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Safeguarding Policy



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Purpose of Regulation: To inform LearnPlay Foundation staff of their responsibilities when working with children and vulnerable adults.

Approval by: LearnPlay Foundation Directors

Responsibility for its update: Rohini Hands, Director & Legal Council

Regulation applies to: LearnPlay Foundation staff, apprentices, contractors, interns & volunteers who work with children

Date of Approval: 6th September 2022

Proposed Date of Review: September 2023



Introduction

LearnPlay Foundation (LPF) is fully committed to protecting children, young and vulnerable adults from risks of harm, abuse, radicalisation and exploitation. This policy outlines the expectations and responsibilities that all LPF employees should recognise in order to minimise these risks. It also acknowledges the professional duty to see that children and vulnerable adults (as well as all LPF staff) are safe from harm.

The aim of the 'Safeguarding Children & Vulnerable People' Policy is to provide children and vulnerable people with appropriate safety and protection whilst visiting/in the care of LPF, and to allow staff to make informed and confident responses to specific safeguarding issues

Definitions

A Vulnerable Adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This **may** include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance mis-user
- Is homeless

The six principles of Adult Safeguarding:

1. **Empowerment** - People are supported and encouraged to make their own decisions and informed consent.
2. **Prevention** – It is better to take action before harm occurs.
3. **Proportionality** – The least intrusive response appropriate to the risk presented.
4. **Protection** – Support and representation for those in greatest need.
5. **Partnership** – Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. **Accountability** - Accountability and transparency in delivering safeguarding.

A child is defined as a person under the age of 18 (The Children Act 1989). For the purpose of this policy document:

- The term 'child' will be used to describe all children and young people under the age of 18 years old participating in LearnPlay Foundation led activities, but the policy will also cover vulnerable adults.
 - The term 'staff' will be used to describe those employed on a contract of employment at LearnPlay Foundation as well as anyone working on behalf of LearnPlay Foundation, including those on a voluntary/unpaid basis.
 - LearnPlay Foundation is also aware of the 16 wider definitions of vulnerability which have been identified Keeping Children Safe in Education (2022), and continues to recognise these, acknowledging updates.
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General Definitions

For the purposes of this Policy, the following words and phrases have the meanings as indicated:

- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- “Child” or “Children” means a person(s) under the age of 18.
- “Channel” forms a key part of the Government Prevent Strategy (see below for Prevent definition). The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism and extremism.
- “College premises” means all buildings and land owned or operated by the College.
- “College staff” means all College employees, authorised agency staff and volunteers working on behalf of the College.
- “Extremism” is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs. Also included in the definition is extremism calls for the death of members of the UK armed forces, whether in this country or abroad.
- “Prevent” refers to the Prevent Strategy, published by the Government in 2011, which is part of the Government’s overall counter-terrorism strategy, CONTEST. The aim of the Prevent Strategy is to reduce the threat to the UK by stopping people becoming terrorists or supporting terrorism.
- “Radicalisation” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- “Safeguarding” is the process of protecting vulnerable people, whether from crime or other forms of abuse.
- “Terrorism” is defined in the Terrorism Act 2006. In summary, this defines terrorism as an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- “Vulnerable adult” means any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. It should be noted that the definition of a vulnerable adult means that this can be a transient category for some individuals.

Definitions of Abuse

Abuse of children can be categorised into four areas (as defined by the Children’s Act 2004):

“Neglect” is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
 - Protect a child from physical and emotional harm or danger;
 - Ensure adequate supervision (including the use of inadequate care-givers); or
 - Ensure access to appropriate medical care or treatment.
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- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

“Physical abuse” includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

“Emotional abuse” is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

“Sexual abuse” involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child on child abuse

The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be made aware of it and understand the importance of challenging this behaviour. Peer on peer abuse is likely to include:

- Bullying (including cyberbullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse including an online element which facilitates, threatens and or encourages physical abuse.
- Sexual violence including an online element which facilitates, threatens and or encourages sexual violence.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment.
- Causing someone to engage in sexual activity without consent.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (sexting).
- Up skirting, involving taking a picture under a person's clothing without permission.
- Initiation / hazing type violence and rituals as a way of initiating someone into a group.

Additional forms of abuse

In addition, Keeping Children Safe in Education 2021 identifies that there are wider safeguarding issues that should be considered and acted upon. The statutory guidance lists specific issues and provides further links to information on all these areas.



The specific areas are:

- Child sexual exploitation
- Child criminal exploitation
- Domestic violence
- Fabricated or induced illness
- Female genital mutilation (FGM)
- Gangs and youth violence
- Mental health (this includes mental health as an indicator of abuse and mental health issues that are safeguarding concerns)
- Radicalisation
- Teenage relationship abuse
- Bullying, including Cyberbullying
- Online abuse
- Drugs
- Faith abuse
- Forced marriage
- Gender-based violence / violence against women and girls
- Honour-based abuse
- Private fostering
- Trafficking

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

Legislation

The principal pieces of legislation governing this policy are:

- Human Rights Act 1998
 - Childcare Act 2016
 - Education Act 2002, 2011
 - Education and Skills Act 2008
 - Mental Capacity Act 2005
 - Modern Slavery Act 2015
 - The Care Act 2014
 - GDPR 2018
 - FGM Act 2003
 - Data Protection Act 2018
 - Working together to safeguard Children 2018
 - Safeguarding Vulnerable Groups Act 2006
 - The Adoption and Children Act 2002:
 - Public Interest Disclosure Act 1998
 - The Police Act – CRB 1997 (including part V)
 - Protection of Freedoms Act 2012 (including part 5)
 - Mental Health Act 2007
 - NHS and Community Care Act 1990
 - Rehabilitation of Offenders Act 1974
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- Safeguarding Children and Safer Recruitment in Education 2007
- Keeping Children Safe in Education – September 2021
- Counter-Terrorism and Security Act 2015
- OFSTED review of Sexual Abuse in Schools and Colleges

Recruitment, Support and Training

All LPF staff members should show respect and understanding for the rights of young people, their safety and welfare and conduct themselves in a way that reflects our principles.

- LPF will take action to help ensure safe recruitment using DBS checks, following up on references, checking for actions against teaching and remaining vigilant even after selection has been made.
- Safeguarding training will be provided to staff prior to delivery. Safeguarding and child protection procedures and expectations will always be made clear to staff and further reinforced over time.
- Awareness of safeguarding issues will continue to be addressed through ongoing training lead by the Senior Lead and DSO.
- A member of staff will always be appointed to raise awareness of this policy and its guidelines among other staff and where appropriate the children, accompanying staff and parents.
- Safeguarding issues are ALWAYS treated seriously

Defined Safeguarding Areas

1. Breast ironing
 2. Bullying including cyberbullying
 3. Child Criminal Exploitation (CCE)
 4. Child Sexual Exploitation (CSE)
 5. Children & the court system
 6. County Lines
 7. Domestic violence
 8. Drugs
 9. Fabricated or induced illness
 10. Faith abuse
 11. Female genital mutilation (FGM)
 12. Forced marriage
 13. Gangs and youth violence
 14. Gender-based violence
 15. Homelessness
 16. Honour based violence
 17. Initiation/ hazing
 18. Mental health
 19. Modern slavery and trafficking
 20. Private fostering
 21. Radicalisation
 22. Sexting
 23. Sexual violence & harassment between children
 24. Teenage relationship abuse: child on child abuse
 25. Up-skirting
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Principles

- The welfare of the child is salient and they feel safe and able to work.
- Children receive protection from neglect, abuse, discrimination, radicalisation and exploitation.
- Regardless of age, culture, disability, gender, language, religious beliefs, racial origin and/or sexual identity, the child's right for protection is honoured.
- There is continued respect for children's rights including individual attention, social contact and relationships intellectual stimulation and security.
- Suspicions & allegations are taken seriously & responded to swiftly and appropriately.
- All members of staff understand their responsibility to report concerns.
- Effective links are developed with parents, guardians & relevant agencies to co-operate as required regarding safeguarding matters.
- Develop an understanding of safeguarding amongst peers so that there is organisation-wide vigilance on every level. Due to the current UK Security level, PREVENT is a key priority (see: LPF Prevent Policy for more details)

Implementation

Training

LPF commits resources for induction, training of staff, effective communications and support mechanisms in relation to Safeguarding. All staff who, through their role, are in contact with children and /or adult at risks will have access to appropriate safeguarding training at an appropriate level. All staff will be expected to complete mandatory annual safeguarding training, and attend any additional training required which is relevant to their role.

We are committed to ensuring that the DSL officer is suitably and legally qualified to fulfil this role and also further ensure that all staff have access to online, in house and external up to date training.

All staff, sub-contractors and volunteers will receive an induction. This induction will include reading the relevant company policies, attending in house workshops as well as formal external training on basic Safeguarding and PREVENT.

In addition we will ensure that;

- All staff will be supported to obtain a prevent qualification
- All statutory information will be made available to staff and learners
- Training on this policy will be include at all induction training for new staff
- Staff refresher training will be held annually as a minimum or upon changes to this policy.
- Line managers will be responsible for ensuring their team are trained in this policy
- Learners will receive regular training and information in order to inform them of, and raise their awareness of, the Prevent agenda as part of their safeguarding training. This is supported by bespoke tutorials which is delivered each year by their Tutor / Assessor to embed learning.

Staff receive awareness training and guidance on how to deal with:

- Inappropriate material and behaviours and how to ensure apprentices & learners are resilient to extreme narratives.
 - Disclosures by learners about their exposure to extremist actions, views or materials
 - Accessing extremist material on line
 - Parental or peer concerns
 - Intolerance of difference Anti-Western or Anti-British views
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- Protecting apprentices & learners from radicalising influences.
- Identifying changes in behaviour of apprentices and learners.
- How to deal with any issues raised by apprentices or learners.

Promoting the policy

There are six main elements to promoting our policy:

1. Ensuring we practice safe recruitment in checking the suitability of staff, learners, sub-contractors and volunteers to work with children and / or adult at risks so that no one unsuitable to work with these groups, or who is disqualified from working with children and / or adult at risks, is appointed.
2. Ensure all staff, learner, sub-contractors and volunteers are aware of their responsibility to protect children, young people and adult at risks and are provided with adequate support and opportunities to develop their skills and knowledge in relation to protection issues.
3. Raising awareness of safeguarding issues and equipping children/ adult at risks with the skills needed to keep them safe.
4. Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse and ensuring all staff, learners, sub-contractors and volunteers understand and adhere to these procedures.
5. Supporting learners who have been abused in accordance with his/her agreed protection plan.
6. Establishing a safe environment in which children and / or adult at risks can learn and develop and promote the rights of children and / or adult at risks to be listened to and taken seriously so that they are able to express their views, thoughts and concerns.

In addition we will ensure the policy is promoted by;

- Producing and circulating the Safeguarding policy to everyone
- Encouraging a LPF wide safeguarding culture by raising the profile of safeguarding across the organisation encouraging students and staff to remain vigilant and report concerns
- Ensuring all the workforce, learners and apprentices understand the possible consequences of non-conformance
- Create a safe environment where students and staff feel confident
- Building opportunities to promote and discuss safeguarding in relation to the curriculum
- Include standard agenda items at all meetings to raise the profile of safeguarding
- Embed safeguarding training and development at all points throughout the staff and learner journey from induction
- Ensuring all learners and apprentices are aware who the DSL is and how to obtain further support, guidance or report concerns
- Creating a curriculum that teaches learners and apprentices to understand safeguarding concerns and how to act upon concerns

Gaining commitment

LPF will follow the legal requirements and procedures and take account of guidance issued by the relevant authorities to:

- Ensure we have a designated senior person who has received appropriate training and support for this role.
 - Ensure we have a nominated responsible person for the protection of children and/ or adult at risks.
 - Ensure every member of staff (including temporary and supply staff and volunteers) and our contractors knows the name of the designated senior person responsible for safeguarding and their role.
 - Ensure all staff, learners and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible.
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- Notify social services if there is an unexplained absence of more than two days of a client who is on the child protection register.
 - Develop effective links with relevant agencies and co-operate as required with their enquiries regarding children and / or adult at risks protection matters including attendance at case conferences.
 - Keep written records of concerns, even where there is no need to refer the matter immediately.
 - Ensure all records are kept securely; separate from the main client file, and in locked locations.
 - Develop and then follow procedures where an allegation is made against a member of staff, sub-contractor or volunteer.
 - Ensure safe recruitment practices are always followed.
 - Adopting easy to follow process in relation to safeguarding that are monitored and reviewed regularly
 - Embedding safeguarding in everything we do including induction and training
 - Promoting safeguarding at learner reviews and staff 1-1's
 - Leading by example
 - Communicating changes in relation to safeguarding clearly and regularly
 - Offering all staff and learner training in safeguarding

This policy should be used in conjunction with other LPF policies and documents as follows:

- Equality & Diversity Policy
- Social Networking Policy
- Whistle Blowing Policy
- Safeguarding Policy
- Induction handbook
- Data Protection Policy
- Prevent Policy
- Staff Code of Conduct
- Learner Code of Conduct
- Keeping Children Safe in Education

Originator:	Rohini Hands
Date of latest review:	06/09/22
Date of last approval:	06/09/22
Approved by:	Rohini Hands
Review interval:	Annually
Next review due by:	August 2023
Signed:	



APPENDIX A

Staff Conduct

- LPF staff should maintain a safe and appropriate distance with children, avoiding physical contact with children wherever possible. Where unavoidable, they should use discretion to minimise it and ensure that it cannot be misinterpreted.
- Physical force should never be used unless it constitutes reasonable restraint to protect the child, another person or to protect property. If a child poses danger to themselves or others, minimum amount of force should be used for the shortest amount of time and the incident should be recorded in writing.
- Private or unobserved situations should be completely avoided.
- Treat all children equally, and with respect and dignity putting the welfare of each child first, before winning or achieving goals.
- Giving enthusiastic and constructive feedback should be used rather than negative criticism, but inappropriate language and/or behaviour should always be challenged.
- Question any unknown adult who enters LearnPlay Foundation's premises and/or who attempts to engage with the children and request written parental/guardian consent for any unusual arrangements.
- Be aware of the other policies and procedures surrounding Safeguarding
- Never taking on the responsibility for tasks for which you are not appropriately trained to do. Always refer any problems to appropriate lead.
- All staff should demonstrate exemplary behaviour and understand the procedures in order to protect themselves from allegations of misconduct.
- Keep written (and confidentially secured) records of concerns about children, even where there is no need to refer the matter immediately. Never tell a learner that you can be a confidential ear – this will break the trust as you are mandated to report some disclosures.
- Ensure that all suspicions or allegations are taken seriously and dealt with according to the procedure; it is not for staff to decide whether or not a suspicion or allegation is true.
- If you feel that not enough action has been taken, and the child is still at risk, concerns should be reported again or the NSPCC Child Protection Helpline contacted for advice.

Staff made aware of suspicions, allegations or actual abuse, **are responsible to take the appropriate action according to this procedure, but should never try to deal with a suspicion do so alone.**



APPENDIX B

Recording and Reporting

Abuse may become apparent via disclosure (the child or someone else), signs of physical injury or behaviour for which there appears to be no satisfactory explanation or even just a feeling. There is a duty to report suspicions, allegations or actual incidents to the designated member of staff even if you are uncertain. Recordings should always:

- Include the core facts (date and time of disclosure, suspicion, allegation or actual abuse incident, who was present etc.)
- Be factual, that is no reference made to your own subjective opinions.
- Be kept confidential and secure, and only shared with those who need to know about the suspicion, allegation or actual incident of abuse.
- Detail what action you and LearnPlay Foundation have taken.

Reports should be made to the Safeguarding Officer:

Full Name	Alina Gheorghe
Email Address	Alina@learnplay.org.uk
Contact number	0121 318 6224

Once this initial report has been made, the lead member of staff will consult with the relevant statutory agencies. Where a report is made, in addition to the above, you should include:

- Staff name, address, telephone number, position/role within LearnPlay Foundation.
- As many details about the child as possible, e.g. name, date of birth, address, home telephone number, school.
- A clear distinction between what is fact, opinion or hearsay.
- What's been done so far - where possible, referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

Emergency Procedures

There are conditions in which emergency response is required beyond the usual safeguarding channels. Where possible you should speak to the Designated Person or Senior Lead before taking action, but where this is not possible, take action:

Call the police if:

- A criminal act has taken place.
- There are concerns about Prevent or Female Genital Mutilation.
- It is clear that the learner cannot safely return home.

Where you are uncertain:

- Contact your local MASH (Multi-Agency Safeguarding Hub) if you are uncertain. The Wolverhampton Hub is located in the Civic Centre
 - 01902 555 392 (9am-5pm) **OR** 01902 552 999 (out of hours)
 - To make the enquiry smoother, where there is time, complete the form and read the instructions at:
 - <https://www.wolverhamptonsafeguarding.org.uk/latest-news/275-multi-agency-safeguarding-hub>
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APPENDIX C

E-Safety & IT usage, Monitoring and Review

We understand that technology in this area evolves and changes rapidly.

E-Safety will be revised following any national or local policy requirements, any child protection concerns or any changes to the technical infrastructure.

- We will regularly monitor internet use and evaluate E-safety mechanisms to ensure that this policy is consistently applied.
- To ensure they have oversight of E-safety, the SMT will be informed of E-safety concerns, as appropriate.
- The DSL for safeguarding will report on a regular basis to the SMT on E-safety practice and incidents, including outcomes.
- Any issues identified via monitoring will be incorporated into our action planning.

The purpose of E-Safety procedure is:

- Safeguard and protect all users i.e. staff, learners and stakeholders.
- Identify approaches to educate and raise awareness of E-Safety.
- Enable all staff to work safely and responsibly, to role model positive behaviour and to manage professional standards and practice when using technology.
- Identify clear procedures to use when responding to online e-safety concerns.

Identifies that the issues classified within E-safety are considerable, but can be broadly categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

Responsibility of all members of staff to:

- Follow the guidelines set out in the Online Delivery Safeguarding Process at all times.
- Read and adhere to the E-safety policy and acceptable use policies.
- Take responsibility for the security of setting systems and the data they use or have access to.
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed E-safety education in curriculum delivery, wherever possible, including teaching and reinforcing the Learner Online Safety Guidelines.
- Have an awareness of a range of E-safety issues and how they may be experienced by the children in their care.
- Identify E-safety concerns and take appropriate action by following the settings safeguarding policies and procedures.
- Know when and how to escalate E-safety issues, including signposting to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.

Responsibility of learners (at a level that is appropriate to their individual age and ability) to:

- Engage in age appropriate E-safety education opportunities.
 - Contribute to the development of E-safety policies.
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- Read and adhere to the acceptable use policies.
- Respect the feelings and rights of others both on and offline.
- Take responsibility for keeping themselves and others safe online.
- Seek help from a trusted adult, if there is a concern online, and support others that may be experiencing E-safety issues.

Responsibility of parents and carers to:

- Read the acceptable use policies and encourage their children to adhere to them.
- Support our E-safety approaches by discussing E-safety issues with their children and reinforcing appropriate and safe online behaviours at home.
- Role model safe and appropriate use of technology and social media.
- Identify changes in behaviour that could indicate that their child is at risk of harm online.
- Seek help and support from the setting, or other appropriate agencies, if they or their child encounter risk or concerns online.
- Contribute to the development of the E-safety policies.
- Use our systems, such as learning platforms, and other network resources, safely and appropriately.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

Managing Information

Information will be gathered, recorded and stored in accordance with the following policies;

- Data Protection Policy
- Information Security Policy (GDPR)

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and adult at risks. The public interest in safeguarding children and adult at risks may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the DSL.



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Prevent Policy



Introduction

The current threat from Terrorism and Extremism in the United Kingdom is real, severe and can involve the exploitation of vulnerable people, including children and young people.

The Office for Security and Counter-Terrorism, in the Home Office, works to counter the threat from terrorism. Their work is covered in the government's counter-terrorism strategy, [CONTEST](#).

The strategy is based on 4 areas of work:

- [Pursue: to stop terrorist attacks](#)
- [Prevent: to stop people becoming terrorists or supporting terrorism](#)
- [Protect: to strengthen our protection against a terrorist attack](#)
- [Prepare: to mitigate the impact of a terrorist attack](#)

PREVENT is a key part of the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation. We have a legal responsibility to fulfil the Prevent Duty Statement.

This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process (see below).

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

Equality, Diversity and Community Cohesion

LearnPlay Foundation aims to guide our learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our young people for life in modern Britain.

We aim to encourage working towards a society in with a common vision and sense of belonging by all. Communities; a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in schools and in the wider community.



Responsibilities

We adhere to the requirements of the Prevent Duty which requires further education institutions to:

- Make sure that all have undertaken appropriate training or development and share information across relevant curriculum areas.
- Have clear and visible policies in place for both staff and learners with regard to risk assessment. This should also include policies for events that may take place by staff, learners, visitors, external bodies and community organisations. They will also need to be aware of places or areas of learning where learners/staff may be in contact with, or possibility get involved with terrorism.
- Have sufficient support available for welfare and pastoral care according to the individual requirements.
- Have policies in place for the use of information technology on the premises and for the use of research in curriculum areas.

The Prevent Duty states the British Values that are expected to be embedded into the curriculum are:

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

The Counter-Terrorism and Security Bill seeks to place a duty on specified authorities including schools, colleges, training providers and universities to ‘have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism’.

LearnPlay Foundation has developed a culture of safety and respect for its learners, staff and visitors. As part of this ethos LearnPlay Foundation has considered the Prevent Duty and the importance of collaborative working between staff, local authorities, police, other educational institutions, policy makers and health providers to identify, detect and safeguard vulnerable people throughout the organisation.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism; and how LearnPlay Foundation will protect our apprentices, learners, staff, clients, and stakeholders from radicalising influences.

Objectives

- To promote, implement and monitor LearnPlay Foundations responsibilities under the Prevent Duty to all apprentice learners, clients, stakeholders, staff and visitors at LearnPlay Foundation.
 - To promote and embed British Values into the organisation’s procedures and curriculum.
 - To protect apprentices and employees from radicalising influences.
 - To ensure apprentices and employees are resilient to extreme narratives
 - Identify changes in behaviour of apprentices and employees.
 - To deal with any issues raised by apprentices or employers.
 - To set a strategy, objectives and an action plan to achieve the Prevent Duty.
 - To ensure apprentice learner and staff safety.
 - To ensure that LearnPlay Foundation promotes a culture of non-bullying, non-harassment and non-discrimination.
 - To provide support for learners who may be at risk, and develop appropriate sources of advice and guidance.
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- To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism and radicalisation.

Legislation

- Counter-Terrorism and Security Act 2015

PREVENT Strategy Objectives and Indicators

The PREVENT strategy objectives are:

Ideology:	Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
Individuals:	Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
Institutions:	Work with sectors and institutions where there are risks of radicalisation which we need to address.

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately.

Vulnerability/Risk Indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a young person or their family may be vulnerable or involved with extremism:

Vulnerability

Identity crisis:	Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
Personal crisis:	Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.



Personal circumstances	Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
Unmet aspirations:	Perceptions of injustice; feeling of failure; rejection of civic life.
Criminality:	Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to extremist influences

- Reason to believe that the young person associates with those known to be involved in extremism
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence
- Use of closed network groups via electronic media for the purpose of extremist activity

Experiences, behaviours and influences

- Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity/use of documents to support this
- Experience of disadvantage, discrimination or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status

More critical risk factors include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance/behaviour

Referral and Intervention Process

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the young person supports terrorism and/or extremism, must be reported to the named Designated H&S / Safeguarding Lead or Senior Management Team immediately and no later than the end of the working day.

Please complete the IAG / Learner concern spreadsheet and update with as much details as possible.

Where a young person is thought to be in need/or at risk of significant harm, and/or where investigations need to be carried out (even though parental consent may be withheld), a referral to Child or Adult Protection Services should be made in line with LearnPlay Foundations Safeguarding are most likely to require a police investigation (as part of the Channel process). As part of the referral process, the Designated Safeguarding Lead or Depute will also raise an electronic referral to Channel.

Channel referral process

Some concerns which are identified may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. The relevant person from your local area Police will carry out an initial assessment and, if appropriate, set up a multi-agency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the young person.

For urgent submissions, please call 101 and ask for the Prevent Team.

Designated Safeguarding Lead

We recognise involvement in situations where there is risk or actual harm can be stressful for staff concerned. DSL is available to offer support and advice.

Managing Information

A key first step in preventing radicalisation is tackling the methods perpetrators use to influence individuals. For example, using personal data to create targeted content, and using it to drive extremism is a common tactic to encourage radicalisation online.

Organisations like Facebook, Google and Twitter possess vast amounts of personal information about the public. Even in the right hands, without proper regulation, these data sets can be exploited in information bubbles, designed to enforce extremist views.

With the new General Data Protection Regulation (GDPR) in force, European entities now have fresh responsibilities for data processing, in terms of delivering high standards of privacy and security to ensure that personal and sensitive data is properly protected.

LearnPlay Foundation take these responsibilities seriously. Public data must be protected from exploitation from those who wish to spread propaganda. That's why protecting data is critical for countering violent extremism online.

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the DSL.

Information will be gathered, recorded and stored in accordance with the Data Protection Policy – GDPR updated.



Policy Implementation

Promoting the policy

- Producing and circulating the Prevent policy to everyone
- Staff policy champion groups are set up to lead the implementation of this policy
- Encourage a company prevent culture by raising the profile of prevent across LearnPlay Foundation to encourage students and staff to remain vigilant and report concerns
- Ensuring all the workforce and Learners understand the possible consequences of non-conformance
- Create a safe environment where students and staff feel confident
- Building opportunities to promote and discuss prevent in relation to the curriculum
- Include standard agenda items at all meetings to raise the profile of prevent
- Embed prevent training and development at all points throughout the staff and learner journey from induction

Gaining commitment

- Adopting easy to follow process in relation to prevent that are monitored and reviewed regularly
- Embedding prevent in everything we do including induction and training
- Promoting prevent at learner reviews and staff 1-1's
- Leading by example
- Communicating changes in relation to prevent clearly and regularly
- Offering all staff and learner training in prevent

Training

- All staff will be supported to obtain a prevent qualification
- All statutory information will be made available to staff and learners
- Training on this policy will be include at all induction training for new staff
- Staff refresher training will be held annually as a minimum or upon changes to this policy.
- Line managers will be responsible for ensuring their team are trained in this policy
- Learners will receive regular training and information in order to inform them of, and raise their awareness of, the Prevent agenda as part of their safeguarding training. This is supported by bespoke tutorials which is delivered each year by their Tutor / Assessor to embed learning.

Staff receive awareness training and guidance on how to deal with:

- Inappropriate material and behaviours and how to ensure apprentices & learners are resilient to extreme narratives.
- Disclosures by learners about their exposure to extremist actions, views or materials
- Accessing extremist material on line
- Parental or peer concerns
- Intolerance of difference Anti-Western or Anti-British views
- Protecting apprentices & learners from radicalising influences.
- Identifying changes in behaviour of apprentices and learners.
- How to deal with any issues raised by apprentices or learners.

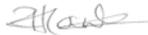
Responsible parties

Director	Rohini Hands
Safeguarding Lead	Alina Gheorge



Review of the Policy

The Prevention of Extremism and Radicalisation Policy will be revised annually by the Senior Management Team and Director.

Policy Review	Review Date	Next Review Date	Approved by	Signed
Annually	6/9/22	6/9/23	Rohini Hands	



ANNEX 1 – Prevent Action Plan

Action	Impact	Person responsible	Date achieved
The Prevent Agenda to be included within LearnPlay Foundations Safeguarding Policy and Procedures.	Extremism, terrorism and radicalisation to be treated as a safeguarding issue in terms of internal reporting	All Staff	Jun-20
			Updated policy
Staff development sessions for staff to inform and provide more detail on the prevent agenda and their responsibilities	To understand the prevent duty to establish necessary policies, procedures and training and heighten awareness of staff to recognise early signs of extremism	All Staff	Ongoing as required
Ensure Staff and learners are aware of reporting procedures	Individuals know how to report concerns	All Staff and Learners	Ongoing as required
Continue to raise learner awareness of the Prevent Agenda through tutorials and 1 to 1's	Learners recognise the signs of extremism in themselves and others	All Learners	Ongoing as required
Policies and procedures to be reviews in light of information and training received to ensure the inclusion of the Prevent agenda	Processes to include the Prevent Agenda	SMT	Jun-21
Review the Prevent Strategy and Action Plan annually	Up to date, relevant and meaningful strategy and plan in place	SMT	Jun-21
Review the Prevent Strategy and Action Plan annually	Up to date, relevant and meaningful strategy and plan in place	SMT	Jun-21
Revise staff recruitment, selection and induction procedures to ensure that prospective and new employees are aware of the Prevent Duty	Applicants and new staff aware of Prevent within all recruitment and induction documentation and activities	SMT / HR	Ongoing as required