



# Safeguarding Policy



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## Other Linked Policies

Policy Title
● Equality, Diversity & Inclusion Policy
● Prevent Policy
● Whistle Blowing Policy
● Modern Slavery Statement
● IT Policy
● Complaints Policy

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# Statement

As a training provider, Ensis Solutions fully recognises its statutory and moral duties to promote the safety and welfare of those learners who are under the age of 18 years and those adult learners who are deemed to be vulnerable. Ensis Solutions is committed to the safeguarding of all learners regardless of their age and vulnerability.

This policy has been developed in accordance with the principles established by the:

- Children Acts 1989 and 2004.
- Education Act 2011; and
- Prevent Duty Guidance for England and Wales 2023.
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006.
- Health and Social Care Act 2012.
- Mental Capacity Act 2005.
- Equality Act 2010.
- Human Rights Act 1998.
- Data Protection Act 2018.
- Public Interest Disclosure Act 1998.

and in line with the government publications:

- 'Keeping Children Safe in Education (September 2023) and Working Together to Safeguard Children (December 2023)' the statutory guidance.
- 'Keeping Children Safe in Education (September 2023) or Working Together to Safeguard Children (December 2023)' and the Local Safeguarding Children Board (LSCB) procedures; and
- 'The Official Referral Process for Prevent – Training Providers' Scope

This policy and its procedures apply to:

- Ensis Solutions its Board and employees in respect of all of its activities
- any other group company for whom Ensis Solutions provides trainers and related services in respect of such training and any other services funded by the Education and Skills Funding Agency

and to:

- learners enrolled with them
- their contractors
- employers with which they provide apprenticeships; and
- other users of their services.

The policy and procedures will always apply when Ensis Solutions is providing services or activities that come under the responsibility of the organisation.

Ensis Solutions recognises that Safeguarding and promoting the welfare of its learners is everyone's responsibility.

Everyone who comes into contact with a learner and their families, carers and employers have a role to play in safeguarding. The safeguarding policy is shared with all staff, learners and employers on an annual basis and, as and when, any in-year updates are made aligned to legislation changes. The policy, its purpose and reporting procedures will be reinforced via team and employer meetings, staff training, learning resources and literature. Additional support and guidance will be provided to ensure that any learner with a learning difficulty or language barrier can access the policy, its aims and supporting literature.

## Introduction, Scope and Purpose

Safeguarding is an all-encompassing term used to describe many aspects of Ensis Solutions life including:

- Learner health, safety and wellbeing
- Bullying
- Harassment and discrimination e.g., homophobic abuse
- The use of physical intervention
- Meeting the needs of learners with medical conditions
- First aid
- Alcohol, drug and substance misuse
- External events (e.g., trade fairs)
- Internet safety
- The security and safety of the Ensis Solutions estate/other places of learning

The policy covers all Ensis Solutions learners, whether they are based in a training centre/classroom or elsewhere (e.g. on employer premises). It is the responsibility of all staff to understand their role in supporting safeguarding across Ensis Solutions and for familiarising themselves with the appropriate procedures and other policies that support this overarching document.

### Key Principles

Ensis Solutions will operate within the following key principles in relation to safeguarding:

- Everyone will be treated with respect and with courtesy by staff and learners, in an environment with a zero tolerance approach to harassment and discrimination
- All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards.
- Ensis Solutions will work with learners and other agencies to promote a safe and healthy culture
- Ensis Solutions will develop partnerships to proactively protect young people and vulnerable adults from abuse (including harm and neglect)
- Staff will be trained and will have a clear understanding of personal safety and good safeguarding practices

- Ensis Solutions will work with learners to promote their own personal health, wellbeing and safety. This will include e-safety themes such as sexting, sharing personal information via social media, and trolling via smartphones
- Learners, where appropriate, will receive confidential advice, guidance and support for a range of issues which they may face. Such information might involve signposting to an external professional/organisation (e.g. GP or local council service)

## Learners' Entitlement

In order to promote a healthy and a safe environment, our learners will be entitled to the following rights:

- To make a disclosure to any member of staff, and to know that the disclosure will be dealt with quickly and sensitively
- To learn in an environment with a 'zero tolerance' approach to bullying or harassment
- To be made aware of some of the basic principles of safer learning and safeguarding relevant to the programme being completed
- To be made aware of how to access support on personal health and safety issues, either within Ensis Solutions or from external agencies
- To be provided with up to date information around personal safety issues
- The opportunity to comment and feed back on the extent to which Ensis Solutions and its courses promote and maintain wellbeing and personal safety
- To learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment.

## Strands of Activity

The safeguarding efforts of Ensis Solutions are supported by the following core strands of activity, where relevant, and working procedures signposted within this section.

## Safe Learning

The principles of 'Help Children Achieve More' (formerly 'Every Child Matters') and safeguarding will be embedded for all age groups within Ensis Solutions teaching and learning practices, and within Ensis Solutions quality assurance and quality improvement frameworks. We will operate safe recruitment practices as outlined in the relevant section of this policy.

Consistent with the 'be healthy' strand of 'Help Children Achieve More', we are committed to attempting to engage learners of all ages on issues related to financial health, mental health and physical health – in order to improve their quality of life. We aim to further develop our practice in this area, e.g., through providing learners with sustainable tools with which to make healthy decisions.

Our commitment to safe learning is enshrined within our teaching and learning strategy, our quality assurance and quality improvement frameworks, the teaching, learning and assessment observation policy and procedure, our learner code of conduct, and the staff recruitment procedure.



## Safe Environment

Ensis Solutions will provide an environment that is as safe and secure as possible for all users, and at the same time is friendly and welcoming. We will have robust systems and processes in place for staff, for learner identification, and for visitor registration. We will ensure a culture of respect with a zero tolerance stance on bullying and harassment. Health and safety is of paramount importance to us. As such, all our facilities and resources will comply with legislative requirements for health and safety.

Our commitment to the safe environment is enshrined within every stage of the learner journey, e.g. through our Safe Working Practices.

As a learner Ensis provides you with access to a range of ICT equipment to support your learning, to help you develop your skills for the future, and become confident in the use of ICT.

## Terms of Use

These guidelines apply to all computers, mobile devices, software and data within Ensis; or belonging to Ensis but located elsewhere. It includes the use of any learning platforms such as BKSBAptem. It covers remote access from outside of Ensis, regardless of which device is used to make the connection e.g., personal computer at home, mobile phone. These resources are provided on the understanding that they are not misused in a way that will interfere with, disrupt or prevent anyone from legitimately using Ensis resources.

You may use your personal laptop or other mobile device to connect to the Ensis online sites, but you must ensure that the appropriate anti-virus / anti-malware protection is installed.

Use of ICT facilities is subject to the provisions of the Data Protection Act 1998, Copyright, Designs and Patents Act 1988, Protection from Harassment Act 1997, Communications Act 2003, Malicious Communications Act 1988, Public Order Act 1986, Obscene Publications Act 1959 and 1964, Protection of Children Act 1978, Sexual Offences Act 2003, Sex Offences Act 2003 Memorandum of Understanding and the Computer Misuse Act 1990.

### What you may use Ensis systems for:

**Ensis systems are provided for purposes related to your Ensis course only.** For any other use you will need to ask permission from your tutor or supervisor. You will be allocated a personal login only after completion of all enrolment procedures.

- **Use of the Internet** - Use of the Internet should be for research and finding sites that help in the completion of Ensis work. Any sites that require payment for services should not be accessed. Should unsuitable sites be accessed inadvertently, please inform the appropriate member of staff.
- **Social Networking sites** - Social networking sites e.g., Facebook are blocked on the majority of PCs in Ensis unless a tutor has specifically asked for them to be used as an integral part of your course.

**Please Note: when using such sites do not share your details with anyone you do not know.**



What you may NOT use Ensis systems for:

**Creating, copying, sending, storing, displaying or receiving of:**

- Any offensive, obscene or indecent images, data or other material
- Material which is designed or likely to cause upset, annoyance, inconvenience or needless anxiety.
- Material which could be considered menacing, discriminatory, harassing, bullying, fraudulent or confidential/private
- Material that is for 'leisure activity' (e.g., playing games, gambling) unless this is an integral part of the course
- Material that infringes the copyright of another person, including unlicensed or illegal software

**You must not create, run, send, store or transmit:**

- Defamatory or libellous material
- Unsolicited commercial or advertising material
- Inappropriate material to any other network users or distribution lists that wastes network resources
- Personal resources e.g., photographs, music

**You must not:**

- Use other people's passwords or log in identities
- Change, copy, corrupt or destroy any other users' data
- Deliberately introduce 'viruses', 'worms', 'Trojans' or other harmful or nuisance programs or files on to Ensis systems
- Enable access to any non Ensis members without permission
- Install, remove or copy software
- Change screen savers, workstation configurations
- Disconnect cables on equipment or connect other devices to any PC
- Record images without the explicit consent of the individual(s) captured in the photograph or video. These images must not be used in an inappropriate context.

Ensis reserves the right to define all terms (e.g., 'offensive', 'menacing', 'indecent', 'defamatory' and 'libellous') in light of current legal and best industry practice standards.

**Please Note: it is ILLEGAL to view indecent images of children – therefore, do not open any file that you suspect may contain such images. If you do receive suspicious files report it to your tutor.**

## Monitoring and Restrictions

Ensis has systems in place that monitor all Internet activity for breaches in the areas outlined above. If there is any reasonable belief that any of the regulations in this document are being broken (or criminal activities being undertaken), then these will be brought to the attention of Ensis staff. Ensis will then order the examination of Internet activity, email messages or network account data, in line with legal guidelines and in certain circumstances the police could be contacted.

For security and legal purposes Ensis can access all data generated when users access/use Ensis systems, and any attempt to engage in activities with the aim of bypassing security or monitoring procedures (e.g. proxies) will be considered in breach of this agreement.

### Safe recruitment (staff)

Ensis Solutions will comply with best practice in the recruitment and training of its staff, in line with the formation of the DBS (i.e. the merging of the ISA and the CRB). Staff will undergo the appropriate DBS checks for their role where applicable and every 3 years thereafter, and we will ensure that all staff undertake mandatory safeguarding training appropriate to their role. Staff will understand the principles of safe working practices and how not to put themselves in situations that compromise themselves or learners.

Our commitment to safe recruitment is enshrined within our interview paperwork and within the employment of staff/engagement of learners with a criminal record. Once in post, should any allegations be made about staff regarding the safety of young people/vulnerable adults, these will be passed to the Safeguarding Lead. Immediate suspension might be necessary, as might the passing of information to external parties.

Newly appointed staff will be inducted into the business, as part of this induction a robust introduction into the safeguarding of children, young people and adults at risk policy and procedures are included. This includes mandatory reading of internal and external policies and e-learning modules.

All staff are required to read this policy and support the effective implementation of the safeguarding policy and procedures.

### Safe Recruitment (learners)

Ensis Solutions is committed to the fair treatment of all learners and welcomes applications from a wide range of individuals, including those with criminal convictions. Ensis Solutions is committed to the equality of opportunity and selects individuals based on their skills, qualifications and experience, and not on their background or personal circumstances. Having a criminal conviction will not necessarily prevent someone from studying at Ensis Solutions.

Ensis Solutions is mindful, however, of the duty of care it owes to its learners, staff and the wider community to act reasonably to protect their health, safety and welfare. As a consequence, Ensis Solutions requires all applicants to disclose any criminal convictions on application and re-enrolment. If a criminal conviction is disclosed or otherwise brought to our attention, Ensis Solutions will work with that person to determine the level of risk posed by the conviction to both the individual and/or to others. The individual will be required to complete a safeguarding risk assessment, providing Ensis Solutions with further information about the offence and contact details for any relevant third party e.g. a Probation Officer.

The information given on the Disclosure Form will then be used to assess whether there is any risk posed should the individual enrol on a course at Ensis Solutions. An interview must take place with a member of the Safeguarding Team prior to enrolment to approve the application and sign the enrolment form. Where medium/high risk has been identified, this will be referred to the Senior Leadership Team to review, and enrolment deferred until a decision is reached.

## Protecting young people and vulnerable adults

Ensis Solutions recognises that the term ‘abuse’ includes physical abuse, emotional abuse (including domestic abuse), sexual abuse, financial abuse, neglect, harm, and failing to act to prevent harm. Ensis Solutions will take safeguarding legislation into account when determining safeguarding provision; we have a legal obligation to protect young people and vulnerable adults from abuse. Ensis Solutions will ensure that disclosures made by learners are dealt with quickly and appropriately. All staff will be trained in the appropriate response to learner disclosure and in the correct procedure for dealing with concerns about a learner. We will work with learners to proactively protect them from abuse and to prevent learners being placed in an abusive situation.

Our commitment to the protection of young people and vulnerable adults is enshrined within all sections of this Ensis Solutions Safeguarding Documentation.

### **Learners with Special Educational Needs and Disabilities**

All staff need to be aware that additional barriers can exist when recognising abuse and neglect in learners with special educational needs (SEN) and disabilities. This can include: Safeguarding/Prevent Duty Policy and Procedures.

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner’s disability without further exploration
- Learners with SEN and disabilities can be disproportionately impacted by issues such as bullying without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers, Staff should refer to the learner’s Education, Health Care Plan (EHCP). This will provide additional guidance specific to the learner’s support needs.

Ensis Solutions recognises that Safeguarding is not just about protecting learners from deliberate harm, neglect, and failure to act. It relates to the broader aspects of care and education and the following procedures should be read in conjunction with this policy:

- Health and Safety Welfare Policy
- Staffing and Recruitment Appointment Policy and Guidelines
- Code of Conduct for All Staff
- Learner Behaviour Policy
- External Speakers and Events Policy
- Education, Health and Care Plan

# Governance and Reporting

Ensis Solutions will establish a safeguarding steering group to oversee its work in this area. The steering group will be chaired by the Safeguarding Lead and will meet quarterly.

The Ensis Solutions Safeguarding Lead will review safeguarding quarterly; at this review progress against Ensis Solutions action plan for safeguarding, as well as reviewing anonymous reports of safeguarding incidents will take place. It will also incorporate information on equality, diversity and inclusion.

## Key Responsibilities

**Safeguarding Lead** - will have overall responsibility for ensuring that Ensis Solutions meets its safeguarding obligations. They will be responsible for the approval of relevant safeguarding policies and procedures. They will also take responsibility for ensuring that all staff understands safeguarding, and that safeguarding is given high priority within the business.

**The Senior Designated Person (for abuse disclosures)** – is Stuart Crosby. They will be responsible for ensuring that processes and procedures for the protection of young people and vulnerable adults are robust and are consistently applied, and that Ensis Solutions fulfils its legal duties, as enshrined within appropriate legislation.

**All employees** - have a responsibility for completing their training and for familiarising themselves with the appropriate safeguarding policies and procedures. They also have responsibility for ensuring that they understand their own role in the promotion of safeguarding, as well as the appropriate action to take should they receive an abuse disclosure. All staff will take part in Safeguarding training annually as part of Ensis Mandatory training requirements.

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES

# Guidance to Responding to Suspicion/ Evidence/ Disclosure of Abuse

## The Context of Abuse

Ensis Solutions acknowledges that:

- People of all ages and from **all backgrounds** can be abused
- Abuse occurs in varied settings, including via **social media** (e.g. Twitter)
- Young people and vulnerable adults can be **perpetrators** of abuse as well as victims
- Young people and vulnerable adults **do not always recognise abuse** as abuse
- All abuse disclosures to staff must be initially **treated as genuine**

Ensis Solutions recognises different categories of abuse:

- **Physical abuse** (including spitting, hitting and kicking)
- **Emotional abuse** (including domestic abuse, e.g. controlling spouse's mobile phone use)
- **Sexual abuse** (including engaging under-18s in the pornography industry)
- **Financial abuse** (including threats from a 'loan shark')
- **Neglect** (including failure to provide food and shelter)
- **Harm** (including preventing someone from accessing education)
- **Failing to act to prevent harm** (including condoning harassment)

Safeguarding is everyone's responsibility. Every member of staff has a responsibility to act as follows:

## Suspicion of Abuse

Staff must report any suspicions of abuse within two hours to the Safeguarding Officer Ensis Solutions by phone. NB If a 999 call is necessary e.g., due to serious head injuries, obviously ring 999 first.

The safeguarding designated officer is: <b>Zoe Dawson:</b> Enrolment Officer	The safeguarding designated lead is: <b>Stuart Crosby:</b> Director (Senior Leadership Team)
Contact Details are: <b>Zoe Dawson</b> <b>Mobile:</b> 07395 361865 <b>Direct Dial:</b> 01942 265859 <b>Email:</b> <a href="mailto:zoe@ensissolutions.co.uk">zoe@ensissolutions.co.uk</a>	Contact Details are: <b>Stuart Crosby</b> <b>Mobile:</b> 07775956725 <b>Direct Dial:</b> 01942 265859 <b>Email:</b> <a href="mailto:stuart@ensissolutions.co.uk">stuart@ensissolutions.co.uk</a>

**Do not contact the parent/carer/family member unless** advised to do so by a Director from Ensis Solutions. Doing so could enhance the risk to the young person/vulnerable adult and/or jeopardise subsequent investigation/court proceedings.

Ensis Solutions recognises that a combination of the following\* **might indicate that abuse has taken/is taking place:**

- Anger/aggression
- Change in personality (e.g., motivation significantly decreases)
- Dishevelled appearance (e.g., unclean-smelling clothes or ceasing to brush hair)
- Drug/alcohol use
- Early/late arrival or departure
- Expensive possessions (i.e., bribes from perpetrator/s of abuse)
- Flinching (e.g., at loud noises or sudden movements)
- Frequent breaks to visit toilet/use phone
- Homelessness/impending homelessness
- Injuries not seen but mentioned
- Loss of appetite/change in eating patterns
- Memory blanks
- Pregnancy
- Sleeping in the day/drowsiness
- STIs (Sexually Transmitted Infections)
- Taking pain killers
- Tearfulness
- Unauthorised absence
- Very low/very high BMI
- Visible injuries
- Withdrawal (e.g., from other learners)

*\* Clearly, many of these factors can be present without abuse having occurred. However, staff must always avoid assumptions such as 's/he does not seem the type to be abused'.*

## Allegations of abuse made against other young people/Venerable Adults

Staff must recognise that young people and adults are capable of abusing their peers and be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Peer-on-peer abuse is abuse people may experience from their peers (people of their own or similar age) perpetrated by a young person/s (under the age of 18 years)/vulnerable adult/s on young person/s/vulnerable adult/s.

Staff need to be aware that abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Ensis Solutions will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns, directly to a Personal Tutor or to the Safeguarding Team.

Peer- on-peer abuse can take the form of bullying (including cyber-bullying) sexting and any other form of sexual or physical abuse. Gender based issues can also occur for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

## Concerns about another Staff Member

It is recognised that sometimes allegations may involve a member of Ensis Solutions staff. In these circumstances the allegation must be reported directly to the Safeguarding Lead.

In the absence of the Safeguarding Lead, or if the allegation concerns the Safeguarding Lead, another member of the Senior Leadership Team must be informed. On receipt of such an allegation, Ensis Solutions' disciplinary procedures relating to allegations of abuse will be followed.

## Concerns about Safeguarding Practices

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the Ensis Solutions' safeguarding practices and that such concerns would be taken seriously by the Management and Leadership Team.

If staff members have any concerns about the safeguarding regime, they should raise this initially with their Line Manager. If no immediate action is taken, then appropriate Whistleblowing Procedures are in place for such concerns to be raised with the Management and Leadership Team.

Where a staff member feels unable to raise an issue within Ensis Solutions or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

General guidance can be found using the following methods:

**NSPCC** - The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**ESFA** - <https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures>

**Speak Up Direct:** Speak Up Direct offers free, independent, confidential advice on the speaking up process.

Telephone: 08000 724 725

Website: [speakup.direct](http://speakup.direct)

**Protect:** Protect is a charity that provides free, legal, and confidential whistleblowing advice to people who are concerned about wrongdoing at work and not sure whether, or how, to raise their concern.

Telephone: 020 3117 2520

Email: [info@protect-advice.org.uk](mailto:info@protect-advice.org.uk)

Website: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

## Evidence of Abuse

If you witness a young person/vulnerable adult being abused, only intervene if you do not put yourself/others at risk in doing so. If you can speak to the victim afterwards, reassure them that their safety and wellbeing is your priority. Do not put yourself/others at risk afterwards by criticising the abuser, either directly or to the victim.



Staff must report any observed abuse within two hours to the safeguarding officer by phone. NB If a 999 call is necessary e.g., due to serious head injuries, obviously ring 999 first.

**Do not contact the parent/carer/family member unless** advised to do so by a Director from Ensis Solutions. Doing so could enhance the risk to the young person/vulnerable adult and/or jeopardise subsequent investigation/court proceedings.

## Types and Signs of Abuse

**Abuse** - may be physical, sexual, or emotional abuse, or neglect.

**Significant harm** - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar learner)

**Physical abuse** - actual or likely physical injury to a young/ vulnerable learner, or failure to prevent injury. This 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 feigns symptoms of, or deliberately causes, ill health to a young/ vulnerable learner they are looking after. This form of physical harm is recognised as Fabricated or Induced Illness.

**Sexual abuse** - actual or likely sexual exploitation of a young/ vulnerable learner, including prostitution. Involving forcing or enticing a young/ vulnerable learner to take part in sexual activities without their consent or understanding. The activities may involve physical contact including penetration or non- penetrative acts. For example, it may also include involving the young/ vulnerable learner looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the victim to behave in sexually inappropriate ways. Can include grooming a vulnerable learner in preparation for abuse.

**Emotional abuse** - emotional abuse is the persistent emotional ill treatment of a young/ vulnerable learner with the intent to cause severe and persistent adverse effects on the victim's emotional development. It may involve conveying to the victim that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Age or developmentally inappropriate expectations being imposed on a young or vulnerable learner, causing them frequently to feel frightened, or the exploitation or corruption of young/ vulnerable learners will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction.

It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. It may include not giving the young/ vulnerable learner opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

**Grooming** - Grooming is "a process by which a person prepares a child, significant adults and the environment for the abuse of the child" (Craven, 2006). Grooming can happen anywhere, including online, in organisations and in public spaces (also known as street grooming) (McAlinden, 2012).

Children and young people can be groomed by a stranger or by someone they know – such as a family member, friend or professional. The age gap between a child and their groomer can be relatively small (NSPCC and O2, 2016).

Grooming techniques can be used to prepare children for sexual abuse and exploitation, radicalisation (Department for Education (DfE), 2017) and criminal exploitation (All Party Parliamentary Group for Runaway and Missing Children and Adults, 2017).

A groomer hides their true intentions and over time “gains the child’s trust and confidence” to abuse them (Sexual Offences Act 2003: explanatory notes). They may work to gain the trust of a whole family, to allow them to be left alone with a child. If they work with children, they may use similar tactics with their colleagues.

The online grooming process can be much quicker than offline grooming (CEOP, 2013). There’s evidence that some online grooming chats can develop in less than 20 minutes (Lorenzo-Dus and Izura, 2017).

Groomers gain trust by pretending to be someone they’re not, for example saying they are the same age as the child online, offering advice or understanding, buying gifts, giving the child attention, using their professional position or reputation, taking the child on trips, outings or holidays.

**Neglect** - neglect is the persistent failure to meet a vulnerable learner’s basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting a vulnerable learner from emotional harm or danger.

**Peer-on-peer abuse** – Peer-on-peer abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. It is behaviour that intentionally hurts another individual or group either physically or emotionally. It is more likely that females will be victims and males’ perpetrators, but all peer-on-peer abuse is unacceptable and will be taken seriously.

It can take many forms including serious bullying (including cyberbullying), up-skirting, relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person’s race, religion, gender, sexual orientation, special educational needs or disabilities; or where a young/ vulnerable person is adopted or in care, has caring responsibilities, is suffering from a health problem, is frequently on the move (e.g. those from military families or the travelling community), is experiencing a personal or family crisis, has actual or perceived differences, (e.g. physical or cultural differences).

**Risks/ abuse related to family/cultural belief/ faith** - It is important to remember that many young/ vulnerable learners are a part of a family. Some families have certain values and beliefs that can cause harm to a young/ vulnerable learner. An example of this can include strong beliefs or a sense of honour

or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women to get the help they need. Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem. In extreme cases the young/ vulnerable person who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The young/ vulnerable person can be physically and emotionally abused to exorcise the spirit.

**Bullying and Harassment** - Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way.

- Anti-Bullying Alliance: <http://www.anti-bullyingalliance.org.uk/>
- Equality and Human Rights Commission <https://www.equalityhumanrights.com/en>
- ACAS Helpline <http://www.acas.org.uk/index.aspx?articleid=2042>
- Family Lives: <http://familylives.org.uk/>
- National Society for the Prevention of Cruelty to Children (NSPCC): <http://www.nspcc.org.uk/>
- ChildLine: <http://www.childline.org.uk/Pages/Home.aspx>
- Kidscape: <http://www.kidscape.org.uk/>

**Cuckooing** - Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person to use it as a base for drug dealing. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism. Once they gain control, gangs move in with the risk of domestic abuse, sexual exploitation, and violence. Children as well as adults are used as drug runners.

It's common for gangs to have access to several addresses. They move quickly between vulnerable people's homes for just a few hours, a couple of days or sometimes longer. This helps gangs evade detection.

These gangs may use accommodation in rural areas, including serviced apartments, holiday lets, budget hotels and caravan parks.

Some vulnerable adults may be forced to leave their homes, making themselves homeless and leaving the gangs free to sell drugs in their absence.

If you have any information, you can contact the independent crime-fighting charity Crime stoppers anonymously on 0800 555 111 or through their anonymous online form at: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org).

**Cyber Bullying and E-Safety** - The safe and responsible use of technology is sometimes presented as primarily a young/ vulnerable learner protection issue, but all ages need support to keep themselves safe online. The risks associated with the use of technology are vast and include internet, text or video messaging, email, chatrooms, social media networking sites, etc. used to embarrass, humiliate, threaten, intimidate, or bully an individual in an attempt to gain power and control over them. Other risks include the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

**Domestic Violence** - can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence. Some young/ vulnerable learners may experience issues with drugs or alcohol to self-medicate or via dependence.

**Female Genital Mutilation (FGM)** - Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that females 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. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a female under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a female under 18 and they have no reason to believe that the act was necessary for the female's physical or mental health or for purpose with labour or birth.

For the purposes of the duty, the relevant age is the female's age at the time of disclosure/identification of FGM (i.e., it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

You can access help and support anonymously from the NSPCC FGM Helpline on 0800 028 3550 or email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

**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. 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 to accept the arrangement remains with the young/ vulnerable person.

Read the handbook about being a survivor of forced marriage available at: <https://www.gov.uk/government/publications/survivors-handbook>. It has details of organisations that can give you help and advice. Get support if you're a victim of forced marriage in Scotland: <https://www.mygov.scot/forced-marriage/get-support/>

**Initiation/Hazing** - Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

Hazing is seen in many different types of social groups, including gangs, sports teams and school groups. The initiation rites can range from relatively benign pranks, to protracted patterns of

behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

**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.

**Racist Abuse/Bullying** - Racism is where someone thinks you're inferior because of your colour, ethnicity, nationality or race. This can result in them treating you differently or unfairly, this is called racial discrimination.

Racial bullying is a type of racism where someone's bullying focuses on your race, ethnicity or culture. Racism and racial bullying are wrong and you can get help to make it stop. Racism and racist bullying can include:

- being called racist names or being sent insulting messages or threats
- having your belongings damaged or having to see racist graffiti
- personal attacks, including violence or assault
- being left out, treated differently, or excluded
- people making assumptions about you because of your colour, race or culture
- being made to feel like you have to change how you look
- racist jokes, including jokes about your colour, nationality race or culture.

Racism can affect anyone. It can make you feel like you're not important or don't fit in. You might feel upset, depressed, or angry. You can be affected by it even when it's not aimed at you, like if you hear someone discriminating against someone's culture.

**Risk to self and/or others** - This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include young/vulnerable learners. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

**Serious Crime** - Serious and organised crime includes drug trafficking, human trafficking, organised illegal immigration, child sexual exploitation, high value fraud and other financial crime, counterfeiting, organised acquisitive crime and cyber-crime.

**Sexual Harassment/Violence** – This is split into 3 key areas outlined below:

- **Sexual violence** – The Sexual Offences Act (2003) sets the sexual violence crimes as follows:
  - Rape is intentional penetration by the abuser with their penis without consent and there is no reasonable belief that the victim consents
  - Assault by penetration is intentional sexual penetration by the abuser with any part of their body other than a penis without consent and there is no reasonable belief that the victim consents

- Intentional sexual touching of the victim by the abuser without consent and there is no reasonable belief that the victim consents
- **Sexual harassment** – This can occur between children, online or offline and 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: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature
- **Online sexual harassment** includes non-consensual sharing of sexual images or videos, sexualised online bullying, unwanted sexual comments or messages, sexual exploitation, coercion, and threats.
- **Harmful sexual behaviour** – Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two.

**Sexual orientation and transgender identity hate crime** - If someone has been violent or hostile towards you because of your sexual orientation, this is known as a homophobic hate incident.

Hostile or violent incidents because of your transgender identity are known as transphobic hate incidents.

Something is a homophobic or transphobic hate incident if the victim or anyone else thinks it was carried out because of hostility or prejudice based on sexual orientation or transgender identity.

This means that if you believe something is a hate incident, it should be recorded as this by the person you are reporting it to. Sexual orientation and transgender identity refer to people who are lesbian, gay, bisexual and trans (LGBT).

Anyone can be the victim of a homophobic or transphobic hate incident. You can be the victim of a homophobic or transphobic hate incident if someone believes you’re a LGBT person even though you’re not. You can also be the victim of a hate incident because of your association with members of the LGBT communities.

Homophobic and transphobic hate incidents can take many forms including: verbal and physical abuse, physical violence, teasing, bullying, threatening behaviour, online abuse, damage to property.

It can be a one-off incident or part of an ongoing campaign of harassment or intimidation.

Hate incidents are not only carried out by strangers. It could be carried out by a carer, a neighbour, a teacher, or someone you consider a friend.

**Sexting** - This is when someone sends or receives a sexually explicit text, image or video. This includes sending ‘nude pics’ or ‘rude pics’ or ‘nude selfies’. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young/ vulnerable people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003.

Any direct disclosure by a learner (male or female) will be taken very seriously. A learner who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort, and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, we will follow the guidance as set out in the UKCCIS publication *Sexting in Schools and Colleges: Responding to incidents and safeguarding young/ vulnerable people*.

**Upskirting** - Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales. It can take place in a range of places, e.g., British Transport Police have seen a rise of reports on public transport. The law captures instances where the purpose of the behaviour is to obtain sexual gratification or to cause humiliation, distress, or alarm. Perpetrators will now face two years in prison with the most serious offenders being placed on the sex offenders' register. Criminalising this distressing practice aims to deter people from committing the crime.

## Disclosure of Abuse

Ensis Solutions recognises that an abuse disclosure can occur within a general wellbeing conversation initiated by a member of staff (e.g., following a period of absence). It also acknowledges that an abuse disclosure can arise 'unprompted' in any situation and to any member of staff.

With regard to an abuse disclosure, all staff should follow the '**Five Rs**' guidance below:

### RECOGNISE

NB If a 999 call is necessary e.g., due to serious head injuries, obviously phone 999.

If an abuse disclosure is being made to you, recognise it as such. Treat it as a truthful. Make it your priority above all other professional commitments that day.

### RESPOND

Throughout the abuse disclosure, be aware of your own safety. Take appropriate action (e.g., cease conversation and seek assistance from colleague) if your safety is at risk.

- Listen
- Appear calm
- Maintain approachable body language
- If appropriate, establish whether others (e.g. siblings) could have been/are at risk
- Explain that you cannot keep information about abuse, harm or neglect confidential, and that the Wellbeing Manager will handle the information very sensitively



- Avoid criticising the alleged abuser (e.g. 'I think your Mum should feel ashamed')
- Avoid stating assumptions (e.g. 'I know your old boss will go to prison for this')
- Avoid leading questions (e.g. 'I bet your grandfather gave you the black eye, didn't he?'). These could jeopardise subsequent investigation/court proceedings
- Avoid investigating (e.g. 'I'll ask your aunt whether she saw anything when she picks you up'). This could jeopardise subsequent investigation/court proceedings
- Examples of NON-leading/NON-investigative questions (i.e. good practice) include 'I'd like to check if there's anything else that you want to explain' and 'I'll give you a few minutes to think about whether you've said everything relevant'

When the disclosure has finished, explain that:

- Ensis Solutions priorities safety and wellbeing
- You are taking the information very seriously
- S/he has done the right thing in talking to you
- S/he will get feedback ASAP about which actions, if any, are being taken
- You will arrange a drink and some privacy/company for them, if appropriate

It is vital to avoid guarantees such as 'I'll stay involved every step of the way' and 'I promise you that everything will be alright now'. These statements are open to misinterpretation and could cause the complainant considerable distress in future weeks.

## REPORT

Staff must report any abuse disclosure within two hours to a Director from Ensis Solutions by phone. NB If a 999 call is necessary e.g., due to serious head injuries, obviously ring 999 first.

**Do not contact the parent/carer/family member unless** advised to do so by a Director from Ensis Solutions. Doing so could enhance the risk to the young person/vulnerable adult and/or jeopardise subsequent investigation/court proceedings.

If the disclosure happens out of normal working hours (08.30 till 17.30, Mon – Fri) and a Director is not available, contact the NSPCC on 0808 800 5000. Inform a Director from Ensis Solutions by phone that you have done so first thing the next working day.

## RECORD

If you can access the **Ensis Solutions ABUSE DISCLOSURE FORM** (section 3 of this Ensis Solutions Safeguarding Documentation), fill it in **in black pen** immediately.

If you cannot access the above form, instead make notes **on paper**. These notes should:

- Be handwritten in black pen
- Mention where disclosure took place and if anyone else was present (e.g. colleague)
- State name of complainant and, if different, name/s of alleged victim/s
- Include nature of alleged abuse: dates, times, names and locations where possible
- Mention all information given, even if it some might seem irrelevant
- Use complainant's own words, even if their language is offensive (e.g. sexually explicit/racist) or seems incorrect (e.g. 'I drove from London to Edinburgh in two hours')

After filling in the form above/writing notes on paper, **ensure that the documentation is:**

1. Signed, with your full name also printed clearly
2. Dated
3. Witnessed by a colleague (only if possible and appropriate)
4. Placed in a sealed envelope marked 'confidential'
5. Locked somewhere which is secure and accessible later that day/in the near future

## REFER

**Only a Director from Ensis Solutions can refer abuse disclosures to external agencies/individuals** (including Local Authority Designated Officers, Multi-Agency Safeguarding Hubs, Local Safeguarding Children Boards and mental health crisis services).

*NB the following four safeguarding documents are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES

## MASH Referrals

MASH provides triage and multi-agency assessment of safeguarding concerns - in respect of vulnerable children and adults. It brings together professionals from a range of agencies into an integrated multi-agency team.

MASH stands for multi-agency safeguarding hub which seeks to enable the sharing of information so risks to vulnerable children and adults can be identified at an early stage. It is a link between universal services such as schools and GPs and statutory services such as police and social care.

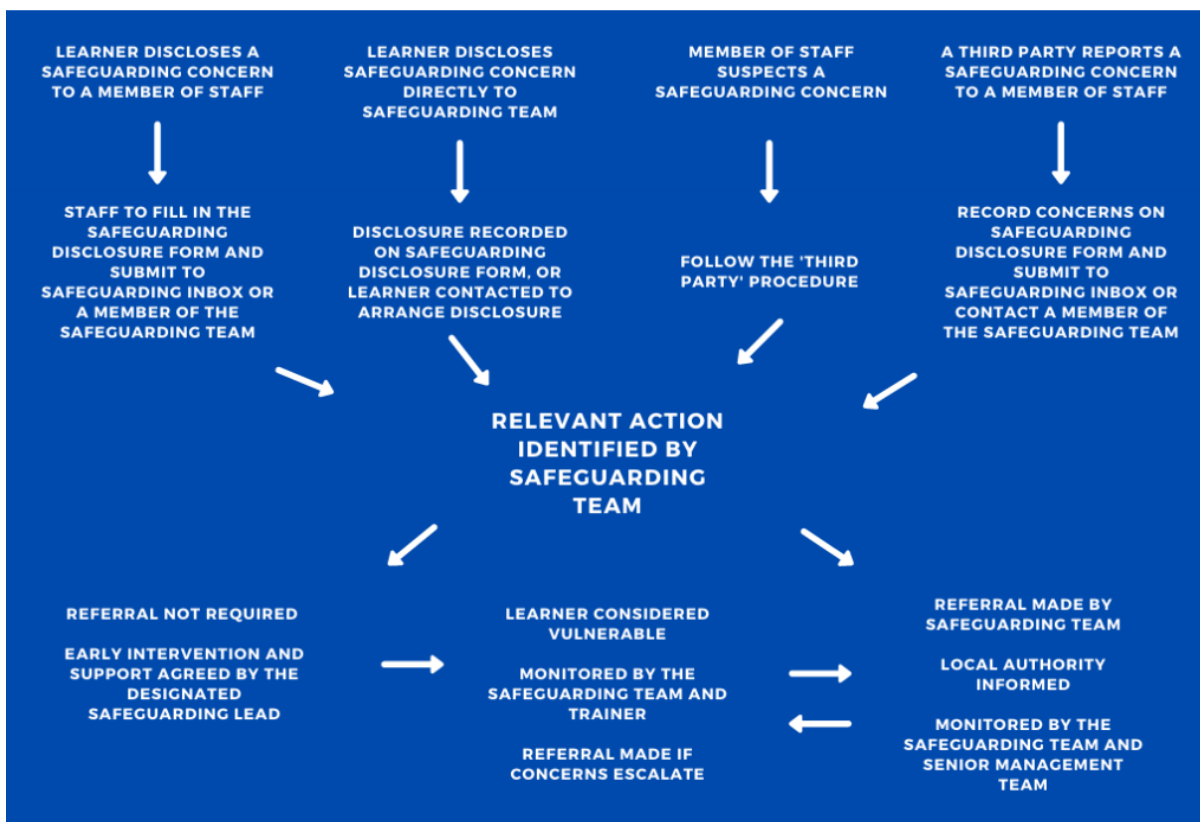
Speak to the Ensis Safeguarding designated officer in the first instance (see contact details below). If a MASH referral is required, the Safeguarding Officer will make contact with the relevant local authority MASH unit.

The safeguarding designated officer is: <b>Zoe Dawson</b>	The safeguarding designated lead is: <b>Stuart Crosby:</b> Director (Senior Leadership Team)	The deputy safeguarding lead is: <b>Emma Harding:</b> Quality & Curriculum manager
Contact Details are: <b>Zoe Dawson</b> <b>Mobile:</b> 07395361865 <b>Direct Dial:</b> 01942 265859 <b>Email:</b> <a href="mailto:zoe@ensissolutions.co.uk">zoe@ensissolutions.co.uk</a>	Contact Details are: <b>Stuart Crosby</b> <b>Mobile:</b> 07775956725 <b>Direct Dial:</b> 01942 265859 <b>Email:</b> <a href="mailto:stuart@ensissolutions.co.uk">stuart@ensissolutions.co.uk</a>	Contact Details are: <b>Emma Harding</b> <b>Mobile:</b> 07387110274 <b>Direct Dial:</b> 01942 265859 <b>Email:</b> <a href="mailto:emma@ensissolutions.co.uk">emma@ensissolutions.co.uk</a>

**Address:**

Oakland House  
 21 Hope Carr Road  
 Leigh  
 Lancashire  
 WN7 3ET

**Safeguarding Learners Procedure Flow Diagram**



**Covid-19 Arrangements**

Safeguarding arrangements around the covid-19 pandemic are constantly monitored and adjusted in relation to government advice and guidance relating to the pandemic. Staff are briefed and updated in response to any government updates. Learners and employers are informed of any changes to delivery.

Ensis Solutions has adapted its delivery methods to the covid-19 pandemic by using video conferencing technology and platforms such as Microsoft Teams and Zoom to complete learning sessions with our learners. This is especially significant during national lockdown periods. The process ensures regular contact with our learners to progress and develop their learning and checks on wider learning such as safeguarding and mental health and wellbeing. Video conferencing allows the learners and trainers not just to hear, but also see each other and fully engage in learning in the same way that they would do during a face-to-face visit.

# Safe Working Practices

## Definitions

**Young person:** Anyone aged under 18.

**Vulnerable adult:** Anyone aged 18 or over in receipt of provision from a Social Care worker and/or assistance with certain types of:

- health care (including mental health care)
- financial management
- personal care
- general household matters
- conduct of own affairs

The above takes into account changes made to the 'Safeguarding Vulnerable Groups Act 2006' by the 'Protection of Freedoms Act 2012'. Ensis Solutions respects learners' right to privacy; we encourage learners (e.g., at initial interview) to declare information about external support that they receive and to seek internal support. We acknowledge however that certain individuals might not do so. Ensis Solutions thus recognises that it is not possible to identify definitively all the vulnerable adults within our 18+ cohort.

This guidance:

- Protects young people and vulnerable adults
- Allows staff to safeguard against malicious or misplaced abuse allegations
- Cannot cover all eventualities. Ensis staff must take responsibility for avoiding actions which would **lead any reasonable person to question their motives and intent**

## Reporting Incidents/Concerns

Always inform a Director from Ensis Solutions in the following situations:

- An **abuse disclosure** occurs, or you suspect/have evidence of abuse. In these cases, refer to sections 2 and 3 of this Ensis Safeguarding Documentation
- A learner seems very **distressed**, and you cannot identify why
- **First aid** is performed on a learner, or a learner is **restrained** in self-defence
- A learner is accidentally or deliberately **hurt** by a staff member/another learner
- A learner significantly **misunderstands or misinterprets** something that a staff member/another learner has said
- A learner/staff member is/appears to be **sexually aroused** by a learner/staff member

## Photographing, Videoing and Filming

- **Written permission** must be obtained from learners (or, if under 18, their parent/carer) if photographs, videos, films etc are taken in the promotion of Ensis Solutions activities. Learners (or,

if under 18, their parent/carer) should be comprehensively informed of how and why any images of them might/will be used.

## Working alone with a Young Person/Vulnerable Adult

If working one-to-one with a young person/vulnerable adult is necessary within your job role:

- Use an area **visible to colleagues** (e.g. within open view on a building site or via CCTV). Inform a colleague where/why you are there. If working in a room, ensure that there is a glass-fronted door and/or that you leave the door partially open.
- Never meet him/her in a **non-workplace setting**, unless this has been approved by a Senior Manager from Ensis Solutions.
- Plan ahead – find out at which periods employer sites/training centres have a **decreased staff presence** (e.g. due to annual leave).

## Young Persons/Vulnerable Adults working without Supervision

- Avoid allowing learners to **work unsupervised** where possible. If necessary, arrange contingency plans (e.g., ask colleagues to check learner safety at regular intervals, or supervise by CCTV).

## Professional Boundaries with Learners

The following applies to current learners. Ensis Solutions cannot stipulate how staff should interact with previous learners. However, Ensis Solutions does advise keeping a professional distance from previous learners (especially from those who were under 18 whilst learners).

DO:

- DO tell your line manager if you have **personal relationships** with learners that existed prior to their applying to Ensis Solutions (e.g. your son/girlfriend/tennis partner).
- DO be alert to the possibility of a learner misinterpreting your words and actions because s/he is **romantically/sexually attracted** to you, is **emotionally dependent** on you, or views you as a **friend**.
- DO take advice if a learner seems to view you in a **romantic/sexual/emotionally dependent** way, or as a **friend**.
- DO treat learners consistently, to **avoid displaying favouritism**.
- DO **maintain appropriate dress** (e.g., ensure that your underwear is not visible, and cover your stomach, back and upper thighs).
- DO **challenge learners who dress inappropriately** (lack of safety clothing, outfit which displays inappropriate body parts such as excessive cleavage, offensive logo etc).
- DO confirm that every room is empty of learners with a **visual check** if locking up (a learner could be asleep, have headphones in, have a hearing impairment etc).

DO NOT:

- DO NOT **transport learners** in a vehicle (your own or otherwise) unless agreed by a Director of Ensis Solutions.
- DO NOT give your **personal mobile number or personal email address** to learners. If giving your ES phone number to learners, clarify that this is your work number.
- DO NOT give your **personal address** to learners.

- DO NOT engage with learners via **social media** (Facebook, Twitter etc) unless through an ES profile which has been approved.
- DO NOT take part in **late night/weekend phone or email conversation** with learners as your actions could be misconstrued.
- DO NOT contact learners **outside the remit of your role** within the organisation.
- DO NOT initiate or pursue **friendships or romantic/sexual/emotionally dependent relationships** with learners.
- DO NOT have **physical contact** such as hugging or back-slapping with learners. Physical contact that can be appropriate in context includes handshaking, administering first aid, and acting in self-defence.
- DO NOT condone learners touching anyone/themselves in a **sexual manner**.
- DO NOT do things of a **personal nature** for learners (e.g., accompanying them to buy clothing for an interview).
- DO NOT **lend** your own money to, or **borrow** from, learners. In an emergency, moneylending can be approved by a Director of Ensis Solutions.
- DO NOT accept **personal gifts** from learners.
- DO NOT give gifts to learners.
- DO NOT use **unprofessional language** in the presence of learners (e.g., homophobic terms or sexual swear words).
- DO NOT condone **learners' use of unprofessional language** (e.g., homophobic terms or sexual swear words).
- DO NOT condone illegal/dangerous activity (speeding, cannabis use etc) e.g., by failing to challenge learner conversations in which such activity seems accepted.
- DO NOT **deliberately socialise** with learners in any out-of-hours setting. If you unexpectedly see a learner during non-working hours (e.g., in the supermarket) maintain a civil professional relationship - for example do not go for a coffee together. Take guidance concerning pre-existing social arrangements with learners that you wish to continue, e.g., you both play for the same cricket team.
- DO NOT overlook the presence of any learners **aged under 18 in the same bar/pub/club as you**. Explain to them that this puts you in an uncomfortable position due to your duty of care. Encourage them to leave, explaining that you will need to notify the bar staff if they do not.
- DO NOT stay in a bar/pub/club where you unexpectedly meet learners aged 18+, where practical. This is in order to **protect yourself** (e.g., from photos of you being displayed via social media without your consent).
- DO NOT discuss **inappropriate/over-personal aspects of your life** with learners, e.g. 'I'm hungover today' or 'I'm upset that my girlfriend doesn't show me affection'.
- DO NOT **damage your reputation** as a professional working with young people. Think carefully about which lifestyle information you place in the public eye (e.g., via Facebook, magazine articles, TV documentaries etc). Be equally mindful of how friends, relatives etc portray you in the public eye.
- DO NOT condone non-constructive and negative comments made by learners **about a colleague** (e.g., 'I hate her haircut').

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM

#### 4. SAFE WORKING PRACTICES

## Further Information

### **National Society for the Prevention of Cruelty to Children (NSPCC)**

FGM Helpline

0800 028 3550

[fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

### **Home Office FGM Unit**

[FGMEnquiries@homeoffice.gsi.gov.uk](mailto:FGMEnquiries@homeoffice.gsi.gov.uk)

### **Metropolitan Police**

Child Abuse Investigation

Command/Project Azure

020 7161 2888

### **Foundation for Women's Health**

Research & Development (FORWARD)

[www.forwarduk.org.uk](http://www.forwarduk.org.uk)

020 8960 4000

Safeguarding Adults, NHS England

<https://www.england.nhs.uk/safeguarding/nhs-england-safeguarding-app/>

### **Childline**

[www.childline.org.uk](http://www.childline.org.uk)

0800 1111 (24 hr free helpline for children)

If you are abroad and require help or advice, please call the Foreign and Commonwealth Office on +44 (0) 20 7008 1500.

Name: Stuart Crosby



Position: Director

Signature: S Crosby (signed electronically)

## Ensis Abuse Disclosure Form

Complete in black pen after speaking to a Director from Ensis Solutions after completion, place in a sealed envelope marked 'confidential' lock envelope in drawer (that is secure and accessible by key)

<b>Date of Disclosure:</b>		<b>Time of Disclosure:</b>	
<b>Location of Disclosure:</b>			
<b>Your Name (person reporting):</b>			
<b>Your job role (person reporting):</b>			
<b>Details of colleagues or additional persons present during the disclosure:</b>			
<b>Your Signature:</b>		<b>Date of Signature:</b>	
Signature of Witness if advised to sign by the Safeguarding Lead:			

<b>Name of person for the disclosure:</b>			
<b>Status of person for the disclosure</b> (learner, sibling, staff):			
<b>Employer or Cohort if relevant:</b>			
<b>Date of Birth:</b>		<b>Phone Number:</b>	
<b>Email Address:</b>			
<b>Home Address:</b>			
<b>Name/Contact Details/Relationship of Emergency Contact:</b>			

<b>If different from alleged victims Name/Contact Details/Relationship who made the abuse disclosure:</b>	
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**ACCOUNT OF DISCLOSURE (CONTINUED OVERLEAF):**

- state context of disclosure (e.g. learner review)
- where provided, give dates, times, names and locations
- if known, mention whether alleged victim lives with under-18s
- mention all details, even those which might seem irrelevant
- use complainant's own words, even if language is offensive or grammatically inaccurate

- account of disclosure CONTINUED. nb write 'N/A' IF EXTRA lines NOT USED.

If the disclosure happens out of hours ( working hours 08.30 till 17.30, Mon – Fri) and an Ensis Solutions Director could not be contacted, contact the NSPCC on 0808 800 5000. Inform an Ensis Solutions Director by phone that you have done so first thing the next working day.

<b>Ensis Director first contacted about the disclosure:</b>	
<b>Date and time of contact:</b>	

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES