

Mercuri International

Safeguarding and Prevent Policy

Introduction

The Prevent and Safeguarding Policy for Mercuri International reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual or emotional abuse, neglect and bullying.

We are committed to providing a caring, friendly and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

Mercuri International has a statutory requirement under Sections 27 and 47 of the Children Act 1989 to assist the Local Authority Social Services Department acting on behalf of children in need.

Mercuri International will safeguard and promote the welfare of children in compliance with the DfE guidance Keeping Children Safe in Education (July 2015) KCSIE (September 2016) and associated guidance, Working Together to Safeguard Children (2015) WT in addition to the Care Act 2014. Mercuri International also complies with the statutory guidance on children who run away or go missing from home or care (January 2014) and The Prevent Duty (The CounterTerrorism and Security Act June 2015) and Social Media for Online Radicalisation (July 2015) and this Policy should be read in conjunction with these procedures and guidance.

The main aims of this policy are to ensure that staff are fully engaged in being vigilant about raising awareness: that they overcome professional disbelief that such issues will not happen at Mercuri International and ensure that we work alongside other professional bodies and agencies to ensure that our apprentices and staff are safe from harm.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views. At Mercuri International, we are fully committed to safeguarding and promoting the welfare of all learners and staff. We recognize that safeguarding against radicalization is no different from safeguarding against any other vulnerability.

At Mercuri International, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The principal objectives of this policy are that:

All staff will understand what radicalization and extremism are and why we need to be vigilant. All apprentices and staff will know that Mercuri International has policies in place to keep them safe from harm and that Mercuri International regularly reviews its systems to ensure they are appropriate and effective.

Mercuri International's staff promote respect, tolerance, and diversity. Apprentices and staff are encouraged to share their views and recognize that they are entitled to have their own beliefs which should not be used to influence others.

It is recognized that apprentices or staff with low aspirations are more vulnerable to radicalization and, therefore, we strive to equip our apprentices and staff with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves. Apprentices and staff are briefed during induction about how to stay safe when using the internet and are encouraged to recognize that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see online.

Mercuri International staff, contractors and associates undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties.

Through various training opportunities within Mercuri International, we ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalization; are aware of the process of radicalization and how this might be identified early on.

Scope:

This policy is applicable to all staff, learners, visitors, contractors and service providers, who may be working with children (those under 16), young persons (those aged 16-18) and vulnerable adults (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006 and/or those persons aged 18 and over who by reason of mental or any other disability, age or illness are or may be unable to look after themselves or, are or maybe unable to protect themselves against harm or exploitation) whom Mercuri International encounters through any of its programmes.

Aims:

The aims of this policy are:

- To identify the expectations of staff in relation to safeguarding.
- To ensure relevant and effective safeguarding practices are in place.
- To ensure the right of every applicant and apprentice to learn within a safe environment.
- To promote awareness to staff of the need to safeguard children, vulnerable adults and all people and to recognize that safeguarding is everyone's responsibility.

- To ensure that the fundamental rights and needs of our applicants and apprentices are observed.
- To prevent abuse through the pastoral support offered to all applicants and apprentices.
- To raise awareness of different types of abuse and children in need issues.
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse.
- To ensure staff act professionally.
- To deter potential, unsuitable individuals from applying to Mercuri International by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements.
- To reject at interview stage anyone where we have doubts about suitability.
- To prevent the risk of abuse by ensuring procedures and standards are in place.

Definitions

What is "abuse"?

Abuse is a violation of an individual's human or civil rights by another person and may consist of a single act or multiple acts. As well as physical and psychological abuse, acts of neglect or an omission to act may amount to abuse. Abuse may also occur when a child or vulnerable adult is persuaded to enter a financial or sexual transaction to which he or she has not consented or cannot consent. Physical abuse – causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. It may be done deliberately or recklessly or be a deliberate failure to prevent injury.

Neglect – is the persistent or severe failure to meet a physical and/or psychological need.

Sexual abuse – involves a child, young or vulnerable person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the consent of the child is irrelevant.

Emotional abuse – occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young or vulnerable person's behaviour and emotional development, resulting in low self-worth.

Children and Young Persons/Vulnerable Adults

'Children and young people' in terms of this policy mean those under the age of 18. Vulnerable adults are aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or being exploited.

Safeguarding and Recruitment

Recruitment

Mercuri International will make it clear when advertising jobs whether the work will involve "regulated activity" as defined by the Protection of Freedoms Act 2012 (amending the Safeguarding Vulnerable Groups Act 2006). Before an applicant can be employed in a regulated activity, Mercuri International will require individuals to provide a satisfactory Enhanced Disclosure from the Disclosure and Barring Service (DBS) with a barred list check to confirm suitability to carry out regulated activity.

Safer Recruitment, selection, and employment procedures

- Mercuri International takes all appropriate steps to ensure that unsuitable people are prevented from working with vulnerable people.
- Each Job Description clearly states the responsibility of the post holder to safeguard children and vulnerable adults.
- Mercuri International ensures that any member of staff or any student who will have substantial one to one contact with children, young people or vulnerable adults will be Data Barring Service enhanced checks for relevant criminal convictions.
- Mercuri International has a duty to comply with the Safeguarding Vulnerable Groups Act 2006

Work that becomes a regulated activity

If the work undertaken either becomes a regulated activity or where an individual is asked to perform work that is a regulated activity, Mercuri International will require a satisfactory Enhanced Disclosure with a barred list check to confirm suitability to carry out regulated activity. If an individual refuses to undertake this check, or if appears on the barred list, the company will investigate whether it is possible they can continue to be employed in activities that are not regulated activities, but the company reserves the right to terminate an individual's employment if no suitable alternative can be identified.

If an employee is added to a barred list during their employment

If an employee is added to a barred list during their employment, Mercuri International will be legally obliged to prevent them from engaging in any further regulated activity. This may mean that the company cannot continue to employ them. If the company receives notification that an individual has been barred, it will investigate whether they can continue to be employed in activities that are not regulated activities, but in these circumstances the company reserves the right to terminate their employment without notice.

It is the company's duty to refer information by law. The company has a duty to refer certain information to The Independent Safeguarding Authority (ISA).

This includes:

- If the Company has dismissed an individual because he or she has harmed, or may harm, a vulnerable adult or child .
- If an individual has resigned from employment with the company in circumstances where there is a suspicion that he or she has harmed, or may harm, a vulnerable adult or child (this will apply where an allegation has been made and the employee resigns before the company can take investigative action). If the company has suspended an individual and has reason to think the employee has engaged in "Relevant conduct" or has harmed, or may harm, a vulnerable adult or child, or has received a caution or a conviction for, a relevant offence.

Roles and Responsibilities

The Designated Safeguarding Officers are **Karen Hyde, Ria Mason and Sarah James**

A Designated Safeguarding Officer has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the company and of overseeing the referral of cases of suspected abuse or allegations.

Procedure

Employees must remain vigilant at all times of the risk to clients of abusive behaviour from different sources including members of their family, other clients, and employees. Any suspicion, allegation or incident of abuse employees must be referred to a line manager (or another manager if appropriate) for full investigation. If the alleged perpetrator of abuse is another employee, the circumstances will be investigated fully under the company's disciplinary procedure. If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the Designated Safeguarding Officer within 24 hours. If necessary, the company will refer details of the circumstances to the Independent Safeguarding Authority.

Dealing with suspicious or allegations of abuse

- Concerns for the safety and well-being of children, young persons or vulnerable adults could arise in a variety of ways and in a range of different settings. For example, a child/ vulnerable adult may report or display signs of abuse, someone may hint that a child is at risk or that a colleague is an abuser, an individual may witness or hear about abuse in another organization. It is essential to act quickly and professionally in all cases of suspected abuse.

- Any allegation by a child, young person or vulnerable adult against a member of staff, another student or volunteer should be reported immediately to the (Safeguarding Lead) relevant individual who has responsibility under this policy. In dealing with such allegations Mercuri International has a duty of care to the individual and staff member, student or volunteer against whom the allegation has been made.

Responding to Disclosure

- Abused children, young people and vulnerable adults are more likely to disclose details of abuse to someone they trust and whom they feel safe with. By listening and taking seriously what the child, young person or vulnerable adult is saying you are already helping the situation.

The following points are a guide to help you respond appropriately.

Actions to be taken by the person being disclosed to:

- React calmly so as not to frighten them.
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said. They may be formally interviewed by the correct authority and they should not have to repeat their account on several occasions. Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation.
- Take what the person is saying seriously, recognizing the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.
- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible in the light of the developments. Explain to them that you will have to share your concerns with the Designated Safeguarding Officer who has the authority to act.
- Record in writing on the Safeguarding Incident Report Form all the details that you are aware of and what was said using the child, young person or vulnerable adult's own words immediately.

Actions to Avoid

The person receiving the disclosure should not:

- Dismiss the concern.
- Panic.
- Allow their shock or distaste to show.
- Speculate or make assumptions.
- Probe for more information that is comfortably offered.

- Make promises or agree to keep secrets.
- Make negative comments about the alleged abuser.
- Should not suggest any actions or consequences that may be undertaken in response to a disclosure or allegation.

Responding to Suspicions

All suspicions, concerns and disclosures have to be reported immediately to the appropriate member of staff. They have the responsibility to:

- Ensure that arrangements are made to identify staff that require training in child, young person and vulnerable adult protection issues.
- Ensure that reports forms and copies of policies and procedures are made available to staff.
- Receive information from staff, volunteers, children, young people and vulnerable adults who have concerns and record them using appropriate forms and procedures identified.
- Receive the appropriate training required for their job role representing Mercuri International on formal investigations into allegations of abuse led by Social Care Services.
- Where a matter appears urgent and the Child/Adult Safeguarding officer is not available delay should be avoided, at such times contact should be made to the Director.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned in the safeguarding of children, young person and vulnerable adults. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- A Designated Child/Adult Safeguarding Officer.
- The parents or carers of the person who is alleged to have been abused.
- Police/Social Care Services.
- Senior Management where appropriate.
- The person making the allegation.
- The alleged abuser (and parents or carers if the abuser is a child or young person).

Reporting FGM

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
 - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth
- For the purposes of the duty, the relevant age is the girl’s age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information:
Explain that you are making a report under the FGM mandatory reporting duty

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work.
- Details of your organization's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work.
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organization's designated safeguarding lead is kept updated as appropriate. In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means. Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it. FGM is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.

Forced Marriage:

What is forced Marriage?

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

How do we know?

The risks are present throughout the year, however there is a substantial increase in children being taken abroad to be married during the summer holidays.

Therefore, absences from college or work, requests for extended leave and children talking about long trips abroad to their family's country of origin or talking about the upcoming holidays with fear can all be potential indicators of forced marriage taking place.

Other potential indicators include:

- Change in behaviour
- Deterioration in mental health
- Deterioration in behaviour and / or attainment (and unexpected poor exam results)
- Running away from home

What should we do?

If you are worried about a young person, you must report it (initially to your designated lead). You or the designated lead can get advice from the Forced Marriage Unit (fm@fco.gov.uk), and if necessary, they can obtain a Forced Marriage Protection Order to protect the young person and prevent them from leaving the UK. In certain circumstances, the government can also extract UK nationals from other countries if they have been taken there for the purposes of being forced to marry.

Cyberbullying

What is cyberbullying?

- Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs.
- Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications.

Who is most at risk?

- Children using social media unsupervised.
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

Definitions

Flaming

Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.

Denigration

Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.

Exclusion

Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.

Outing

Sharing secrets about someone online including private information, pictures, and videos.

Impersonation

Tricking someone into revealing personal information then sharing it with others.

Harassment

Repeatedly sending malicious messages to someone online.

Cyberstalking

Continuously harassing and denigration including threats of physical harm.

Prevent Policy

Mercuri International strongly believes in and adheres to the government's prevent strategy laid out in the 2015 Counter Terrorism and Security Act and the duty it places on training providers. This is as per paragraph 114 of the Counter-terrorism strategy (CONTEST) 2018.

All Apprentices engaging with Mercuri International in any way will undertake an induction session at our academy which is to include but not exclusively, health and safety in the workplace, awareness of safeguarding and British values and prevent. It is our aim to set core values that are for all stakeholders. We view British values to be of paramount importance, underpinning what it is to be a citizen in a modern & diverse Great Britain. As well as actively promoting these values to our learners, we embed our strategy across the full apprentice journey, staff promote it through their delivery & embed safeguarding naturally with learners.

Leaders & Managers champion 'Prevent' & 'Safeguarding', leading strongly on ensuring that these points are discussed in a variety of fora. Relevant communication and promotions are a regular feature. We actively promote all forms of equality & foster greater understanding of and respect for people of all faiths (or those of no faith), races, genders, ages, disabilities & sexual orientations.

The Prevent Strategy will specifically

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

What is CONTEST?

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.'

CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- **PREVENT** - to stop people becoming terrorists or supporting violent extremism.
- **PURSUE** - to stop terrorist attacks through disruption, investigation and detection.
- **PREPARE** - where an attack cannot be stopped, to mitigate its impact.
- **PROTECT** - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places.

What is Extremism?

The Government has defined extremism as "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". This also includes calls for the death of members of the British armed forces.

What is Terrorism?

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 of 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.

What is radicalization?

People can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. The risk of radicalization is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

Use of inappropriate language

- Possession of violent extremist literature.
- Behavioural changes.
- The expression of extremist views.
- Advocating violent actions and means.
- Association with known extremists.
- Seeking to recruit others to an extremist ideology.

The Government has defined extremism as "vocal or active opposition to fundamental British Values".

which include:

- Individual liberty.
- Rule of law.
- Democracy.
- Mutual respect and tolerance of different faiths and beliefs.

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race.
- Religion and belief.
- Sex.
- Sexual orientation.

Channel

What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Who does Channel work with?

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalization or personal vulnerabilities.

How does Channel work?

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment, or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

How will the person be involved in this process?

A person will always be informed first if it is felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

This policy relates to all Staff and Apprentices and Stakeholders.