

1.Statement of Intent

Safeguarding and promoting the welfare of children, young people and adults at risk of abuse or neglect.

This policy defines how PQMS Training operates to safeguard children, young people and adults at risk of abuse or neglect. The policy will apply to staff including governors and managers and anyone else who might have contact with PQMS learners. The responsibility for Safeguarding and protecting children, young people and adults at risk applies both in and out of education or the workplace environment and will include the use of the internet and any other devices.

PQMS has a duty of care and is committed to the welfare, protection, and safety of everyone who attends our centres either as a learner on programme or as a visitor. We also have a duty to safeguard and support our staff. PQMS recognises Safeguarding as enabling a person to live free from abuse and harm to include the emotional, physical or sexual abuse of a person, neglect and mental ill health. (See appendix 1 for types of abuse)

This policy will apply to all staff, contractors and volunteers and will be used to support their work.

Definitions

Children and young people are defined as those persons aged under 18 years old.

“Safeguarding and promoting the welfare of children” is defined in Working Together to safeguard children 2018 as:

- protecting children from maltreatment
- preventing impairment of children’s health and 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

Adults at risk of abuse or neglect

For the purposes of this policy, adults at risk refers to someone over 18 years old who;

- has care and support needs
- is experiencing, or is at risk of, abuse or neglect
- as a result of their care and support needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

If someone has care and support needs but is not currently receiving care or support from a health or care service, they may still be an adult at risk

2. Safeguarding policy

PQMS has a zero-tolerance approach to abuse. PQMS has a duty for the care and protection of adults who are at risk. It also recognises its responsibilities for the safety and care of children under the Children Act.

PQMS is committed to promoting wellbeing, preventing harm and responding effectively to concerns.

3. Our Commitments

- We have robust systems to keep all children, young people and adults at risk safe from harm
- We raise awareness of our Safeguarding duties with learners at induction and throughout their programme
- We promote a positive, safe and effective culture where staff and learners are able to raise concerns confidently
- We ensure checks for suitability to work at PQMS are carried out prior to employment
- Staff complete timely and mandatory induction and training which includes Safeguarding
- We have a whistleblowing procedure and code of conduct
- All Safeguarding concerns will be logged on 'Myconcern' however they are made
- We have a Safeguarding lead and team, who are responsible for the coordination and management of Safeguarding
- The Safeguarding team will meet regularly to promote best practice
- We display information about Safeguarding around our centres and on our website
- PQMS works with partners to stop abuse where it is happening and prevent abuse where there is a risk that it may occur.
- Employers are advised of their responsibilities for the safety of their employee

4. Reporting a concern

If you suspect that someone is being abused or if a disclosure is made, you must report this to the Safeguarding team where possible within 2 hours. This should be done through 'Myconcern' but can also be reported via Safeguarding@pqms.ie, or by contacting any of the Safeguarding team directly (Appendix 2). If the concern is urgent, then please contact a member of the Safeguarding team by phone instead of/ as well as through Myconcern.

When dealing with any concern you must not promise confidentiality as you will need to pass this information to the Safeguarding team. PQMS may also pass this information to partner organisations including but not limited to local Safeguarding partners, social workers and the police.

You must ensure that you take a factual record of the disclosure or concern. This will include:

- The date
- The time
- The name of the person you are concerned about
- The name of the complainant (if different from above)

- The place where the alleged abuse happened
- Basic details of the concern (if it is a reported concern, you should use the words as far as possible of the person making the complaint)
- A description of any injuries you have seen

You must not ask any leading questions. Examples of leading questions may start with 'isn't it true that', or 'isn't it a fact' or 'won't you admit' or 'wouldn't you agree'

You must not put yourself or anyone else in a vulnerable position, which may include starting to investigate yourself or visiting someone you might think is in danger.

You will need to add a report to 'Myconcern', if you haven't already done so and where possible within 24 hours of the disclosure.

The Safeguarding team will investigate any claim with appropriate external parties. It is not your responsibility to investigate the concern.

Any Safeguarding concern must not be discussed with anyone internally or externally to PQMS other than as required by the Safeguarding team.

Please note that consent will be sought from the person who the concern is raised about, in accordance with the details in appendix 3

5. Safeguarding Team actions

A member of the Safeguarding team will deal with any concern in an appropriate manner.

Any Safeguarding concern raised through Myconcern will be dealt with by a member of the Safeguarding team where possible, within the first 24 hours of the concern being raised.

Once the concern has been received, a member of the Safeguarding team may contact you for additional information or actions that need to be taken. Please follow their instruction and act on this within any deadlines set.

A detailed trail of the concern will be recorded securely by the Safeguarding team.

6. Residential Safeguarding

PQMS will have additional Safeguarding procedures in place for learners who stay away from home as part of their programme. Learners have a welfare card in their induction pack which details important contact numbers in case of any concern and/or emergency.

Employers are advised of their responsibilities for the safety of their employee when staying away from home including

- Informing PQMS of selected accommodation
- Checking that those learners sharing rooms are allocated appropriately including those over 18 years not sharing with learners under 18

7. How allegations of abuse will be dealt with

Allegations against a PQMS staff member

Any allegation of abuse or any concerns raised against a PQMS staff member will be treated seriously. When dealing with any such allegation, we will do so with an open mind and recognise that the allegation may or may not be true. The allegation will be referred to the alleged person's line manager, the Safeguarding lead and the Human Resources (HR) manager as appropriate. The allegation will be dealt with through the following procedure:

On receipt of the allegation, the Safeguarding lead will record all the relevant information on Myconcern. The Safeguarding lead will inform the HR manager and the alleged person's line manager who will initiate and refer to the company disciplinary process as necessary.

Advice will be sought from social services and/or the Local Authority Designated Officer (LADO) as to what action needs to be taken which may or may not include suspension. Once the referral has been made, then any subsequent investigation that is made from an outside party will take precedence over any PQMS disciplinary procedure.

If the staff member is dismissed or resigns before any disciplinary procedure is completed, they will be advised that it is PQMS's duty to inform the disclosure and barring service of the situation.

Allegations against a member of the public

On receipt of the allegation, the Safeguarding lead will record all the relevant information on Myconcern. The Safeguarding lead will decide whether a referral to specialist support is needed which may include Safeguarding partners, Channel and /or any others as appropriate. If a referral is made, we will require consent from the child/young person/adult at risk if they are deemed competent to give it. Although it is best practice to have consent for a referral, they may be situations that warrant a referral without consent.

Allegations of Peer-on-Peer abuse

All staff should be aware that children can abuse their peers (often referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to;

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Up-skirting, which typically involves taking a picture under a person's clothing obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Nude image sharing (also known as youth produced sexual imagery)
- Initiation/hazing type violence and ritual

- Use of any derogatory language

If an allegation of abuse is made, you must report this to the Safeguarding team where possible within 2 hours. This should be done through 'Myconcern' but can also be reported via Safeguarding@pqms.ie, or by contacting any of the Safeguarding team directly. If the concern is urgent, then please contact a member of the Safeguarding team by phone instead of/ as well as through Myconcern.

Any Safeguarding concern raised through Myconcern will be dealt with by a member of the Safeguarding team where possible within the first 24 hours of the concern being raised.

Once the concern has been received, a member of the Safeguarding team may contact you for additional information or actions that need to be taken. Please follow their instruction and act on this within any deadlines set. The Safeguarding team will decide the most appropriate course of action.

Other related documents

We strongly recommend that other policies are read alongside this Safeguarding policy, to include:

Acceptable use of Technology policy
Anti-bullying and harassment policy
Cyberbullying policy
Data protection policy
Events with external people policy
Health & Safety Policy
Hotel stays for 16-18 year olds
Online Safety Policy
Prevent Policy
Safer recruitment policy
Staff behaviour code of conduct policy
Whistleblowing policy

This policy will be reviewed annually.

Signed off CEO
Liam Minehane



Appendix 1

Types of Abuse

Bullying (Inc. cyberbullying)

Behaviour by groups or individuals repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, through social media exchanges)

Indicators may be;

- Signs of physical abuse; bruising, welts, burns, scarring etc.
- Signs of emotional abuse; withdrawn, anxious, anger, excessive crying or nervousness
- Increased or reduced use of mobile/fixed communication devices for internet usage

Child Sexual Exploitation (CSE)

A form of sexual abuse that involves the manipulation and/or coercion of young people, under the age of 18, into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. It is not a choice made by the victims and the manipulation or 'grooming' process involves befriending children, gaining their trust and supplying, for ingestion, drugs and alcohol. These manipulations will often occur over a prolonged period of time, and also before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. This form of abuse is often mistaken by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no person under the age of 18 can legally consent to being in a relationship.

Discriminatory abuse

Discriminatory abuse is abuse aimed towards people with differences or perceived differences on the grounds of disability, gender and gender identity and reassignment, age, race, religion or belief, sexual orientation, and political beliefs.

It can include physical abuse/assault, sexual abuse/assault, financial abuse/theft, neglect and psychological abuse/harassment. It also includes verbal abuse and racist, sexist, homophobic or ageist comments, or jokes or any other form of harassment.

Examples of discriminatory abuse can include;

- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

Domestic Abuse

Is defined as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but can also be by a

family member or carer. Domestic abuse is very common. In the vast majority of cases, it is experienced by women and perpetrated by men. Domestic abuse can also include child to adult abuse.

Domestic abuse can include, but is not limited to;

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical or sexual abuse
- Financial abuse
- Harassment and stalking
- Online or digital abuse

Female Genital Mutilation (FGM)

FGM is when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting' but has many other names. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of learner abuse and violence against women.

Financial or material abuse

Financial abuse is when someone takes your money or belongings without asking and uses this for their personal gain. The Care Act 2014 describes 'financial abuse' as a type of abuse which includes **having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.**

Financial abuse may include;

- Someone taking or misusing someone else's money or belongings for their own gain
- Harming, depriving or disadvantaging the victim
- Controlling someone's purchases or access to money
- Staff or volunteers borrowing/accepting gifts or money from service users
- Being asked to sign or give consent to financial agreements when a person does not have the mental capacity to understand or give an informed consent

Forced Marriage (FM)

Forced marriage is a marriage in which one or more of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, where both parties will consent to the assistance of their parents or a third party (such as a matchmaker) in choosing a spouse. Forced marriage is a human rights abuse and a criminal offence. Both young men and women can be at risk in affected ethnic groups.

Emotional or Psychological abuse

Emotional or Psychological abuse may start small but can quickly evolve into a systematic use of manipulation that can be frightening and threatening. Emotional or Psychological abuse is about purposely controlling the victim's freedom, and/or acting to undermine or isolate the victim. Psychological abuse can occur prior to physical, sexual, or other abuses. However, it can also happen at the same time.

Examples of psychological abuse;

- Belittling and name calling

- Constant criticism
- Threatening behaviour towards the victim or children in the relationship
- Unrealistic demands
- Not speaking to the victim for prolonged periods

Gangs and youth violence

Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending.

Indicators may be;

- May have expensive items
- Change in behaviour and respect for others
- A change in social activities
- Social media interaction and a change in language used
- Evidence of gang tattoos; more or irregular choice of tattoos and in highly visible areas
- Carrying, or evidence of concealed weapons

Mental ill health

Mental ill health is the absence of psychological wellbeing and effective physical or psychological functioning. It affects how an individual copes and manages in times of adversity.

Indicators may be;

- Signs of emotional changes; withdrawn, anxious, anger, excessive crying or nervousness
- Loss of interest/ difficulty interacting
- Changes in behaviour or personal appearance
- Change in sleeping habits
- Appetite or weight changes
- Low energy

Modern Slavery

Modern slavery encompasses slavery, human trafficking, and forced labour and domestic servitude. '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. Modern slavery is about being exploited and completely controlled by someone else and being unable to leave.

Someone is in slavery if they are;

- forced to work – through coercion, or mental or physical threat
- owned or controlled by an 'employer,' through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on their freedom of movement.

Nude image sharing

Previously termed sexting, nude image sharing is the sending of sexually explicit images through any electronic device including smartphones, tablets, laptops or mobiles. Nude image sharing has become a normalised activity, particularly in teenagers and is often not reported because of this.

Radicalisation

A process by which a person comes to support/ partake in terrorism and extremism (this can also include – political/ animal rights and ecological extremist). Extremism is ideology that is considered to be far outside the acceptable mainstream attitudes of society, including opposition to British values.

Indicators may be;

- isolating themselves from family and friends.
- talking as if from a scripted speech.
- unwillingness or inability to discuss their views.
- a sudden disrespectful attitude towards others.
- increased levels of anger.
- increased secretiveness, especially around internet use

Self-Neglect abuse

Self-neglect is any failure of an adult to take care of himself or herself that causes or is likely to cause, serious physical, mental or emotional harm or substantial damage to or loss of assets within a short period of time.

Self-neglect can happen as a result of an individual's choice of lifestyle, or the person may;

- be depressed,
- have poor health,
- have cognitive (memory or decision making) problems, or
- be physically unable to care for self.

Self-neglect may include;

- Living in unsanitary conditions
- Suffering from an untreated illness, disease or injury
- Suffering from malnutrition to such an extent that, without an intervention, the adult's physical or mental health is likely to be severely impaired.
- Creating a hazardous situation that will likely cause serious physical harm to the adult or others or cause substantial damage to or loss of assets, and
- Suffering from an illness, disease or injury that results in the adult dealing with his or her assets in a manner that is likely to cause substantial damage to or loss of the assets.

Serious Violence

The Serious Violence Strategy, which was introduced by the government in 2018, identifies offences such as homicides and knife and gun crimes as key factors which account for around one percent of all recorded crime. The impact of serious violent crime on individuals and the community is significant. Tackling serious violence is not a law enforcement issue alone; it requires a multiple- strand approach involving a range of partners across different sectors.

The main areas that the Serious Violence Strategy focuses on are;

- Tackling county lines
- Early intervention and prevention
- Supporting communities and local partnerships

- Effective law enforcement and the criminal justice response

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime.

Indicators may include;

- Increased absence from school
- Relationships with older individuals or groups or a change in friend groups
- Significant decline in performance
- Signs of self-harm
- Significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

All staff should familiarise themselves with the types of abuse that can occur and the reporting measures in place for any concerns.

Appendix 2

Contact Name	Safeguarding Role	Email address	Contact phone number
Bev Thomas	DSL	bev@pqms.ie	07821 131174
Dan Cavanagh	DSO (Bury)	danc@pqms.ie	02477 719819
Gillian Goodlet	DSO (Scotland)	gillian@pqms.ie	01506 300942
Michelle Tennant	DSO (Bedworth)	Michelle@pqms.ie	02476 316789
Sharon Amatt	DSO (Apprenticeships)	Sharon@pqms.ie	07941 891664

Please note you can contact any of the safeguarding officers about any concern you have, regardless of location

Appendix 3

Capacity, Consent and Decision Making

The consideration of capacity is crucial at all stages of Safeguarding Adults procedures. For example, determining the ability of an adult at risk to make lifestyle choices, such as choosing to remain in a situation where they risk abuse; determining whether a particular act or transaction is abusive or consensual; or determining how much an adult at risk can be involved in making decisions in a given situation.

The key development affecting this area of work is the implementation of the Mental Capacity Act 2005, which provides a statutory framework to empower and protect adults at risk who may not be able to make their own decisions. It makes it clear who can take decisions in which situations and how they should go about this. It enables people to plan ahead for a time when they may lose capacity. It applies to anyone aged 16 years and over therefore appropriate liaison needs to occur for young people aged 16 to 18 years with Children's Services where relevant as part of Safeguarding Adults work.

The whole Act is underpinned by a set of five key principles:

- **A presumption of capacity** - every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise;
- **The right for individuals to be supported to make their own decisions** - people must be given all appropriate help before anyone concludes that they cannot make their own decisions;
- That individuals must retain the right to make what might be seen as eccentric or **unwise decisions**;
- **Best interests** - anything done for or on behalf of people without capacity must be in their best interests; and
- **Least restrictive intervention** - anything done for or on behalf of people without capacity should be the least restrictive of their basic rights and freedoms.

For full guidance refer to the relevant local Safeguarding Partnership guidance on the applicable website:

<https://www.coventry.gov.uk/cscp>

<https://www.westsussexscp.org.uk/>

<https://burysafeguardingpartnership.bury.gov.uk/>