

Safeguarding Policy

We have the privilege of educating. An integral part of that privilege is providing our learners with safe spaces and environments in which to learn, develop and grow, where they feel safe and are kept safe.

Document control

Document reference:	P19V4.5
Document:	Safeguarding policy and procedure
Version:	Issue version – 4.5
Issue date:	October 2023
Review date:	October 2024
Replaces version/date:	Version 4.4(October 2022)
Author:	Jayne Wass – Designated safeguarding lead / quality director
Owner:	Jayne Wass – Designated safeguarding lead / quality director
Summary:	<p>This policy applies to all staff, learners, and other relevant persons with particular reference to the safeguarding of children and vulnerable adults from abuse, significant harm or radicalisation.</p> <p>This document is inclusive of the safeguarding procedure, online safety and addendum for delivery during Covid-19.</p>

Authorisation

Signature:	<i>Graham D Howe</i>	Title	<i>Managing Director</i>	<i>18th October 23</i>
-------------------	----------------------	--------------	--------------------------	-----------------------------------

Safeguarding team

For further information or in the event of any concern regarding safeguarding please contact:

Designated safeguarding lead: Jayne Wass – quality director

M. 07960223760 | **E:** jayne.wass@theapprenticeshipcollege.co.uk

Safeguarding officer (deputy DSL): Cat Lawson – delivery manager

M. 07834073159 | **E:** cat.lawson@theapprenticeshipcollege.co.uk

Safeguarding officer (deputy DSL): Scott Flinton – skills coach manager

M. 07469 250987 | **E:** Scott.Flinton@theapprenticeshipcollege.co.uk

Safeguarding officer (deputy DSL): Ruth Ussher – EPA and programme support manager

M. 07941914617 | **E:** ruth.usscher@theapprenticeshipcollege.co.uk

Purpose

The purpose of this policy is to make sure that all learners are protected through the awareness, preventative and reactive actions of all apprenticeship college staff and those associated with the organisation.

The apprenticeship college is legally obliged and has a clear commitment to safeguarding and promoting the welfare of children and vulnerable adults who access our services. We take seriously our responsibility to safeguard and promote the welfare of our learners, and we will work together with our staff and relevant external agencies to promote a joined-up approach to safeguarding.

The apprenticeship college believes that all staff have a collective and individual duty to provide a caring, safe, and supportive environment that positively promotes the health and wellbeing of each learner. Staff, through training and support will take responsibility to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with this policy, the safeguarding reporting structure and related documentation and the overarching safeguarding (including prevent) policies and procedures.

Scope

This policy applies to all learners with the apprenticeship college who may need support, all staff, associates, visitors, and volunteers.

The apprenticeship college instigate a whole organisational approach to safeguarding, we understand that any of our learners may experience outcomes or barriers to their learning which may be a cause for concern. We make sure that all our staff are supported to recognise behaviours, signs and symptoms of significant harm or need and will act appropriately and in the interest of the learner, when required.

We will make sure that our safeguarding policy and related procedures are compliant with legislation guidance issued by the Government DfE, ESFA, other relevant bodies and operates in line with the requirements of the Local Safeguarding Children Boards and Safeguarding Adult Boards for the regions in which we deliver provision. We will review them annually to ensure that they remain current. All our staff are made aware of the relevant policies and procedures and their commitment to ensuring the implementation and effectiveness.

Linked documents

Safeguarding also encompasses issues such as staff conduct, health and safety, bullying, online safety, behaviour management. This document should therefore be considered alongside the relevant policies and procedures.

Legislation and recommended reading

This policy is derived from a variety of legislative provisions and statutory guidance, in particular it is based on the legal framework and on good practice found in:

Keeping children safe in education (2023)

Working together to safeguard children (update 2020)

Prevent duty (2023)



Equality Act (2010)

What is safeguarding

Safeguarding is the overarching term used to describe the protection of the health, wellbeing and human rights of individuals.

Safeguarding comprises 4 main aims

- protection from maltreatment or significant harm
- Preventing impairment of health or development
- Ensuring all learners have the opportunity to experience circumstances consistent of safe and effective care
- Take action to enable people to achieve the best outcomes

(Working Together to Safeguard Children, defines maltreatment as; 'Inflicting harm or failing to prevent harm' The Children Act defines harm as; 'Ill-treatment or the impairment of health or development.' Significant can be defined as; 'compared to the health and development of another with that which could be reasonably expected of a similar person.

Many areas are considered to fall under the definition of safeguarding including

- Abuse (emotional and physical)
- Harassment and bullying (including online)
- Discriminatory abuse
- Financial abuse
- Institutional abuse
- Mental health
- Forced marriage
- Neglect or self-harm
- Domestic violence
- Radicalisation and extremism

We understand the importance of recognising the signs and symptoms of potential maltreatment or significant harm and how to report and refer a concern to the appropriate agencies so that they can investigate and take the necessary action.

We recognise that a learner who is abused, experiencing bullying or is witness to violence may feel alone frightened and confused. We understand our responsibility to provide a stable encouraging and safe environment.

Prevent

An important part of our safeguarding duty is the prevention of extremism and radicalisation. As part of the Counter-Terrorism and Security Act 2015, we are required to pay 'due regard to the need to prevent individuals from being drawn into terrorism'

There is no single way of identifying a person who may be vulnerable to extremist ideology, and it is often the culmination of a number of influences which can include family, friends or relationships they have made online or in the physical world. Extremism can also include non-violent action.

All staff are expected to undertake training and awareness raising and be familiar with the preventing extremism and radicalisation policy.



All learners are expected to undertake training and awareness raising as part of their programme of learning.

An important part of prevent, is the promotion of British values. These are the norms that shape our society, and which are enshrined in law, through legislation such as the Equality Act 2010.

British values are described as

- democracy
- the rule of law
- individual liberty and mutual respect
- tolerance for those with different faiths and beliefs

All learners are encouraged to explore ideas in a context where these values are recognised and respected.

(Our Preventing extremism and radicalisation policy (P23) and related procedures set out in detail our obligations under the Prevent statutory duty)

Our duties and responsibilities

The apprenticeship college will

- Support the development of every learner in ways which foster security, confidence and independence.
- Provide learning environments both physical and remote, in which learners feel safe valued and respected.
- Implement preventative safeguard measures to help raise awareness of safeguarding and protect learners from maltreatment or harm.
- Ensure learners have an awareness of safeguarding and understand how to access support.
- We will work with our employers to provide guidance and support and ensure that they understand their responsibilities for reporting any concerns they may have through our procedures.
- Maintain open channels of communication with our employers. Learners may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people
- Ensure that safe recruitment measures are implemented for staff working in regulated activity with learners.
- Support all staff affected by their experiences of safeguarding concerns and protect learners by encouraging staff to share concerns using the confidential reporting process by contacting the lead safeguarding officer.

Governance and oversight

The safeguarding steering group will be responsible for the implementation and dissemination of the safeguarding policy and procedure and will be led by the designated safeguarding lead and member of the executive team with overall executive responsibility safeguarding.

Designated safeguarding lead and safeguarding officers

The safeguarding team are the most appropriate people to advise on responses to safeguarding concerns or safeguarding issues and are the first point of contact.

The responsibility of the designated safeguarding lead and the safeguarding officers include:



- Providing support and advice to staff who share a concern or disclosure about a learner and maintaining appropriate records of concerns incidents or disclosures on a secure 'safety and welfare concern' register.
- Immediately investigating significant concerns and referring to the appropriate local safeguarding children's board or adult safeguarding board when necessary.
- Follow up all referrals and disclosures made in line with this policy and procedure as appropriate.
- Oversight of the maintenance of a secure confidential single central file to record staff DBS certificate details, safe recruitment details, emergency contact information.
- Oversight of the delivery and review of staff CPD and training in safeguarding and prevent.
- Promotion of safeguarding policy and procedures and providing staff with support to ensure they are consistently implemented.
- Maintain up to date training and regular refresher training.

Always maintain confidentiality regarding safeguarding.

If there are concerns regarding a member of staff these will also be handled in line with the apprenticeship college HR procedures and overseen by a senior member of the executive team.

All staff

Have a duty to:

- Understand and fulfil the safeguarding responsibilities as outlined in this policy and the related procedures, reporting structure, and supporting documents.
- Ensure that all learner data is kept confidential in line with the apprenticeship college data protection policy.
- Report any safeguarding concerns or disclosures immediately to a safeguarding officer in line with the reporting procedure and supporting guidance.
- Maintain strict confidentiality with learners in line with the policy and guidance.
- Engage in safeguarding and prevent training and complete safeguarding assessments were required.
- Access additional information, advice and support when appropriate.
- Act on the basis that the welfare of the learner is of paramount concern and if in doubt to immediately seek advice from a safeguarding officer.

Have an awareness of 'contextual safeguarding', this is an approach to understanding and responding to learners' experiences of significant harm beyond their families. It recognises that the different relationships that learners form in their neighbourhoods, groups and online can feature violence and abuse and recognises that learners could be vulnerable to abuse beyond their front doors. It recognises the impact of the public/social context of a learner's life and consequently their safety. Extra-familial harm can take a variety of forms and learners can be vulnerable to

- sexual exploitation
- criminal exploitation
- online abuse
- peer on peer and relationship abuse,
- risks associated with gangs,
- risks associated with radicalisation



- safeguarding risks in public spaces
- trafficking and modern slavery

Have an awareness of peer-on peer-abuse. It is important to recognise that abuse can be learners abusing other learners, even if there are no reports of peer on peer abuse it should be recognised that this does not mean it is not happening, and staff should report any concerns. This type of abuse can take many different forms including:

- Bullying, cyber-bullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships
- Sexual violence, this may include an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Sexting - consensual and non-consensual sharing of nude or semi-nude images and or videos
- Up-skirting – taking pictures under someone's clothing without them knowing. Up-skirting is a criminal offence and anyone of any gender can be a victim
- Initiation/hazing type violence and rituals.

We recognise that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge our responsibilities and duty of care.

All staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a learner's safety and welfare. All staff will be supported by the safeguarding team.

Staff must always endeavour to share our intention to report a concern with the parents/carers of the learner (where applicable) and the learner themselves unless to do so would put the learner at greater risk of harm.

Staff are to uphold a zero tolerance for all forms of harassment and abuse and recognise that it will not be tolerated or passed off as banter or having a laugh. Our staff are empowered to challenge inappropriate behaviours and report any concerns they have.

In practice

Whilst a lot of safeguarding activity is proactive, we encourage our delivery and wider learning staff to include within their sessions the promotion of the safeguarding and prevent agenda so that they can act on any concerns that arise.

Whilst in many cases learners may not seek help, there are common signs which can help staff to recognise when things may be wrong. Warning signs may include

- Absence – missing sessions or missing work
- Changes in appearance
- Changes in behaviour and character (becoming quiet/loud/aggressive/withdrawn)
- Changes in emotional health (anxiety/low mood/crying)
- Self-harm
- Withdrawing from certain activities (reluctance to go online/changes in use of technology)
- Misusing drugs or alcohol
- Is at risk of modern slavery, trafficking or exploitation



- Is in a family circumstance presenting challenges

It is important to stress that the existence of some of these characteristics are not a definitive sign that anything is wrong, we encourage our staff to be curious when things do not seem quite right. Staff should seek advice and guidance from the safeguarding team in the first instance.

Safeguarding online

The increasing use of the internet and digital technology has presented huge opportunities to enrich the learning environment for our learners through the use of online classrooms, e-portfolios and learning software, and to support them to expand their personal horizons and skills in the digital space. If we are to provide our learners with access to and engagement with online content, we need to ensure they have the skills to be able to use the internet safely and develop appropriate online behaviours.

Empowering our learners to be active and ethical digital citizens requires building capacity to safely navigate the digital space. Digital environments bring enormous opportunity, but also risks.

Our learners need to be aware of ways in which they can protect themselves online and ensure the security of their personal data. Dangers can include bullying and abuse, revenge porn, grooming, identity theft, and viruses.

An important part of our learners' development is becoming a critical thinker, developing a critical mindset will also help learners to examine and assess the validity and authenticity of information online.

We will :

- Make sure that our staff and learners engage with remote learning in line with existing policies relating to behaviour, online delivery, and safety protocols.
- assess how our learners may be at risk of harm using the internet or technology.
- provide relevant support so that our learners are able to work safely and effectively online.
- Help our learners to develop an objective attitude to online information.
- Provide clear guidance on what is and is not acceptable use of the internet at the apprenticeship college.
- Work with our employers to make clear to our learners relevant organisational policies and procedures on using the internet and technology in the workplace.
- Make sure that online delivery take place following relevant guidance.
- Make sure that online learning environments / tools / systems are in line with the privacy and data protection/GDPR requirements.
- Make sure our staff are trained to identify and deal with concerns about online safety

Apprenticeship college devices and systems are managed via an IT management service provider who provide appropriate filtering and monitoring, cyber security and user guidance and support. When learners and staff use our equipment, it is monitored closely, and suitable firewalls/ software safeguards have been installed to prevent any unauthorised or harmful attacks. All staff have received 'Cyber awareness training'

Any concern regarding online behaviour or use will be responded to in line with our safeguarding reporting procedure and other relevant policies.



Safeguarding Procedure

This document details how staff, learners and visitors can report concerns, suspicions, and allegations of harm.

It provides the overarching safeguarding framework under which our related policies and procedures as described in our safeguarding policy will be managed to enable us to discharge our safeguarding responsibilities in relation to the safeguarding of children, the safeguarding of vulnerable adults and the safeguarding from radicalisation (the prevent duty). Appropriate safeguarding action should be taken wherever there is concern.

how to report a concern

If you are concerned that there is an immediate risk of serious harm, call emergency services on 999 or 101 without delay.

A disclosure is when a person tells you that something has happened. Do not promise confidentiality and report as soon as possible following the procedure below to a member of the safeguarding team who will then take over the investigation.

A concern is when you feel something is not right but have not been told anything. You may choose to report your concern immediately to the safeguarding team following the procedure below or seek advice from a member of the safeguarding team or you may raise your concerns with the learner prior to reporting or seeing advice formally.

Do not investigate any allegation that has been disclosed to you or any concerns that you might have. This is undertaken by the relevant external agency who will be contacted (where appropriate) by a safeguarding officer.

Our procedure is based on the recognise, report, respond, record principles, staff should make themselves familiar with how to report a concern and in the event of a concern being raised should respond as quickly as possible.

Recognise	<p>A change in behaviour / attendance / appearance / punctuality. Hear or told something / professional judgement tells you something is not quite right.</p> <p>Remember you don't need to be certain before you speak up. If you are ever worried about someone, you should always speak to a member of the safeguarding team.</p>
Respond	<p>Where a disclosure is made, respond positively, listen without judgement, do not prompt or question what you are being told. You may need to ask questions but try and keep them to a minimum and do not ask leading questions.</p> <p>Reassure that reporting the incident is the right thing to do, explain that the information they have disclosed will only be shared with others who need to know, but never promise confidentiality.</p> <p>Do not try to address the situation yourself. You should escalate the incident to a member of the safeguarding team immediately.</p>



	If you have a concern where you feel that something is not right but have not been told anything, you may choose to report your concern immediately to the safeguarding team without speaking to the learner / raise your concerns with the learner if you feel it is ok to do so prior to reporting / or seek advice and support from a member of the safeguarding team prior to raising a new incident.
Report	<p>Make a confidential written record that includes factual details about the disclosure, time, date, what was said, names of parties.</p> <p>Contact a member of the safeguarding team and send the report to them as soon as possible after the disclosure.</p> <p>If you are unable to reach a member of the safeguarding team because it is out of hours and there is a pressing and urgent risk of harm you should make a referral to the multi-agency safeguarding hub (MASH) team for the area the learner resides in or by calling 999 or 101 if there is an immediate threat of harm.</p>
Record	A member of the safeguarding team will follow up your concern and where necessary report to external agencies. They will record your concern, progress and outcomes following this procedure.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard. GDPR allows the processing and storage of sensitive and personal information in relation to safeguarding, this should be treated as 'special category data'. Safeguarding of children and individuals at risk is a processing condition that allows practitioners to share special category data. This includes allowing practitioners to share information without consent where there is a good reason to do so.

The role of the safeguarding team

Designated safeguarding lead: Jayne Wass – quality director

M. 07960223760 | E: jayne.wass@theapprenticeshipcollege.co.uk

Safeguarding officer (deputy DSL): Cat Lawson – delivery manager

M. 07834073159 | E: cat.lawson@theapprenticeshipcollege.co.uk

Safeguarding officer (deputy DSL): Scott Flinton – skills coach manager

M. 07469 250987 | E: Scott.Flinton@theapprenticeshipcollege.co.uk

Safeguarding officer (deputy DSL): Ruth Ussher – EPA and programme support manager

M. 07941914617 | E: ruth.ussher@theapprenticeshipcollege.co.uk

Incidents or concerns reported to the safeguarding team will be initially assessed and the designated safeguarding officer will where appropriate conduct any follow up with the learner and will note how the concern has been followed up and resolved and note any actions



reached. All incidents or concerns will be recorded on a safeguarding concern form / reported and logged on the safeguarding and welfare tracker and followed up accordingly.

Concerns will be shared with the relevant professionals as soon as they are identified. For young people under the age of 18, concerns would usually be shared with parents in line with guidance in keeping children safe in education. Parents would not be informed where it may cause greater risk of harm to the young person. Reasons for not informing parents will be logged and, should a referral to social care be needed, raised, and informed appropriately. For learner over the age of 18, we would usually need to seek consent to share information with other professionals, agencies and next of kin. However, where the team assess significant and imminent risk, for example, risk of suicide, the DSL may authorise sharing information without consent. The lack of consent will be made explicit when sharing information.

Concerns about a member of staff

Any suspicion, allegation, or actual abuse of a learner by a member of staff must be reported to the DSL immediately. All such allegations against a member of staff which meet the harm threshold will be reported to the relevant local authority in the first instance. Any concern or allegation will also be dealt with under the appropriate staffing policy and procedures and will be overseen by a managing director.



Appendix 1 – concern form / report

Safeguarding Concern Form

Full name of learner	Date of Birth	Age	Gender
Learning Programme		Employer & Location	
Resides with?	Emergency contact details if known		
Factual description of nature of concern (include dates and times of any specific incidents)			
Name of person making the referral :	Contact Number	E-mail	Date
Safeguarding Officer		Date received	

This section to be completed by the Designated Safeguarding Officer
Individuals/agencies involved to date

Role/Service	Contact Name	Contact Number

Action to be taken

Action	Who is involved?	By when?



--	--	--

Outcome

--

Review Date _____

Details of Review Findings

--

Appendix 2 - definitions

Physical Abuse - This may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.

Neglect - Neglect is the persistent or severe failure to meet a child's, young persons or vulnerable adult's physical and/or psychological needs. It can result in serious impairment of their health or development.

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

Emotional Abuse - Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's, young person's and vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive electronic communications.

Financial Abuse - Financial abuse in intimate relationships is a way of controlling a person's ability to acquire, use, and maintain their own money and financial resources.

Significant Harm - Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

Forced Marriage – This term is used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

Extremism and Radicalisation - We will help support individuals who may be vulnerable to radicalisation and where we believe an individual is being directly influenced by extremist materials or influences, we will ensure that the learner is referred to the 'Channel' process through direct liaison with the Multi Agency Safeguarding Hub (MASH). In such instances, the Designated Safeguarding Lead will seek external support from the Local Authority and Prevent



Coordinator. If the risk is seen to be serious and dangerous behaviour imminent, the matter will be reported to the police.

Female Genital Mutilation - 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.

Child Criminal Exploitation- County Lines- Criminal exploitation is a geographically widespread form of harm, that is a typical feature of county lines criminal activity: drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas. CCE also involves enticing or grooming young people into crime or gang activity for illicit gains.

Children Missing in Education - Children missing in education is often an indicator for other potential safeguarding concerns. We will use attendance policies and measures for attendance reporting and follow up to monitor learners, who could potentially be 'missing in education'

Child Sexual Exploitation - Child sexual exploitation is a form of child sexual abuse. 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 (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

Domestic abuse - Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Peer on peer abuse- All staff should be aware that children can abuse other children and that it can happen both inside and outside of the learning environment. It is important that all staff challenge inappropriate behaviours between learners that are abusive in nature.

Homelessness - Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Up-skirting – the taking of surreptitious, sexually intrusive photographs – is to become a specific criminal offence punishable by up to two years in prison. Such invasive behaviour is currently prosecuted under either the offence of outraging public decency or as a crime of voyeurism under the Sexual Offences Act.

Wider Mental Health - mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have experienced childhood trauma, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff should be aware of how these experiences can affect their mental health, behaviour and education.

