Document Number:	**001A**
Document Name:	**DFN Project SEARCH Safeguarding Policy**
Effective Date:	**1st April 2022**
Approved by the Board:	**30th March 2022**

Should you wish to report a safeguarding concern please contact us using this form

Expression%20of%20concern%20Form.doc

1. Purpose

The purpose of this Policy is to set out the DFN Project SEARCH Safeguarding Policy and Associated Guidance Notes. It will make clear:

- The safeguarding policy of DFN Project SEARCH as an organisation and its employees, associates, visitors, volunteers, and trustees.
- The safeguarding procedures that accompany DFN Project SEARCH's policy and support its implementation.
- Guidance Notes that the charity provides to partners who deliver its model to beneficiaries through the DFN Project SEARCH programmes that operate in England, Ireland, Portugal, Scotland, and Wales.

Adopting the principles of good Safeguarding practice is crucial to the work of DFN Project SEARCH and the Charity will continually review and improve its policies, systems, and procedures to ensure they work and that they reflect best practice.

2. Background

This Safeguarding Policy document ('Safeguarding Policy' or 'Policy') sets out the place Safeguarding holds within the organisation and the framework for responding to Safeguarding risks. In association with the Code of Conduct, it describes the appropriate measures that DFN Project SEARCH takes to prevent Safeguarding incidents occurring wherever possible and the steps that DFN Project SEARCH takes to monitor, investigate, and report on Safeguarding concerns should they arise.

This Policy is designed to support an improved safeguarded environment for those that DFN Project SEARCH employs or commissions, works with and the work of those it supports. It applies to all DFN Project SEARCH employees, volunteers, trustees, and associates.

DFN Project SEARCH believes that Safeguarding is fundamental to its work and embraces the opportunities it presents to share learning with those partners that it works with. DFN Project

SEARCH works with organisations that share its commitment to Safeguarding and reflect its approach and principles within their Safeguarding policies, procedures, and practices.

Alongside this policy DFN Project SEARCH provide guidance for partners that deliver DFN Project SEARCH programmes. Whilst the charity does not have primary responsibility for safeguarding the beneficiaries of the programme it takes very seriously its responsibility to partner with organisations that are registered with OFSTED and the CQC and other statutory agencies who provide regulation and guidance on safeguarding children and adults at risk of harm. These agencies are responsible for the beneficiaries of the programme.

The Charity will however collect anonymous data and intelligence about safeguarding matters from partners and share that information with the Charities trustees and with programme partners in order that lessons can be learnt and improvements in safeguarding practice can be achieved for all programmes.

3. The Scope of this Policy

This Policy and procedures apply to all employees, associates, trustees, commissioned workers, and anyone who volunteers for the Charity or visits programme sites at the Charities invitation.

The guidance notes that are provided to DFN Project SEARCH programme partners are commended to them and should be discussed by the relevant steering groups in conjunction with the policies and procedures of all the local partners involved in delivering the programme.

To bring clarity to safeguarding responsibilities in a DFN Project SEARCH Programme please see the attached document which sets out the responsibilities of each partner in the major areas of safeguarding policy and practice.

Safeguarding%20Responsibilities.docx

4. The Policy

i. INTRODUCTION

a. **Our work -** DFN Project SEARCH champions and connects organisations who are working hard to make improvements in the life chances of young adults with a learning disability or autism spectrum condition or both by providing them with the necessary skills and experience to access paid employment and a career of their choice. DFN Project SEARCH provides a tried and tested model of delivery, training, and guidance for those involved in that delivery and quality assurance to ensure that the beneficiaries have the best possible programme in their community.

b. **Purpose of this policy** This Safeguarding Policy ('Policy') sets out DFN Project SEARCH's commitment and approach to preventing, reporting, and responding to safeguarding incidents. The focus of this policy is to protect our employees, associates, trustees, visitors, and volunteers as well as children, young people, and adults at risk from harm. This Policy should be read in conjunction with DFN Project SEARCH's Safeguarding Procedures which provide more details about what to do to

support the policy and Guidance Notes for Programme Sites which set out the Charities expectations of partners delivering the model.

c. **Statement of commitment** Safeguarding is at the heart of DFN Project SEARCH's vision, mission, purpose, and values. It is unacceptable for anyone to experience abuse or exploitation and safeguarding children, young people, and adults from abuse is key to our work. Safeguarding people is everyone's responsibility. DFN Project SEARCH takes a zero-tolerance approach to any form of bullying, harassment, sexual exploitation, or abuse committed by those obligated under this policy. DFN Project SEARCH fosters a culture of safeguarding where everyone should feel comfortable to challenge behaviour that does not align with this Policy or other DFN Project SEARCH policies and feels able to report concerns.

d. **Laws and standards -** The principles in this Policy have been drawn from key international, regional, and national instruments. These include the International Standards for Keeping Children Safe, the UN Convention on the Rights of the Child (1989), the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention) and UK national legislation related to safeguarding. DFN Project SEARCH is a charity registered in England and Wales and Scotland and is required to comply with the requirements of the UK Charity Commission and the Office of the Scottish Charity Regulator whose guidance is also considered in this Policy.

ii. PREVENTING AND REDUCING THE RISK OF ABUSE

a) **Working with Partners -** All Partners are expected to create a positive environment in which safeguarding is prioritised so that children, young people, and adults at risk are protected from harm. The primary responsibility for safeguarding the beneficiaries of a DFN Project SEARCH programme rests with the Education Partner except for one programme in Wales and the programme in Ireland where the supported employment agency has the primary responsibility. These agencies are all regulated by Government bodies and subject to regulation and guidance regarding the handling of safeguarding matters. DFN Project SEARCH will only work with partners who are regulated and comply with the required safeguarding standards.

a) **Sharing Learning:** DFN Project SEARCH is the only partner in the many DFN Project SEARCH partnerships that has the capability of learning from safeguarding issues across all programmes. DFN Project SEARCH will collect data and share the learning anonymously that comes from that data with all teachers and coaches involved in delivering the programme so that safeguarding practice can continuously improve.

b) **Support and Guidance**: DFN Project SEARCH is committed to provide support to partners when requested to strengthen their capability to develop and review their own safeguarding policies, procedures, and practices to keep people safe. With that in mind DFN Project SEARCH provides guidance to all our programme sites, monitors high level and low-level safeguarding issues and shares information to encourage continuous learning and development in the field of safeguarding. The guidance for programme partners can be found here.

c) **To summarise - all DFN Project SEARCH partners must**:

i. Sign the Guiding principles for Partnership Working that sets out the requirement to understand and follow the safeguarding policies of the education partner or supported employment partner for the 2 exceptions mentioned above.
ii. Ensure that there is a data sharing protocol in place that will enable all parties involved in the partnership to share safeguarding data and information in confidence within the steering group.
iii. Ensure that safeguarding is discussed at steering group meetings on a regular basis and that any issues or problems are discussed candidly but in complete confidence.
iv. Have their own safeguarding policy and procedures and share these with all partners including DFN Project SEARCH.
v. Discuss and agree how they will create a positive reporting culture and how they will respond to safeguarding incidents or concerns.
vi. Ensure that all parties know how to report a concern to the education partner and that a copy of the education partners policy is available to all members of the steering group.
vii. Agree to report any major safeguarding incidents or concerns to DFN Project SEARCH's Safeguarding Lead claire.cookson@dfnfoundation.org.uk immediately when reported to the local authority or the police. DFN Project SEARCH is required to notify the charity commission of any significant incident. (A significant incident is described as having caused serious harm to a person or persons, an incident that will create reputational damage for the partner and the charity, an issue that appears systemic.) The lead partner should address the safeguarding concern by applying their own safeguarding policy and they should agree to undertake and co-operate with investigations into safeguarding concerns.

b) **INTERNAL PRACTICES IN DFN PROJECT SEARCH**

a) **Human Resources** Safeguarding considerations will be implemented at all stages of the recruitment process for DFN Project SEARCH Employees and DFN Project SEARCH Associates.

i. Safer recruitment: DFN Project SEARCH operates strict procedures to ensure it recruits only those employees or representatives who are suitable to work with children, young people, and adults at risk. Safe recruitment requires that DFN Project SEARCH reflects their commitment to safeguarding in all job and contract advertisements, the interview and selection process and in the strict application of recruitment checks and references, observation during probationary periods and continued performance.

ii. Employee's training: Creating a safeguarding culture in which all DFN Project SEARCH employees, DFN Project SEARCH Associates and DFN Project SEARCH Visitors challenge behaviour that increases the risk of harm to children, young people, and adults.
iii. All new DFN Project SEARCH Employees and DFN Project SEARCH Associates will have a mandatory induction within one month of commencing work for DFN Project SEARCH that covers the Code of Conduct, this Policy, and related procedures.
iv. In addition, all DFN Project SEARCH Employees, Trustees and Associates will receive subsequent safeguarding refresher training to be held at least once per year.

b) Creating a safe and trusting environment and culture – It is important to DFN Project SEARCH that at all levels there is a strong commitment to creating a safe and trusting environment. In so doing the organisation can be assured that managers, employees, trustees, visitors, volunteers, and associates are more likely to behave in a manner that supports good safeguarding practices within the organisation and encourages partners to do the same. The following steps have been put in place to create an appropriate culture:

i. All DFN Project SEARCH employees can contact the CEO at any time. She is the safeguarding lead, and her deputy is also available and if a safeguarding incident occurs, they are available by phone, email, teams or zoom.
ii. All employees talk to their manager in a one-to-one discussion at least monthly where they can take the opportunity to raise any non-urgent safeguarding issues that concern them.
iii. All employees meet each week on zoom as a team for a catch up where any safeguarding issues that are team related can be raised.
iv. There is an informal opportunity for the team to talk each week on zoom where issues can be discussed, and ideas exchanged.
v. The team have monthly team meetings where safeguarding is a standing item on the agenda.
vi. At each monthly staff team meeting there is a general discussion about health and safety with a particular focus on mental health and wellbeing. For the most part the DFN Project SEARCH team work remotely and independently and so this focus on caring for the well being of each other helps to foster a trusting and caring environment that in turn supports a strong safeguarding culture.
vii. Safeguarding is a standing item on the DFN Project SEARCH Board.
viii. The DFN Project SEARCH Board Members regularly receive reports from employees of DFN Project SEARCH and are accessible and open to discuss matters of safeguarding and health and wellbeing. The Board pay attention to issues such as staffing levels and work pressures and are concerned that individuals are set realistic and achievable targets.
ix. The policies of the organisation are designed to safeguard employees, associates, volunteers, visitors, and trustees. They include policies which support a good safeguarding environment such as a whistle blowing policy, an anti-bullying and harassment policy, a grievance procedure and a health and safety policy

c) **Activities and events**

v. DFN Project SEARCH will consider safeguarding risks when organising any activity or event, including fundraising, profile raising, networking or other events for DFN Project SEARCH. A risk assessment will be conducted for all new activities and events. DFN Project SEARCH will ensure appropriate risk mitigations measures are in place.
vi. All those working directly with DFN Project SEARCH Employees and DFN Project SEARCH Associates should be made aware of this Safeguarding Policy and how to report a concern. Safeguarding briefings will be made with all event attendees prior to the event. When working with children, young people, and adults at risk, awareness raising on ways they can keep themselves and their peers safe will be included.
vii. When DFN Project SEARCH employees, Trustees, Visitors and Associates visit a DFN Project SEARCH site or activity, in person or remotely, they will ask to see, sign, and abide by the Safeguarding Policy of those responsible for the activities they are observing.

d) **Communications and digital safeguarding –** DFN Project SEARCH is committed to respecting the rights of children, young people and adults at risk featured in its online communications, the proper handling of data, and enabling a safe online environment for all users. The main principles relating to digital safeguarding include informed consent, privacy protection, responsible use of technology, the provision of trustworthy content and the provision of guidance for employees and user conduct.

iii. REPORTING SAFEGUARDING INCIDENTS AND CONCERNS

a) Whoever is notified of a safeguarding incident or concern has an obligation to report. Those making reports of safeguarding incidents or concerns DO NOT need to decide whether abuse has taken place. They DO need to report any information about the safeguarding incident or concern which they identify, or which has been raised with them by the Education Partner or DFN Project SEARCH if they have no connection to the education partner. No individual should attempt to deal with a safeguarding incident or concern alone, including investigating the concern themselves.
b) Actions taken should follow the principle of the best interest of the child, young person, or adult. If a child, young person, or adult is at immediate risk of harm or has been seriously injured, immediate action should be taken, such as calling the relevant emergency services. The education partner, or if you do not know the education partner the DFN Project SEARCH Safeguarding contact, must be informed once any emergency action has been undertaken.
c) If you are working for DFN Project SEARCH or visiting at the request of DFN Project SEARCH then safeguarding incidents and concerns are to be reported to DFN Project SEARCH's Safeguarding Lead: claire.cookson@dfnfoundation.org.uk as well as to the lead education partner. A Safeguarding Incident Reporting Form is available at the top of this document and is accessible to all to report any safeguarding incident or concern.

iv. RESPONDING TO SAFEGUARDING INCIDENTS OR CONCERNS FROM BENEFICIARIES

a) The guiding principle in responding to any safeguarding concern is that the protection and welfare of the child, young person or adult at risk is paramount. No

child, young person or adult at risk should be put at further risk by any action taken by DFN Project SEARCH, its employees, trustees, associates, or visitors.

b) Safeguarding incident and concerns that are witnessed by DFN Project SEARCH employees, associates, volunteers, visitors, or trustees and occur on site should always be acted upon and investigated swiftly by the education partner but should also be notified to the safeguarding lead at DFN Project SEARCH. The Safeguarding Lead should ensure that the survivor is kept up to date with the progress of any investigation and provided with feedback at the end of any investigation.

c) All parties in the steering group must maintain confidentiality when managing safeguarding incidents and concerns, on a need-to-know basis.

d) DFN Project SEARCH is committed to supporting survivors/victims of exploitation, abuse and harassment and all decisions should be risk-assessed and minuted by the relevant safeguarding Lead in consultation with the Steering Group.

e) If you have any concerns that the matter has not been dealt with appropriately by the education partner, please follow up with by contacting DFN Project SEARCH's Safeguarding Lead: claire.cookson@dfnfoundation.org.uk. For further advice.

v. RESPONDING TO SAFEGUARDING INCIDENTS OR CONCERNS REPORTED TO DFN Project SEARCH

a) Safeguarding incident and concern reports made to DFN Project SEARCH directly to the Safeguarding Lead: claire.cookson@dfnfoundation.org.uk will always be acted upon and investigated swiftly. The Safeguarding Lead will ensure that the survivor is kept up to date with the progress of any investigation and provided with feedback at the end of any investigation.

b) All parties must maintain confidentiality when managing safeguarding incidents and concerns, on a need-to-know basis.

c) DFN Project SEARCH is committed to supporting survivors/victims of exploitation, abuse and harassment and all decisions will be risk-assessed and minuted by the DFN Project SEARCH Safeguarding Lead in consultation with the Designated Safeguarding Trustee.

vi. POLICY IMPLEMENTATION AND MONITORING

a) **Roles and responsibilities for policy implementation**

i. Safeguarding is the responsibility of all those working or partnering with DFN Project SEARCH. DFN Project SEARCH partners have the responsibility to ensure that all their employees, representatives, visitors, and partners are made aware of this Policy and their own associated organisational policies. They should undertake regular safeguarding due diligence processes, risk assessments with mitigating measures to prevent and to respond to harm that may occur in the work supported by DFN Project SEARCH.

ii. The Safeguarding Lead for DFN Project SEARCH is the Chief Executive Officer, who has overall responsibility for ensuring the implementation of this policy and to whom safeguarding incidents and concerns should be reported.

iii. The Board of Trustees ('the Board') has ultimate accountability for safeguarding. The Board must always act in the best interests of those who DFN Project SEARCH's work is intended to support and assist. All Trustees will receive training appropriate to their role. A member of the Board has been appointed as the Designated Safeguarding Trustee who chairs the

Safeguarding Committee (made up of other Trustees and employees) which will meet regularly.

b) Policy monitoring

i. Safeguarding risks, statistics and updates will be reviewed and assessed every month by DFN Project SEARCH Senior Management Team, every 2 months by the Safeguarding Board Lead with the CEO and every six months by DFN Project SEARCH Board. Safeguarding is a standing agenda item at all Board meetings. The Board will receive regularly updates on safeguarding concerns and the outcome within the confines of confidentiality.

ii. DFN Project SEARCH will report confidentially annually in the Annual Report on their safeguarding approach, practices, and experience. DFN Project SEARCH is committed to reviewing its policy and good practice on an annual basis, or sooner if there is a change in legislation or learning from an incident.

iii. The Board has agreed this Policy and will review it regularly, and as required, to ensure it always remains fit for purpose. Trustees and DFN Project SEARCH Employees are responsible to ensure that DFN Project SEARCH complies with this Policy and for making Safeguarding a priority

c) **Related policies and documents**

i. For DFN Project SEARCH employees, associates and trustees, this Policy should be implemented in conjunction with DFN Project SEARCH's Safeguarding Procedures.

safeguarding%20procedures.docx

ii. Other relevant policies to consider include DFN Project SEARCH's Employees Handbook.

iii. For DFN Project SEARCH partners this policy should be read in conjunction with Safeguarding Programme Guidance Notes included above.

Document Number:	002
Document Name:	Safeguarding Guidance Notes for DFN Project SEARCH Programmes
Effective Date:	1st April 2022
Approved by the Board:	30th March 2022

1.0 Purpose

The purpose of this guidance note is to support DFN Project SEARCH programmes to operate effectively with regards to their approach to safeguarding by bringing clarity to roles and responsibilities of all the parties involved.

This document should be read and then used as primarily a reference point for programme partners and to navigate this document please use the links below:

Background	Guidance Note 9 - High Level Incident Reporting to DFN Project SEARCH
Guidance Note 1 – Types and Indicators of Abuse	Guidance Note 10 – Low level incident reporting
Guidance Note 2 – The Law and Safeguarding	Guidance Note 11 – Safeguarding and Remote Delivery
Guidance Note 3 – Safer Recruitment	Guidance Note 12 – Information Sharing
Guidance Note 4 - Training	Guidance Note 13 – The Prevent Agenda
Guidance Note 5- Responsibilities	Guidance Note 14 – Peer on Peer Abuse
Guidance Note 6 – Reporting Concerns to your Local Authority and Confidentiality	Guidance Note 15 – Voyeurism
Guidance Note 7 – Prevention of Abuse	Guidance Note 16 – Mental Health First Aid
Guidance Note 8 – How to Support Adults at Risk to Keep Themselves Safe	Guidance Note 17 – Vetting Procedures Inside a Host Businesses
	Appendices and Document History

2.0 Background

DFN Project SEARCH is committed to ensuring the best possible outcomes for people participating in our programmes. It is our intention that all the people who go through our programme will move into paid employment and that they will thrive and contribute to society as economically active people enjoying the benefits of a long-term career.

Interns going through our programme and graduates moving into work should be safe and free from abuse and neglect and we believe that it is important to empower students to ensure their own safety and to know what to do if they feel they are being abused or neglected.

Living a life that is free from harm and abuse is a fundamental right of every person. All of us need to act as good neighbours and citizens in looking out for one another and seeking to prevent the isolation which can easily lead to abusive situations and put adults at risk of harm. That is one of the fundamental principles of a society which is caring, compassionate and fair. And when abuse does take place, it needs to be dealt with swiftly, effectively and in ways which are proportionate to the issues and where the adult in need of protection stays as much in control of the decision making as is possible.

DFN Project SEARCH require that all its Staff and Associates as well as onsite Teachers and Job Coaches are recruited by their employer using safer recruitment principles and will be subject to thorough vetting checks including the highest level of DBS checks or equivalent.

DFN Project SEARCH require that its own staff and Associates receive the necessary training to enable them to support the young people on our programmes to be safe and to empower them to make good decisions about their own well-being. Each employing organisation of its partners is expected to provide similar safeguarding training upon appointment and every year thereafter for teachers and coaches so that they are best placed to support the interns to protect themselves from harm.

DFN Project SEARCH require that its staff and associates are aware of the way that local safeguarding arrangements work in communities across the different nations and that onsite teams are aware of the local safeguarding arrangements in their area and have all the necessary contacts and training to enable them to report suspected issues or problems to the right authorities in a timely manner. The team must be aware of what issues require immediate attention and are matters of a criminal nature so that they can be reported immediately to the appropriate authorities.

Although some of the young people on the programme may be classed as children the majority would be classified as adults and some as adults at risk of harm. However, when the young person leaves the programme, they will hopefully move into work or continue to look for work and then they will be treated as adults. It is therefore very important that the young people are taught how to protect themselves as adults and that the programme readies them for the adult

world whilst remembering that for some it may be that if an incident occurs the policies for children must be applied.

Understanding The Principles of Safeguarding Adults

- Empowerment - Presumption of person led decisions and informed consent.
- Prevention - It is better to act before harm occurs.
- Proportionality – Proportionate and least intrusive response appropriate to the risk.
- Protection - Support and representation for those in greatest need.
- Partnership - Local solutions through services working with their communities.
- Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability - Accountability and transparency in delivering safeguarding.

- ***Empowerment*** – The on-site team will give individuals the right information about how to recognise abuse and what they can do to keep themselves safe. They will give students clear and simple information about how to report abuse and crime and what support can be given. We will consult them before we take any action. Where someone lacks capacity to decide, we always act in his or her best interests.
- ***Prevention*** - The on-site team will help the employers that we work with to understand how to identify and report signs of abuse and suspected criminal offences. They will support staff to recognise signs and take action to prevent abuse occurring. In all their work the tutor and job coaches will consider how to make employment safer for students and graduates.
- ***Proportionality*** – The on-site team will discuss with the individual and where appropriate other partner agencies what to do where there is risk of significant harm before taking a decision. Risk is an element of many situations and should be part of any wider assessment.
- ***Protection*** – The on-site team know how to use local complaints and reporting arrangements for abuse and suspected criminal offences. They take responsibility for contacting the right person if they have concerns.
- ***Partnership*** – The on-site teams work in partnership with education providers, supported employment agencies, local government, tutors, and job coaches who should know who to contact if they have concerns. There are multi-agency partnership arrangements in place in all local authority areas and staff understand how to use these.
- ***Accountability*** - The roles of all agencies are clear, together with the lines of accountability. Staff understand what is expected of them and others. Agencies recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

The role of DFN Project SEARCH on-site teams and the steering group.

Transitioning from childhood to becoming an adult is a difficult time for all young people on many levels and not least in terms of safeguarding issues. Typically, as a child, safeguarding matters are managed by adults who seek to protect the child from harm but as explained above when people move into adulthood, we seek to encourage them to manage safeguarding matters such that they are empowered to protect themselves from harm throughout their adult lives. It is not easy for anyone to make this move but it can be even more challenging for young people with learning disabilities and autism spectrum conditions who may be more vulnerable to exploitation and find decision making more challenging.

As an on-site team you have a group of people who can work together with the young person to help them make that transition safely and using the principles of safeguarding adults support them to make decisions that will keep them safe from harm throughout their adult life. Everyone in the operational team and the steering group should be seen as a resource to support the young people to make the right choices and should treat all discussions about options and risks as strictly confidential unless because of the nature of concerns they need to be reported to the Local Authority or the Police (see below).

As well as seeking to support the young people to make the right decisions for themselves about safeguarding matters it is also the role of the steering group to consider the safeguarding issues from the host employers' perspective. In most cases managers and mentors working with young people on our programme do not need to have DBS and other vetting clearances as a direct result of being a mentor or manager as that role alone would not meet the threshold set for such clearances to be required. However, in many of our programmes those managers and mentors may already have those clearances because of other duties that they fulfil and so that may assist with reviewing the risk faced by the young person.

There may however be some cases where the steering group determine that DBS clearances and vetting may be appropriate even though the mentor or manager does not normally require it because of the nature of the way that the rotation works. For example, you may determine that you will require a DBS and other vetting clearances for a mentor of a student who has significant learning disabilities and is to spend much of the working day in a van in a one-to-one situation with their mentor travelling to different locations to undertake their skill building activities.

The Host Business Safeguarding Policy

The DFN Project SEARCH programme is designed to have the young people on the programme embedded into the host businesses world so that the students develop an understanding about the world of employment and what it is like to be an adult in a working environment. As such we share with our students the host businesses policies and procedures so that they understand how things work and what is expected of employees.

It therefore makes sense that the educators and job coaches should teach the policy of the host business to advise students about what to do if they feel they are unsafe or vulnerable inside or outside of work during their time on the programme. This should include advice on how to report a concern and who to go to and what to do if the perpetrator is a colleague or a manager within the host business.

However, it is best that the students bring concerns to the education lead, job coach lead or the business liaison during the DFN Project SEARCH year as any matters that need to be raised will be dealt with by the education partner.

Further Reporting Arrangements with the School/College

As well as linking the safeguarding arrangements with the host business to help the students assimilate well and to help them think about their future protection as adults in employment, the status of all the young people on the programme is that they are in education and on the school roll.

All safeguarding incidents **must therefore be reported to the education partner** and their policies must be followed. This is an issue that should be discussed at the steering group so that there is a clear flow between the arrangements in the host business and the educator so that all parties have the information they need. It is worth noting that if the young person is under 18 years of age the school/college will be following guidance for the safeguarding of children.

(NB arrangements in Ireland are different and the interns are supported by the SEA).

Ensuring Clarity about Responsibilities in your Programme

All DFN Project SEARCH partners must:

- Sign the Guiding principles for Partnership Working that sets out the requirement to understand and follow the safeguarding policies of the education partner or supported employment partner for the 2 exceptions mentioned above.
- Ensure that there is a data sharing protocol in place that will enable all parties involved in the partnership to share safeguarding data and information in confidence within the steering group.
- Ensure that safeguarding is discussed at steering group meetings on a regular basis and that any issues or problems are discussed candidly but in complete confidence.
- Have their own safeguarding policy and procedures and share these with all partners including DFN Project SEARCH.
- Discuss and agree how they will create a positive reporting culture and how they will respond to safeguarding incidents or concerns.

- Ensure that all parties know how to report a concern to the education partner and that a copy of the education partners policy is available to all members of the steering group.
- Agree to report any major safeguarding incidents or concerns to DFN Project SEARCH's Safeguarding Lead claire.cookson@dfnfoundation.org.uk immediately when reported to the local authority or the police. DFN Project SEARCH is required to notify the charity commission of any significant incident. (A significant incident is described as having caused serious harm to a person or persons, an incident that will create reputational damage for the partner and the charity, an issue that appears systemic). The lead partner should address the safeguarding concern by applying their own safeguarding policy and they should agree to undertake and co-operate with investigations into safeguarding concerns.

Building up the Student's Knowledge:

In all cases we require that DFN Project SEARCH students know:

- The principles of safeguarding adults
- How to protect themselves and make good decisions to keep themselves safe
- The types of abuse that exist
- What might be an indicator of abuse
- Who they should report abuse to if they are a victim or have witnessed abuse:

What you can do if you suspect or know of abuse

- If it is a medical emergency, call 999
- Don't ignore it
- Talk to the person you feel is being abused
- Listen and make a note of issues, times, and details
- Report it by calling your local Safeguarding Adults hotline or by emailing them

Local Safeguarding Arrangements for Adults

Further information is available from your local safeguarding Adults Board based in your local authority area in England and Wales. You will find local policies, procedures, guidance, training, and support on their websites. The on-site team and their managers must familiarise themselves with the guidance available in their area and make use of the resources available to help them and the young people on the programme. In Scotland these boards are known as Adult Protection Committees, in Ireland the HSE provides guidance and in Portugal through the link: https://data.dre.pt/eli/lei/147/1999/09/01/p/dre/pt/html..

Local Safeguarding Children's Board

For interns under 18 years of age further information is available from your local safeguarding Children Board based in your local authority area. You will find local policies, procedures, guidance, training, and support on their websites. The on-site team and their managers must familiarise themselves with the guidance available in their area and make use of the resources available to help them and the young people on the programme. In Scotland these boards are known as Child Protection Committees.

Further Information

Below are some further guidance notes that will be helpful to our onsite teams.

In addition, information is available at the following websites:

https://www.gov.uk/government/publications/safeguarding-policy-protecting-vulnerable-adults

https://www.cqc.org.uk/sites/default/files/20150710_CQC_New_Safeguarding_Statement.pdf

What you can do if you suspect or know of abuse

- If it is a medical emergency, call 999
- Don't ignore it
- Talk to the person you feel is being abused
- Listen and make a note of issues, times, and details
- Report it by calling your local Safeguarding Adults hotline or by emailing them

To Summarise:

It is expected that the DFN Project SEARCH on-site team, the operational team and the steering group will:

- Have read and understood the law and the guidance on safeguarding adults and children for those under 18
- Recognise that except for the programme in Ireland and one programme in Wales the Educators policy must be followed if an incident occurs. The Educator has primary responsibility for the intern from a safeguarding perspective.
- Connect with specialists in this field in their local authority and avail themselves of available training and resources from that connection.
- Understand this policy and guidance notes in this document
- Encourage the young people on our programmes to grow and develop their own skills and protective behaviours to keep themselves safe during the programme year and beyond into adulthood.

- Help the young people on the programme to determine what they will and will not disclose about themselves to other people and on platforms such as social media.
- Consider how to support the young person and the employer to prevent safeguarding problems from occurring and protect the young person and the managers and mentors from unnecessary risk.
- Put safeguarding on the agenda and use the operational meetings and the steering group meetings as a place to debate, consider, monitor, and improve safeguarding practices for both the interns and the employer and remember that as a partnership you have access to valuable experience and resource that can help you to deliver the best decisions for the young people on the programme.
- Provide agreed high-level data to DFN Project SEARCH about safeguarding incidents reported to the educator so that trends and issues can be identified and responded to for the benefit of the young people on the programme.
- Understand your accountability for safeguarding issues as a team and as an individual and remember that if you have any serious concerns about the wellbeing of an interns follow the guidance below.
- Ensure that the students know as part of their induction onto the programme:
    - The principles of safeguarding adults
    - How to protect themselves using protective behaviours and make good decisions to keep themselves safe
    - The types of abuse that exist
    - What might be an indicator of abuse
    - To whom they should report abuse to if they are a victim or have witnessed it.

Further Guidance

Further guidance is provided based upon the information available in England which is in most cases very similar to the guidance for programmes in Scotland and Wales from their respective Governments. Sites in Ireland and Portugal have some different arrangements that should be explored but many of the principles and issues will resonate and are applicable.

3.0 The Scope of this guidance

This guidance applies to all DFN Project SEARCH programmes and impacts on all partners and associates and staff of DFN Project SEARCH. It is recognised that programmes in Ireland, Portugal, Scotland, and Wales, whilst applying the principles outlined in the policy, may have different responsibility and reporting arrangements which must be understood and applied to achieve the same clarity for all partners involved in their programmes. The programme specialist is available to support all programmes who require further assistance to ensure that their safeguarding practices are robust.

4.0 Related Issues

- Data Sharing Protocols and the Data Collection Requirements in a DFN Project SEARCH Programme

5.0 Guidance Author

Carmel McKeogh

6.0 Guidance Notes

There are 15 guidance notes included

Guidance Note 1 - Types of Abuse and Indicators of Abuse

Introduction

People with care and support needs, such as older people or people with disabilities, are more likely to be abused or neglected. They may be seen as an easy target and may be less likely to identify abuse themselves or to report it. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.

Signs of abuse can often be difficult to detect. This note aims to help people who work with people with care and support needs to identify abuse and recognise indicators. Many types of abuse are also criminal offences and should be treated as such.

Types of abuse:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

Evidence of any one indicator from the following lists should not be taken on its own as proof that abuse is occurring. However, it should alert practitioners to make further assessments and to consider other associated factors. The lists of indicators and examples of behaviour are not exhaustive, and people may be subject to a number of abuse types at the same time.

Physical abuse

Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint

- Making someone purposefully uncomfortable (e.g., opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g., over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g., tying someone to a chair)

Possible indicators of physical abuse

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

Domestic violence or abuse

Types of domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional.

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged sixteen or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation, and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money

- preventing the person from escaping abuse
- regulating everyday behaviour.

Possible indicators of domestic violence or abuse

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

Sexual abuse

Types of sexual abuse

- Rape, attempted rape, or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus, or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Possible indicators of sexual abuse

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

Psychological or emotional abuse

Types of psychological or emotional abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation, or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Possible indicators of psychological or emotional abuse

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

Financial or material abuse

Types of financial or material abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits, or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat, or undue influence put on the person in connection with loans, wills, property, inheritance, or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home

- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards, or documents
- Exploitation of a person's money or assets, e.g., unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g., unnecessary, or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Possible indicators of financial or material abuse

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney, or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g., insufficient food in the house
- Unnecessary property repairs

Modern slavery

Types of modern slavery

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution, and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

Possible indicators of modern slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others

- Living in dirty, cramped, or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

NB. There is Further Home Office information on identifying and reporting modern slavery on their website

Discriminatory abuse

Types of discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- 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

Possible indicators of discriminatory abuse

- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear, or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Organisational or institutional abuse

Types of organisational or institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour

- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles, or hearing aids
- Not taking account of individuals' cultural, religious, or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Possible indicators of organisational or institutional abuse

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational, and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

Neglect and acts of omission

Types of neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation, and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious, or ethnic needs
- Not taking account of educational, social, and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

Possible indicators of neglect and acts of omission

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene

- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

Self-neglect

Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health, or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs
-

Indicators of self-neglect

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing, or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting many animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

If you have any queries or concerns and wish to discuss this matter further than please contact your Programme Specialist for advice.

GUIDANCE NOTE 2

The Law and Safeguarding

Adults

The Care Act 2014 sets out a legal framework for local authorities and other parts of the public sector system about how we should protect adults at risk of abuse or neglect.

Local Authorities have safeguarding duties and they must:

- Lead a multi-agency local adult safeguarding system, that seeks to prevent abuse and neglect and stop it quickly when it happens
- Make enquiries, or request others to make them, when they think an adult with care and support needs may be at risk of abuse or neglect and they need to find out what action may be needed.
- Establish Safeguarding Adults Boards/Adult Protection Committees in Scotland, including local authority, NHS, and Police, which will develop, share, and implement a joint safeguarding strategy
- Carry out Safeguarding Adult Reviews when someone with care and support needs dies because of neglect or abuse and there is a concern that the local authority or its partners could have done more to protect them.
- Arrange for an independent advocate to represent and support a person who is the subject of a safeguarding enquiry or review, if required.

Any relevant person or organisation must provide information to Safeguarding Adults Boards as requested.

You will find a video that explains the Act on the Social Care Institute for Excellence site by following this link https://www.scie.org.uk/care-act-2014/video.asp

Similar guidance is available in Ireland and Portugal from government departments who are responsible for the safeguarding of adults

If you have any queries or concerns and wish to discuss this matter further than please contact your Programme Specialist for advice.

Children

The Department for Education (DfE) is responsible for child protection in England, in Wales it is the Department for Education and Skills and in Scotland it is Education Scotland. They set out policy, legislation, and statutory guidance on how the child protection system should work. Local safeguarding partners are responsible for child protection policy, procedure, and guidance at a local level.

The local safeguarding arrangements are led by three statutory safeguarding partners in England and similar arrangements are in place in Wales and Scotland:

- the local authority
- the clinical commissioning groups or the NHS
- the police.

Working together with other relevant agencies, they must co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children, including deciding to identify and support children at risk of harm.

Duty to protect children

> The most recent guidance for protecting children was updated in England in 2021 and the document can be found by following this link.
> https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf

It is worth noting that everyone who works with children has a responsibility for keeping them safe and everyone who meets children and families has a role to play in sharing information and identifying concerns.

This overarching duty is similar in Scotland, Wales, Portugal, and Ireland.

In addition, section 11 of the Children Act 2004 places a statutory duty on certain agencies to co-operate to safeguard and promote the welfare of children. This includes:

- local authorities
- NHS services and trusts
- police
- probation services and young offenders' institutions.

People who work in these agencies and who do not report suspected cases of abuse or neglect may be subject to disciplinary proceedings but do not currently face criminal penalties.

Mandatory reporting

It is mandatory for all regulated health and social care professionals and teachers in England. If you think a child is in immediate danger, contact the police on 999. If you are worried about a child but they are not in immediate danger, you should share your concerns.

- Follow your organisational child protection procedures. Organisations that work with children and families must have safeguarding policies and procedures in place.
- Contact your local child protection services. Their contact details can be found on the website for the local authority the child lives in.
- Contact the police. Services will risk assess the situation and take action to protect the child as appropriate either through statutory involvement or other support. This may include making a referral to the local authority.

GUIDANCE NOTE 3

Safer Recruitment

All personnel working on a DFN Project SEARCH programme whether employed by a school, college, local authority or supported employment agency should be recruited using the safer recruitment guidance provided by the Department for Education in England, the Department of Education and Skills in Ireland, the Ministry of Science, Technology and Higher Education in Portugal, the Education Department in the Scottish Government and the Education and Skills Department in Wales.

- DFN Project SEARCH require that all personnel who work in and support the onsite teams are subject to the highest level of DBS checks (enhanced with barred list check) or equivalent.
- There is detailed guidance provided for employers by the statutory agencies in each country about how to handle references, the right to work, gaps in employment, checking qualifications and these should be followed by the organisations recruiting staff.
- It is the duty of the employing organisation to ensure that the on-site teams are fit persons to work in the programme.

If you have any queries or concerns and wish to discuss this matter further than please contact your Programme Specialist for advice.

GUIDANCE NOTE 4

Training

GENERAL SAFEGUARDING ADULTS TRAINING

It is expected that each employing partner organisation in the DFN Project SEARCH programme will ensure that their employees have training in safeguarding adults. This training should be delivered before they commence their work on the programme with annual refresher training provided.

This training is often available and free through your local adults safeguarding board.

There is also a significant amount of information, guidance and training available through the Social Care Institute for Excellence web site which is commended to programmes.
https://www.scie.org.uk/safeguarding

GENERAL SAFEGUARDING CHILDREN ARRANGEMENTS

It is expected that each employing partner organisation in the DFN Project SEARCH programme will ensure that their employees have training in safeguarding children if applicable. This training should be delivered before they commence their work on the programme with annual refresher training provided

This training is often available through your local children's safeguarding board.

There is also a significant amount of information, guidance and training available through the NSPCC and through the Social Care Institute for Excellence web site which is commended to programmes.

THE PREVENT AGENDA – Radicalisation and Terrorism

The Home Office provide a very useful on-line training module for use by sites which introduces the Prevent duty. It explains how it aims to safeguard vulnerable people from being radicalised to support terrorism or become terrorists themselves.
https://www.elearning.prevent.homeoffice.gov.uk/m/screen1

It is expected that each employing partner organisation in the DFN Project SEARCH programme will ensure that their employees have training in the Prevent agenda. This training should be delivered before they commence their work on the programme with annual refresher training provided.

If you would like training in this field delivered through your network, please contact your Programme Specialist.

GUIDANCE NOTE 5

RESPONSIBILITIES

Overall responsibility for safeguard adults and children on the programme ultimately lies with the education partner as the young people on the programme are students on the school roll.

It is however the responsibility of all partners to ensure that there are effective processes in place regarding safeguarding, and that the processes and procedures link effectively with those of the Local community. This includes ensuring that:

- All team members involved in the programme read these guidance notes and undertake appropriate training and refresher training as required.
- Local safeguarding policies and procedures are in place in the host business which include the relevant Local Authority procedure for submitting a safeguarding alert with up-to-date contact details
- All team members are responsible for maintaining clear and professional boundaries between themselves and the people they support. This is important because staff who do not adhere to boundaries based on trust, respect, and the appropriate use of power with a focus on meeting the needs of the individual, can cause confusion and the risk of potential abuse.
- All team members feel empowered to act on any concerns, suspicions, or evidence of abuse, and report any concerns to their line manager or a senior member of the team.
- If team members do not feel their concerns have been acted upon or taken seriously, then they should follow the process outlined in their employers Whistleblowing policy.

Below is a table which sets out the responsibilities of partners involved in a DFN Project SEARCH Programme.

Area	Educator	Host Business	Supported Employment	DFN Project SEARCH
Safeguarding Policy Writing and Review	Each education partner will have their own policy informed by guidance from the DFE in England, Education Scotland, the DFES in Wales and the Ministry for Education in Portugal. In Ireland, the	Most of the larger host businesses have safeguarding policies but not all host businesses will have one (they may have other policies such as disciplinary, grievance and bullying and harassment instead).	All supported employment providers will have their own safeguarding policies which will be led by adult guidance from the CQC	DFN Project SEARCH has its own policy that relates to how the organisation will deal with safeguarding matters internally and how it supports partners by monitoring high level incidents and 'near misses' across all programmes. There is only DFN Project SEARCH that has access to this wider

	education role is smaller, and they do not lead on policy in this area.	Those that have one will take guidance from specialists in the field such as the local authority designated officer in councils in England and Wales and the Child protection Committee in Scotland or NHS England in the case of hospitals.		view of the programmes and so can use that information to enhance and improve safeguarding for all
Safeguarding Policy Sharing and Exploration	Except for Ireland, the education partner has the lead policy when it comes to issues relating to safeguarding as they affect the intern. They also have the primary data about the intern, and they should put in place a data sharing protocol. With this in place a discussion should take place at the steering group to explore this policy and any issues that might arise so that	The host business policy should be shared with the education and supported employment partner in the steering group. The teacher will need to familiarise themselves with the policy so that they can teach it and the steering group should explore any anomalies which might arise between this policy and the educator's policy.	This policy should be shared with all partners and the steering group should explore any anomalies which might arise between this policy and the educator's policy or the host business policy.	DFN Project SEARCH can support partners with this exercise at the Steering Group and the Programme Specialist can assist where there are difficulties that arise or seek advice from the safeguarding leads.
Safeguarding Policy Implementation	The education partner has the lead when it comes to dealing with safeguarding matters that arise when it comes to managing the matter with the intern and their family if necessary.	The intern should be taught the host business policies in preparation for employment, and they should already be familiar with the college processes. Where the incident involves a host business employee, matters relating to the employee will be dealt with by the host business	Except for one programme in Wales and the programme in Ireland, the supported employment agencies policies will not have the leading policy, however because of the data sharing protocol in place, the supported employment partner should be aware of the issue that arose	DFN Project SEARCH should be notified of incidents: •Immediately if the issue is serious and should be reported to the charity commission •At the end of each term if the issue was raised with the safeguarding lead at the education

			and how it was dealt with	partners establishment • If called upon to participate in a 'near miss' discussion group
Safeguarding Training and awareness	The education partner is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. The education partner is also responsible for ensuring that it has shared its policies and procedures with the host business liaison, the supported employment agency staff and the DFN Project SEARCH Programme Specialist Each year the education provider will provide a training refresh for its staff and let partners know of any changes to its policies or procedures	The host business partner is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. The host business partner is also responsible for ensuring that it has shared its policies and procedures with the education partners staff, the supported employment agency staff and the DFN Project SEARCH Programme Specialist Each year the host business will provide a training refresh for its staff and let partners know of any changes to its	The supported employment partner is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. The supported employment partner is also responsible for ensuring that it has shared its policies and procedures with the education partners staff, the host business liaison and the DFN Project SEARCH Programme Specialist Each year the supported employment provider will provide a training refresh for its staff and let partners know of any changes to its	DFN Project SEARCH is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. DFN Project SEARCH is also responsible for ensuring that it has shared its policies and procedures with the education partners staff, the host business liaison, and the supported employment agency Each year DFN Project SEARCH will provide a training refresh for its staff and let partners know of any changes to its policies or procedures

		policies or procedures	policies or procedures	
Recruitment and Selection of staff	The education partner is responsible for recruiting and selecting staff in accordance with the safer recruitment guidelines provided by the DFE and its equivalent bodies in Wales, Scotland, Portugal, and Ireland. All staff should be checked and vetted through the relevant systems that exist to ensure they are fit to work with children and adults at risk of harm.	The host business will employ some individuals whose job roles will require them to be vetted to work with children and adults at risk of harm and some who do not require that level of check. Where an intern is working in a workplace that does not involve intensive one to one time with an employee there is no need for the employee to be vetted just because they work with a young person on a work placement programme. However, if there is extensive one to one time with an intern then a decision would be made about vetting requirements by	The supported employment partner is responsible for recruiting and selecting staff in accordance with the safer recruitment guidelines provided by the DFE and its equivalent bodies in Wales, Scotland, Portugal, and Ireland. All staff should be checked and vetted through the relevant systems that exist to ensure they are fit to work with children and adults at risk of harm.	DFN Project SEARCH recruit and select staff in accordance with the safer recruitment guidelines provided by the DFE and its equivalent bodies in Wales, Scotland, Portugal, and Ireland. All staff and Associates are checked and vetted through the relevant systems that exist to ensure they are fit to work with children and adults at risk of harm.

		the steering group.		

GUIDANCE NOTE 6 - REPORTING CONCERNS TO A LOCAL AUTHORITY

It is the responsibility of the Local Authority where the alleged abuse has occurred to coordinate any safeguarding work, to determine whether abuse has occurred, whether it meets the threshold for progressing to a Safeguarding Strategy meeting, and to agree the measures needed to protect the adult or child at risk.

If a safeguarding concern progresses to a Strategy Meeting, and that any team member is invited to attend the meeting, their manager will prepare a Safeguarding Strategy Report for the meeting and will personally attend with the team member who raised the concern

The senior manager must ensure that the steering group receives a copy of the minutes of the Safeguarding Strategy Meeting, that these are carefully reviewed and that any changes to Safeguarding arrangements that are required are noted and acted upon.

CONFIDENTIALITY

The Government guidance document 'No Secrets' recognised that there were circumstances in which it was necessary to share confidential information. The Care Act 2014 sections 42-46 and Chapter 14 of the statutory guidance replaces No Secrets and puts it on a statutory footing.

The statutory guidance on information sharing and record keeping states that:

a) Whenever a complaint or allegation of abuse is made, the organization should keep clear accurate records of all action taken.
b) Staff should be given clear direction on what information is recorded, including.
   i. What information do staff need to know to provide a timely response to the adult concerned?
   ii. What information do staff need to know to keep adults safe under the organisation's duty to protect people from harm?
   iii. What information is not necessary?
   iv. What is the basis for any decision to share (or not share) information with a third party?

In accordance with Data Protection and Information Governance policy, data on students will be shared with Local Authorities/SABs when it is requested, pursuant to the General Data Protection Regulation (GDPR), i.e., that the processing of such data is necessary for the provision of health or social care. Information sharing must be in line with the principles and rules of fairness, confidentiality and data protection when making records available to those adults affected by, and subject to, an enquiry.

If the alleged abuser is on the programme themselves, then information about their involvement in an adult/child safeguarding enquiry, including the outcome, should be included in their records.

There may be exceptions to the disclosing of information and if in doubt, you should always seek advice

GUIDANCE NOTE 7

PREVENTION OF ABUSE

To prevent and minimise abuse from occurring, the following standards should be adhered to:

- All schools, colleges, local authorities and supported employment agencies will ensure that all individuals who are employed or volunteer to work with adults and children at risk are subject to enhanced DBS checks
- Safe recruitment policies must be followed for all staff and volunteers who work in our programmes
- All references, including a reference from the last employer, are taken, and received before formal offers of employment are made in writing.
- All reasonable efforts to check the references are bona fide and genuine are taken
- All staff will receive regular supervision, and safeguarding supervision where appropriate.
- All allegations will be responded to in a positive manner.
- All staff members are issued with identity badges, which they must always carry.
- All internships that the students undertake will be risk assessed and as part of that risk assessment process the team should consider if steps should be taken to safeguard the young person by taking measures such as ensuring the young person is not left alone for long periods, that they are not left in one to one contact with a worker, that in some circumstances their mentor might need to be DBS cleared and vetted.
- Visits by celebrities, VIPs and other official visitors will be well managed and visitors will always be supervised

GUIDANCE NOTE 8

HOW TO SUPPORT YOUNG ADULTS AT RISK TO KEEP THEMSELVES SAFE

DFN Project SEARCH is committed to empowering and enabling students to keep themselves safe from harm and abuse. This is to be achieved through the following approaches:

- Promote awareness of emergency services and how to access these, including reporting concerns directly to the police and Local Authority safeguarding services
- Provide information in accessible formats to students regarding their rights to self-determination, privacy, dignity, and protection from all forms of abuse, including domestic violence and hate/mate crime.
- Provide information in large print, audio format, DVD, other languages, Braille etc and support people through the curriculum to understand what constitutes abuse and unacceptable behaviour.
- Provide guidance on reporting safeguarding concerns
- Ensure that personal safety and safeguarding concerns are addressed in an open and supportive manner and forms part of the risk assessment, development, and support plans.
- Promote awareness of organisations which provide advocacy or specialist advice and support e.g., in relation to domestic violence or hate crime.
- Requesting the support of an Independent Mental Capacity Advocate (IMCA) where the person has a need to independent support.
- Support people to understand the risks associated with social networking and internet usage.
- Raise awareness of 'stranger danger'
- Develop safeguarding training for students as part of your curriculum
- Provide the students with information and advice about mate crime and how to safeguard their personal finances
- Work with other agencies to increase reporting of hate motivated incidents and crime.
- Contact agencies who might support you by providing training to the interns, for example the Police or the Local Authority.
- The attached easy read document provided by the NHS may be a useful tool to support your safeguarding training with interns.
  https://www.thh.nhs.uk/documents/_Patients/PatientLeaflets/general/Safeguarding_Adults_LD-EasyRead-DOH.pdf

GUIDANCE NOTE 9

HIGH LEVEL INCIDENT REPORTING TO DFN Project SEARCH

Within a DFN Project SEARCH programme the responsibility for safeguarding students is the duty of the education partner as the status of the young people is that of a student on the school/college roll.

However, DFN Project SEARCH is a Charity registered in England and in Scotland and as such it too has obligations regarding safeguarding which include a requirement to:

- Periodically review our safeguarding policy and procedures, learning from any serious incident or 'near miss'.

DFN Project SEARCH is also in a unique position in that it is the only partner that is involved in all the programmes in the UK and is therefore the only one that can see trends or repeated problems and issues that arise. Being sighted on these trends, issues and problems will be helpful to all programmes in terms of sharing learning, revising policy, and improving curriculum and job coaching delivery with a view to further enhancing safeguarding practice so that young people will better be able to achieve their employment goals and retain employment in the longer term.

To ensure that this opportunity for improvement is realised DFN Project SEARCH will take six specific actions:

1. We will collect high level data from programmes and review it at Board Meetings once per year.

2. The data collected will be anonymized and will include:
    a) Date Incident reported to the college/school safeguarding team
    b) A brief description of the nature of incident
    c) When was the outcome determined?
    d) What was the outcome?

3. The data will be collected by the DFN Project SEARCH Impact and Learning Manager on a termly basis from the education partner.

4. We will share learning that emerges from the high-level data and the qualitative review with the Project SEARCH Headquarters in the US to impact the development of programme materials and our learning and development offer to our existing and new programmes.

5. We will also share the learning with programme partners in education, supported employment, local authorities, and host businesses so that it can support continuous improvement in their teaching, coaching and employment practices

SERIOUS INCIDENT REPORTING

Our partners are asked to share with the CEO Claire Cookson immediately it occurs details of any serious safeguarding incident in order that:

- We can support the programme with advice and guidance if necessary
- We can share any intelligence if appropriate with other programmes to stop any further incidents occurring
- Prepare for any media enquiries together

A serious incident is described by the Charity Commission as an incident where:

- Serious harm has happened to a person or persons
- There is likely to be reputational damage to the charity and the partners
- There seems to be a systemic problem

Contact Details for the CEO are as follows:

- **E** claire.cookson@dfnfoundation.org
- **M**+44 (0)7760 225367
- **T** +44 (0)20 3432 3402
- **A** 10 Norwich Street, London. EC4A 1BD (postal address only)

GUIDANCE NOTE 10

Low level Incident Reporting

The latest guidance from the Department for education in England contains information about how to handle low level safeguarding concerns.

These are concerns that do not meet the harm threshold but where the DFE suggest that governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. They state that it is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children and adults at risk of harm. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Examples of such behaviour could include, but are not limited to:
    - being over friendly with children or young people
    - having favourites
    - taking photographs of children or adults at risk of harm on their mobile phone
    - engaging with a child or adult at risk of harm on a one-to-one basis in a secluded area or behind a closed door
    - using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns are shared responsibly and with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

The educators policy should make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e. to create and embed a culture of openness, trust and transparency in which the school's or college's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

The governing body or proprietor should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

Schools and colleges can achieve the purpose of their low-level concerns policy by, for example:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping identify any weakness in the school or colleges safeguarding system.

Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

The school or college policy should also set out the procedure for responding to reports of low-level concerns. If the concern has been raised via a third party, the headteacher/principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All this needs to be recorded along with the rationale for their decisions and action taken. A good low level concerns policy will simply be a reflection and extension of the school's or college's wider staff behaviour policy/code of conduct. More detailed guidance and case studies on low-level concerns can be found in Developing and implementing a low-level concerns policy (farrer.co.uk).

In a DFN Project SEARCH programme, the onsite team, including the job coach whether employed by the college or not, should be familiar with the college policy on low level incident reporting

In addition DFN Project SEARCH randomly select a group of tutors each year to discuss low level safeguarding incidents that have occurred in order that any learning can be shared from commonly occurring issues across all of its programmes to improve safeguarding practice across all programmes.

GUIDANCE NOTE 11

Safeguarding and Remote Delivery of Support to Interns

As a result of the Covid 19 pandemic DFN Project SEARCH programmes have had to embrace new ways of working with interns to deliver support, training and guidance and engage with the young people and their families.

Parents, carers, and young people want to be educated and gainfully occupied during this period and schools/ colleges and supported employment agencies are all balancing the different perspectives and needs to provide the best support they can, given the circumstances.

This has meant the use of technology to deliver lessons and coaching, sending work through mail systems and using the telephone to connect with young people in the best way possible to meet their needs. Working in these new ways brings its challenges in terms of technology, logistics, welfare, physical and mental health and raises issues with regards to safeguarding.

Detailed Guidance

The UK Governments have issued detailed guidance for schools and colleges because of covid 19 and DFN Project SEARCH expects that all tutors and job coaches and their respective managers have read the guidance and ensured they have a full understanding of their responsibilities.

- The Department for Education detailed guidance for schools and colleges Actions for FE colleges and providers during the coronavirus pandemic - GOV.UK (www.gov.uk)
- Scottish Government guidance https://www.gov.scot/publications/coronavirus-covid-19-supplementary-national-child-protection-guidance/
- Welsh Government Guidance - https://gov.wales/education-safeguarding-guidance-coronavirus

Guidance in Ireland and Portugal will also be available to programme teams and should similarly be read, understood, and followed.

Delivering curriculum, job coaching support and job development support remotely

To support interns to stay safe, well and motivated things that the steering committee and onsite team need to consider are:

- The creation of structure to the day may well be beneficial for interns and for families as well as for tutors and job coaches.

- Shortening the time of virtual lessons and job coach meetings and punctuating them through the day may be beneficial and help to alleviate the problem of people having too much 'screen time'
- Including activities such as exercise, creative writing or drawing, board games and quizzes, music, audio books, reading and the development of new hobbies and recording them in diaries and reflective journals may assist interns mental and physical health and wellbeing.
- Fortnightly surveys of the interns and parents can be used to find out whether the systems put in place for them are working and to gather suggestions for improvement which should be responded to where possible an appropriate.

Staying safe using technology

The UK government advice signposts schools and college personnel to the charity UK Safer Internet Centre for advice and guidance on using the internet safely. You can find them at: https://www.saferinternet.org.uk/

The Government also promote the work of the UK Council for internet safety who can be found at: https://www.gov.uk/government/organisations/uk-council-for-internet-safety

Mencap also provide some training modules that can be used to teach online internet safety which will help interns to stay safe online and this can be found at https://www.mencap.org.uk/about-us/our-projects/safesurfing

It is worth noting that guidance in this area changes frequently as new threats and fixes for problems are developed and so it is worth checking websites for updates and DFN Project SEARCH will share whatever new information we become aware of through our newsletters

Guidance Note 12

Information Sharing and Safeguarding

Data Sharing Protocols

i. DFN Project SEARCH programmes are delivered by partners who work together to support the interns and graduates who are the beneficiaries of the programme. It is imperative that to safeguard the interns and graduates, partners can share information with one another openly with confidence that each member of the partnership will treat the information as confidential unless it is agreed that there is an acceptable and lawful reason to divulge it.

ii. To facilitate this a data sharing protocol should be established and signed by all partners. For the most part the data sharing protocol will be tabled and led by the education partner who holds the primary data about the intern to enable them to be properly supported and safeguarded. However, you will find below a sample data sharing protocol if your education partner does not have one that is appropriate.

Template%20%20Mul
ti%20Party%20Data%

Information sharing Definitions

i. **Confidentiality:** Not all information is confidential. Confidential information is information of some sensitivity, which is not already lawfully in the public domain or readily available from another public source, and which has been shared in a relationship where the person giving the information understood that it would not be shared with others.

ii. DFN Project SEARCH understands confidentiality to mean that no information regarding beneficiaries shall be given directly or indirectly to any third party which is external to the parties in the partnership without those beneficiaries prior expressed consent to disclose such information.

iii. **Breach of confidentiality:** Confidence is only breached where the sharing of confidential information is not authorised by the person who provided it or to whom it relates. If the information was provided on the understanding that it would be shared with a limited range of people or for limited purposes, then sharing in accordance with that understanding will not be a breach of confidence. Similarly, there will not be a breach of confidence where there is explicit consent to the sharing.

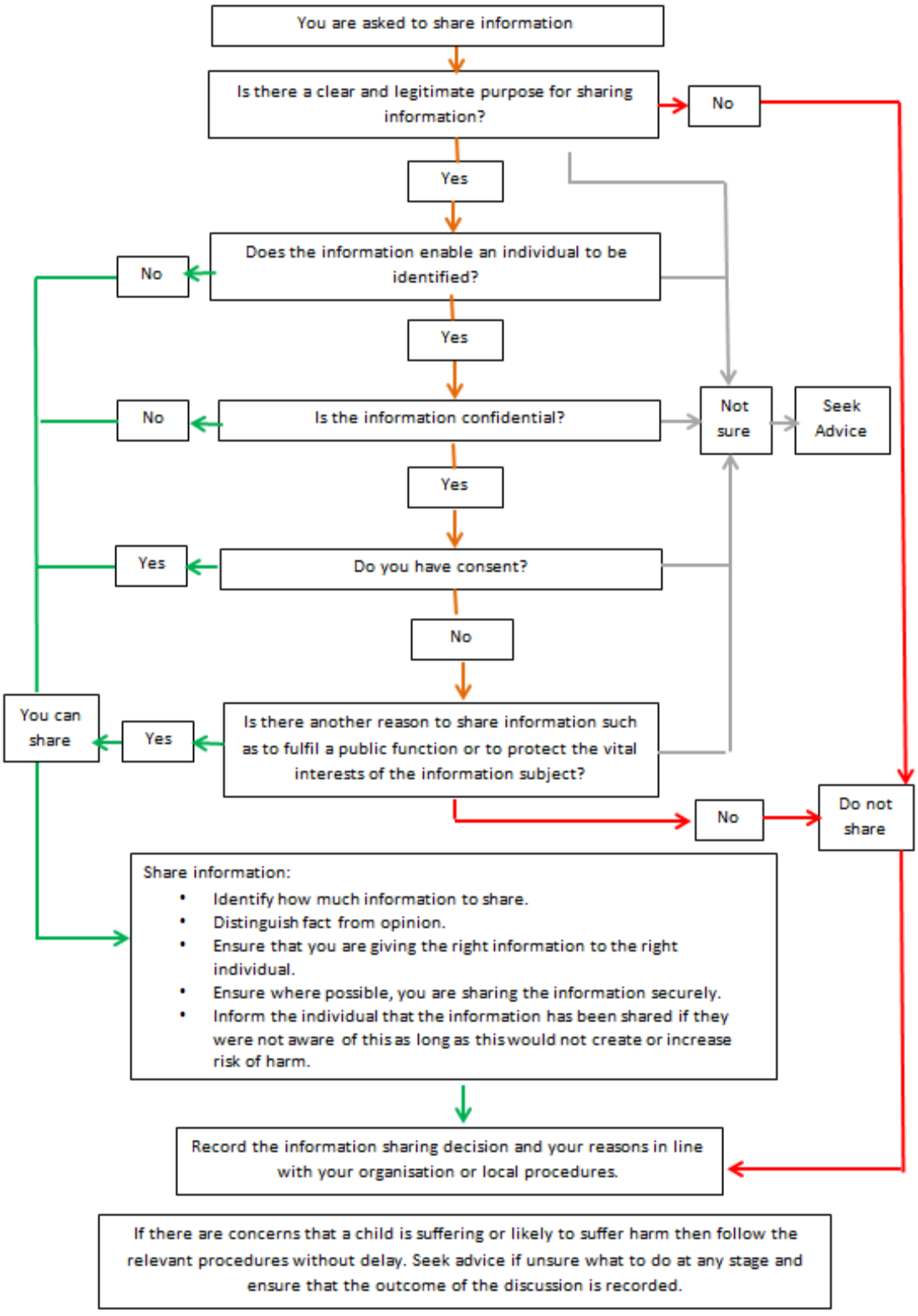
iv. Even where sharing of confidential information is not authorised, the partners may still lawfully share it if this can be justified in the public interest.

v. Seeking consent should be the first option, if appropriate. Where consent cannot be obtained to the sharing of the information or is refused, or where seeking it is likely to undermine the prevention, detection or prosecution of a crime, the question of whether there is a sufficient public interest must be judged by the safeguarding lead or deputy on the facts of each case.

vi. Therefore, where you have a concern about a child, young person, or adults at risk of harm, you should not regard refusal of consent as necessarily precluding the sharing of confidential information

vii. **Public interest**: A public interest can arise in a wide range of circumstances, for example, to protect children or other people from harm, to promote the welfare of children and adults at risk of harm or to prevent crime and disorder. There are also public interests, which in some circumstances may weigh against sharing, including the public interest in maintaining public confidence in the confidentiality of certain services. The key factor in deciding whether to share confidential information is proportionality, i.e., whether the proposed sharing is a proportionate response to the need to protect the public interest in question. (Serious crime: This means any crime which causes or is likely to cause significant harm to a child, young person, or serious harm to an adult.)

Information sharing flowchart – please see below


You are asked to share information
Is there a clear and legitimate purpose for sharing information?
No
Yes
Does the information enable an individual to be identified?
No
Yes
Is the information confidential?
No
Not sure
Seek Advice
Yes
Do you have consent?
Yes
No
Is there another reason to share information such as to fulfil a public function or to protect the vital interests of the information subject?
Yes
You can share
No
Do not share
Share information:
Identify how much information to share.
Distinguish fact from opinion.
Ensure that you are giving the right information to the right individual.
Ensure where possible, you are sharing the information securely.
Inform the individual that the information has been shared if they were not aware of this as long as this would not create or increase risk of harm.
Record the information sharing decision and your reasons in line with your organisation or local procedures.
If there are concerns that a child is suffering or likely to suffer harm then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

GUIDANCE NOTE 13

PREVENT: VULNERABLE TO RADICALISATION (VTR) OR INFLUENCED BY EXTREMISM

I. Staff, trustees, associates, volunteers, or consultants may notice a change in the behaviour a child or adult at risk of harm that may suggest they are vulnerable to violent extremism. Here is a link to guidance from the Government about this issue: https://www.gov.uk/government/publications/prevent-duty-guidance

II. After having discussed concerns with appropriate colleagues, being mindful of confidentiality, if there is a cause for concern that the individual may be vulnerable to violent extremism, the safeguarding lead of the education partner should be contacted so that decisions can be taken about referring the matter to the relevant police force.

III. UNLIKE SAFEGUARDING STAFF MUST NOT DISCUSS CONCERNS WITH THE INDIVIDUAL PRIOR TO REFERRAL

IV. Causes of Concern

A. People who are vulnerable to radicalisation (VTR) come from all walks of life, genders, ages and social groups, income levels, professions etc. Extremism is any form of extremism; this includes extreme right-wing views, animal rights issues as well as religious views.
B. It is unhelpful to have a narrow view of who can be VTR. It is important to keep an open mind. Looking at the factors associated with a person who becomes vulnerable to it can be helpful to look at. They include the factors set out in the diagram below.
C. This guide is to help you refer concerns about an individual who may be vulnerable to being drawn into terrorism. Below are questions which may help you to quantify and structure your concerns. The list is not exhaustive and other factors may be present, but they are intended as a guide to help communicate your professional judgement about what has led you to make a referral.
D. Faith / ideology
    I. Are they new to a particular faith / faith strand?
    II. Do they have naïve or narrow religious or political views?
    III. Have there been sudden changes in their observance, behaviour, interaction, or attendance at their place of worship / organised meeting?
    IV. Have there been specific examples or is there an undertone of "Them and Us" language or violent rhetoric being used or behaviour occurring?
    V. Is there evidence of increasing association with a closed tight knit group of individuals / known recruiters / extremists / restricted events?

VI. Are there particular grievances either personal or global that appear to be unresolved / festering?
VII. Has there been an increase in unusual travel abroad without satisfactory explanation?

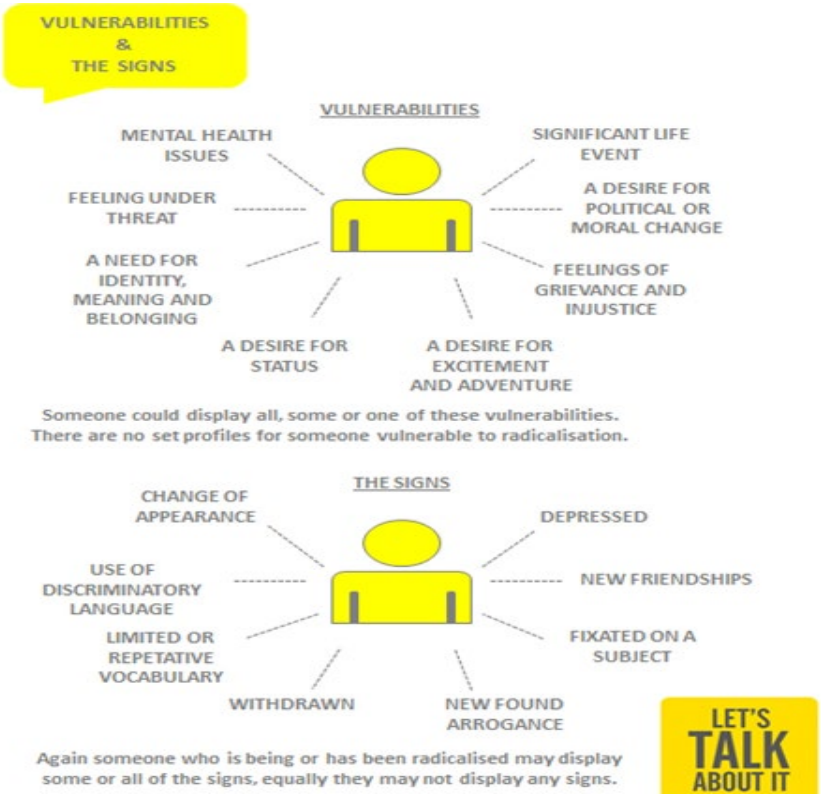
E. Personal / emotional / social issues
   i. Is there conflict with their families regarding religious beliefs / lifestyle choices?
   ii. Is there evidence of cultural anxiety and / or isolation linked to insularity / lack of integration? Is there evidence of increasing isolation from family, friends, or groups towards a smaller group of individuals or a known location?
   iii. Is there history in petty criminality and / or unusual hedonistic behaviour (alcohol/drug use, casual sexual relationships, and addictive behaviours)?
   iv. Have they got / had extremist propaganda materials (DVD's, CD's, leaflets etc.) in their possession?
   v. Do they associate with negative / criminal peers or known groups of concern?
   vi. Are there concerns regarding their emotional stability and or mental health?
   vii. Is there evidence of participation in survivalist / combat simulation activities, e.g., paint balling?

F. Risk / Protective Factors
   i. What are the specific factors which are contributing towards making the individual more vulnerable to radicalisation? E.g., mental health, language barriers, cultural anxiety, impressionability, criminality, specific grievance, transitional period in life etc.
   ii. Is there any evidence of others targeting or exploiting these vulnerabilities or risks?
   iii. What factors are already in place or could be developed to firm up support for the individual or help them increase their resilience to negative influences? E.g., positive family ties, employment, mentor / agency input etc.

G. Reporting Terrorism and Suspected Radicalisation

All site staff, trustees, associates, volunteers, and consultants should notify the Safeguarding lead at the college if they are concerned about an individual intern, they think is at risk of radicalisation however in addition:

i. You can report online material that promotes terrorism or extremism on the GOV.UK website (https://www.gov.uk/report-terrorism).
ii. If you suspect someone is involved in terrorism in any way or that someone has been radicalised, you can also call the police or report your suspicions to them online.
iii. You can remain anonymous throughout this process.
iv. Alternatively, you can call the Anti-Terrorist Hotline anonymously on 0800 789 321.



GUIDANCE NOTE 14

PEER ON PEER ABUSE

I. Peer on peer abuse occurs when a young person or adults at risk of harm is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer-on-peer abuse is under the age of 18 or an adult at risk of harm. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child or adults at risk of harm perpetrator as well as the victim.

II. Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however, it can also affect boys and young men, those with learning difficulties or disabilities, LGBTQ Children, and young people (CYP) and those who are from different communities.

III. Situations where young people are forced or coerced into sexual activity by peers or associates can be related with gang / serious youth violence activity but that is not always the case.

IV. Peer influence or peer pressure is a major factor in the decisions made by young people to join groups. Many young people see it as a "way out" from their day-to-day life and feel a strong bond with their peers, one which they may be lacking at home.

V. There is no clear definition of what peer on peer abuse entails. However, it can be captured in a range of different definitions:

a) Domestic Abuse: relates to young people and adults at risk of harm who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships.

b) Child Sexual Exploitation: captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts, and situations by a person of any age - including another young person.

c) Harmful Sexual Behaviour: refers to any young person or adults at risk of harm, who demonstrates behaviour outside of their normative parameters of development (this includes but is not exclusive to abusive behaviours)

d) Serious Youth Crime / Violence: reference to offences (as opposed to relationships / contexts) and captures all those of the most serious in nature including murder, rape and GBH between young people under-18 and adults at risk of harm.

e) Peer on peer abuse can refer to any of the above individually or as a combination, therefore professionals working with young people and adults at risk of harm who are experiencing abuse from their peers must respond to the needs of each of the definitions to uncover the level of complexity and respond in the most effective manner.

f) It is possible that a young person or an adult at risk of harm may be sexually exploited in a gang related situation by their boyfriend or girlfriend.

VI. Key Areas Where Peer on Peer Abuse Occurs:

a) **Bullying** (including Cyberbullying) Bullying is defined as "behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally". Bullying often starts with trivial events and it is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading hurtful and untruthful rumours, threatening, or undermining someone; mocking; making offensive comments; taking belongings; inappropriate touching; producing offensive graffiti; or always leaving someone out of groups. It can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child or adults at risk of harm both physically and emotionally. A child or adults at risk of harm that is being bullied can feel like there's no escape because it can happen wherever they are, at any time of day or night. There are many different forms of bullying:

1. 'Cyberbullying' involves sending inappropriate or hurtful text messages, emails, or instant messages, posting malicious material online (e.g., on social networking websites) or sending or posting offensive or degrading images and videos.
2. Racist and Religious Bullying: A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin, or national status
3. Sexual, Sexist and Transphobic Bullying: includes any behaviour, whether physical or nonphysical, where sexuality is used as a weapon by boys or girls.
4. Homophobic Bullying: targets someone because of their sexual orientation (or perceived sexual orientation).
5. Disablist Bullying: targets someone solely based on their disability, this can include manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.
6. It is important to remember that bullying can also be a combination of the above. There has been much media attention surrounding children and young people who have committed suicide due to being bullied. Professionals must understand the damaging and at times fatal effects bullying can and does have on children and adults at risk of harm to be able to respond to it effectively.

b) Child Sexual Exploitation (CSE)

1. Many of the warning signs and indicators of CSE tend to refer to adult perpetrators, e.g., associations with older boyfriends / girlfriends, relationships, or associations with risky adults and / or entering or leaving vehicles driven by unknown adults.
2. As per the revised definition of CSE it "occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity". This can also occur with an adult at risk of harm. The key element of CSE is the imbalance of power and control within the exploitative relationship. Many children and adults at risk of harm are not aware of the exploitation as they have a genuine belief that they are loved by their boyfriend / girlfriend or are acting in accordance with their peers. Children and adults at risk of harm are often recruited into exploitation by those who they trust, those of a similar age and with similar hobbies, often the nature of peer-on-peer exploitation encompasses a sense of peer pressure and wanting to fit in.
3. In peer-on-peer exploitation, schools and youth clubs are also locations where children and young adults at risk of harm can be exploited.

c) Harmful Sexual Behaviour Including Sexting

1. Sexually harmful behaviour from young people and adults at risk of harm does not always occur with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour, and it may be just as distressing to the young person or adults at risk of harm who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault / abuse.
2. This also includes sexting when someone sends or receives a sexually explicit text, image, or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies. Pressuring someone into sending a nude picture may occur in any relationship and to anyone, whatever their age, gender, or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be committing a criminal offence.

b) Gang Activity and Youth Violence

1. A child or an adult at risk of harm can be exploited (sexually and / or physically) by a gang, but this is not necessarily the reason why gangs

are formed. The Office of the Children's Commissioner has defined CSE in gangs and groups as:

a. Gangs - mainly comprising men and boys aged 13-25 years old, who take part in many forms of criminal activity (e.g., knife crime or robbery) who can engage in violence against other gangs, and who have identifiable markers, for example a territory, a name, or sometimes clothing.
b. Groups - involves people who come together in person or online for the purpose of setting up, coordination and / or taking part in the sexual exploitation of children in either an organised or opportunistic way.
c. Types of exploitation may include using sex as a weapon between rival gangs, as a form of punishment to fellow gang members and / or a means of gaining status within the hierarchy of the gang.
d. Children or adults at risk of harm may be forced to enter the gang by carrying out an initiation process which may be harmful to them and / or may inflict harm to others.
e. Where abuse takes place in a gang environment, female members may perceive the abuse as normal, as well as accepting it as a way of achieving a respected status / title within the gang.

e) Domestic Violence

1. Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and / or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and / or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, to gain power and maintain control over the partner.

VII. Keeping children and adults at risk of harm safe – action steps and approach

a) Actions to be Taken Keeping Children Safe in Education, 2016 states that 'Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of peer-on-peer abuse and sets out how allegations of peer-on-peer abuse will be investigated and dealt with'. Based on that guidance DFN Project SEARCH will also be cognisant of the following when matters of peer-on-peer abuse are witnessed by staff, volunteers, associates, and consultants.

1. Notify the DFN Project SEARCH Safeguarding Lead if you are concerned about peer-on-peer abuse in a setting that DFN Project SEARCH works

with. The safeguarding lead may contact the organisation concerned to ensure that they are aware of the guidance on this matter and are following it. Broadly the guidance states that:

a. Professionals in the setting consider the impact on the environment when both the perpetrator and victim attend the same setting. It is vital for professionals to understand that the child or adult at risk of harm who is perpetrating the abuse may also be at risk of harm.
b. Professionals in the setting to make every effort to ensure that the perpetrator is also treated as a victim and undertake assessments to conclude this. Sensitive work must be undertaken with the child who is perpetrating, by helping them to understand the nature of their behaviour and the effect it has on others may prevent the abuse.
c. Professionals in the setting should make every effort to understand the environmental context of the child's or adults at risk of harm's life when assessing the risk posed to them. Individual experiences do not necessarily cause the abuse the victim is experiencing, but this may be used by perpetrators who have power and control over them.
d. Those who are working with Children and adults at risk of harm must be able to use their professional judgement in identifying when what may be perceived as "normal developmental childhood behaviour" becomes abusive, dangerous, and harmful to others.

2. If the peer-on-peer abuse involves adults at risk of harm who work, volunteer, or consult for DFN Project SEARCH the Safeguarding Lead at DFN Project SEARCH Claire Cookson will deal with the issues and will themselves be mindful of the issues raised above

GUIDANCE NOTE 15

Safeguarding children and young people from racism and creating an anti-racist culture

Farrer and Co. are a legal company that specialise in safeguarding and produce regular guidance notes and articles about the subject. Following on from the tragic death of George Floyd in the USA and the subsequent global movement that emerged and called for change they shared an open letter which was sent to The Independent news organisation from a group of over 200 black students and alumni asserting the prevalence of racism in independent schools and imploring these schools to take a stand against racist behaviour and attitudes within their communities.

In the UK schools and colleges are in a unique position to tackle racism and ensure their students, are balanced and unbiased. Schools and colleges can "prioritise cultivating environments of acceptance and understanding, producing adults who aren't simply not racist, but anti-racist".

The letter makes the following suggestions for how schools and colleges can begin to tackle this issue:

- Introduce unconscious bias training as standard for all staff as well as providing workshops for students across year groups.
- Talk to your black students about their experiences, take the time to understand what they are going through and listen to their recommendations.
- Hire a workforce that accurately represents your communities. We ask for all schools to review their hiring process and commit to becoming equal opportunity employers.
- Ensure access to BAME councillors for students.
- Adopt a clear racial code of conduct, with appropriate punishments included. Commit to following through with these punishments when required.
- A tangible commitment to diversifying curriculum."

While these suggestions were initially directed at independent schools, they are also applicable to other organisations that work with children and young people and likewise the further initiatives discussed in this article are relevant sports and religious organisations and charities as well as schools.

Your organisation may already have some of the above measures or others in place, but recent events have shown beyond doubt that there is still far more work to be done. While the issues highlighted by the Black Lives Matter movement are far reaching and complex and there is no simple solution to creating an anti-racist organisational culture, here we discuss some initial practical steps you can take towards tackling racism in your organisation.

1. Listen, understand the problem

Before an organisation can start to tackle racism, it needs to understand the lived experience of those it engages with, hearing the perspectives of children and young people, but also staff, trustees, and other stakeholders. One element that stifles improvement in organisational culture is that fear of saying the wrong thing causes people to say nothing at all. Organisations that work with children must create appropriate forums and space to enable frank discussions to take place and remember that having an awkward conversation is better than having no conversation at all.

2. Education, education, education

After listening comes education. The Equality Act 2010's definition of racial harassment is much wider than people assume, and it is extremely important that organisations understand and educate their staff and young people on how to recognise harassment perpetrators by others, or unwittingly themselves. There has been much discussion in the press around "micro aggressions" and how unwanted comments relating to race can have the effect of violating a person's dignity or creating a hostile, intimidating, or degrading environment for others.

The Equality and Human Rights Commission is an excellent source of guidance on how anti-discrimination legislation applies to schools and provides practical examples which demonstrate each type of prohibited conduct. In addition, in October 2019 the EHRC published Tackling Harassment: Universities Challenged which presents the findings of their inquiry into racial harassment in publicly funded universities in England, Scotland and Wales and many of their recommendations can also be implemented in settings which work with children and young people.

Organisations should use what they learn from the conversations to highlight where further training, for example on unconscious bias or microaggression, is needed.

3. **Introduce a peer-on-peer abuse policy**

As much of the racism experienced by the signatories of the letter to schools was from other students, it follows that an organisation must ensure it has adequate measures in place to deal with peer-on-peer abuse. As we have discussed previously in our Safeguarding publications, a peer-on-peer abuse policy sends an immediate message that your organisation takes such abuse extremely seriously. Organisations should adopt a zero-tolerance approach to all forms of peer-on-peer abuse, and particularly racial abuse.

Farrer & Co has produced a peer-on-peer abuse toolkit in collaboration with Dr Carlene Firmin and a number of other experts in the field, which provides practical guidance on how to prevent, identify early and respond appropriately to peer-on-peer abuse. Further information on peer-on-peer abuse and all of the areas discussed in this article can be found in our toolkit here.

In addition to a peer-on-peer abuse policy, your organisation should ensure your other policies such as

harassment and behavioural policies and their code of conduct are up to date and make specific reference to racial abuse.

4. **Conduct a proactive risk assessment**

This is an important step in determining the risks that students/young people are exposed to and assessing and monitoring those risks. As part of the risk assessment, organisations should consider the demographic profile of the young people they work with to help assess whether certain groups may be particularly vulnerable to peer-on-peer abuse – BAME students/young people should be considered here.

As well as conducting a risk assessment, organisations should ensure there are action plans in place to address any identified risks, and that these are 'put into action' when needed and are not merely a paper exercise.

We should emphasise that this proactive risk assessment of the general risks facing the student body/group is distinct from any responsive risk assessment(s) that may be required following an allegation of racial abuse.

5. **Check your messaging**

Schools and organisations should ensure that they actively promote equality of race, and other protected characteristics, in their curriculum and activities.
Organisations may decide to review their own Black history, for example relating to the origin of buildings or traditions and consider whether this is something they want to comment on and/or include in their curriculums.

6. **Respond appropriately and proportionately to concerns or allegations**

Perhaps one of the key messages from the letter to The Independent was that students felt their concerns about, or allegations of racial abuse were not taken seriously by their schools. It is essential that all concerns and allegations of racial, or any peer-on-peer abuse are handled sensitively, appropriately, and promptly. The way in which an organisation responds to complaints such as these can have a significant impact on its culture and, as demonstrated by the letter, a negative experience can have a detrimental effect on a young person for life. It is crucial that they feel reassured by how the organisation is handling their concern/allegation and that there is appropriate support in place to safeguard the young person's mental and physical wellbeing. Examples of possible support measures include:

- offering a 1:1 meeting with the Head of the school or the leader of the organisation. This has the dual effect of demonstrating that the organisation is taking the young person's concern seriously and allowing them to voice their views and experiences at the highest level;

- where possible, providing appropriate apologies to the young person. An act as simple as saying sorry can often go a long way in affecting how an individual feels about their experience;

- signposting to agencies that can offer support. This may be in the form of charities that offer these services, or it may be appropriate for the organisation to pay for private counselling;

- clearly explaining what measures the organisation is proposing to take because of their disclosure. The organisation's aim should be to reassure the young person that their concerns are being taken seriously and the organisation is 100per cent committed to tackling any form of racist behaviour – a key allegation in the letter to The Independent was apathy on the part of schools to address racism.

Whilst most of the measures discussed above refer to racial abuse experienced by students; they are also relevant for staff members who experience racial abuse. In the Safeguarding Unit, we frequently find that when organisations are made safer for children, they are also safer for the adults working there.

As we highlighted at the beginning, the student and alumni who wrote to The Independent implored schools to produce adults "who aren't simply not racist, but anti-racist".

Schools and organisations should use the measures discussed in this article to seek to achieve this very important goal.

GUIDANCE NOTE 15

Voyeurism

On 12 April 2019, the Voyeurism (Offences) Act 2019 came into force, which added two new offences to the Sexual Offences Act 2003 to cover the practice of 'upskirting'. The offences include taking a photograph or video recording beneath the skirt or dress of a person (or enabling another person to do the same), without their consent for the purpose of "obtaining sexual gratification; or humiliating, alarming or distressing them". The offence carries a maximum penalty of two years' imprisonment.

This is a topical issue for our programmes given reports of a growing number of cases. It is also a growing issue between students and would fall within the definition of peer-on-peer abuse in the Keeping Children Safe in Education guidance.

Given the gravitas associated with the new offence, it is recommended that colleges review current practices and ensure that interns are aware of the new crime and the potential consequences of any involvement in upskirting. Action may include reference to this in the curriculum when discussing safeguarding and behaviour.

Policies relating to safeguarding and behaviour may need updating and interns made aware that it is not just the person who takes the picture(s)/ makes the recording who will be sanctioned; anyone who has helped that person take the picture(s)/make the recording will be deemed equally culpable. Finally, it may be worth reviewing the school's or college's policy concerning mobile phones and whether the rules on their use/presence need updating.

GUIDANCE NOTES 16
MENTAL HEALTH FIRST AID

Background

One quarter of people experience a mental health problem at some point in their life (Singleton et al, 2001), yet:

- prevalence rates for people with a learning disability are between 20.1% and 40.9% (Taylor et al, 2004; Cooper et al, 2007).
- 3% for schizophrenia (three times greater than for the general population), with higher rates for people of South Asian origin.
- The same as the general population for anxiety and depression (though higher in people with Down's syndrome).
- For children and young people, a prevalence rate of 36% for a diagnosable psychiatric disorder, compared with 8% for those who do not have a learning disability. These young people were also 33 times more likely to be on the autistic spectrum and were much more likely than others to have emotional and conduct disorders. (Emerson and Hatton,2007)

Source: Public Health Observatory for Learning Disability (October 2012)

People with a learning disability have an increased risk of developing poor mental health due to:

- Social, economic, psychological, and emotional factors as well as some biomedical factors.
- fewer accessible psychological and material resources to deal with adversity (Jahoda et al, 2006)
- more likely to experience social exclusion, poverty, and abuse (Gravell, 2012).
- Risk-averse service cultures contribute to restrictive environments which mean fewer opportunities for these individuals to build a sense of self-efficacy and develop problem-solving skills (Dagnan and Jahoda, 2006)
- lack of meaningful activity can increase vulnerability for depression (Stancliffe et al, 2011).
- not given opportunities: to get a job, move out of the family home, socialise, or have relationships. This may cause them to develop low expectations of themselves.

Gaps in Support

- There is a gap between mental health services and learning disability services.
- Assessments to detect mental health problems in people with a learning disability are not always well developed
- When symptoms presented by someone with a learning disability are attributed to their learning disability, rather than the true problem and vice versa.
- Staff supporting people with a learning disability "are likely to use a challenging behaviour rather than a mental health conceptual framework to understand problematic behaviours".

The Role of DFN Project SEARCH

Supporting interns with 'normal' levels of anxiety is part of the role of the onsite team: 'Normal' levels of anxiety can be seen as:

I. "A feeling of worry, nervousness, or unease about something with an uncertain outcome" that is:
    I. Related to a **specific** situation or problem.
    II. **Lasts only as long** as the situation or problem.
    III. Is **proportional** to the situation or problem.
    IV. Is a **realistic response** to a realistic situation or problem.

People with Clinical anxiety need professional support from mental health specialists, and this can present as:

I. **A Diagnosable mental health condition** that has a big impact on the person's life.
II. Anxiety may come up **unexpectedly** for seemingly no reason.
III. Anxiety response to a situation or problem may be **much stronger** than you would expect.
IV. May experience a lot of **unrealistic anxiety** e.g., fear of a situation that will likely never happen.
V. **May last for a long time** even if the situation has been resolved.
VI. May feel **impossible to control** or manage.

Such disorders include.

- Generalised Anxiety Disorder, Social Anxiety Disorder, Panic Disorder, Phobias, PTSD, OCD, Health Anxiety, Body Dysmorphic Disorder, Perinatal Anxiety

The onsite offer to interns

- Our universal offer is in the form of a curriculum that supports good mental health and resilience
- Our targeted offer is in the work of the onsite team when supporting individual interns to manage normal levels of anxiety
- Referring people to specialised support services where there is a need for professional support.
- DFN Project SEARCH teams are not fixers, we are model facilitators, sharers of best practice and we can help to connect people to what they need.

Support from the wider steering group

How can the steering group support the onsite team?

- Encourage on site teams to raise concerns about interns' mental health if the issues are worrying the skills trainer/instructor at the steering group and create space for discussion
- If it is a safeguarding issue refer it to the educators designated safeguarding lead for support
- Empower teams to know where they can go for support in the community
- Encourage use of the designated safeguarding lead from the educator as a guest speaker and for training.
- Connect people who can help the onsite team and make them aware of referral routes.
- Highlight wellbeing and relationship curriculums.
- Include guest speakers from mental health specialists as part of the induction processes for interns
- Pay attention to the health and wellbeing of the instructor/skills trainer

Mental Health First Aid

There are some excellent courses that teach Mental Health First Aid. You will find examples of these courses on the internet and there are many different providers to choose from. Most courses will:

- Teach you practical skills to spot the triggers and signs of mental health issues.
- Help you gain confidence to step in, reassure and support a person in distress.
- On completion you will be a certified Mental Health First Aider.
- This course is a blend of live training sessions and self-learning activities.

There are also courses called:

- Mental Health Knowledge for Managers
- Mental Health Skills for Managers

Below you will find some key learning points from those courses

Supporting a person developing a mental health problem, experiencing a worsening of an existing mental health problem or crisis.

A – Approach the person and help and assist with any crisis

- Approach a person about their concerns
- Find a suitable time and space where both people feel comfortable
- If the person does not initiate the first aider should
- Respect the person confidentiality and privacy

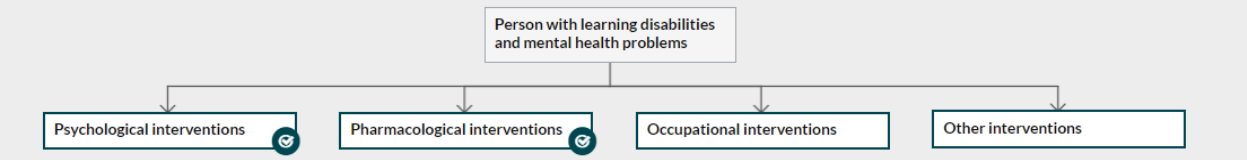
L – Listen and communicate non-judgmentally
G – Give support and information
E – Encourage person to get appropriate professional help
E – Encourage other supports

How to access services in an emergency

- Contact G.P. – search using this link: https://www.nhs.uk/service-search/find-a-gp
- Contact out of hours service on 111
- Local urgent care centre hub. Find services here: https://www.nhs.uk/service-search/other-services/Urgent%20Care/LocationSearch/0
- Urgent mental health help: https://www.nhs.uk/service-search/mental-health/find-an-urgent-mental-health-helpline
- Samaritans: 116 123, jo@samaritans.org
- SHOUT: text 85258 or https://giveusashout.org/get-help/
- Childline: 0800 11 11 https://www.childline.org.uk/info-advice/your-feelings/

How to support someone to make a referral in a non-emergency situation

I. Main route is through a GP Referral – you could consider writing supporting evidence for the person to take with them.
II. Through educators designated safeguarding lead
III. Through Local Advocacy groups
IV. Improving Access to Psychological Therapies (IAPT) England https://www.england.nhs.uk/mental-health/adults/iapt/ Scotland https://www.nhs24.scot/our-services/living-life/, Wales



Here are some useful resources specifically aimed at people with a learning disability or autism spectrum condition or both from our partners in Wales that you might find helpful https://www.ldw.org.uk/mental-health-resources-for-people-with-a-learning-disability/

Guidance Note 17

Vetting and Barring Procedures inside a Host Business

Background - A Disclosure and Barring Service check, better known as a DBS check in England and Wales and a Disclosure Scotland check in Scotland, is a process that is crucially important for safe recruitment. It is especially important when a job requires the applicant to be in a position of trust around children or adults at risk of harm. A DBS check enables you to find whether your employee has a criminal record and is likely to pose a danger.

Having a criminal record should not stop an ex-offender from working and a minor offence doesn't mean that someone is necessarily unsafe in other areas. There are guidelines in place to ensure that people with a criminal record are treated fairly.

However, for jobs that involve personal care or unsupervised contact with adults at risk of harm or when working with or around children, there is no choice. A vetting check is the only way to ensure that the person you employ is not a danger. It is designed to prevent people being abused by others who see a position of trust as an opportunity to do just that.

It is important to remember that abusers usually come across as perfectly normal and often seem well suited to this type of work. This means you cannot always trust your own gut instinct; you need the background information of the correct check.

There are 4 different categories of checks - To cater for different positions there are 4 different types of check. The category you choose depends upon the role of the job holder.

- **Basic check:** This enables you to see conditional cautions and unspent convictions.
- **Standard check:** This discloses spent and unspent convictions, cautions, reprimands, and final warnings
- **Enhanced check:** The same information as a standard check. However, it also provides any added information held by the local police that's considered relevant to the role
- **Enhanced check with barred lists:** This shows the same information as an enhanced check. It also reveals whether the applicant is on the list of people barred from doing the role.

(There are two types of barred list: One is for people who have been barred from working with adults at risk of harm. The other is for people who work with children.)

Eligibility for an enhanced check when working with adults at risk of harm

The types of jobs where an enhanced disclosure would be required includes care work such as personal care, driving vulnerable adults such as hospital taxi drivers or positions where you have access to somebody's finances. It also includes other kinds of responsible position that brings you in contact with children or adults at risk of harm on an unsupervised basis.

For full details about eligibility please see:

England and Wales - https://www.gov.uk/government/collections/dbs-eligibility-guidance
Scotland - https://www.mygov.scot/browse/working-jobs/finding-a-job/disclosure

Interns and Graduates on a DFN Project SEARCH programme

In most DFN Project SEARCH programmes it has already been determined that the intern is ready for work and that employment is a realistic goal for them. This means that the young person, their family and carers, the college, the supported employment agency, and the host business see them as capable of working in an environment that includes people with a disability and those who do not. They are also deemed as capable of having a level of independence that will enable them to function and be safe in a traditional work environment.

During the internship year there is a significant amount of training for interns about safeguarding and they are taught using the principles of adult safeguarding, so that they are empowered for the world of work by developing skills that help them to keep themselves safe and to understand potential dangers and know where to go if they need support or feel in any way unsafe.

We know that workplaces have a mix of personnel in them and that inevitably some employees in a host business may be potential abusers. However, most staff will behave appropriately, be very supportive and be perfectly safe for the interns and graduates to associate with. In addition, it is not possible to vet all host business staff as the rules about who can be subject to the vetting regimes are necessarily strict.

For the most part managers and mentors are not required to have an enhanced vetting check to work with an intern as most of our interns work in environments where people move around, where there are no 'closed off' areas and where people do not have individual access to be with one person.

It is likely that only if a manager or mentor had unsupervised access to that intern on a regular basis, such as if they were driving an intern from place to place and were unsupervised, they were helping the intern with some element of their personal care or supporting them with their finances would there be a need for an enhanced check with checks of the barred list to be completed. If that is not a concern, because the employee has no unsupervised access to the intern then the host business could only vet that employee in the way that was applicable to their job role (which may or may not include any of the elements of the checks mentioned above)

If the steering group are unclear about whether vetting was required for a manager or mentor, then they should refer to the lead education partners designated safeguarding lead for advice and guidance.

7.0 Appendices / Forms

None

8.0 Document History

Author	Date Written	Reason	Date Approved by the Board
Carmel McKeogh	April to September 2019	Introduce the policy and guidance notes to programmes to bring clarity to the approach.	8th October 2019
Carmel McKeogh	March to June 2020	Revise the policy to include: • reference to children's safeguarding arrangements • reference to collecting data for monitoring at Board level • Guidance on Safeguarding and Remote Delivery of Support to Interns	
Carmel McKeogh	September 2021 to March 2022	The policy has been out for consultation and updated and reviewed with added sections and updated links	

Safeguarding Responsibilities

Area	Educator	Host Business	Supported Employment	DFN Project SEARCH
Safeguarding Policy Writing and Review	Each education partner will have their own policy informed by guidance from the DFE in England, Education Scotland, the DFES in Wales and the Ministry for Education in Portugal. In Ireland, the education role is smaller, and they do not lead on policy in this area.	Most of the larger host businesses have safeguarding policies but not all host businesses will have one (they may have other policies such as disciplinary, grievance and bullying and harassment instead). Those that have one will take guidance from specialists in the field such as the local authority designated officer in councils in England and Wales and the Child protection Committee in Scotland or NHS England in the case of hospitals.	All supported employment providers will have their own safeguarding policies which will be led by adult guidance from the CQC	DFN Project SEARCH has its own policy that relates to how the organisation will deal with safeguarding matters internally and how it supports partners by monitoring high level incidents and 'near misses' across all programmes. There is only DFN Project SEARCH that has access to this wider view of the programmes and so can use that information to enhance and improve safeguarding for all
Safeguarding Policy Sharing and Exploration	Except for Ireland, the education partner has the lead policy when it comes to issues relating to safeguarding as they affect the intern. They also have the primary data about the intern, and they should put in place a data sharing protocol. With this in place a discussion should take place	The host business policy should be shared with the education and supported employment partner in the steering group. The teacher will need to familiarise themselves with the policy so that they can teach it and the steering group should explore any anomalies which might	This policy should be shared with all partners and the steering group should explore any anomalies which might arise between this policy and the educator's policy or the host business policy.	DFN Project SEARCH can support partners with this exercise at the Steering Group.

	at the steering group to explore this policy and any issues that might arise so that	arise between this policy and the educator's policy.		
Safeguarding Policy Implementation	The education partner has the lead when it comes to dealing with safeguarding matters that arise when it comes to managing the matter with the intern and their family if necessary.	The intern should be taught the host business policies in preparation for employment, and they should already be familiar with the college processes. Where the incident involves a host business employee, matters relating to the employee will be dealt with by the host business	Except for one programme in Wales and the programme in Ireland, the supported employment agencies policies will not have the leading policy, however because of the data sharing protocol in place, the supported employment partner should be aware of the issue that arose and how it was dealt with	DFN Project SEARCH should be notified of incidents: •Immediately if the issue is serious and should be reported to the charity commission •At the end of each term if the issue was raised with the safeguarding lead at the education partners establishment •If called upon to participate in a 'near miss' discussion group
Safeguarding Training and awareness	The education partner is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. The education partner is also responsible for ensuring that it has shared its policies and procedures with the host business liaison, the supported employment agency staff and the DFN	The host business partner is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. The host business partner is also responsible for ensuring that it has shared its policies and procedures with the education partners staff, the supported employment agency staff and the DFN	The supported employment partner is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. The supported employment partner is also responsible for ensuring that it has shared its policies and procedures with the education partners staff, the host business liaison and the	DFN Project SEARCH is responsible for ensuring that it trains its staff regarding its safeguarding policies and procedures. DFN Project SEARCH is also responsible for ensuring that it has shared its policies and procedures with the education partners staff, the host business liaison, and the supported employment agency Each year DFN Project SEARCH will provide a training refresh for its staff and

	Project SEARCH Programme Specialist Each year the education provider will provide a training refresh for its staff and let partners know of any changes to its policies or procedures	Project SEARCH Programme Specialist Each year the host business will provide a training refresh for its staff and let partners know of any changes to its policies or procedures	DFN Project SEARCH Programme Specialist Each year the supported employment provider will provide a training refresh for its staff and let partners know of any changes to its policies or procedures	let partners know of any changes to the charity's policies or procedures
Recruitment and Selection of staff	The education partner is responsible for recruiting and selecting staff in accordance with the safer recruitment guidelines provided by the DFE and its equivalent bodies in Wales, Scotland, Portugal, and Ireland. All staff should be checked and vetted through the relevant systems that exist to ensure they are fit to work with children and adults at risk of harm.	The host business will employ some individuals whose job roles will require them to be vetted to work with children and adults at risk of harm and some who do not require that level of check. Where an intern is working in a workplace that does not involve intensive one to one time with an employee there is no need for the employee to be vetted just because they work with a young person on a work placement programme. However, if there is extensive one to one time with an intern then a decision would be made	The supported employment partner is responsible for recruiting and selecting staff in accordance with the safer recruitment guidelines provided by the DFE and its equivalent bodies in Wales, Scotland, Portugal, and Ireland. All staff should be checked and vetted through the relevant systems that exist to ensure they are fit to work with children and adults at risk of harm.	DFN Project SEARCH recruit and select staff in accordance with the safer recruitment guidelines provided by the DFE and its equivalent bodies in Wales, Scotland, Portugal, and Ireland. All staff and Associates are checked and vetted through the relevant systems that exist to ensure they are fit to work with children and adults at risk of harm.

		about vetting requirements by the steering group.		