



Safeguarding & Prevent Policy
Francesco Group Education

Safeguarding Children and Vulnerable Adults Policy and Prevent Duty



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This policy has been ratified by Francesco Group Holdings Ltd on 1st September 2024 by:

Managing Director – Ben Dellicompagni

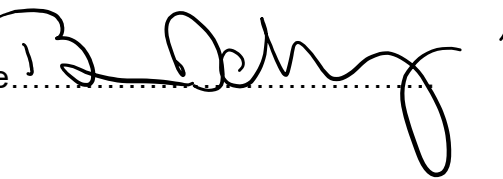
Signature.....

Director of Commerce – Craig Davies

Signature.....

The Policy is signed as current from 1st September 2024

Managing Director – Ben Dellicompagni

Signature.....

Director of Commerce – Craig Davies

Signature.....

Review date 1st September 2025



Safeguarding & Prevent Policy

Francesco Group Education

1. Policy Statement

Francesco Group is committed to safeguarding and promoting the welfare of learners. Francesco Group recognises its moral and legal duty to work with other agencies in protecting children and young people from significant harm and responding to disclosures and allegations of abuse. Francesco Group is committed to developing and maintaining external partnerships to support the well-being of learners.

This policy recognises that the welfare of learners is paramount in all circumstances. It aims to ensure that regardless of age, size, disability, gender, ethnicity, language, religious beliefs, sexual identity and socio-economic background have the right to protection from abuse.

Francesco Group adopts an open and accepting attitude towards children and young people as part of its general responsibility for pastoral care. Francesco Group hopes that children or young people and parents/guardians will feel free to talk about any concerns or worries which may affect educational progress and that they will see Francesco Group as a safe place if difficulties are encountered. Concerns and allegations raised by children and young people will be taken seriously if they seek help from a member of staff.

Francesco Group aims to follow the procedures set out by local Safeguarding Children's Partnerships, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2024. Francesco Group will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. Policies and procedures for the recruitment, selection and employment of staff who work with children and vulnerable adults are implemented in line with legislative requirements.

2. Purpose

This document sets out Francesco Group's policy in relation to the safeguarding of learners and deals with the procedures for responding to disclosures or allegations of abuse or neglect. All staff have an awareness of safeguarding issues through regular training and briefings, some examples of safeguarding issues are listed below.

- Abuse – Physical, Emotional, Peer on Peer, Sexual, Child-on-child
- Drugs

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- Missing from Home or Care
- Neglect
- Financial or Material
- Forced Marriage
- Child Sexual Exploitation
- Child Criminal Exploitation
- Domestic Abuse
- Female Genital Mutilation
- Radicalisation
- Trafficking
- Bullying
- Cyber
- Nude and semi-nude images
- Self Harm
- Suicide
- Mental Health

Types of abuse, neglect or other safeguarding issues include, but are not limited to, the following:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact of children of all forms of domestic abuse. Children may be abused by an adult or adults and by another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or

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developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **Peer on Peer abuse:** This is most likely to include, but not limited to: bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm; sexting; up-skirting and initiating/hazing type violence and rituals. Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by young people should never be passed off as 'banter' or 'part of growing up'. The DFE states 'peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.' Concerns should be referred to senior staff who may need to consult with the Designated Safeguarding Lead.
- **Sexual abuse:** Sexual abuse involves forcing or enticing a child, young person or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.
- **Child-on-child abuse:** Sexual abuse of children by other children is a specific safeguarding issue in education that can happen both inside and outside of

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Academies and online. All staff should challenge inappropriate behaviour between children that are abusive in nature. For example, dismissing sexual harassment as “just banter” or “just having a laugh” can lead to a culture of unacceptable behaviours and in worse cases normalising abuse and leading to children not coming forward to report it.

- **Drugs:** There is evidence that children and young people are increasingly misusing illegal drugs and alcohol. Consequences range from poor achievement and non-attendance, poor health, committing crime to support the habit and increased risk of being a victim of crime and sexual exploitation.
- **Missing from Home or Care:** There are strong links between children and young people involved in sexual exploitation and other behaviours such as running away from home or care, bullying, self-harm, teenage pregnancy, truancy and substance misuse. They may have been coerced to run away by someone else. In addition, some are particularly vulnerable, for example, children/young people with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum seeking children. The majority of children/young people who go missing are not in care and go missing from their family home. However, those who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.
- **Neglect:** Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
 - provide adequate food, clothing and shelter (including exclusion from home or abandonment)
 - protect a child from physical and emotional harm or danger
 - ensure adequate supervision (including the use of inadequate care-givers)
 - ensure access to appropriate medical care or treatment.It may also include neglect of, or unresponsiveness to a child’s basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under reported or challenged concern.

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- **Financial or Material:** This may include theft, fraud and exploitation, pressure in connection with money or material possessions, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. This may also include loss of jewellery or personal property, loss of money from a wallet or purse.
- **Forced Marriage:** This involves a young person, or adult at risk of harm being forced into a marriage against their will.
- **Child Sexual Exploitation:** Child Sexual Exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status, it is a crime not a choice made by victims. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual.
- **Child Criminal Exploitation:** Child Criminal Exploitation (CCE) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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- **Domestic Violence:** The Home Office defines domestic violence as "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old 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 Psychological, Physical, Sexual, Financial or Emotional Controlling behaviour and can be a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim." Children who live in households where domestic violence is taking place are seen to be highly vulnerable.
- **Female Genital Mutilation:** This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. If a discovery that a girl under the age of 18 appears to have had an act of FGM carried out, this must be reported to the police.
- **Radicalisation:** Whilst this may not be always considered a form of abuse, it is addressed within this policy. Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to the Prevent team who will offer guidance and support and will refer to the Channel process, if required, with the aim of preventing activity which could be deemed as criminal. There is no typical profile for a person likely to become involved in extremism but staff and learners should be alert to any changes in behaviour and language that shows signs of radicalisation.
- **Trafficking:** Human trafficking is defined as a process that is a combination of three components: Movement. Control, through harm or threat of harm. For the purpose of Exploitation. A child/young person may be trafficked between several countries in the EU or globally, prior to being trafficked into or within the UK. The child may have entered the UK illegally or legally (with immigration documents), but the intention of exploitation underpins the entire process.
- **Bullying:** Bullying can take many forms and includes:

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- Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures).
 - Physical: Pushing, kicking, punching or any use of aggression and intimidation.
 - Racial: Racial taunts, use of racial symbols, graffiti, gestures.
 - Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
 - Verbal: Name calling, spreading rumours, teasing.
- **Cyber:** All areas on internet, such as email, internet and chat room misuse. The use of Mobile phones to threaten by way of text message and calls. The misuse of associated technology, for example the use of camera and video facilities used in sexting.
 - **Nude and semi-nude images:** Means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via mobile phones, social media, gaming platforms, chat apps or forums. Once these images have been taken and sent, the sender has lost control of these images and these images can be re-distributed anywhere. Indecent imagery is the legal term used to define nude or semi nude imagery and by having in their possession, or distributing, indecent images of a person under the age of 18 on to some other person, young people are not aware that they are breaking the law and committing an offence under the Sexual Offences Act 2003. Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
 - **Self Harm:** The majority of Young People who self harm have no intention of ending their life. Most Young People do so to manage their feelings. However, it is important to note young people who carry out self harm are at an increased risk of suicide. The rates of self harm have increased over the last decade. One in five 14-year-old females and one in ten male teenage boys' self harm (Children's Society 2018). Reasons why young people self harm can include: Loss of a parent, parental illness or drug/ alcohol abuse, severe lack of communication within the home, being subject to very high expectations at home and/or school, neglect and deprivation,

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sexual, physical and or emotional abuse, fear or shame or oppression regarding sexuality, bullying, racial harassment, chronic illness or disability.

- **Suicide:** There are an estimated 19,000 suicide attempts by adolescents in the UK per year which equals one every 30 minutes (Hawton and Van Heeringen 2002). In England 149 children (aged 10 -19) committed suicide in 2014 which equals almost 3 children every week (PHE 2016). Most young people who self harm DO NOT intend to kill themselves BUT a history of self harm is common among young people who attempt suicide.
- **Mental Health:** All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child, they should raise a safeguarding concern following this policies procedures. A range of advice can be accessed by external agencies to help identify and support learners with mental health issues.

3. Scope and definitions of terms used

This document applies to all staff, volunteers, partners, contractors and visitors in relation to the safeguarding of children and vulnerable adults.

A **child**, as defined in the The Children Act 1989 and 2004, is anyone who has not reached their 18th birthday.

A **young person** is defined as anyone aged under 18 who do not fall into the child category.

A person who is aged 18 or over , may be considered to be vulnerable if that person:

- Receives personal care, or nursing, or support to live independently in their own home, or a care home
- Is a migrant worker
- Receives any health or social services
- Is an ex-offender

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- Has a substantial learning or physical disability, or
- A physical or mental illness, chronic or otherwise, including to alcohol or drugs, or
- A substantial reduction in physical or mental capacity due to advanced age or illness

A **vulnerable adult** is defined as a person who is, or may be in need of community care services by reason of mental or other disability, age or illness, and who is, or may be unable to care for him/herself against significant harm or exploitation.

Abuse is defined as a violation of an individual's human and civil rights by another person or persons.

Safeguarding and promoting the welfare of children is defined as: 'protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.'

4. Objectives

- Promote and prioritise the safety and wellbeing of learners in all areas of delivery.
- Keep children and young people safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided.
- Assist staff working with children and young people to work safely and responsibly and to monitor their own standards and practice.
- Set clear expectations of behaviour and codes of practice.
- Give a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.
- Minimise the risk of misplaced or malicious allegations made against staff who work with learners.
- Raise awareness of child protection and safeguarding issues
- Adopt relevant and appropriate filtering and monitoring process to reasonably limit children's exposure to risks presented within IT systems.
- Ensure learners understand what constitutes as sexual harassment and know this will not be tolerated.
- Continually refresh Safeguarding and Prevent delivery and ensure this is a regular and consistent part of the training curriculum for learners and staff.
- Ensure the Prevent risk assessment is refreshed regularly and that staff are aware and confident in the use of external referral or support processes



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- Raise awareness of Safeguarding and Prevent information with our work employer partners.

5. Responsibilities

Francesco Group Board of Directors

Francesco Group Board of Directors has overall responsibility for ensuring that Francesco Group has sufficient measures in place to safeguard and promote the welfare of learners who are children or vulnerable adults.

The Designated Safeguarding Lead (DSL) has lead responsibility for the safeguarding of children and vulnerable adults. The DSL will have a Deputy Designated Safeguarding Lead and assistance from Safeguarding Officers.

Francesco Group Safeguarding Officers are responsible for coordinating safeguarding activities and responsible for responding to and supporting safeguarding issues raised by staff.

The Board of Directors must ensure:

- that it complies with its duties under legislation and has regard to the latest statutory guidance to ensure that Francesco Group policies, procedures and training in relation to the safeguarding of learners is effective and in compliance with the law at all times.
- That Francesco Group has an effective Safeguarding Policy and procedure in place together with a staff behaviour policy (code of conduct). The Safeguarding Policy will describe procedures which are in accordance with the Safeguarding Children's Partnerships in the three county's that we operate our Academies in and will be updated annually.
- That Francesco Group contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children 2023*.
- That all Learners are taught appropriately about safeguarding, through teaching and learning opportunities, including online, as part of providing a broad and balanced curriculum.
- That Francesco Group has documented recruitment and selection policies and procedures in place to prevent people who pose a risk of harm from working with children.
- That Francesco Group has procedures in place to handle allegations against members of staff and volunteers, other children and for making a referral to



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the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed.

- That appropriate safeguarding responses are in place to support children who go missing from education settings, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- That Francesco Group provides a safe environment to learn and work, including online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potential harm and inappropriate online material. Filtering and monitoring systems should provide reports of online activities, documented decisions on what is blocked or allowed, completing actions following concerns or checks to the system.

Designated Safeguarding Lead

The Designated Safeguarding Lead has lead responsibility for the safeguarding of children and vulnerable adults and for the implementation of this policy and procedure. The Designated Safeguarding Lead will provide support to staff members to carry out their safeguarding duties.

The Designated Safeguarding Lead will endeavour to:

1. Update their own knowledge using recognised accreditation routes to ensure currency of awareness and experience.
2. Ensure everyone understands their roles and responsibilities in respect to safeguarding and Prevent duties and provide them with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to young people.
3. Ensure all training staff read and refresh their understanding of Part 1 of Keeping Children Safe in Education.
4. Develop and implement procedures for identifying and reporting suspected cases of abuse.
5. Ensure learners know that all the education team have safeguarding knowledge and feel they can approach them, if they are worried about anything.
6. Ensure all staff report any cases of alleged or suspected abuse to the safeguarding lead and feel able to report the same if perpetrated by a

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colleague, confident in the protection provided within the whistleblowing policy.

7. Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose concern.
8. Assign responsibility and undertake regular review of filtering and monitoring process to minimise risk, block harmful comment where possible and to ensure colleagues know how to escalate concerns if identified.
9. Ensure company guidelines are followed when recruiting training staff and ensuring a DBS is in place prior to commencement of their working with learners.
10. Ensure an accurate and current safeguarding register of staff involved in 'regulated activity' is maintained.
11. Ensure external speakers or events are risk assessed, prior to occurrence, against Prevent guidance and any action taken is appropriate and effective.
12. Ensure use of ICT within training, including online or electronic forms of communication is safe, monitored and safeguarded.
13. Establish a safe environment in which learners can study.
14. Ensure all records are kept securely and confidentially.
15. Share information about concerns with relevant agencies - and follow the correct process of transferring information to other organisations if an apprentice deemed at risk, moves on or transfers to another training provider.
16. Maintain contact and establish links with:
 - Local authority children's social care
 - Local Safeguarding Children's Partnerships
 - Local Adult Safeguarding Board
 - Prevent Channel agency
17. Regularly review safeguarding policy and good practices.
18. Promote the importance of safeguarding and Prevent practices on posters displayed in staff rooms and classrooms, to include photographs of the safeguarding panel and advice on raising a concern.
19. Promote the fundamental British Values.
20. Discuss safeguarding; Prevent and Sexual harassment within Learner Voice structure (at least annually) to check understanding and how delivery relates to specific learner groups.
21. Maintain an awareness of local context and specific safeguarding or prevent issues that could affect staff or apprentices.



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Francesco Group Staff

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Francesco Group staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. All staff members have a responsibility to provide a safe environment in which children can learn and must follow health and safety and safeguarding procedures at all times. Any procedures for recording accidents or near misses should also be adhered to. In addition, all staff must wear their identity badges at all times whilst on site and complete regular checks on learners to ensure that they wear their identity badges too. Risk assessments are carried out for any activities or learners deemed to potentially impact on learner safety. They must undertake safeguarding training as required – see section on safeguarding training. This training should be in line with local Safeguarding Children's Partnership requirements.

All staff, volunteers and visitors must report safeguarding concerns and suspected or alleged cases of abuse of children or vulnerable adults using the reporting system to alert a member of the safeguarding team. If the concern relates to a member of staff, the Designated Safeguarding Lead should be alerted. In addition to working with the Designated Safeguarding Lead, staff members should be aware that they may be asked to support social workers to take decisions about individual children.

Recruitment procedures both for staff and learners have a clear focus on preventing potential abusers gaining employment or places on programmes involving close work with children and vulnerable adults. This involves completing DBS checks on potential employees and requiring new employees to complete online training on safeguarding.

Apprentices

Apprentices will undertake safeguarding awareness as part of their Apprenticeship Induction and 10 weekly review process. This awareness will include e-safety, cyber bullying, personal safety, Prevent and how to report a safeguarding concern.

Apprentices will follow a program of modules using the Virtual Learner Hub resource. All Apprentices will participate in the Well Being program, a series of monthly topics, delivered face to face, designed to educate, inform and advise on a wide range of subjects including safeguarding, personal wellness and resilience. Apprentices are also informed of safeguarding practices, advice on how to raise a concern, via posters displayed in classrooms, break areas, toilets, workplace noticeboards. Any ex-offenders applying for an Apprenticeship are subject to additional safeguards and risk assessment procedures.



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Apprentices views are regularly sought on safety-related matters and the responses inform self assessment and annual planning with a view to continually seeking to maintain and improve the safety first culture of the organisation.

Employers providing employment for Apprentices

All employers must adopt an appropriate child protection procedure. This will be checked by the organisation co-ordinating the placement together with fulfilment of Health and Safety arrangements and relevant insurance. A copy of Francesco Group's Safeguarding Policy and Procedures will be made available to all employers/ work placement providers along with 'The Employers Guide to Safeguarding' booklet. The Employers in return to acknowledge that they fully understand the requirements within it.

6. Statutory Framework

The Children Acts 1989 and 2004 establish the basic principles for those involved in working with children.

Under the Children Act 1989, amended by the Adoption and Children Act 2002 'harm' means ill treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill treatment of another. There are no absolute criteria on which to rely when determining what constitutes significant harm.

Section 175 of The Education Act 2002 places a duty to make arrangements to safeguard and promote the welfare of children.

The regulatory framework for the safeguarding of children and vulnerable adults is contained in the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. The Protection of Freedoms Act 2012 updates vetting and barring legislation.

'Keeping Children Safe in Education 2024' is the key statutory document for safeguarding in education. It should be read alongside Working Together to Safeguard Children 2023 which provides guidance about how organisations should cooperate in safeguarding and promoting the welfare of children in accordance with the **Children Act 1989** and the **Children Act 2004**.



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7. Safeguarding Training

The Safeguarding Panel will arrange appropriate staff safeguarding training and ensure that safeguarding training records are kept up to date.

All staff will undertake appropriate safeguarding awareness training to equip them to carry out their responsibilities for child protection effectively and be kept up to date with refresher training at 3 year intervals.

All staff members receive a briefing on the safeguarding policy/procedure and reporting systems as part of staff induction organised by their line manager. All staff are required to comply with a staff behaviour policy (Code of Conduct) which includes requirements in relation to Safeguarding.

Temporary staff and volunteers who work with children or vulnerable adults will be made aware by their line manager of Francesco Group's arrangements for safeguarding and their responsibilities.

The Designated Safeguarding Officer will keep a record of the date of the last training/refresher undertaken by staff and will inform a staff member's line manager when their next refresher training is due.

8. Safeguarding Checks for Staff and Volunteers

All staff and unsupervised volunteers who participate in regulated activities are required to undertake an Enhanced Check for Regulated Activity (DBS Check). Records of DBS checks are stored centrally by the Director of Operations. For unsupervised volunteers, Enhanced Checks for Regulated Activity must be carried out and Line Managers must receive written confirmation before the volunteer can commence their volunteering post. DBS request forms are available from the Director of Operations.

9. Minimising the Risk from Visitors

Staff receiving official visitors who will be allowed to move unaccompanied around the premises must ensure that such visitors sign in at Reception and receive and wear a visitor's badge. The badge/s must be returned to Reception prior to the visitor/s leaving the premises.



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10. Minimising the Risk from Employees of Contractors

All work by contractors must be appointed and controlled via the Board of Directors. A risk assessment is completed by the Directors prior to any contractor's work on Francesco Group premises and this must include all Learners safeguarding. If, following consultation with the Designated Safeguarding Lead, the Board decides that a written statement is required from the contractor to confirm that staff who will work on site have had satisfactory DBS checks, then work cannot commence until the statement has been received and permission to work is granted.

In any case, the Board will inform the Management Team in advance of the dates and locations where contractors will be working so that extra vigilance can be maintained. Prior to work, on each day Reception will issue each member of a contractor's team a visitor's Badge (after checking, if appropriate, that permission to work has been issued). The badge must be worn at all times on the premises and returned to Reception when leaving each day.

11. Procedure for dealing with allegations of abuse

All Francesco Group staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child or vulnerable adult.

If a child or vulnerable adult discloses abuse to a member of staff or a member of staff clearly suspects that a child or vulnerable adult has been abused or is at imminent risk of abuse then they must report this to the Designated Safeguarding Lead or another member of the Safeguarding team. It is the role of the Designated Lead or Deputy in their absence to report an allegation of abuse to the local Children's Advice and Support Service (SCASS) within the Multi Safeguarding Hub (MASH) and/or the Police. Any lower risk incidents, whilst often dealt with initially within a curriculum area, should still be recorded in the reporting system (see



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appendix 3) to enable an accurate picture of safeguarding issues to be obtained across the provision.

Following the completion of safeguarding procedures, the DSL will risk assess the categories of the individual issue and rate as follows:

Low risk – No safeguarding actions are taking place and/or safeguarding issues have been fully addressed. Monitoring is continued.

Medium risk – Safeguarding protection plan is/remains in place.

High risk – Protection plan is being implemented. Legal action is being taken. The abusive behaviour is persistent and/or deliberate.

In the case of disclosure or suspicion of abuse concerning a young person aged under 18, Francesco Group Safeguarding officers **will always** refer the matter to the appropriate external authorities. To ensure procedures are followed accurately the DSL will follow Local Safeguarding Children's Partnership Threshold document acknowledging the appropriate level of support/ response required:

Level 1 - Single service / support

Level 2 - Early help (EHF) - more than one agency - Team around the child (TAC)

Level 3 - Social worker involved - (MARF - Multi-Agency) likely complex and multiple needs

Level 4 - Acute needs - Child Protection (section 47)

Francesco Group ensures there are procedures in place to manage allegations of abuse against staff members.

If the Deputy Designated Safeguarding Lead is the subject of the allegation the matter must be reported to the Designated Safeguarding Officer. If the Designated Safeguarding Lead is the subject of the allegation, then the matter must be reported to the Managing Director. If the Managing Director is the subject of the safeguarding allegation, then the matter must be reported to the Chairman of the Board. We will take all possible steps to safeguard our Apprentices and to ensure that the adults in our Academies are safe to work with children. We will always ensure that the procedures outlined in Safeguarding Children Partnerships Protocol: Managing Allegations of Abuse Against Persons who work with Children and role of LADO and



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'Keeping Children Safe in Education 2023' are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO).

The Staffordshire LADO can be contacted on 0300 111 8007

The Birmingham LADO can be contacted on 0121 675 1669

The Poole LADO can be contacted on 01202 817600

The Designated Safeguarding Lead will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Designated Safeguarding Officer should contact the LADO directly on any of the above contact details in the county that the Academy is located

Additional information regarding safeguarding allegations against staff

If allegations are made against staff, KCSE guidelines will be followed, firstly with the identification of whether the concern is:

High level - **may meet** the harm threshold

Low level - **does not meet** the harm threshold

In all cases of **proven** high level concerns a referral will be made to the DBS so information is transferred to protect future learners should the individual move on into another role involving regulated activity.

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Francesco Group staff should use the following guidelines when following up on a disclosure or report of suspected/ alleged abuse by a child or vulnerable adult.

– **Respond** → **Record** → **Report**

- React calmly so as not to frighten, alarm or deter the individual from disclosing
- Reassure him/her that you are glad they have told you, they have done the right thing and that it is not their fault
- Don't promise to keep it to yourself, at the earliest opportunity remind them of our confidentiality procedure and explain what this means.
- **Respond** - Explain that you need to make sure that they will be safe and will have to pass on the information to a Safeguarding Officer. Let them know the safeguarding officer will want to speak to them and can deal with the matter appropriately. If you require any clarification view the Safeguarding Procedure Flowchart (Appendix 3)
- Listen carefully to what they have to say and take them seriously.
- Allow them to tell you what happened in their own words.
- It is important to clarify what you have heard, and to establish the basic facts. However avoid leading questions and do not ask them specific questions about explicit details.
- **Record** – Using the Safeguarding Referral Form (Appendix 2) – copies can be found on the company Google Drive, under 'Safeguarding Resources'. Make brief notes during the initial disclosure, explaining to them why you are doing this. If this is not possible, make notes as soon as possible afterwards. All notes should be dated and signed by the staff member taking them.
- **Report** – the matter with your notes, to a Safeguarding Officer at your earliest convenience.

 Designated Safeguarding Lead:
Craig Davies – Stafford

 Deputy Designated Safeguarding Lead
Leah Wright – Stafford

 Designated Safeguarding Officers by Academy:
Stafford Academy – Leah Wright
Birmingham Academy – Jemma Donovan
Poole Academy – Heather Caveny-Barton



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12. Written Records Relating to Allegations of Abuse

The Designated Safeguarding Lead shall retain copies of:

- The report from the person first raising the concerns
- The written report to the Staffordshire Children's Advice and Support Service
- Any relevant notes, memorandum or correspondence
- Any other relevant material

These records will be retained and kept securely at all times in accordance with Data Protection and under the control of the Designated Safeguarding Lead.

13. Safeguarding Risk Assessments

Details are included in other procedures as follows:

Learners on visits (Educational Visits Health and Safety Risk Assessment)

If a risk assessment on a learner with a statement of needs results in teaching staff or welfare Assistant's supporting the learner to meet their physical needs; it may be advisable to include a condition that another adult should be present.

14. Review of this Procedure

This policy and procedure will be reviewed by Francesco Group Senior Management Team at least once each year and updated as necessary.



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PREVENT STRATEGY

1. Purpose and Scope

Prevent is a strand of the Government counter terrorism strategy – CONTEST. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The government has defined extremism as: "vocal or active opposition to fundamental British values. This also includes calls for the death of members of the British armed forces" British Values are as follows:

Democracy	All have a voice. Your opinion counts Create change for the better
Individual liberty	Freedom of speech Know our human right and exercise our rights in college and beyond. Question what we are told
Rule of law	No one is above the law Laws protect everyone Respect the rules of the college Innocent until proved guilty
Tolerance and Respect	Together we are one community through respect and understanding of one another. Respect all backgrounds and cultures, ages, genders and sexualities and religions/beliefs, i.e. the protected characteristics set out in the Equality Act 2010

Prevent is a national agenda linked to the Counter Terrorism and Security Bill (2015), to support learners to express their views in a non-extremist way and not be drawn into violent or terrorism activities. The national Prevent strategy seeks to:

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

Private Training Providers and Colleges of Further Education have a key part to play in fostering shared values and promoting cohesion. Providers and Colleges should focus on the risks of violent extremism, which represents the greatest threat at

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national level, while recognising that other forms of violence and extremism can and do manifest themselves within. The vulnerability of individual learners also make them prone to influence from extremist organisations and/or individuals and providers and colleges are well placed to support such students, to raise awareness of the dangers of becoming involved with these influences and to build resilience in learners. See Appendix 3 & 4.

2. Objectives

This strategy has five key objectives:

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

In order to achieve these objectives the strategy will concentrate on four areas detailed in the subsequent sections:

- Leadership and values
- Teaching and learning
- Support for learners
- Managing risks and responding to events

3. Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners, staff and visitors and promotes respect, equality and diversity and understanding.

This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation
- Building staff and learner understanding of the issues and confidence to deal with them

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- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies.

4. Teaching and Learning

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

This will be achieved through:

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

5. Support for Learners

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Developing strong and effective learner support services and safeguarding procedures
- Supporting at risk learners through such processes, including referral to Channel as required.
- Listening to what is happening in the Academies and the community
- Continuing to develop anti-bullying strategies and challenging discriminatory behaviour
- Helping learners and staff know how to access support in Academies and or through community partners
- Supporting problem solving and repair of harm
- Focussing on narrowing the attainment gap for all learners.

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6. Managing Risks and Responding to Events

To ensure that Francesco Group monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the Provider
- Understanding and managing potential risks within the Academies and from external influences
- Ensuring measures are in place to minimise the potential for speakers or groups associated with extremist organisations can gain access to learners in the Academies
- Responding appropriately to events in local, national or international news that may impact on learners and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the Academies
- Ensuring plans are in place to respond appropriately to a threat or incident within the Academies
- Developing effective ICT security and responsible user policies.

7. External Speakers and Room Bookings

Francesco Group values the opportunities presented by external speakers for learners to experience diverse opinion and to enter into debate. This is seen as an essential part of both personal and academic development. The Group values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate. Francesco Group values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal guidelines.

Francesco Group will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means offensive, misogynistic, anti-social, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.

Francesco Group will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence. Any events where external speakers are invited to address learners:

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- are lawful
- ensure the health and safety of all members of the Academy, buildings and equipment
- support equality and diversity
- support good community relations (internally and externally)
- do not significantly constrain the work of the Academies
- safeguard the Academies good reputation

In order for the Academies to effectively filter inappropriate organisations or external speakers from gaining access to learners, speaker and external room bookings will need advanced approval of any planned event so that the necessary checks can be made.

Concerns about an individual in relation to extremism or radicalisation will be referred to the Prevent Team by the Designated Safeguarding Lead or Deputy. The Prevent team may refer to the Channel Process

You can call the National Police Prevent advice line [0800 011 3764](tel:08000113764), in confidence, to share your concerns with their specially trained officers.

Prevent Co-ordinator

Tel: 01785 232054

Email: prevent@staffordshire.pnn.police.uk

Prevent Team

For Stafford Academy

Tel: 01785 238239 or 01785 233109

Email: prevent@staffordshire.pnn.police.uk

For Birmingham Academy

Tel: 0121 251 0239

Email: prevent@west-midlands.pnn.police.uk

For Poole Academy

Tel: 01202 229336

Email: dorsetprevent@dorset.police.uk



**Safeguarding & Prevent Policy
Francesco Group Education**

Appendix 1 – Useful Information and Statutory Guidance

Francesco Group Designated Safeguarding Lead

Craig Davies – Mobile – **07787 517571**

Francesco Group Designated Safeguarding Deputy

Leah Wright– Mobile 07580997188

Francesco Group Safeguarding Officers

STAFFORD ACADEMY	BIRMINGHAM ACADEMY	POOLE ACADEMY
Leah Wright	Jemma Donovan	Heather Caveny-Barton
07580997188	07966390381	07887942441

For concerns of immediate harm you must contact the police on 999 or 101

If you have concerns that a child or young person is suffering or is at risk of significant harm you may contact the following to make a referral:

Stafford Academy

Staffordshire Children’s Advice and Support Service

For children, telephone: 0300 111 8007

between 8.30 am to 5.00 pm Mon – Thurs, and between 8.30 to 4.30 pm on Friday.

Out of the above hours or on weekends and bank holidays:

Emergency Duty Service 0345 604 2886.

For vulnerable adults, telephone: 0345 604 2719

between 8:30am – 5.00pm Monday to Thursday, and 08:30am - 4:30pm Friday.

Out of the above hours or on weekends and bank holidays:

Emergency Duty Service 0345 604 2886.

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Poole Academy

For children who may be suffering or at risk of significant harm, living in the following areas:

Dorset - **Children's Advice and Duty Service**
Telephone: **01305 228558**

Bournemouth, Christchurch or Poole - **Children's First Response Hub**
Telephone – **01202 123334**
Between 8.30 am – 5.15 pm Monday to Thursday, 8.30 am – 4.45 pm Friday

Out of the above hours or on weekends and bank holidays:
Telephone – **01202 738256**
Email – **childrensfirstresponse@bcpcouncil.gov.uk**

Birmingham Academy

If you have any concerns about the safety and/or welfare of a child or young person living in Birmingham

Children's Advice & Support Service (CASS)
Telephone - **0121 303 1888**

Out of the above hours, call the Emergency Duty Team:
Telephone – **0121 675 4806**

If you have access to secure e-mail:
secure.cass@birmingham.gcsx.gov.uk,
if you do not have access to a secure email:
cass@birminghamchildrenstrust.co.uk



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Appendix 2 – Safeguarding Concern Form

Safeguarding Concern Form

Please use this form to record any safeguarding concerns raised about a young person (under the age of 18) or a vulnerable adult. This is to ensure that we meet our obligations under government regulations and that we are complying with Francesco Group policy and guidelines.

The information provided on this form will only be used for the above purpose and will be stored confidentially.

Reporting & Recording Safeguarding Concerns

Name of person completing this form:

Position: Contact number.....

Name of person raising concern (if different to above)

She/He is a student Yes [] No [] She/He is a member of staff Yes [] No []

Name of young person/vulnerable adult about whom there is a concern:

.....

Is the young person/vulnerable adult named above a student at Francesco Group?

Yes [] No []

If Yes, name of provision/salon/course

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If **No**, please give their name and age and say whether they are at school, college or apprentice etc. and what relationship they have to the person raising the concern.

.....

.....

.....

Brief description of incident/conversation

(please make clear what is stated as fact/opinion or hearsay)use an extra sheet if necessary:

Brief outline of actions/advice taken or given, including any other services/people contacted at this point:

Was the young person/vulnerable adult made aware that this information would have to be passed on to the relevant parties?

Yes No

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If no, please say why

Details of any witnesses to incident/conversation including names:

Date form completed:

Date form passed on to Designated Safeguarding Lead:

Name (please print)..... Signature.....

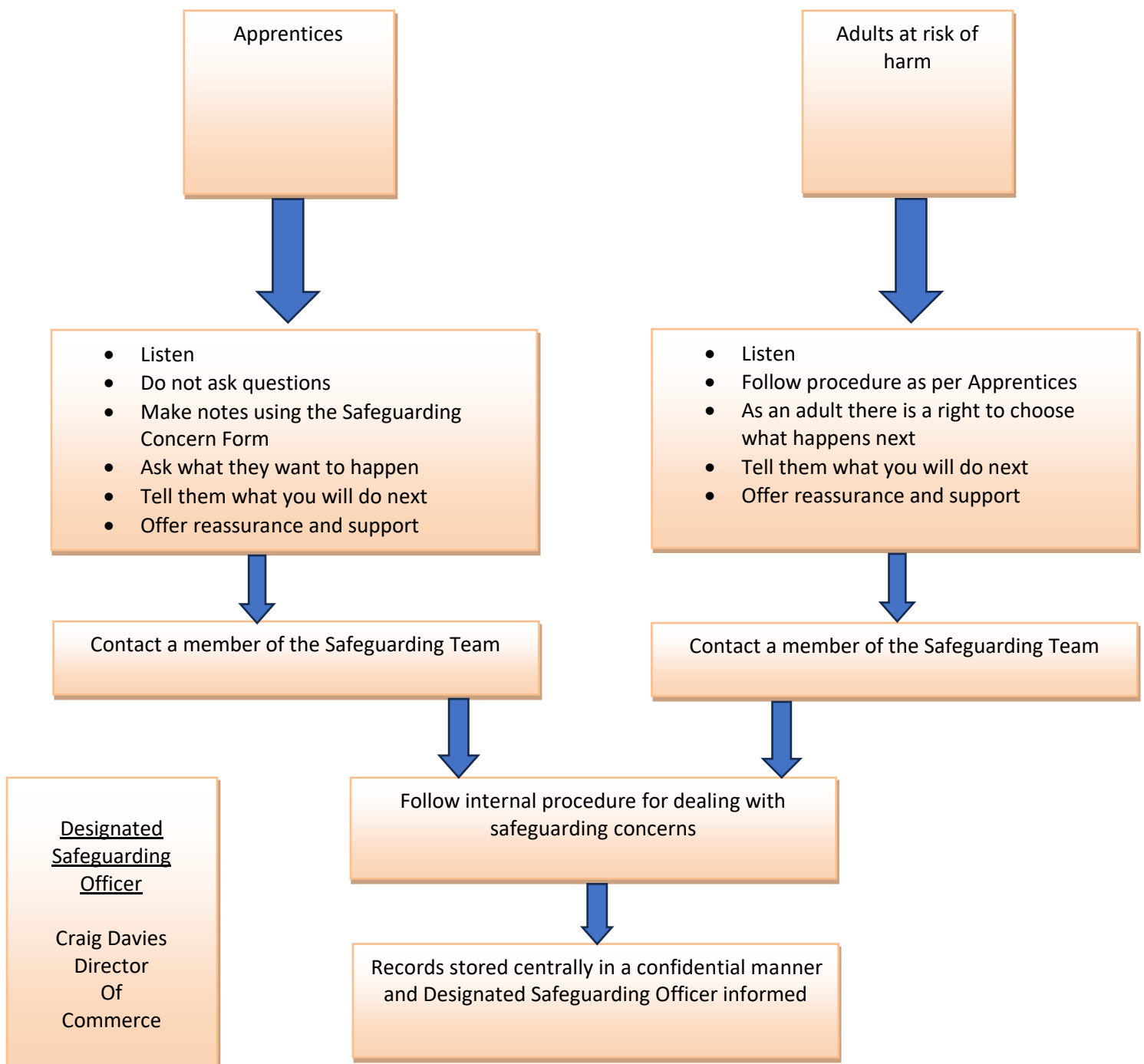
Date:

Designated Safeguarding Officers Signature.....

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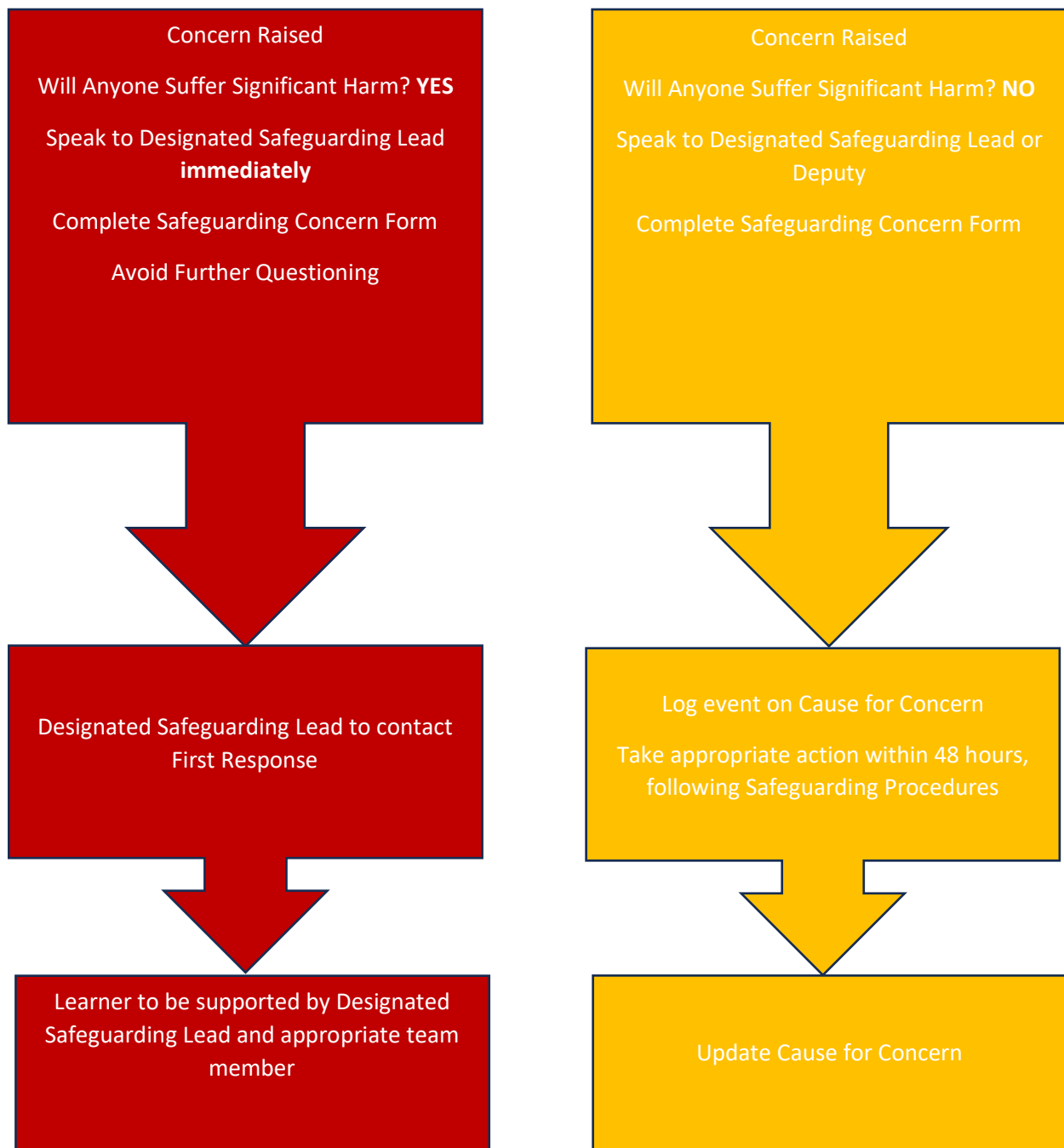
Appendix 3 – Safeguarding Procedure Flowchart



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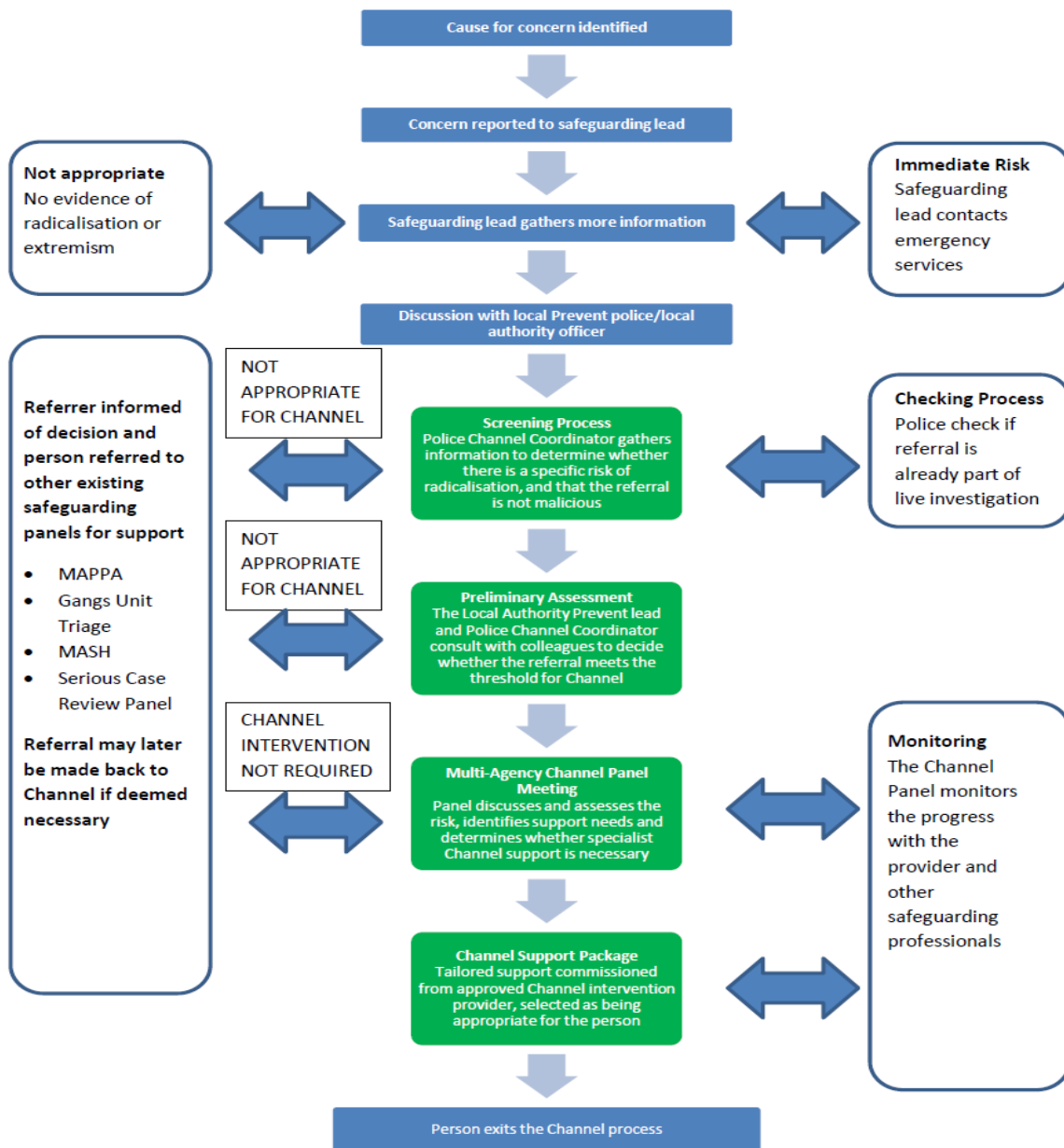
Appendix 3 – Referral Process for Safeguarding Issues



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Appendix 4 – The CHANNEL Process





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Appendix 4 – Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as ‘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.’ We also include calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts
- Foster hatred which might lead to inter-community violence in the UK

4. There is no such thing as a “typical extremist”, those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Learners may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them, their families and communities. It is vital that staff members are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

- Identity Crisis – the Learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the Learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

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- Personal Circumstances – migration; local community tensions; and events affecting the Learner’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the Learner may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Need – Learner may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and / or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis

Concerns about an individual in relation to extremism or radicalisation will be referred to the Prevent Team by the Designated Safeguarding Officer or Deputy. The Prevent team may refer to the Channel Process

Prevent Co-ordinator

Tel: 01785 232054

Email: Prevent@staffordshire.pnn.police.uk



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Prevent Teams

For Stafford Academy
Tel: 01785 238239 or 01785 233109
Email: prevent@staffordshire.pnn.police.uk

For Birmingham Academy
Tel: 0121 251 0239
Email: prevent@west-midlands.pnn.police.uk

For Poole Academy
Tel: 01202 229336
Email: dorsetprevent@dorset.pnn.police.uk

National Prevent Advice Line

Tel: 0800 011 3764

What is Channel?

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned.

More information about Channel can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf