

Policy on Safeguarding Young People and Adults at Risk

Lomax Training Services Limited is committed to safeguarding and promoting the welfare of children and young people, as well as vulnerable adults, and expects all staff to share this commitment.

We will consider any request for this policy to be made available in an alternative format.

We review our policies regularly to update them and to ensure that they are accessible and fair to all. All policies are subject to equality regular review. Reviews are carried out to see whether the policy has, or is likely to have, a different impact on grounds of race, gender, disability, age, religion, sexual orientation, or human rights.

We are always keen to hear from anyone who wants to contribute to these reviews, and we welcome suggestions for improving the accessibility or fairness of the policy.

To make suggestions or to seek further information please contacts:

Tracey Butler, Business Development Manager
Colin Arkley, Quality Manager

Rationale

This policy applies to all learners and particularly children, young people and adults who may need support.

Lomax Training Services Limited recognises its legal duty under the Education Act 2011, Keeping Children Safe in Education (2020), Working Together to Safeguard Children Act (2018), Safeguarding Vulnerable Groups Act (2006), DfE Statutory guidance and regulations as stated by the Disclosure and Barring Service (DBS).

Lomax Training Services wants to ensure that children, young people, and adults at risk are protected from abuse. All complaints, allegations or suspicions will be taken seriously and in accordance with this policy.

Safeguarding and promoting the welfare of children, young people and adults is defined for the purposes of this Policy as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes

Under this policy the term abuse relates to the mistreatment of an individual's human and civil rights by any other person or persons Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm. For further information on what constitutes abuse please refer to Appendix A.

Lomax Training Services Limited promotes a whole organisation approach to safeguarding and consults regularly with external partners in reviewing this policy.

Key Definitions and Concept

Young People

Those under the age of 18, that is, up until his/her 18th birthday.

Young People in need of protection and early help

Lomax Training Services Limited recognises that young people could be in need because they are suffering or likely to suffer significant harm. Where the Local Authority believes a young person is at risk, they have a duty to make enquiries to decide whether action should be taken, and Lomax Training Services Limited would have a duty of care to ensure information is shared under this Policy.

Adults at Risk (formerly known as Vulnerable Adults)

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an "adult at risk" is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) the following definitions for the purpose of this policy have been used.

An individual;

- Is or may need community care services by reason of mental or other disability, age, or illness.
- Is or may be unable to take care of himself or herself.
- Is unable to protect himself or herself against significant harm or serious exploitation

Whilst not definitive, the main categories of people covered by the definition of "adult at risk" for the purpose of this policy include those who:

- Have a learning disability
- Have a physical or sensory impairment
- Have a mental illness
- Are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker)

Preventing Radicalisation and Terrorism (PREVENT)

This policy must be read in conjunction with Lomax Training Services Limited Prevent Strategy document.

Prevent is 1 of the 4 elements of CONTEST, the UK Government's counter-terrorism strategy, defined as:

'To have due regard to the need to prevent people from being drawn into terrorism'.

Stopping people becoming or supporting terrorists or violent extremism. Violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs.

An integral element of Lomax Training Services Limited Safeguarding legal responsibility to fulfil the Prevent Duty and our ethos is based on encouraging students to respect the Fundamental British Values of:

- Democracy.
- The rule of law.
- Individual liberty and mutual respect.
- Tolerance of those with different faiths and beliefs.

Lomax Training Services Limited works with the Local Authority and partners, including our Regional Prevent Lead to ensure that we are kept informed and protected from any potential risks or radicalising influences within our locality and to ensure that our staff and apprentices have the most up to date information that is available and can ensure that they have resilience to extreme influences.

All staff have undergone Prevent training and are aware of looking out for any changes in an apprentice's behaviours and fully understand how to deal with any issues which may arise and how to report these.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside of Lomax Training Services Limited and/or can occur between children, young people, and adults outside of Lomax Training Services Limited control.

All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children, young people and adults should consider whether the wider environmental factors are present in a child's, young people and adults' life that are a threat to their safety and/or welfare.

These threats can take a variety of different forms and children, young people and adults can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

Aim

This policy will enable Lomax Training Services Limited to demonstrate its commitment to keeping young people and adults at risk with whom it works safe. It should be read in conjunction with all the associated Policies and Procedures.

Lomax Training Services Limited acknowledges its duty to act appropriately and immediately to any allegations, reports or suspicions of abuse. Underpinning the aim is a series of objectives which, once achieved will demonstrate the fulfilment of the stated aim of this policy.

This policy will fulfil the stated aim by ensuring that Lomax Training Services Limited will:

- Establish a safe environment in which its learners can learn and develop.
- Ensure safe recruitment in checking the suitability of staff to work with young people and/or adults at risk.
- Develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse.
- Have a Designated Safeguarding Lead (DSL) and provide his/her name to all staff and students.
- Promote good practice and work in a way that can prevent harm, abuse and coercion occurring by providing training for all staff, and raising awareness of, safeguarding

- issues within Lomax Training Services Limited.
- Ensure that any allegations of abuse or suspicions are dealt with appropriately and immediately, and that the person experiencing abuse is supported.

Learners Entitlements

All learners are entitled to:

- Be taught in environments which are safe, conducive to learning and free from disruption or threat of harm
- Expect appropriate action from Lomax Training Services Limited to tackle any incidents of violence, threatening behaviour, abuse, discrimination, or harassment
- Have any report of safeguarding issues taken seriously by Lomax Training Services Limited and investigated/resolved as necessary.
- Be treated with respect.
- Contribute to the review of this policy.

Learner Responsibilities

Providing a safe atmosphere which enhances a learner's learning experience is a shared responsibility which also places responsibilities on learners.

Learners' entitlements are most likely to be met fully when they:

- Show respect to Lomax Training Services staff, fellow learners, property, and the environment.
- Take a positive and proactive role within the Lomax Training Services Limited and online to keep themselves and others safe.
- Follow the reasonable instructions of Lomax Training Services Limited staff and others involved with their learning.
- Report any incidents of concern (and are encouraged to do so).
- Appreciate that they are not allowed to increase safeguarding risks to themselves or others
- Adhere to Lomax Training Services Limited rules and do not contravene any aspect of the disciplinary code.
- Co-operate with, and abide by, any arrangements put in place to support their behaviour.

Staff Responsibilities

All Lomax Training Services Limited staff (including supply staff) have a responsibility to:

- Complete mandatory safeguarding training on a 3-year basis
- Complete induction where it is outlined our responsibility to ensure the health, safety, and wellbeing of our learners.
- All staff should be aware of and implement the Lomax Training Services Limited Policy and Procedure on Safeguarding Young People and Adults at Risk
- Provide a safe, secure, and supportive environment for Young People and Adults at Risk.
- Listen to Young People and Adults at Risk and respond in an appropriate way.
- Protect Young People and Adults at Risk from abuse.
- Make referrals, preferably via a Designated Safeguarding Lead, in accordance with Lomax Training Services Limited procedures.
- Whilst all staff should speak to the designated safeguarding lead (or deputy) regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on tutors. If a tutor, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18,

- the tutor must report this to the police.
- Recognise that, if at any time there is a risk of immediate serious harm to a person, a referral should be made to First Contact immediately. Anybody can make a referral. If the person's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the person at some point.
 - Undertake any additional Safeguarding training, appropriate to their role.

Management Responsibilities

The Management ensures that:

- There are effective safeguarding policies and procedures that are in line with the local authority procedures and that the policy is made available to learners or parents/carers on request.
- Lomax Training Services Limited operates safe recruitment procedures and appropriate checks are carried out on staff and volunteers who work with Young People and Adults at Risk
- A staff behaviour policy (or code of conduct) and social media policy exists and reflects key obligations of staff.
- There are procedures in place to manage safeguarding concerns, or allegations against staff that might indicate they would pose a risk of harm to learners.
- There are 2 Designated Safeguarding Leads (DSLs), including a Senior Manager who takes lead responsibility for dealing with safeguarding issues.
- Designated Safeguarding Leads undertake appropriate training.
- Colin Arkley and Tracey Butler and other staff who work with Young People and Adults at Risk undertake appropriate safeguarding training at least every 3 years.
- Lomax Training Services Limited undertakes an annual review of the Safeguarding Young People and Adults at Risk Policy and Procedures. It amends as soon as practicable any risk in arrangements as these are brought to its attention.
- The managing director takes responsibility for liaising with the local authority and/or partner agencies in the event of an allegation of abuse being made against Colin Arkley or Tracey Butler.

The Managing Director ensures that:

- The policies and procedures adopted by the Lomax Training Services Limited are implemented and followed by staff.
- Sufficient resources and time are allocated to the Designated Safeguarding Lead to discharge their responsibilities;
- All staff feel able to raise concerns about poor or unsafe practice with regards to Young People and Adults at Risk and that such concerns are addressed sensitively and effectively.
- Cases are reported to the Secretary of State if a person ceases to work in education and there are grounds for believing that s(he) may be unsuitable to work with Young People and Adults at Risk.

Lomax Training Services Managers

Embrace a whole Lomax Training Services Limited approach to promoting and safeguarding the welfare of young people and adults at risk.

Consider how learners may be taught about safeguarding through teaching and learning opportunities, as part of providing a broad and balanced curriculum, including covering relevant issues through physical and mental health.

- Ensure staff are aware of the policy and procedures and that they receive appropriate training and support to undertake their roles effectively
- Ensure that all learners are taught in environments which are safe, conducive to learning and free from disruption or threat of harm.
- Ensure this policy and its associated procedure are implemented within their areas.

Designated Safeguarding Lead

The Managing Director designates an appropriate senior member of staff to take lead responsibility for young people and adults at risk. This person is currently the Quality Manager and has both the status and authority within Lomax Training Services Limited to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. When required, he has the responsibility for:

- The referral of cases of suspected abuse or allegations of abuse to the relevant investigating agencies, contributing to assessment /case conferences as appropriate.
- Acting as a source of support and expertise within Lomax Training Services Limited when deciding whether to make a referral and liaising with relevant agencies
- Liaising with the Managing Director, James Lomax, to inform him/her of any issues and on-going investigations and ensure there is always cover for this role
- Undertaking child protection and inter-agency training, including refresher training every two years, to ensure roles and responsibilities are carried out effectively
- Ensuring staff who work with Young People and Adults at Risk have information on the Safeguarding Young People and Adults at Risk Policy and its associated Procedure and they participate in appropriate induction and training
- Maintaining accurate, secure records of referrals or concerns
- Working with the management team to ensure that the Safeguarding Young People and Adults at Risk Policy and its associated Procedure are updated and that arrangements are reviewed annually
- Identifying appropriate methods to inform learners, parents and carers of Lomax Training Services Limited safeguarding and partnership arrangements
- Forwarding relevant information when Young People and Adults at Risk who are subject to a Child Protection Plan move to another educational establishment.

Standards by which the Success of this Policy can be Evaluated

- Learner voice feedback received from surveys, focus groups, forums and during tutorials.
- Formal reflection of, and reporting on, operating safeguarding procedures through the recording, monitoring, and analyses of Safeguarding Concern forms submitted.
- Self-Assessment and External Review.
- Staff responses to training and employing appropriate strategies.

Responsibility for Implementing this Policy

- The Senior managers have overall responsibility for the implementation of this policy and its associated procedure across Lomax Training Services Limited.
- Managers are responsible for overseeing the operation of this policy.
- The tutor's staff are responsible for meeting learner Entitlements.

Associated Policies, Procedures, Legislation and Guidance

Promoting and Safeguarding the Welfare of Young People and Adults at Risk includes:

- Ensuring the safe recruitment of staff (Recruitment and Selection Procedure, Disclosure and Barring Service Utilisation Policy)
- Having effective arrangements in place to promote and maintain a safe learning environment. (Prevention of Bullying Policy, Health & Safety Policy Manual, Prevention of Harassment, Bullying and Victimisation in the Workplace Policy, Prevention and Management of Substance Misuse Policy, Disciplinary Procedure, Equality & Diversity Policy, PREVENT Strategy). This list is not exhaustive and new policies will be developed to discharge the duties relating to this Policy
- Taking all measures to ensure that learners are suitably protected from the risks associated with radicalisation and extremism

This policy and procedure are underpinned and shaped by the relevant legislation and guidance

Review of this Policy

All policies will be subject to a review either because of the changing landscape, against which the policy was originally drafted, or in keeping with good governance.

The effectiveness of this policy will be monitored annually and reviewed every five years considering experience and best practice. This mechanism recognises that changes to legislation may prompt a review of the policy before the one year stipulated

Signed

A handwritten signature in black ink that reads "James Lomax".

James Lomax
Managing Director

Appendix A - Key Definitions

(Definitions as stated by Keeping Children Safe in Education September 2020 – Part 1)

Young people and adults at risk in need of protection

Some Young People are in need because they are suffering or likely to suffer 'significant harm'. Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person.

Young People and Adults at Risk in Need

Young people and adults at risk who are defined as being 'in need' under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a child in need.

Young people and adults at risk learners missing from education

All staff should be aware that young people and adults at risk going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.

This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines.

It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their organisation's unauthorised absence and young people and adults at risk missing from education procedures.

Young people or adults at risk with family members in prison

It is not uncommon for young people and adults and at-risk learners to have a parent sent to prison each year. These families are at more risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

NICCO provides information designed to support professionals working with offenders and their young people and adults at risk students, to help mitigate negative consequences for those young people and adults at risk students.

Child Criminal Exploitation (CCE)

Although the term refers to CCE this incorporates young people and adults at risk students and can be described where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

Some of the following can be indicators of CCE:

- Young people and adults at risk students who appear with unexplained gifts or new possessions
- Young people and adults at risk students who associate with other young people involved in exploitation
- Young people and adults at risk students who suffer from changes in emotional well-being
- Young people and adults at risk students who misuse drugs and alcohol
- Young people and adults at risk students who go missing for periods of time or regularly come home late
- Young people and adults at risk students who regularly miss school or education or do not take part in education.

Modern Day Slavery and Human Trafficking

These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern-day slavery within your own country. It is possible to be a victim even if consent has been given to be moved.

Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young or adults at risk person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; it can also occur using technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.

It can include both contact (penetrative and non-penetrative acts) and non-contact sexual

activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- Young people and adults at risk students who have older boyfriends or girlfriends; and
- Young people and adults at risk students who suffer from sexually transmitted infections or become pregnant.

Technology can also play a part in sexual abuse, for example, through its use to record abuse and share it with other like-minded individuals or as a medium to access children and young people to groom them. A common factor in all cases is the lack of free economic or moral choice.

Sexting or Youth Produced Imagery

Sexting or Youth Produced Imagery is sending and/or receiving sexually explicit messages or images primarily between mobile telephones.

Sexting or Youth Produced Imagery can include sexual dialogue (chat) or requests for pictures/images of a sexual nature and can be illegal.

The question of legality depends on what the image is or what the chat involves and who it is sent between. However, it is a crime to possess, take, make, distribute, or show anyone an indecent or abusive image of a child or young person under 18 years of age. Also, while the age of consent is 16, the relevant age in relation to indecent images is 18.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with young people and adults at risk students and adults at risk adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Young people and adults at risk students can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Young people and adults at risk students are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

Young people and adults at risk students can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of

transporting drugs and a referral to the National Referral Mechanism should be considered.

Types of Abuse and how to recognise them

Physical Abuse

Physical abuse is the physical ill treatment of a person which may or may not cause physical injury. It may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a person.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. It can also occur when a person is not provided with adequate care and support, causing him/her unjustifiable physical discomfort.

This can include inappropriate use of restraint or sanctions, withholding of food, drink or necessary aids to mobility or independence.

Possible Behaviour:

- Explanation inconsistent with injury
- Refusal to discuss injuries
- Fear of going home or parents being contacted
- Arms and legs kept covered in hot weather or fear of undressing
- Aggressive bullying behaviour
- Frozen watchfulness/cowering/flinching at sudden movements
- Withdrawal from physical contact
- Fear of medical help
- Admission of excessive punishment
- Running away
- Self-destructive tendencies.

Sexual Abuse

Sexual abuse includes acts which involve physical contact; it may also include those acts which do not. Non-contact sexual abuse may include voyeurism, (coerced into being photographed or videotaped), being subjected to indecent exposure, serious sexual harassment, and innuendo.

It could also include showing sexual material to a person who does not consent to, or have the capacity to consent to, watching such material.

Sexual abuse involves forcing or enticing a person to take part in sexual activities, not necessarily involving a high level of violence, whether the person is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include 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.

Sexual abuse can include an isolated incident of assault, or sexual acts within an on-going relationship where the person is unable to give consent, either because of impaired capacity or because the power imbalance in the relationship is too great for the consent to be considered important by the perpetrator.

Possible Behaviour:

- Overly compliant behaviour
- Behaves in a sexually inappropriate way in relation to their age
- Withdrawn and unhappy, insecure, and 'clingy'
- Plays out sexual acts in too knowledgeable a way for their age
- Regresses to behavioural pattern of much younger children
- Say of themselves that they are bad or wicked
- Arriving early at organisations and leaving late with few, if any, absences
- Excessive masturbation – exposing themselves
- Drawings of sexually explicit nature
- Attempts to sexually abuse another child
- Recurring nightmares and/or fear of the dark
- Had a 'friend who has a problem' and then talks about the abuse of 'a friend'

Emotional Abuse

This is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on his/her emotional development. It may involve conveying that (s)he is worthless or unloved, inadequate, or valued only insofar as (s)he meets the needs of another person.

It may include not giving the person opportunities to express her/his views, deliberately silencing her/him, or deriding what (s)he says or how (s)he communicates.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a 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.

It may include a calm but destructive attitude towards an adult, intimidation, threats of harm or abandonment, indifference, isolation or withdrawal from services/support, humiliation, blaming, controlling, coercion, harassment, verbal abuse, emotional blackmail, the denial of basic human rights, denial of sexuality and the treatment of adults as children.

Possible Behaviour:

- Over reaction to mistakes
- Obsessive behaviour (e.g., rocking, twisting hair, sucking thumb)
- Withdrawal from relationships with other children
- Fear of parents being contacted
- Extremes of passivity or aggression
- Attention seeking
- Chronic running away
- Compulsive stealing, scavenging for food or clothes
- Impaired capacity to enjoy life.

Neglect

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs and a necessary level of care and support, likely to result in the serious impairment of the person's health and/or development. Neglect can be deliberate or unintentional. Neglect can be:

- Medical or physical care needs being ignored to such an extent that a person's health and well-being is impaired
- Administering too much, too little, or the wrong type of medication
- A failure to allow the person access to appropriate health, social care, or education services
- With holding of the necessities of life, e.g., adequate nutrition, heating, or clothing.
- A failure to intervene in situations assessed to be dangerous to the person or others around them, especially when the person lacks capacity to assess risk.

Possible Behaviour:

- Chronic running away
- Compulsive stealing
- Scavenging of food and clothes
- Low self-esteem
- Neurotic behaviour (e.g., rocking, thumb sucking, hairtwisting)
- Inability to make social relationships
- Tendency to destroy things.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Whilst not intended to be an exhaustive list, sexual harassment 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 (organisations 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; and
- Online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It is important to consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Financial and Material Abuse

Financial and material abuse involves an individual’s funds, resources or possessions being taken or inappropriately used by a third party.

With Adults at Risk, this may include theft, fraud, or extortion through threat, exploitation, misuse or misappropriation of property or possessions by someone trusted to handle the adult’s finances, preventing the adult’s access to his/her funds.

Risks of financial abuse may increase if (s)he lacks capacity or numeracy skills, lives alone and is regarded as “vulnerable” within the local community, and where there is a dependence on other people with the management of finances.

Domestic abuse

The cross-government definition of domestic violence and abuse as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

All young people and adults at risk students can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Mental Health

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.

Staff should note that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children, young people, and adults 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 that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property.

Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into care where there is harm or is at risk of harm.

Honour-based abuse (including Female Genital Mutilation (FGM) and Forced Marriage (FM))

Honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

FGM

Comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. **FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.**

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage.

Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Providers and organisations can play an important role in safeguarding young people and adults at risk students from forced marriage.

Preventing radicalisation

Young and adults at risk people are more likely to be exposed to extremist ideology and radicalisation. Like protecting from other forms of harms and abuse, protecting young and adults at risk people from this risk should be a part of a organisations' safeguarding approach.

Extremism - is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation - refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The Prevent duty

All schools and organisations are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard 21 to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

Channel

A voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being adults at risk to being drawn into terrorism.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are adults at risk to being drawn into terrorism and consider the appropriate support required.

A representative from the school or organisations may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

Peer on peer abuse

Young people and adults at risk can abuse others. This is generally referred to as peer-on-peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Sexual violence and sexual harassment between young people and adults at risk students in schools and organisations

Sexual violence and sexual harassment can occur between two young people and adults at risk students of any age and sex. It can also occur through a group sexually assaulting or sexually harassing a single person or group of.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows young female students’, adults at risk students and students with SEND and LGBT are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting skirts (up skirting). Dismissing or tolerating such behaviours risks normalising them.

Appendix B

Lomax Training Services Limited Code of Conduct

This code of conduct shall provide clear guidance on the standards of behaviour all the organisations' staff are expected to observe. Failure to comply with the Code of Conduct could result in disciplinary action including dismissal. A serious breach of this code may result in a referral being made to an external or statutory agency.

Lomax Training Services Limited seeks to provide a safe and supportive environment where the welfare and health and safety of learners and staff is paramount. Staff should always act professionally. All staff have a duty of care to keep students safe and are accountable for the way in which they use their authority and position of trust.

Setting an Example

All staff must:

- Avoid using inappropriate or offensive language at all times
- Demonstrate high standards of conduct to encourage learners to do the same
- Avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

Safeguarding

- All staff have a role to play in safeguarding children, young people and vulnerable adults
- All staff are responsible for their own actions
- All staff are required to read the organisation's relevant safeguarding policies and procedures
- All staff are required to undertake Safeguarding Training which should be refreshed every three years
- All staff should take reasonable care of learners under their supervision with the aim of ensuring their safety and welfare
- Any safeguarding concerns should be reported to the organisation's designated safeguarding lead
- All staff and work placement providers should be aware of, and follow, the organisation's safeguarding procedures
- Staff should never give out their own personal details or the personal details of other members of staff or learners
- Staff must never access, store, or disseminate inappropriate images
- Staff should never contact learners outside of organisations for the purpose of 'friendship', including via the use of social media
- Staff are encouraged to report any suspected infatuation or any situation which they may feel compromises their professional standing
- Staff are vulnerable to accusations when working alone with a learner. If possible, leave the door open or use a room with a window in the door. Avoid travelling in a car with one student.