

Safeguarding Policy



This policy applies to all SECCTA employees, including those who work full time or part time. This policy is also relevant to Freelance Tutors, Subcontractors and any other company, organisation or individual providing services on behalf of SECCTA to learners or employers.

This policy does not form part of any Contract of Employment and can be amended at any time. The Company may also vary the processes within the policy, including the time limits, if appropriate in any case.

Introduction

The company is fully committed to meet its responsibility to protect and safeguard the welfare of children, young people and adults. We recognise the important role we can play in identifying and protecting children, young people and adults who are at risk.

Safeguarding is the responsibility of all employees as well as third parties who provide services on behalf of the company.

In delivering our safeguarding duties, the company will:

- Ensure we practice safe recruitment, in particular checking the suitability of potential employees (and other third parties) to work with our learners;
- Establish a safe environment in which learners can learn and develop;
- Provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of children and adults at risk of harm;
- Establish and maintain an environment where employees feel well informed about safeguarding and where they are listened to when they have concerns about the safety and wellbeing of someone who is at risk;
- Raise awareness of safeguarding issues and equip learners with the skills needed to keep them safe, including online safety;
- Develop and implement procedures for identifying and reporting cases (or suspected cases) of abuse, and for receiving disclosures of abuse;
- Support learners who have been abused or neglected;
- Maintain an attitude of “it could happen here” where safeguarding is concerned.

The company has a duty of care to all our learners, and a moral responsibility to those we may encounter through our work. All employees are expected to be alert to all possible forms of abuse and must not discount any allegation or suspicion in relation to safeguarding.

Safeguarding includes making sure that children and adults at risk of harm are protected from different types of abuse and neglect (including self-neglect, domestic abuse, exploitation, discrimination, physical, financial, sexual, emotional and organisational abuse, neglect and modern slavery), and in securing appropriate support for them and their families.

For the purposes of this policy, the learners we work with are all over the age of 16. Learners who are aged 16 or 17 are classed as children, and those 18 or over are considered to be adults.

Lead for Safeguarding

This policy creates the Lead for Safeguarding role. This is a role, which may or may not be a permanent position, that holds day to day responsibility for the oversight and promotion of the company Safeguarding policy, its aims and objectives, and for reporting to Senior Management and the Board of Directors on how effectively the company is meeting the goals set out in this policy.

The Board of Directors will nominate an individual to hold this position, and where necessary ensure the individual receives sufficient training to ensure they can undertake their responsibilities effectively.

The Lead for Safeguarding, where they are not already on the Senior Management Team, shall sit on the Senior Management Team to advise on Safeguarding matters.

The Board of Directors may also appoint others into similar roles who report to the Lead (such as a deputy) to assist the Lead generally or to have primary responsibility for a specific region, geographical area or specific service(s). These deputy positions may or may not be a permanent position. Where the holders of such roles also have another role in the company, they will report to the Lead for Safeguarding in regard to safeguarding matters, and their regular line manager for their other responsibilities.

Responsibilities

All Employees

It is the responsibility of every employee and third-party delivering services on our behalf to know, understand and follow this Safeguarding Policy and to know how and to whom to refer their concerns or disclosures.

In addition, employees (and others delivering services on the company's behalf) should:

- take care not to place themselves in a vulnerable position with a child or adult at risk of harm,
- be aware of the main categories of abuse (see Appendix A) and understand that abuse, neglect and safeguarding issues are rarely standalone events, and, in most cases, multiple issues will overlap with one another,
- be aware of group that may be at higher risk, or where abuse may be ignored or dismissed too readily (see Appendix B),
- understand the issues of radicalisation,
- undertake Safeguarding and Prevent training and to update their knowledge regularly as required by the company.

Managers

Managers who manage employees (or external third parties) that either:

- deliver services to children and/or adults at risk of harm, or
- may otherwise have contact with such individuals

must ensure that the individuals they manage receive Safeguarding and Prevent training as part of their induction, and periodic updates as determined by the Lead for Safeguarding, the Senior Management Team or the Board of Directors.

Managers should ensure that Safeguarding is a regular agenda item in supervisions and team meetings, to ensure that any issues have be dealt with appropriately, and for the dissemination of new information and best practices.

Managers are expected to ensure all employees whom they oversee are made aware of their whistleblowing responsibilities during their induction and reminded of them through regular management processes and employee training.

Lead for Safeguarding

It is the responsibility of the Lead for Safeguarding to ensure that the company complies with its legislative duties and has regard to government guidance (including Keeping Children Safe in Education) to ensure that our policies, procedures and training are effective and comply with the law.

The Lead will therefore:

- Oversee this policy and associated practices, and to champion safeguarding issues.
- Ensure that relevant policies and procedures are in place, which are compliant with the national guidance and reviewed regularly.
- Ensure that all employees, volunteers and third parties delivering service on behalf of the company undertake appropriate levels of Safeguarding and Prevent training.
- Monitor procedures and practice and ensure compliance with all relevant regulations.
- Ensure that safe recruitment procedures are in place and are applied to all vacancies to ensure employees and any third parties are suitable to work with children and adults at risk of harm.
- Ensure any deficiencies in safeguarding arrangements are remedied without delay.
- Ensure that employees are equipped to respond to the needs of vulnerable children and adults, including those with disabilities and those children who are Looked After by the Local Authority.
- Ensure that teaching supports learners in recognising and responding to risks, including technology and online safety.

- Act as focal point for employee concerns and to liaise with local authorities and other relevant agencies.
- Refer all cases of suspected abuse or radicalisation to the relevant authorities, including referring any case where a crime has been committed to the police.

The knowledge and skills of the Lead and any deputies should be maintained in-line with relevant government guidance.

The company expects the Lead and any deputies to undertake formal refresher training every two years. In addition, they are expected to maintain and develop their knowledge in between such training by staying current on the latest developments and best practices, for example, by subscribing to relevant newsletters, monitoring current news regarding safeguarding or attending events which are for safeguarding practitioners.

Deputy Lead(s) for Safeguarding

Deputy or Assistant Lead(s) may be appointed to assist the Lead generally or to have primary responsibility for a specific areas or services. Where deputy or assistant lead(s) are appointed, they should usually be trained to the same standard as the Lead.

Whilst many of the activities of the Lead can be delegated to appropriately trained deputies, the ultimate responsibility for safeguarding remains with the Lead. This responsibility cannot not be delegated.

Key Contacts

All employees, and third parties delivering services on behalf of the company, should be aware of how to contact the Lead for Safeguarding, as well as any deputies (or similar roles) who may be appointed for their area(s) of responsibility.

All managers must ensure that the company Safeguarding Contacts Poster is displayed in their office where it is easily accessible for all employees to view. This poster must clearly name the Lead for Safeguarding, as well as any deputies or assistants that have responsibility for that area and any services delivered from that office.

Recruitment and Selection

This section should be read in conjunction with our Safer Staff Recruitment Policy which together details our recruitment and selection process and the steps taken to ensure the safety of people at risk of harm.

Criminal Record Checks (Disclosure and Barring Service)

The company will carry out Disclosure and Barring Service (DBS) checks on all potential employees who will or are likely to have contact with children or adults at risk of harm to ensure that no one is employed who has a criminal conviction that would deem him or her to be a danger to children or adults at risk of harm.

This will include all tutors teaching young people (for example young apprenticeship programmes) as well as those who will conduct workplace assessments either where the learner is under 18, or the workplace has children or adults at risk of harm present.

It also includes employees who may conduct learner interviews, teaching inspections and those who attend employer sites. As such it is likely to include the majority of the company's teaching, sales and quality staff.

In conducting these checks, the company will follow the legislative requirements and the DBS Code of Practice. For more information on the process of applying for a DBS check, please see the Safer Staff Recruitment Policy.

Where there is any matter within the DBS disclosure that causes concern, employment will not be offered or be terminated if deemed appropriate.

The company does not currently maintain a definitive list of crimes which are acceptable or otherwise. Each disclosure is reviewed on a case-by-case basis and various risk factors taken into account such as the seriousness of the crime, the employee's part in it, how long ago the crime was committed and relevance of this to the role for which they have applied.

The company generally considers a DBS check to be valid for a period of three years. After this a new check should be conducted to ensure individuals have not been convicted of a crime which would make them unsuitable to continue in their employment. However, where there are specific concerns the company may conduct a new check earlier.

In some cases ongoing checks may not be required where the company is subscribed to a service which will automatically inform them of any changes to an individual's criminal record.

Employment Changes

Should an employee have a significant change of role, in particular where they move from a role which does not require a DBS check (or a check on one of the barred lists) to one which does, they will be subject to further checks, which will include conducting a DBS check and/or a check against the relevant Barred List/s as applied.

Where the company has reason to believe an employee's DBS is no longer valid (for example where the company becomes aware that the employee has been convicted of a crime), or where an employee discloses information which would affect their DBS status, the company will conduct a further check.

In cases where the employee discloses that they have been convicted of a crime which would prohibit the employee from continuing in their employment, further checks are not usually necessary, and the relevant procedures should be followed to terminate their employment.

Visitors and Contractors

The company will not usually undertake DBS checks for visitors or ad hoc contractors, however, depending on the nature of their visit the company will take different approaches to how it manages such visitors:

1. Regular visitors will be accompanied throughout their visit by a member of staff and never be left alone with children or adults at risk of harm.

2. Visitors from approved organisations, who have suitable safeguarding / DBS processes in place (such as Ofsted), will be treated as meeting our requirements and may be allowed unsupervised access to children or adults at risk of harm where appropriate and their identity has been verified.
3. Regular visitors, contractors or other third parties, with their consent, may undertake the relevant safeguarding / DBS processes, which if suitable responses are received will then be allowed unsupervised access to children or adults at risk of harm where necessary to the work they undertake.

The Directors or Senior Managers, in consultation with the Lead or relevant deputy, may approve an organisation under paragraph 2 above once they are satisfied that the organisation has sufficient safeguards in place to keep those we work and interact with safe.

Teaching and Assessing Practices

We believe in the importance of education about safeguarding and in enabling each person to take responsibility for their own and others' safety.

Teaching and assessing staff must be mindful of ensuring the safety and welfare of their learners and this should be at the forefront during learner induction, the delivery of programmes, assessment practices, tutorials and on-the-job work placements.

While working with learners at work placements, assessors must be mindful of the safeguarding of vulnerable people, and sensitive to any vulnerable people that their learners are working with.

Identification should be shown by assessors before entering a workplace and appointments booked through the learner and if requested, their supervisor.

One-to-one tutorials need to be conducted in areas that the learner feels comfortable in, which should be in view of other tutors, assessors or other staff members where possible.

Work Placements

For training programmes where learners are required to gain a work placement, the company has a responsibility to ensure that these placements are safe for the learners and any young people or adults at risk of harm that may use their services.

Whilst most organisations are run by well intentioned, honest and reliable people, it is known that the few who are determined to harm vulnerable groups of people deliberately seek out groups and organisations where they can meet those they target. A safeguarding culture will discourage them from becoming involved and make it harder for them to harm or abuse vulnerable people.

Prior to learners being placed in a work placement the company must ensure it is safe. This includes verifying that risk assessments have been conducted, mitigations implemented, and assessments have been reviewed (usually at least annually).

When an employer agrees to provide a work placement, they must also agree to inform the company of any issues, such as accidents, immediately. Where the learner is funded, the company may be required to notify the funder of any accidents during their training.

Supporting Vulnerable Children

We recognise that without appropriate intervention and support, abuse or witnessing violence may have an adverse impact on children which may last into adulthood.

The company will support learners by:

- Encouraging self-esteem and self-motivation,
- Creating a culture which actively promotes a positive, supportive and safe environment,
- Liaising with other agencies which support children such as Social Care teams and Child and Adolescent Mental Health Services (CAMHS).

Looked After Children

The most common reason for children becoming looked after is because of abuse and/or neglect. The Board of Directors and Senior Managers should ensure that employees have the skills, knowledge and understanding necessary to keep looked after children safe.

All managers should ensure that employees working with looked after children have the information that they need in relation to the child's legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order), as well as contact arrangements with their birth parents or those with parental responsibility.

They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them. The Lead for Safeguarding (or the relevant deputy) should also have details of the child's social worker.

Concerns and Disclosures

For the purposes of this section, any reference to an employee, includes third parties providing services on behalf of the company and volunteers (where applicable).

Procedure

Where any employee (or third-party delivering services on our behalf) is concerned about a child or adult at risk of harm, or a concern has been reported or disclosed, the individual receiving this information should follow the below procedure.

Where any employee witnesses someone in imminent danger, please see the below Imminent Harm section for actions to be taken immediately, before the steps in the below procedure.

1. Information regarding the concerns should be recorded on the Concern Form as soon as the disclosure has been made. The written record must be a clear, precise, factual account of the observations or what has been said using Body Maps where appropriate.

Where this concern is the result of a disclosure it is important to use the language and wording of the person making the disclosure when relaying what they said.

2. The completed form, along with any notes, body maps or similar records, must then immediately be sent to the Lead for Safeguarding (or the relevant deputy where one is

appointed for the area or service). The Lead must then be informed by telephone or in person that a Safeguarding Concern has been sent to them.

Never destroy any original notes as these may be required by the police or a court.

3. The Lead or deputy will review the information and decide upon the most appropriate course of action. This will usually be one of the following:
 - a. To take no further action,
 - b. To monitor the situation,
 - c. To discuss the matter with a parent, carer, guardian or equivalent,
 - d. To make a referral to the relevant authorities (i.e. Social Care, Police, Channel etc.)
4. If it is decided to take no further action, the Lead / Deputy must be entirely satisfied that there is no evidence or likelihood of harm, and that the concerns have been thoroughly investigated.
5. If it is decided to monitor the situation, the Lead / Deputy will agree arrangements with the relevant tutor(s), assessor(s) and managers on how this will be monitored, and how frequently updates must be provided to the Lead / Deputy. Monitoring should continue until such time as:
 - a. It is believed there is no risk of harm or other safeguarding concern,
 - b. It becomes appropriate to discuss the matter with a parent, carer, guardian or equivalent,
 - c. It is necessary to make a referral to the relevant authorities.
6. If it is decided to discuss the matter with a parent, carer, guardian or equivalent, the Lead / Deputy should do so, and work with them until such time as:
 - a. It is believed there is no risk of harm or other safeguarding concern,
 - b. It is necessary to make a referral to the relevant authorities.
7. Where it is necessary to make a referral to the relevant authorities, this will be discussed with the parents, carers, guardian(s) or equivalent, unless to do so would place the individual at further risk or undermine the collection of evidence.
8. The Lead / Deputy will then notify the relevant authorities using their processes for such notifications, including sending any relevant notes or other information they require.

Please note, if the employee raising the concern disagrees about the level of concern and decisions made, and as such feels that the child or adult at risk of harm has not been protected, then any employee can make a direct referral to relevant authorities.

Imminent Harm

Where any employee (or third-party delivering services on our behalf) witnesses abuse taking place they should not attempt to intervene as this may increase the risk to the person being harmed, as well as to the employee.

Employees should remove themselves from the situation, and either immediately:

- Call the emergency services where a crime is actively in progress, such as a physical assault, and assistance is required to prevent further harm from occurring (or call medical assistance if required), or
- Call the Lead, or relevant Deputy for advice, and follow that advice.

Receiving a Disclosure

If an individual discloses that they have been abused the employee receiving the disclosure should:

- Listen to what is being said without displaying shock or disbelief, allowing them to talk freely and at their own pace;
- Take what they say seriously;
- Reassure them, but do not make promises, particularly about maintaining confidentiality – it might be necessary to refer to other agencies;
- Reassure them that they are not at fault, and they were right to tell someone;
- Listen and only ask questions when it is necessary to obtain clarification;
- Do not criticise the alleged perpetrator;
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by them;
- Use Body Maps (or draw a diagram) to indicate the position of any visible injuries, or for the person to indicate what happened;
- Record statements and observations rather than interpretations or assumptions.

A written record of the disclosure should be made, using the individual's own language when relaying what they said. This record should be attached to the Concern Form following the above procedure.

If an individual discloses that they are, or have abused others, the employee receiving the disclosure should:

- Listen to what is being said without displaying shock or disbelief, allowing them to talk freely and at their own pace;
- Take what they say seriously;
- Do not make promises, particularly about maintaining confidentiality – it might be necessary to refer to other agencies;
- Listen and only ask questions when it is necessary to obtain clarification;
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by them;
- Record statements and observations rather than interpretations or assumptions.

A written record of the disclosure should be made, using the individual's own language when relaying what they said. This record should be attached to the Concern Form following the above procedure.

Where the individual is a learner who works with children or adults at risk of harm, it may be appropriate for the company to inform their employer, to prevent harm coming to the people they work with. The Lead or relevant Deputy will decide where it is appropriate, and will notify the employer, either directly or through the Sales Team.

Communicating with Parents and Guardians

Where a child or adult at risk of harm has made a disclosure or where a concern has been raised, the company will normally inform the parent, guardian or other person(s) who are legally responsible for them.

However, where it is considered that disclosing this information might place the child or adult at risk of harm at increased risk of significant harm, no such disclosure should be made. This may be due to:

- The behavioural response it prompts (e.g. the person being subjected to abuse, maltreatment, threats or forced to remain silent if the alleged abuser is informed),
- It leading to an unreasonable delay,
- It leading to the loss of evidential material,
- Placing an employee at risk.

Complaints from External Individuals

The company offers two approaches for parents, guardians or others to raise a safeguarding concern.

The first method is to use the complaints procedure in our Complaints and Feedback Policy. However, where a complaint is regarding a safeguarding concern, it should then be redirected to the Lead or relevant deputy and will then be handled under this procedure. The person raising the complaint should be informed of this, as it may change the expected timescales and communications.

The second option, where the external party understands that they are raising a safeguarding concern, is to ask them to complete the Concerns Form (with assistance from a representative of the company if necessary), and then this procedure will continue as normal for handling such concerns.

Concerns About Third Parties

Where there is a concern about individuals who are not our learners, nor otherwise directly connected to the company, we are not the responsible party for managing the concern or disclosure.

Where such a concern is raised, or a disclosure made, it should ordinarily be referred to the relevant organisation through their own safeguarding processes. Only where that organisation is not responding to the concern (or it is believed they are not), then we will refer the concern or disclosure to the relevant authority (such as a Local Authority, the Police, Care Quality Commission etc.).

We cannot investigate safeguarding matters where we are not responsible for the individual(s) who require safeguarding.

Allegations against Employees

Any allegation against an employee, where they may have:

- Behaved in a way that has or may have harmed a child or adult at risk of harm,
- Possibly committed a criminal offence against/related to a child or adult at risk of harm,

- Behaved towards a child or adult at risk of harm in a way which indicates they may pose a risk of harm if they work regularly or closely with children or adults at risk of harm

must be reported to the Lead for Safeguarding without delay using the standard procedure above, unless the Lead is the subject of the allegation. In such cases a deputy must be informed, where one has been appointed, otherwise the most senior manager who is not the subject of the allegation must be informed, usually this will be a Director or a member of the Senior Management Team.

The concerns form should include recording the time, date and place where any alleged incident took place, with brief details of what was said to have happened.

When an employee leaves the company before any investigation is concluded, the company will continue to investigate it thoroughly, and where appropriate notify any relevant authorities (such as social services or the police) or professional bodies (where applicable) to ensure, as far as we can, that action can be taken to prevent the individual from harming others in the future.

Employee / Learner Relationships

We discourage any of our employees from having relationships with learners while they are undertaking training with the company. This has implications for both academic reasons, as well as the potential for an abuse of power, which is a safeguarding concern.

Employees are expected to be aware that sexual relationships with learners aged under 18 years old, where the employee is in a position of trust over that learner, is unlawful and could result in legal proceedings taken against them.

Allegations, Arrest or Charges Outside of Employment

Where an employee (or third party) is accused of a crime, arrested or charged with a crime, but prior to any guilty plea or conviction, the company must take additional steps to ensure that our learners and any adults at risk of harm or children they work with are protected.

The additional steps will depend on the nature of the allegation, and the risk posed. It is important that the manager, working with the Lead or relevant deputy ascertains the facts as quickly as possible, which will usually include interviewing the employee.

The Lead or deputy must then agree with the manager what measures are to be taken. These could vary significantly depending on the accusation. For example, drunk driving with a child in the car may be considered a low risk (with regard to the company's learners), compared to an allegation of sexual assault which would be considered a high risk.

It may be necessary for employees to be removed from their normal duties or suspended for a period of time, while any criminal investigation or trial is occurring. This is likely to include barring the employee from making any contact with learners or their employers during this time.

Where this is likely to take a significant period of time, specialist advice should be taken to decide whether the employment should be terminated.

Support for Employees

Dealing with a disclosure and/or safeguarding issues can be stressful. Any employee involved in a dealing with any matter under this policy should consider seeking support. This may include discussing this with their manager or a Mental Health First Aider.

Managers should also consider what support can be offered to the employee. This may be specific support designed to meet the employee's needs, as well as the support that is available through the Staff Wellbeing Policy.

Confidentiality

Safeguarding raises issues of confidentiality that must be clearly understood by all employees, including any individuals who work for third parties delivering services on behalf of the company.

All employees have a responsibility to share relevant information about the protection of children and adults at risk of harm with other professionals, particularly the investigative agencies (including social services, multi-agency safeguarding hubs and the police).

If a child or vulnerable person confides in an employee (or third party), and requests that the information is kept secret, it is important that the employee tells the person (for children, in a manner appropriate to their age/stage of development) that they cannot promise complete confidentiality. Instead, they must explain that they may need to pass information to other professionals to help keep them or others safe.

Individuals who receive information about children, adults at risk of harm and their families in the course of their work should only share that information within appropriate professional contexts and if unsure they should consult the Lead or relevant deputy who will advise what may or may not be shared, following legal constraints and current best practice.

Radicalisation, Extremism and Prevent

The further education sector can play a key role in identifying concerns around potential radicalisation. Vulnerable young people in particular can be targets of radicalisation and extremist groups, and staff within education settings are well placed to observe changes in behaviour including, expressions of extremist views and beliefs, social isolation, and even significant changes in appearance.

The company recognises that protecting children from the risk of radicalisation is a part of our wider safeguarding duty to protect children from significant harm.

The company also recognises that education providers required to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty.

Prevent Statement

The company embraces its duty in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

It is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

To that end, the company expects all senior managers to continually assess where and how students and staff may be at risk of being drawn into terrorism.

Reporting Concerns

Where any employee is concerned about a learner showing signs of extremism, or radicalisation they should immediately report their concerns to the Lead for Safeguarding, or relevant deputy using the above standard procedure.

The Lead (or deputy) will consider all the available facts and decide whether it is appropriate to make a referral to the Channel programme.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals if there are concerns that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

In addition to information sharing, if an employee makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

Peer on Peer Abuse

Learners can be vulnerable to physical, sexual and emotional bullying and abuse by their peers, or they may be the perpetrator of such behaviour. It is also possible that a learner who has harmed another, may well also be a victim.

Tutors are expected to manage their classrooms effectively, and to work to ensure that bullying or abuse does not occur during their lessons. Where it does occur, tutors should use their skills and experience to defuse the situation, and once under control ascertain whether any learner disciplinary actions are appropriate, or whether a safeguarding concern should be raised.

It should be noted that some sexual behaviour, particularly between young people, can be expected, but some signs of sexual behaviour may indicate abuse. Tutors should always be mindful of this, and raise a concern when appropriate.

Online Safety

Access to the internet creates many opportunities for learners to expand their knowledge, communicate with other and much more. However, it also poses risks from malicious or hostile actors, such as stealing personal data, grooming, radicalisation and others.

There is also potential to access content which the learner does not want to see, or is unsuitable for them, such as pornography, harmful images or videos (such as beheading), or dangerous information (such as bomb making instructions).

The company is also aware, that young people in particular may be more vulnerable to being groomed and this fact can be exploited by the extremists or other hostile actors.

The company does not currently directly operate any network or internet services that our learners can access. As such we cannot directly control or limit access to any website or service.

Due to this we ensure that online safety is included and taught as part of our apprenticeship programmes at all levels. This is intended to help learners protect themselves online, and use the internet responsibly and safely, both during their time as a learner with us and beyond.

The company expects our employees to be aware of online safety, and will support them in doing so, in particular ensuring they:

- Understand how to create a safer online environment;
- Have the skills, knowledge and understanding to help people stay safe online;
- Inspire safe and responsible internet use and behaviour;
- Know how to safely use mobile technology;
- Know how to safely use camera equipment, including camera phones;
- Know what steps to take if they have concerns and where to go for help.

Whistleblowing

All employees are expected to promptly report any concerns in the course of their duties where they witness or are otherwise aware of poor practice and/or unsuitable behaviour which may harm any child or adult at risk of harm.

This includes the requirement to self-disclose any personal information which may impact on their suitability to work in an education setting.

Where internal reporting arrangements are viewed not to have been taken seriously or with sufficient rigour, any employee is encouraged to raise concerns externally if the matter is not resolved by the Lead or relevant deputy, for example via the relevant Local Authority or the Government's Whistleblowing report line.

Monitoring and Review

The Board of Directors will examine quarterly reports on safeguarding, in particular to identify any trends or lessons which the company can learn and where required make improvement to process or training.

The company will also conduct periodic surveys (or similar) of learners, employers and employees, and will ensure questions relating to safeguarding are included in these surveys.

The company will keep its policy and procedures on safeguarding children and adults at risk of harm under review to take account of any new legislation, regulations or best practice documents to ensure that employees are kept fully up to date with their responsibilities and duties regarding the safety and well-being of young people and adults at risk of harm.

Even when legislation has not changed, this policy will be reviewed annually to ensure it is up to date with best practice and any changes in the organisation.

Associated documents

- Concern Form
- Body Map Template
- Safeguarding Contacts Poster

Appendix A: Types of Abuse

Discriminatory abuse:	is unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.
Domestic violence or abuse:	is violence and emotional abuse used by one person in a relationship to control the other. Violence can be criminal and includes physical assault, sexual abuse, and stalking. As well as emotional, psychological and financial abuse. Children can also be victims of domestic abuse as they may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships.
Emotional abuse:	is ongoing emotional maltreatment or emotional neglect. It's psychological abuse and can seriously damage emotional health and wellbeing. Emotional abuse can involve deliberately trying to scare or humiliate a person or isolating or ignoring them.
Financial or material abuse	is the theft of money or possessions, or any misuse of a persons finances to benefit themselves or others. This may be by fraud or scamming, by preventing a person from accessing their own money, benefits or assets, or using pressure, threats or influence.
Modern slavery:	is when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour, domestic servitude, sexual exploitation and debt bondage.
Neglect:	is the ongoing failure to meet someone's basic needs. I.e. may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. Neglect is dangerous and can cause serious, long term damage – even death.
Organisational or institutional abuse	is the mistreatment or neglect of individuals by an organisation or institution due to poor care practices in a care setting.
Physical abuse:	is deliberately hurting someone causing injury such as bruises, broken bones, burns or cuts. It isn't accidental - people who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped, or having objects thrown at them.
Self-neglect:	Is the lack of self-care to an extent that it threatens personal health and safety, such as not caring for their personal hygiene or health, self-harming or an inability or unwillingness to manage their personal affairs.

Sexual abuse: is forcing or persuading someone to take part in sexual activities. This doesn't have to be physical contact, and it can happen online. Sometimes, the person won't understand what's happening to them is abuse. They may not even understand that it's wrong. Sexual abuse also includes Upskirting.

Appendix B: Groups at Higher Risk

Learners with Disabilities or Special Educational Needs

Disabled people or those with special education needs may be at greater risk of abuse. This is especially important where they may not be able to communicate when they have been the victim of abuse.

Female Genital Mutilation (FGM)

Female Genital Mutilation (also known as female genital cutting' or female circumcision) covers procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons.

It is a practice that takes place worldwide, and in the UK primarily occurs among immigrant and refugee communities.

Potential warning signs FGM might happen:

- A special occasion or ceremony is going to take place where a girl 'becomes a woman' or is 'prepared for marriage'
- A relative or someone known as a 'cutter' is visiting from abroad
- A female relative, like a mother, sister or aunt has undergone FGM
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays

Potential warning signs FGM might have taken place:

- Difficulty or discomfort walking, standing or sitting
- Complaints of pain between legs
- Spending longer than normal in the bathroom or toilet (due to difficulties urinating)
- Appearing quiet, anxious, or depressed
- Mentioning that someone did something to them that they are not allowed to talk about
- Reluctant to go to the doctors or have routine medical examinations
- Asking for help, but possibly avoiding being explicit about the problem because they're scared or embarrassed
- Acting differently after an absence (e.g. acting withdrawn or Bleeding, discharge, urinary infections, clutching their body

Required actions: In these cases, parents will not normally be informed. Where FGM appears to have been carried out on a girl under 18, even if it is against the learner's wishes, it should also be reported to the police.

For those over 18, no reporting is necessary, but victims can still be referred to relevant support organisations.

Grooming

Grooming is when a person builds a relationship with a child, young person or an adult who's at risk so they can abuse them and manipulate them into doing things. The abuse is usually sexual or financial, but it can also include other illegal acts.

Grooming can take place online or in person and it can happen over a short or long period of time - from days to years.

Potential warning signs:

- Are they being secretive about how they're spending their time?
- Do they have an older boyfriend or girlfriend?
- Do they have money or new things like clothes and mobile phones that they can't or won't explain?
- Are they drinking or taking drugs?
- Are they spending more or less time than usual online or on their devices?
- Do they seem upset or withdrawn?
- Are they using sexual language you wouldn't expect them to know?
- Are they spending more time away from home or going missing for periods of time?

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Exploitation can also happen on-line.

Gangs and Youth Violence

Education providers are increasingly recognised as places where early warning signs can be spotted that individuals are getting involved in gangs or youth violence.

Potential warning signs:

- Frequently absent and doing badly in their course.
- In a relationship or hanging out with someone older than them.
- Being angry, aggressive or violent.
- Being isolated or withdrawn.
- Having unexplained money and buying new things.
- Wearing clothes or accessories in gang colours or getting tattoos.
- Using new slang words.
- Spending more time on social media and being secretive about time online.
- Making more calls or sending more texts, possibly on a new phone or phones.
- Self-harming and feeling emotionally unwell.
- Taking drugs and abusing alcohol.
- Committing petty crimes like shop lifting or vandalism.
- Unexplained injuries and refusing to seek medical help.
- Carrying weapons or having a dangerous breed of dog.

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.

Potential warning signs:

- self-harming or attempted suicide
- depression, or becoming worried or withdrawn
- poor performance at work or in their studies, or unexplained absences
- a surprise engagement to a stranger you've not heard of before
- a sudden holiday (some people are tricked into going abroad for a holiday or to see relatives)
- no control over their own money
- not returning from a visit to another country

Fabricated or induced illness

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. The parent or carer tries to convince doctors that the child is ill, or that their condition is worse than it really is.

The parent or carer does not necessarily intend to deceive doctors, but their behaviour is likely to harm the child. For example, the child may have unnecessary treatment or tests, be made to believe they're ill, or have their education disrupted.

FII used to be known as "Munchausen's syndrome by proxy".

Potential warning signs:

- a parent or carer persuades healthcare professionals that their child is ill when they're healthy
- a parent or carer exaggerates or lies about their child's symptoms
- a parent or carer manipulates test results to suggest the child is ill
- a parent or carer deliberately induces symptoms of illness

Substance Misuse

Substance Misuse is the harmful or hazardous use of illicit drugs and alcohol. Use of these substances can lead to dependency. Users can become seriously ill, developing long term health effects or in extreme cases die.

Preventative actions: Employees should provide appropriate information on drugs and alcohol as part of our apprenticeship delivery and work with local partners to prevent drug or alcohol misuse.

Required actions: In cases of substance misuse employees should work to tackle problem behaviour.

Mental Ill Health

Mental Ill Health includes both diagnosed mental illnesses and mental health episodes which are usually temporary and not diagnosed by a medical professional. People suffering from Mental Ill Health may be more likely to be the victim of abuse as they may find it harder to recognise abuse or stand up to it.