners and their Parents and Carers.

Children, young people and adults at risk may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. Additionally, some children, young people and adults at risk may find themselves involved in activities which are inappropriate or possibly illegal.

Linden therefore recognises 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. These issues are addressed within the learner journey, within relevant policies and procedures.

The welfare and protection of our children and adults at risk is paramount and consideration should always be given as to whether the use of photography will place them at risk. Images may be used to harm children or adults at risk, for example as a preliminary to grooming or by displaying them inappropriately on the Internet, particularly social networking sites. For this reason, consent is always sought when photographing learners and additional consideration is given to photographing vulnerable children (particularly looked after children) or vulnerable adults (those known to be fleeing domestic violence). Consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

We are aware of the Safeguarding Partners escalation procedures for raising concerns in respect of poor practice, and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults. Online safety also involves being aware of the risks to young people, our staff/volunteers and adults at risk when communicating via the Internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities, and social networking sites such as Facebook and Twitter.

As an organisation working with young people, Linden acknowledges the impact and involvement that social networking sites such as Facebook and Twitter have on the lives of young people, and their role in the ways which they interact with each other.

There is a wide range of ways to communicate with young people and this is a rapidly changing environment as new technologies, applications and social media sites merge. No Code of Conduct for e- safety can cover all of these separately. However, there are broad principles that we expect all staff/volunteers to adhere to in order to safeguard young people and themselves in respect of using all these forms of media, devices, apps and social networking sites.

Safe online environments:

With increased use of technology at the centre of learning activity, staff are increasingly vigilant to the dangers of online abuse.

Staff recognise the increased dangers associated with the following:

Child sexual exploitation

Radicalisation

Sexual grooming

Sexualised online bullying

Staff training highlights the dangers of online learning. Learners are made aware of the dangers and how to protect themselves.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Communications

- When communicating with young people/vulnerable adults online, observe the same rules of behaviour as if speaking with them in person by being professional: polite, respectful, not swearing or saying anything (using the written word, images or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Ask yourself whether the content of the message could be misunderstood or misinterpreted by someone else.
- Always ensure the content of any online communication has a clear work purpose.
- Do not use any text-speak abbreviations or symbols/emoticons, even if you ordinarily use these in your personal life.
- Never disclose non-public and confidential information about Linden, its staff, associates, volunteers or the young people with whom we are working.
- Do not say anything or re-tweet any posts that could be deemed offensive, controversial or socially inappropriate in any way.
- Contact with young people or adults at risk online should only be a recognised element of your work and done strictly for the business of Linden only.
- Do not send any illegal or inappropriate content (written, images or icons), including sexting via mobile phones.

Openness and scrutiny

- Always communicate with young people in a way that is open for others to see, if necessary.
- Do not use private messaging facilities on social networks or apps; if it needs to be private, then do this by email exchange or phone and note the conversation afterwards.

- Ensure there is always a record of such conversations that would be open for others to check, if necessary.
- It should always be clear who the communication is from when Linden is communicating with a young person or a vulnerable adult.
- There should be no use of anonymous apps, where the sender can remain anonymous.

Recording

Only use social media and apps where there is a permanent record of what's been said and sent, thereby being open to scrutiny, e.g. the use of Snapchat is not appropriate.

Safe remote learning environment

Safe online learning environments are promoted and managed via staff training and development. Linden recognises the emphasis on remote learning during the pandemic, as such Linden have implemented additional training to raise awareness of the dangers of working online.

Additional resources have been shared with learners and staff to promote online safety aligned to the heightened risks during the pandemic.

Use of equipment

Linden IT equipment (including computers, laptops, mobile phones, PDAs, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content, including abusive images of children or young people.

All Linden IT equipment is pre-set with security software to ensure safe and professional use at all times and a copy of the Data Security certificate is located at HO.

Role of the Designated Safeguarding and Prevent Officer (DSPO)

Linden has appointed DSPOs and a Lead DSPO to have overall responsibility for issues related to Prevent/safeguarding children and vulnerable adults. The DSPO is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within the organisation and for liaising with health, children's services, adult services and other agencies about suspected or actual cases of abuse. The Lead DSPO will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.

Designated members of staff receive training in safeguarding children and adults at risk and interagency working as required by the LSCB. They also receive refresher training annually as required by Linden. The team are required to keep up-to-date with developments in safeguarding children and adults at risk.

The Lead DSPO has governance over safeguarding and Prevent matters across Linden, and the Director has overall responsibility for safeguarding and Prevent at Board level. The Director will ensure that resources, support and all relevant training are available and in place for staff. The Director will support the safeguarding and Prevent team in meeting their responsibilities and will ensure that Linden meets its commitments and takes them seriously.

The Lead DSPO is responsible for reviewing the child and adult at risk safeguarding policy annually, or more frequently if there is a change to current legislation, along with any policies linked to the safeguarding policy and processes and procedures that support the embedding and working practices of this policy.

- The Lead DSPO is responsible for ensuring the child and adult at risk policy is available publicly and to employers, parents and carers, that employers, parents and carers are aware that suspected abuse referrals may be made, and Linden's role in this.
- The Lead DSPO will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a child or vulnerable adult.
- The Lead DSPO will alert the police when a crime may have been committed.
- All DSPOs foster strong links with the LSCB and Designated Local Authority Person.
- Lead DSPOs refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority adult's social care.
- Lead DSPO will refer to the ESFA should Linden be subject to an investigation regarding our safeguarding practices.
- Lead DSPO will refer all reportable safeguarding matters to the funding partner, where Linden are not the funder.
- All DSPOs liaise with senior management to inform them of issues, especially on-going enquiries and police investigations.
- All DSPOs maintain a proper record of any safeguarding referral, complaint or concern, even when that concern does not lead to a referral.
- All DSPOs act as a source of advice, support and expertise to staff on matters of safety and safeguarding.
- All DSPOs liaise with relevant agencies following a referral to ensure it has been dealt with effectively, and identify whether or not a resolution has been achieved. DSPOs ensure that Linden works with employers and other training organisations that provide apprenticeships and/or work placements for children or adults at risk, to ensure that appropriate safeguards are in place.
- The Lead DSPO provides information on a monthly basis to the Board setting about how Linden has discharged its duties. The Lead DSPO is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.
- If the Lead DSPO is absent from the business, the Deputy Lead DSPO will be responsible for undertaking Lead DSPO duties.
- The lead DSPO has the responsibility to ensure that all staff have completed the required mandatory training, attended development as part of their CPD and will monitor the quality reports to ensure that safeguarding and Prevent are effectively promoted at all times.

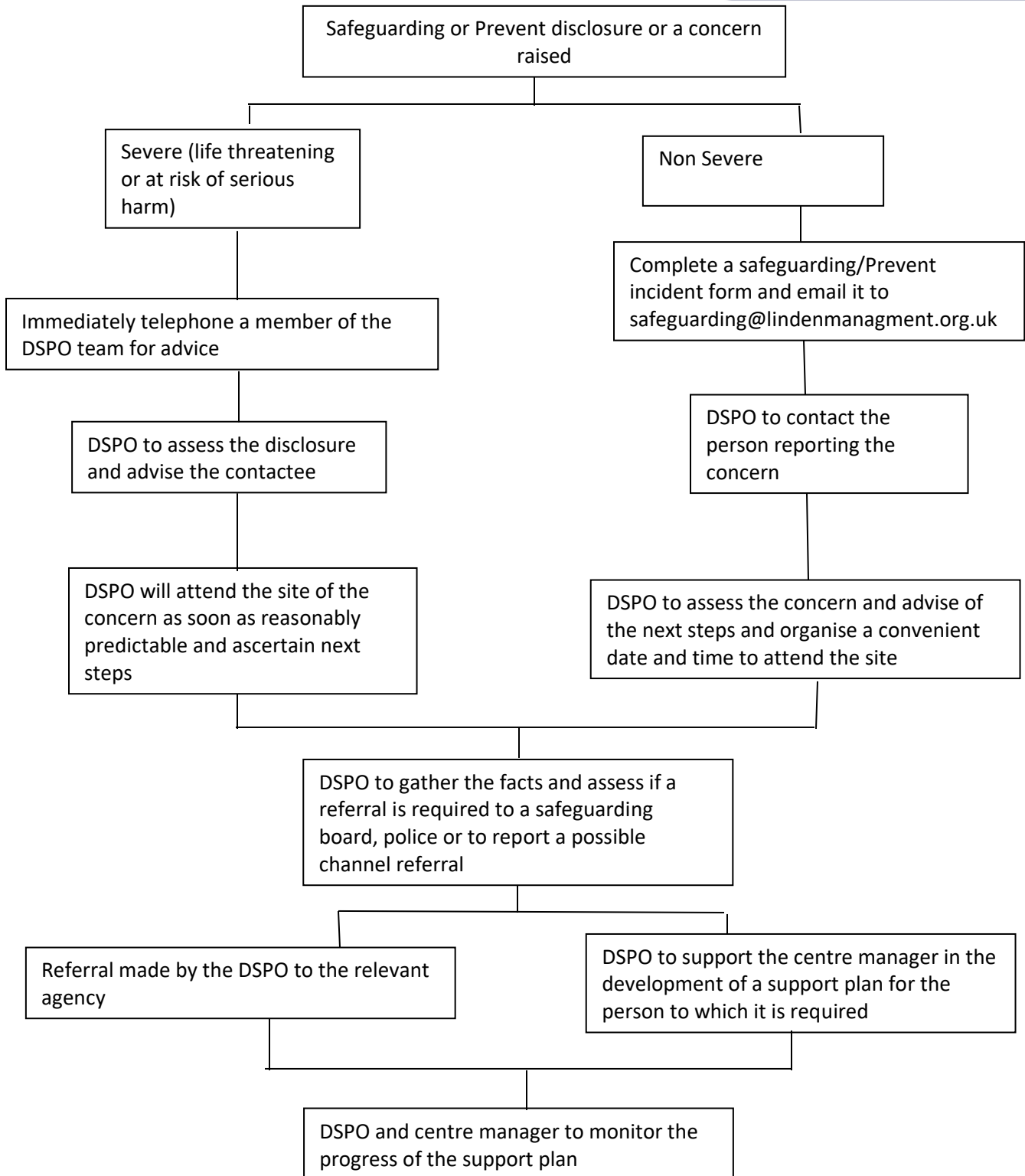
Under no circumstances should a member of staff, volunteer or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSPOs, with support from the senior management team, to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

SCPs may make their own referrals but must inform Linden Management immediately.

Responding to concerns

Linden ensure and emphasise that everyone in the organisation understands and knows how to share any concerns immediately with the Lead or Deputy for Safeguarding and the additional DSPOs. The process for responding to concerns is set out below.

Reporting Flow Chart



When an allegation of abuse is made to a member of staff, the member of staff who receives it should:

- Reassure the individual making the allegation (child or vulnerable adult) that they have done the right thing
- Listen and not interrupt
- not promise that the matter will be kept confidential. Explain to him/her that the matter must be reported to a member of Linden's designated safeguarding team as part of the legal duty. If there is any doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding team members
- Let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding issue
- Note that this is not an investigation and simply establish the key facts. Remember **TED – Tell, Explain, Describe**
- Only ask simple, open, non-leading questions, e.g. if a child or adult at risk tells you they have been hurt, ask “Can you describe how that happened” rather than “Did someone hit you?”
- Accept what the individual is saying and do not offer an alternative interpretation of the alleged events
- Raise the concern with a DSPO and not ask anymore questions
- Write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual, ensuring that you make clear what is fact and what is opinion or hearsay in any given piece of information
- Not ask the individual to sign anything at this stage
- Note anything about the individual which may be connected, e.g. any visible injuries, including the position and description
- Report the matter to a DSPO immediately within the same working day
- Complete the relevant documentation (the DSPO Referral Form located on the system) and submit to the designated safeguarding team via the safeguarding e-mail address safeguarding@lindenmanagement.org.uk ensuring that you tell the individual what will happen next.

Remember, if a child or adult at risk tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, it doesn't make it any less real and distressing for the child or vulnerable adult. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred on to the DSPO as per this procedure.

Staff should be mindful that an allegation may involve another child/children/young person(s) and if a child has been involved, the Lead DSPO should be contacted immediately as the welfare of the child being accused is equally paramount at this time.

The DSPO will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to staff support, if needed.

If a child or adult at risk chooses to disclose, **you should never:**

- Take photographs of injuries
- Examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate First Aid)
- Investigate or probe, aiming to prove or disprove possible abuse
- Make promises to the individual about confidentiality or keeping secrets

- Assume that someone else will take the necessary action
- Jump to conclusions or react in any way to what the individual is disclosing
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur. **Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED, THEN IT IS ASSUMED THAT IT DID NOT HAPPEN**
- Fail to pass the information on to the designated safeguarding team
- Ask the individual to sign a written copy of the disclosure or a statement

Where a child or adult at risk has communication difficulties or uses alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children or vulnerable adults.

If a young person or adult has personal needs, their requirements should be discussed prior to commencement of programme and additional support plan implemented. Linden will respect personal privacy and dignity, ensuring that young people and adults are supported in meeting their own physical care needs, wherever this is possible.

If it is determined by the DSPO that the concern is not a safeguarding one but rather the child is in need of support services, then this should be discussed with the child and with the parents. A referral for child in need of local authority services requires parental consent.

The DSPO is responsible for following up any referrals made to social care to ensure that action has been taken. This should be done within 3 working days of having made the referral, if social care has not been back to the DSPO to confirm their actions. A record of actions being taken must be made by the DSPO.

If there is concern that the action is not sufficient to safeguard the child or adult, then the DSPO must discuss with the Lead DSPO and escalate, if necessary, with social care or the police. The LSCB will have procedures to follow in this instance.

Abuse Requiring Immediate Response

If medical attention or police emergency action is required, then:

- The emergency services should be contacted on 999 immediately. The Linden DSPO team should be informed without delay
- The DSPO team should contact the relevant social care and/or police services
- You will need to inform the duty manager, if the referral is out of hours
- The DSPO must consider if it is safe for the child or adult at risk to return home to a potential abusive situation, seeking advice from social care or police, as required
- Managers in the police or social care agencies will then advise about how to proceed to ensure immediate wellbeing of the child or vulnerable adult
- The child or adult at risk should remain with Linden staff, volunteers, SCPs or contractors, if they are in immediate danger or in need of medical attention

The Duty Manager Rota details the name and contact details of each manager who will be responsible for dealing with any incidents or crisis, and can be located on the system. All Linden staff have been shown a copy of the Linden safeguarding policy, including incident reporting procedure. These documents are accessible on the system and will also be available at relevant sites where Linden contract activities will be undertaken.

Where there is any doubt about the safety of the child or adult at risk if they were to return home to a potentially abusive situation, the Lead DSPO must inform the relevant social care agency and/or the police of their concerns. Managers in the police or social care agencies will then advise about how to proceed to ensure the immediate wellbeing of the child or vulnerable adult.

If no action has been taken after 48 hours, the Lead DSPO or DSPO team member should utilise the escalation process with the LSCB. Staff must also be aware that if they feel the referral has not been dealt with, no action has been taken, or that Linden senior management is trying to disregard the referral, they should follow the procedures as set out in the Whistleblowing Policy.

Allegations against Staff, Associates, Volunteers, Delivery Partners or Contractors

All allegations of abuse made against a member or members of staff, associates, volunteers, SCPs or contractors will be managed in line with Linden's safeguarding and employment policies and procedures.

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or adults at risk in their present position or in any capacity. It is essential that any concerns for the welfare of a child or adult at risk arising from abuse or harassment by a member of staff, volunteer, SCP or contractor should be reported immediately to the Lead DSPO, who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures are, therefore, to be followed in respect of allegations that a member of staff, volunteer, SCP or contractor has:

- Behaved in a way that has harmed, or may harm, a young person or vulnerable adult
- Possibly committed a criminal offence against, or related to, a young person or vulnerable adult
- Behaved towards a child or adult at risk in a way that indicates they are unsuitable to work with children or adults at risk

Where you have concerns about a colleague, volunteer, SCP or contractor, you should report these concerns to the DSPO team immediately, detailing your concerns on the Linden Safeguarding and Prevent incident form, and they will manage the allegations in line with agreed policy.

The Lead or Deputy Lead DSPO will discuss allegations against staff, volunteers, SCPs or contractors with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action, if any, is necessary. They will notify parents/carers that the person the allegation has been made against will be suspended, partly to protect them during any investigation. They will also consider risks to other children and communication with relevant organisations/bodies, and will support the person the allegation has been made against, ensuring they are treated fairly and with impartiality as detailed in Linden's disciplinary policy and procedures. They will include any support from the other agencies involved and manage possible media interest. Disciplinary or Capability procedures will not be initiated until the investigation by police or social care has been concluded. Linden will take the lead from these bodies at all stages of the process and involve the relevant DSPO and Senior Managers.

This may include:

- Child Protection or Adult at risk Safeguarding Investigation – this will assess whether the child/adult is in need of protection or in need of services – led by social care
- Criminal Investigation – led by the relevant police force
- A Disciplinary Investigation – in line with Linden's disciplinary procedures

In the first two instances, social care and/or the police will lead on investigations.

Linden's Lead DSPO will notify the Disclosure and Barring Service (DBS) where:

- Linden have permanently removed a member of staff, volunteer, delivery partner or contractor from regulated activity

Linden thinks that the person has either:

- Engaged in relevant conduct, satisfied the harm test or
- Received a caution for, or been convicted of, a relevant offence

For most cases, the DBS only has the power to bar a person who is, has been, or might in the future engage in regulated activity.

Linden's Director will act as Linden's Named Senior Manager to provide high level support to the Lead DSPO in handling allegations of abuse made against a member of staff, volunteer, SCP or contractor, in line with current Linden policy.

If the concern raised is related to a DSPO, then the Lead DSPO in conjunction with the strategic management team will follow the safeguarding process. If concerning the Lead DSPO, then the Deputy DSPO would be involved with the strategic management team. If concerning the named Senior Manager, then the Lead DSPO would be informed in conjunction with the Board of Directors.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken, the individual the allegation was made against will be supported back into work and their team environment by the Director, with an agreed support plan put in place.

Support for the Referrer

Linden will fully support and protect staff, volunteers, SCPs and contractors who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or adult at risk and reports his or her concern about a colleague's practice.

This support may take the form of counselling or moving the person reporting the abuse/potential abuse to another workplace temporarily whilst the incident is investigated. Linden Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately. However, all staff, volunteers, SCPs and contractors have a duty to safeguard and promote the welfare of children and vulnerable adults. In order to investigate concerns robustly, it may not be possible to maintain complete anonymity, but interests of the referrer will be protected when concerns are raised.

Following a referral, staff, volunteers, SCPs and contractors may be involved in the assessment and management process led by the relevant social care team, may be invited to take part in any strategy meeting, or may attend an initial Case Conference. Where there is a criminal investigation, they may be required to co-operate with the police. In all these circumstances, they will be offered sufficient time to prepare and attend meetings with the support of their line manager and Linden DSPO Team.

They will also receive appropriate senior management support and the DSPO will continue to provide support and guidance as required/appropriate. Records will be kept of every concern raised and they will be detailed in terms of what actions have been taken, whether an external agency has been involved and is leading on any investigation, and what the outcome has been, so that the file can be closed and then stored for legal purposes on the secure system.

Record Keeping and Information Security

Well-kept records are essential in situations where it is suspected or believed that a child or adult at risk may be at risk from harm.

Records should state who was present, the time, date and place. Records should be factual, state exactly what was said, observed or alleged, be written in ink and signed by the recorder.

Records must also be stored, retrieved and destroyed within current Data Protection laws and Linden's robust Data and Information Security requirements.

The use of a standard Safeguarding and Prevent incident Form for all staff, irrespective of their role or which delivery contract they currently work with, is available on the system.

Staff, volunteers, SCPs and contractors are guided in recording, so that they are mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that records may become evidence in court proceedings. Equally, staff, volunteers, SCPs and contractors must be aware that documents regarding an individual that Linden holds may be subject to a Freedom of Information request under the Freedom of Information Act. Under the Act, individuals have the right to access their own records, unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender
- Information held for the purposes of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person

Records are kept for the time required legally and/or contractually by the various government Commissioners and there is a robust storage, retrieval and disposal process and system in place.

Details of allegations that are found to be malicious will be removed from personnel files. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, detail of how the allegation was followed up, resolution to the allegation, and notes of action/s taken and any decisions reached, is kept on the confidential personnel file of the accused and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction, and it will help to prevent unnecessary re-investigation if an allegation re-surfaces at a later date. In respect of safeguarding allegations against an adult, the record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation, if that is longer. Records in relation to a safeguarding concern about a child should be kept for 7 years, unless a minimum time is specified in contracts held by Linden.

Where a request for information sharing is made, the Lead DSPO and senior management would make a decision as to whether they are able to share the information and, if necessary, would seek relevant legal advice and advice from other bodies such as the NSPCC and Childline. All decisions taken about information sharing are expected to keep the safety of the young person or adult at risk of central and paramount importance. Once the decision has been made, regardless of whether it is to be shared or not, this is still recorded, identifying the reasons for the decision. If the request has come from the LSCB, they will provide Linden with clear rationale as to why the information is needed and the request should be proportionate to the reason. Linden follow the 7 Golden Rules to Information Sharing as per the guidance document "Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers".

All learners undergo induction relevant to the business or contact area. Part of this process includes consent forms, as required, and collection of other personal details. This is recorded on Linden's systems, and other documents directly relating to delivery all are stored securely.

Learners and their parents/carers are made aware of the need for Linden and/or delivery partners to hold information relating to them, what will be held, how it will be held, how long it might be held, who might have access to it and how it will be used.

The safeguarding form is sent to the Linden safeguarding e-mail address and this is then uploaded by a member of the DSPO team to the secure safeguarding folder within 24 hours. It can only be accessed by the DSPO team. Once a copy has been uploaded to the system, any local records will be destroyed. All concerns and incidents are reported on at senior management level and lessons learnt in how these were dealt with are discussed. Where appropriate, procedures are revised.

Awareness sessions regarding data and information security are delivered to staff at all levels in the organisation, with reminders of new items sent through email. All information covering data protection and security are held on our system, which all staff, volunteers, SCPs and, where applicable, contractors are made aware of through the awareness and induction sessions.

Safer Recruitment and Training for Staff

When recruiting new members of staff, Linden follows the government guidance “Safeguarding Children: Safer Recruitment in Education” and Safer Recruitment principles, and pays due regard to the Safeguarding Vulnerable Groups Act 2006 (updated 2018) and the Protection of Freedoms Act 2012. Linden adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that the relevant Linden staff member uses the DBS checking service to assess applicants’ sustainability for positions of trust. The company also compiles fully with the Code of Practice and aims to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified.

Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance. Applicants will also have to complete a Declaration Form in line with Linden’s recruitment guidance.

Newly appointed staff will have a job role induction (JRI) in line with the Linden Probation time over a 6-month period. A robust induction into the Prevent Duty and safeguarding of children, young people and adults at risk procedures is provided when they join the organisation, this includes mandatory reading of internal and external policies and e-learning modules. Probation is a period of both professional development and review. It provides a fair opportunity for an employee to understand the organisation, the standard of performance required and to be given the guidance and support needed to be effective in his or her new role.

Probation allows the manager of the newly-appointed employee to assess objectively whether the new recruit is suitable for the role, taking into account the individual’s overall capability, skills, performance and general conduct in relation to the job in question.

Linden ensures that all employees are made aware of the standards expected of them and implements the appropriate support, training feedback to achieve these standards. When supporting and working with our SCP, Linden endeavours to give guidance and recommendations to those that request/need support on recruiting suitable people.

For the organisation, probation allows the assessment of the employee’s contribution, potential and suitability for the role to which they have been appointed.

Furthermore, probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan.

Employees will be made aware of the relevant Safeguarding and Prevent procedures as part of that induction programme and will be given a copy of Linden’s Safeguarding Policy.

Training Interventions

Individual/Group	Training	Frequency
All new staff	<ul style="list-style-type: none"> • Safeguarding • Prevent and Channel • Extremism and Exploitation (dependent on role) • Policy review (internal and external) • Commitment to the policy and understanding of rights and responsibilities 	At induction
All staff	<ul style="list-style-type: none"> • Safeguarding • Prevent • Policy review internal and external) 	<p>Complete with annual updating or at time of changes.</p> <p>Quarterly team development training to identify opportunities to promote safeguarding and Prevent.</p> <p>Annual update and refresher of all induction training activity</p>
Managers – Additional Training	<ul style="list-style-type: none"> • Prevent for Managers 	Complete and appropriate updating
Safeguarding Leads (DSPO)	<ul style="list-style-type: none"> • Prevent for Managers • Self-harm • Preventing Violent Extremism • Forced Marriage Awareness • Female Genital Mutilation • Bullying and Harassment • Honour-based violence • Sexting • Domestic Violence • Sexual Exploitation • Online Safety • Channel 	Complete and appropriate updating
	<ul style="list-style-type: none"> • Designated Safeguarding Officer 	Every 2 years
Board and Senior Managers	<ul style="list-style-type: none"> • Prevent for Board Members • Safeguarding 	Complete and appropriate updating

Linden Safeguarding/Prevent Code of Conduct

Linden follows the Equality and Human Rights commission Statutory Code of Practice 2010. This Safeguarding Code of Conduct also details how individuals can protect themselves against allegations of abuse.

Avoid personal and social contact with children or adults at risk and seek to minimise the risk of any situation arising in which misunderstandings can occur.

You should **NOT**:

- Engage in flirting or innuendo, make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult
- Issue or threaten any form of physical punishment
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them
- Engage in any sort of sexual relationship with a young person, even when the young person is aged 16 or over and therefore legally able to consent
- Use any type of physical punishment in order to discipline. Shouting at young people should be avoided whenever possible and only used if alternative forms of discipline have failed
- Photograph or film young people for which no prior consent has been sought
- Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer or games, etc.)
- That has inappropriate content for young people
- Invite or allow a young person or adult at risk who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship
- Engage in or tolerate any inappropriate physical activity involving young people
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature for children or adults at risk that they can do for themselves
- Dismiss an allegation of any sort relating to a learner's or adults at risk's welfare or delay the reporting of an allegation
- Discourage anyone from reporting concerns or ask individuals to keep secrets
- make promises to keep secrets, keep any disclosure confidential, overreact or be judgemental, should you suspect abuse
- Spend excessive amounts of time alone with children or vulnerable adults, away from others
- Make unnecessary physical contact with children or vulnerable adults. However, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports, etc. In all cases, contact should only take place with consent of the child or vulnerable adult
- Arrange to meet a child, adult at risk or their families, with whom you work outside of working hours, unless it is with consent of the parents/carers and person in charge of the activity
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes or e-cigarettes to/from a young person or their family

- Consume alcohol, take illegal drugs or legal highs during the working day/evening or at events, including during any breaks or when in the presence of young people
- Smoke/vape with, or in front of, young people
- Steal, or condone someone else's stealing, regardless of the value of the stolen item

You **SHOULD**:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and vulnerable adult's rights to privacy, encouraging children and adults to feel comfortable enough to report attitudes or behaviours they do not like
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If this is unavoidable, always ensure your line manager knows where you are, with whom and why
- Act with discretion with regard to personal relationships at organised activities, ensuring your personal relationships do not affect your leadership role within the organisation. All pre-existing relationships between staff, volunteers, delivery partners, contractors and/or participants of the organised activities must be declared
- Avoid working in isolation with children and adults at risk, follow the recommended adult-to- young people ratios for meetings and activities and ensure there is separate sleeping accommodation for young people, adults and group leaders
- Never give out a personal mobile number or private e-mail address and ensure working hours of contactability are stated
- Be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSOs
- Treat all young people and adults equally and listen to them, avoiding favouritism and gossiping ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns
- Never befriend or chat to children or adults at risk on social media/network sites. Always use professional language when writing, phoning, emailing or using social media/network to communicate with young people or vulnerable adults
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this happens, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned
- Immediately report concerns relating to the welfare of a child or adult at risk in your care, whether these concerns are about actions/behaviours of another colleague or based on any conversation with the child or vulnerable adult, particularly when they make an allegation
- Act as a role model
- Set and monitor appropriate boundaries and relationships when working with children and adults at risk, based on openness, honesty and respect for the child or vulnerable adult.

Ensure that the focus of your relationship with a young person that you have met through any programmes remains professional at all times. The aim should never be to develop the relationship into a friendship or intimate relationship

- Respect a young person or vulnerable adult's right to personal privacy but never agree to keep any information relating to the harm of a young person or adult at risk confidential. Provide support to a child, young person or adult at risk making a complaint
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the D SPOs without delay and record all the facts
- Ensure that if a distressed young person needs comfort, that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a young person before you act. Hugging should be limited and never initiated by staff/volunteers. Any hugging should be done by the side of the young person with an arm placed around the shoulders, side by side
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary in relation to the activity and that this is done in a way that other colleagues can observe you
- Promote an awareness of Safeguarding and Prevent, ensuring that all learners and employers are aware of their rights and responsibilities.

Upon induction to the programme, the child, young person or adult at risk will be given a copy of the Code of Conduct and Linden staff will go through this document with them to ensure they understand their responsibilities.

If a child, young person or adult at risk feels that there has been a breach of the Code of Conduct, they should report this breach by utilising the Linden complaints process. The complaint will be fully investigated as per the policy/process and actions will be taken to ensure the individual making the complaint is fully supported. If the complaint is in regard to another child, young person or vulnerable adult, there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of Code of Conduct may need the intervention of the DSPO team and the Linden safeguarding procedures should be followed.

All complaints are recorded and followed up to a satisfactory conclusion. The manager for the relevant contract would conduct the investigation with support from the Linden complaints manager.

Staff who breach this code of behaviour may be subject to Linden's disciplinary procedures, whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.



All children, young people and adults at risk should be treated with respect and the Code of Conduct has been written with respect, dignity and safety for every individual in mind. However, staff understand that children and young people are capable of abusing their peers. Peer abuse can take many forms, such as sexting, bullying, physical and emotional abuse, and inappropriate banter.

Linden works with all SCPs to enrich their own approach to safeguarding, sharing information and policy. Guidance available is cascaded to all SCPs.