



## **Fit Training International**

### **Safeguarding Child and Young Persons and Vulnerable adults Protection Policy & Strategy**

September 2018

#### **DEFINITIONS:**

This Policy applies to all staff, tutors, including senior managers and the board of Directors, volunteers and sessional workers, agency staff, learners or anyone working on behalf of Fit Training International

Please note that for the purposes of this guidance, the statement “young people/person” applies to all persons under 18 years of age.

#### **PURPOSE:**

- To protect children young people and vulnerable adults who receive Fit Training Internationals training services.
- This includes the children of adults who use our services.

Fit Training International believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote to the welfare of all children and young people and to keep them safe. We are committed to practice in a way that protects them.

This policy has been developed in accordance with the following guidance and legislation:

- The Children Act 1989
- The Children Act 2004
- Human Rights Act 1998
- Data Protection Act 2018
- Working Together to Safeguard Children 2015
- What to do if you are worried a child is being abused 2015
- Keeping Children Safe in Education 2015
- Protection of Freedoms Act 2012
- Apprenticeship Skills, Children and Learning Act 2009
- Care Act 2014
- Keeping Learners Safe 2015
- Safeguarding Children: Working Together 2018 Under the Children Act 2004
- The counter terrorism and Security Act 2015
- Prevent Duty Guidance Act 2015
- Modern Slavery Act 2015

## **BACKGROUND CONTEXT**

Fit Training International Ltd is committed to ensuring that a safe and friendly environment exists, where young people feel comfortable and valued. The organisation believes that:

- All young people have the right to exist in a safe and caring environment
- All young people have the right to expect an adult in a position of responsibility to listen to them when they need to express themselves
- All young people should be valued and respected as individuals
- Bullying in any form is strictly unacceptable
- Racist, homophobic, and sexist language or behaviour is strictly unacceptable
- Any form of discrimination towards minority groups is strictly unacceptable

## **Definition of Abuse**

### **Sexual Abuse**

#### **Children**

Forcing or enticing a child or young person, not necessarily involving a high level of violence to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside the clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **Adults at Risk**

Sexual abuse is the direct or indirect involvement of the adult at risk in sexual activity or relationships, which they:

- Do not want or have not consented to
- Cannot understand and lack the mental capacity to be able to give consent to
- Have been coerced into because the other person is in a position of trust, power or authority (for example a care worker)

## **2.Radicalization & Extremism**

The Counter Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the **Prevent duty**").

Extremism: the holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL / white supremacy groups, anti-gay groups, Islam / Christian ideology.

All employees are required to undertake mandatory e learning and face to face training, this provides employees with information on how to refer a concern using the Channel process.

### **3.Female Genital Mutilation**

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Employees have a responsibility to activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Care and sensitivity should be shown to adults at risk who have been subject to FGM and further support should be sought where required. As this differs from region to region if in doubt you should contact Head of Safeguarding Hayley Morran at Fit Training or Robert Reveley DSO.

### **4.Forced Marriage**

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the young people.

In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

### **Additional Abuse includes:**

- **Discriminatory**

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment; because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

- **Domestic abuse or violence**

Includes an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been, an intimate partner or family member regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual, financial abuse; so called 'honour' based violence, forced marriage or Female Genital Mutilation (FGM).

- **Financial or material**

Including theft, fraud, internet scamming, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Modern slavery**

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- **Organisational (sometimes referred to as institutional)**

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in a person's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Self-neglect**

Includes a person neglecting to care for their personal hygiene; health or surroundings; or an inability to provide essential food; clothing; shelter or medical care necessary to maintain their physical and mental health; emotional wellbeing and general safety. It includes behavior such as hoarding.

#### **4. The referral process**

The following "5 R" process MUST be followed by ALL staff:

- ***Recognise*** the signs of abuse
- ***Respond*** and react accordingly
- ***Record*** the facts of the disclosure

- **Report** the disclosure to a Safeguarding Representative for your locale as soon as possible / within 48 hours. All reports must be forwarded to the National Safeguarding Advisor/Head as soon as possible/within 48 hours.
- **Refer** (to the emergency services or Social Services or through the Channel process) in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to Safeguarding Representative and National Safeguarding Advisor as soon as possible after the referral, always within 48 hours.

### **Information sharing**

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality.

When sharing information there are **Seven Golden Rules** (Source: Information sharing – Guidance for Practitioners and Managers (2008)).

1. The Data Protection Act is not a barrier to sharing information
2. Be open and honest
3. Seek advice
4. Share with consent where appropriate  
There may be some circumstances where seeking consent including parental consent is not required
5. Consider safety and well-being
6. Ensure that information sharing is appropriate and secure
7. Keep a record

### **4c. Record**

A Fit Training Safeguarding Report Form, (obtain form Contract Manager) MUST be completed.

Where a Safeguarding Report Form is not readily available please ensure that the following information is noted:

- Your details
- Name of those involved
- Date of incident(s) / disclosure / suspicion
- Details of incident(s) / disclosure / suspicion
- Background information
- Actions taken

Whilst you can record observations, do not interpret or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation.

The Safeguarding Report Form should be kept securely and forwarded to the Fit Training Head of Safeguarding Hayley Morran or, in their absence, directly to the National Safeguarding Advisor.

#### 4d. Report

Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported Hayley Morran **07584687306** Safeguarding Representative or Robert Reveley in absence DSO immediately.

If that Safeguarding Representative for your locale is not available, please contact the Safeguarding Advisor.

#### 4e. Refer

Where required, the Safeguarding Representative will refer or support you with guidance on next steps and / or signposting the relevant external agency. Please see points 2.

There may be some circumstances where a situation may need to be reported to a prime via the Internal Notification Procedure, these are:

- Any referrals to Social Services or through the Channel process – please notify the National Safeguarding Advisor.

**Any violent incidents – please notify the Fit Training Director Safeguarding advisor Hayley Morran and Health and Safety Manager Robert Reveley**

- **Should there be a disagreement between the member of employees and the local safeguarding representative or manager about the need to make a referral, advice should be sought from the Safeguarding Advisor, Head of Safeguarding or a direct referral made to the relevant social services department by the employee who has the concern.**
- Any concerns about a young person who is part of a programme that is school linked should be relayed to the school's designated safeguarding representative (bullet point above also applies)
- Concerns about a young person subject to a Child Protection Order should be relayed to the keyworker immediately, in the absence of a key worker, the procedure below should be followed.
- Head of Safeguarding, Hayley Morran will inform the Director of FTI and Safeguarding lead at any prime provider about all referrals to Social Care, in accordance with internal notification procedure.

#### Learners Aged 18 Years or Over

- There is no need to report the abuse to any outside agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk in which case the relevant safeguarding procedures should be followed.

The learner may wish to involve the police. The role of FTI is to support them through this process. Alternatively, the abuse may be in the past and learners may require directing towards a counselling agency, such as NSPCC, Victim Support, Support line or other abuse survivor support agencies.

## **Guidelines for implementing Safeguarding**

To support the safeguarding concept, Fit Training International implement the following guidelines:

- Staff should always be aware of the needs of young people, and be vigilant for any possible signs of abuse
- Staff should not spend time alone with young people, especially away from others. Meetings with individual young people should take place as openly as possible. If privacy is needed the door should be left partly open and other staff either present or informed of the meeting
- Staff should not have any unnecessary physical contact with young people. There may be occasions where physical contact is unavoidable, desirable or necessary, such as providing comfort, reassurance or for physical support. Physical contact should, however, only take place with the consent of the young person and the purpose of the contact should be made clear.
- It is not good practice to take young people alone on a car journey, however short. Where this is unavoidable, it should be with the full knowledge and consent of the parents or carers, and someone in authority. Staff must state the purpose and anticipated length of route and duration – staff must also check their insurance liability.
- Staff should not meet with young people outside organised meetings or activities, unless it is with the knowledge and consent of parents/carers and someone in charge of activities or in a position of authority.
- Staff who are engaged in relationships should ensure that their personal relationships do not affect the young people around them.
- It should be noted that on occasions, young people themselves can be responsible for abusing their peers.
- Staff should never:
  - Engage in physical games
  - Allow young people to use inappropriate language unchallenged (i.e. racist, sexist or homophobic comments)
  - Make suggestive comments in front of, about, or to a young person - even in fun
  - Let allegations made by a young person go without being addressed and recorded
  - Deter young people from making allegations through fear of not being believed
  - Jump to conclusions without checking facts

- Rely on their own name and reputation to protect them (i.e. everyone, regardless of position, should adhere to these guidelines)

To ensure that these guidelines are upheld, Fit Training International has taken the following action:

- Ensured that properly trained staff are in place, all of whom have an Enhanced DBS Disclosure
- Ensured that all staff are aware of their responsibilities in issues of the safeguarding of young people
- Ensured that all relevant staff agree to the guidelines of this policy when around young people
- Fit Training International has a 'zero tolerance' approach to all forms of abuse, intimidation, bullying (physical or emotional), racist and sexist behaviour
- Fit Training International will immediately inform Senior Management in the event that illegal substances are discovered including drugs, weapons etc.
- Whilst respecting privacy and data protection, Fit Training International cannot guarantee confidentiality in all circumstances. If we discover anything that we believe parents/carers, social services or the police should be informed of, we will do so, believing it to be in the best interests of the young person.

### **Responsibility for implementation of the policy**

The CEO is responsible for implementing and monitoring the Safeguarding Policy.

### **Monitoring and Quality Assurance**

This policy along with related practices will be reviewed annually in line with the academic year.

### **Access to policy documentation, advice and support**

The Safeguarding Policy is made available to all Fit Training International delivery staff in formats appropriate to the various audiences.

This policy was reviewed on 1<sup>st</sup> September 2018

*Janet Reveley*

.....

Janet Reveley

**CEO**

**Tel 07802648300**

Robert Reveley

.....

Robert Reveley

**Director DSO**

**Tel 07770624143**