



# Safeguarding Policy

# Contents

Safeguarding Policy.....	- 2 -
Safeguarding Risk Areas .....	- 5 -
Safeguarding Leadership and Management.....	- 13 -
Appendix 1 .....	- 20 -

## Safeguarding Policy

### 1. Policy Statement

1.1 Apprenticeship Connect is committed to the safeguarding and wellbeing of all people and fully recognises our responsibilities for protecting vulnerable groups. Our policy applies to all staff, learners, contractors, visitors and volunteers working on behalf, of or in conjunction with Apprenticeship Connect.

1.2 This policy has been developed in accordance with the principles established by the Children Act 1989 2004; the Education Act 2002 and in line with government publications.

1.3 This policy is in line with statutory guidance for schools, colleges and further education Keeping Child Safe in Education (2021) and Working Together to Safeguard Children (2018)

Further, this policy recognises the following important and relevant pieces of safeguarding-related legislation:

- Safeguarding Children and Safer Recruitment in Education (2011)
- Safeguarding Vulnerable Groups Act (SVGA) (2006)
- Protection of Freedoms Act (2012)
- Revised Code of Practice for Disclosure and Barring Services Registered Persons (2015)
- Sexual Offences Act (2003)
- Equality Act (2010)

1.4 There are six main principles of the organisation's safeguarding strategy:

**1. Leadership and management** - ensuring effective leadership and management of safeguarding provision.

**2. Safer recruitment** - ensuring that we operate safer recruitment practices.

**3. Training** - raising awareness of safeguarding throughout the organisation and ensuring staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.

**4. Equipping, educating and empowering** - raising awareness of safeguarding to all our learners and ensuring that learners who are the most vulnerable are equipped with the skills and knowledge to keep them safe.

**5. Reporting** - developing and implementing procedures for identifying and reporting cases or suspected cases of abuse.

**6. Culture** - establishing safe environments in which vulnerable groups can learn and develop and establishing a culture where safeguarding is taken seriously.

1.5 We recognise that because of the day-to-day contact with learners, our staff are well placed to observe the outward signs of abuse and identify risk. Apprenticeship Connect will, therefore:

1.5.1 establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to;

1.5.2 ensure learners know that there are designated staff within Apprenticeship Connect whom they can approach if they are concerned or worried;

1.5.3 include opportunities within our ongoing teaching, learning and assessment for learners to develop the skills they need to recognise and stay safe from abuse.

1.6 To support our commitment to the safeguarding and wellbeing of all our learners we will:

1. Ensure that we have a designated person for safeguarding who has received appropriate training and support for this role.

2. Ensure that all staff are aware and understand their responsibilities concerning safeguarding, being alert of the signs and indicators of abuse or harm, and referring any concerns directly to the designated person for safeguarding.

3. Ensure that effective safeguarding procedures are developed and implemented and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of recognition, response, record, report, and refer.
  4. Ensure that we develop effective links with relevant external agencies and local safeguarding partnerships and co-operate with any requirements of any safeguarding referral matters.
  5. Ensure that we keep written records of any safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
  6. Ensure all records are stored securely and in accordance with the Data Protection Act 2018.
- 1.7 Apprenticeship Connect recognises its responsibility for the safeguarding of children and vulnerable adults from abuse, inappropriate and inadequate care, and is committed to responding in all cases where there is a concern. Due to the nature of our work, Apprenticeship Connect may be in the front line of work with some children and vulnerable adults. This may mean we are the first to know a child or vulnerable adult is being or has been, abused, or neglected or that we are concerned about a person's wellbeing. Everyone has an equal responsibility to ensure that individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests with the leadership team and the designated person but also with every individual member of staff employed or volunteering within our organisation whilst at work, at an employer's premises or home.

## **2. Understanding Safeguarding**

- 2.1 Safeguarding is a proactive process of protecting and ensuring the safety and wellbeing of children and vulnerable people.
- 2.2 Safeguarding may involve instances in which a child or vulnerable person is suffering or likely to suffer from harm.
- 2.3 Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with children or vulnerable adults.
- 2.4 The benefits of effective safeguarding include:
  - All people are appropriately protected, and all issues are dealt with effectively
  - Staff are clear about individual responsibilities, roles and boundaries

- Staff are protected from malicious and misplaced allegations
- People can rely on those in positions of trust
- When learners feel safe and secure, they can concentrate on learning

## 2.5 How do we define a child or vulnerable adult?

- Child: A child is defined as a person who has not yet reached their 18<sup>th</sup> birthday (Children's Act 1989, 2004).
- Vulnerable adult: An adult is a person aged 18 years and over. The Safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving these activities. Therefore we define a vulnerable as:
  - 'a person aged 18 or over who at a particular point in time is vulnerable and may be exposed to the risk of harm, neglect abuse or any other factor endangering their health, safety and wellbeing'.

## 2.6 What is regulated activity?

Regulated activity is work that a barred person must not do. It is defined in the Safeguarding Vulnerable Groups Act (SVGA) (2006) which has been amended by the Protection of Freedoms Act 2012.

## 2.7 Who is a barred person?

A barred person is a person on one of the two barred lists; the children's barred list or the adults' barred list. The barred lists are a database of individuals who must not work in regulated activity. Individuals enter a barred list if they commit an 'autobar' offence, an offence which automatically prohibits working in regulated activity. Additionally, individuals may be placed on a barred list based on referral information.

# Safeguarding Risk Areas

The following section defines and describes various types of safeguarding risk areas. The organisation has sought to define the majority of types of risks however this may not represent an exhaustive list of all types of risks.

## 3. Abuse

### 3.1 What is abuse?

Working Together to Safeguard Children (2018) defines abuse as:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, concerning the impact on children of all forms of domestic abuse. Children may be abused in a family or an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

### 3.2 Types of abuse:

Working Together to Safeguard Children (2018) sets out definitions and examples of the five broad categories of abuse:

**Physical abuse:** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child.

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

**Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Domestic abuse** can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Domestic abuse continues to be a prevalent risk factor identified through children social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others such as the non-abusive parent.

### 3.3 Other types of abuse

For a child or vulnerable adult, Apprenticeship Connect recognises a further three signs of abuse:

**Financial abuse** is defined as the misappropriation of money or assets; transactions to which the person could not consent, or which were invalidated by intimidation or deception; or the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and any unreasonable restriction on a person's right to control over their lives to the best of their ability.

**Discriminatory abuse** is defined as any form of abuse based on discrimination because of a person's race, religious belief, gender, age, disability, sexual orientation, marital status or pregnancy/maternity.

**Institutional abuse** is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of providers rather than the persons acquiring the service.

#### **Peer-on-peer abuse includes:**

- People who experience a type of abuse/or abuse a peer.
- 'Up-skirting' is when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

## 4. Neglect

4.1 Working Together to Safeguard Children (2018) defines neglect as ‘the persistent failure to meet a child’s basic physical and/or psychological needs is likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- b. protect a child from physical and emotional harm or danger;
- c. ensure adequate supervision (including the use of inadequate caregivers);
- d. ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

## 5. Female Genital Mutilation

5.1 Female genital mutilation (FGM) is a form of child abuse and is dealt with under the organisation’s Safeguarding Policy.

5.2 The World Health Organisation (WHO) defines FGM as below:

“Female Genital Mutilation (FGM) compromises all procedures involving partial or total removal of the external female genitalia or another injury to the female genital organs whether for cultural or non-therapeutic reasons”

5.3 The UK government has written advice and guidance on FGM that states;

“FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child, it is a violation and the child’s right to life, their right to their bodily integrity, as well as their right to health. The UK government has signed several international human rights laws against FGM, including the Convention on the Rights of the child”  
“UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani Women”



- 5.4 Indications that a person is at risk of FGM:
1. The family come from a community that is known to practice FGM.
  2. In conversation, an individual may talk about FGM.
  3. A person may express anxiety about a special ceremony.
  4. A person may talk or have anxieties about forthcoming holidays in their country of origin.
- 5.5 Where Apprenticeship Connect has any concerns that a person is at risk of FGM then we refer to local authorities for advice.
- 5.6 When a person discloses that they are victims, or may conduct FGM, Apprenticeship Connect's procedure for reporting suspected abuse to children and vulnerable adults is followed.

## **6. Children Missing in Education**

- 6.1 A child is missing when their whereabouts are unknown, whatever the circumstances of their disappearance. These children have taken unauthorised absence and would not usually come within the definition of missing.
- 6.2 Children who are in the social care system may be more likely to run away than other children.
- 6.3 The person may be missing from care or home because they are suffering physical, sexual or emotional abuse and/or neglect. Children who go missing may be victims of sexual exploitation and trafficking. In addition, young people who are missing may be fleeing forced marriage or honour-based violence. All staff must be aware that a child missing in education may be due to other underlying safeguarding concerns.
- 6.4 Many of these young people stay with friends or family members, but some do not have access to support and could be at risk of significant harm through physical or sexual abuse. They may end up in potentially harmful situations including sleeping rough.
- 6.5 Children/young people missing from education are also at risk of harm.
- 6.6 Apprenticeship Connect has drawn up this policy to deal with children who miss training in these circumstances, particularly on repeat occasions and for these children and young people who leave their training programme without clear indications of where they will be continuing their education.

6.7 This policy covers those instances of absence where:

1. There is a repeated pattern of absence.
2. The reason for absence is unclear or unexplained.
3. A member of staff has concerns about the nature of the child's absence.

In these instances, Apprenticeship Connect's designated safeguarding lead should be consulted. Where a child is deemed to be at risk, Apprenticeship Connect's procedure for reporting suspected abuse to children is followed.

## **7. Sexting**

7.1 Sexting among children and young people can be a common occurrence, where they often describe these incidents as 'mundane'. Children and vulnerable adults involved in sexting incidents will be dealt with (by the police) as victims as opposed to perpetrators (unless there are aggravating circumstances).

7.2 If a report indicates a sexting incident remember that intimate images are typically considered to be illegal images which is why incidents need very careful management for all those involved.

7.3 Apprenticeship Connect's policy is for all members of staff to report any suspected cases or cases of sexting to Apprenticeship Connect's designated safeguarding lead.

7.4 Apprenticeship Connect's designated safeguarding lead will record all incidents of sexting. This includes actions that are taken and actions that are not taken, together with justifications.

## **8. Child Sexual Exploitation (CSE)**

8.1 Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a 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. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

## **9. Honour Based Violence**

9.1 Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of a family or community.

- 9.2 It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs or their culture. For example, honour-based violence might be committed against people who:
1. Become involved with a partner from a different culture or religion.
  2. Want to get out of an arranged marriage.
  3. Want to get out of forced marriage.
  4. Wear clothes or take part in activities that might not be considered traditional within a particular culture.

Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

1. Domestic abuse.
2. Threats of violence.
3. Sexual or psychological abuse.
4. Forced marriage.
5. Being held against your will or taken somewhere you don't want to go.
6. Assault.

## **10. Forced Marriage**

- 10.1 A person may be at risk of forced marriage if their family belongs to a community which practices arranged marriage; it is critical to note that this does not necessarily mean any marriage will be forced. A distinction must be made between an arranged marriage which is legal and forced marriage which is a criminal offence punishable by up to seven years imprisonment.
- 10.2 Apprenticeship Connect will seek to ensure that all staff are trained to understand the differences between the two practices.

## **11. County Lines**

- 11.1 As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile

phone lines or another form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

# Safeguarding Leadership and Management

## 12. Safeguarding Leadership and Management and Responsibilities

12.1 Apprenticeship Connect has in place a safeguarding team, key roles with designated responsibility include:

- Gemma Stansfield, Designated Safeguarding Lead
- Sally Sloan, Deputy Safeguarding Lead
- Gary Punt, Male Safeguarding Officer
- Rafiq Adebambo, Board representative and advisor

12.2 The designated safeguarding lead is a member of Apprenticeship Connect's management team. They have a key duty to take the lead responsibility for raising awareness of safeguarding in the organisation and dealing with issues relating to the welfare of people and the promotion of a safe environment for children and vulnerable adults within the organisation.

This includes:

1. Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the local authorities and other agencies (such as the Police or Channel) as appropriate.
2. Providing advice and support to other staff on issues relating to child/vulnerable adult protection.
3. Maintaining a proper record of any child/vulnerable adult protection referral, complaint or concern (even when the concern does not lead to a referral).
4. Ensuring that all staff receive training in children and vulnerable adult issues and are aware of safeguarding procedures.

12.3 Apprenticeship Connect takes the view that all staff and learners are required to take shared responsibility for the protection and safety of children and vulnerable adults at Apprenticeship Connect's sites, employer sites and whilst online.

12.4 It is expected that all parents/guardians (either learners or from the general public) who bring children into Apprenticeship Connect's sites or any external facilities/events abide by the health and safety regulations.

12.5 Processes are in place to check the suitability of staff and learners working directly with children and vulnerable adults. Some staff and learners across the company

will be in regular or significant contact with children or vulnerable adults in the course of their teaching or other work. There is a commitment that such staff and learners have a satisfactory Disclosure and Barring Service (DBS) enhanced with a barred list check in place. Refer to the organisation's Safer Recruitment Policy and Disclosure and Barring Service (DBS) Policy for policy and procedures relating to safe recruitment and .15 below.

- 12.6 Apprenticeship Connect has processes in place to ensure that external speakers/trainers on-site are checked. Please refer to the External Speaker Policy and for the related procedures.

### **13. Implementation and Monitoring**

- 13.1 The organisation manages, monitors and plans its safeguarding activity through the following meetings:

#### Safeguarding Leadership Meeting

- A monthly meeting is held between the designated safeguarding lead and the Board representative
- Plan safeguarding leadership strategies
- Case review
- Continuous improvement and the Safeguarding Action Plan

#### Safeguarding Management Meeting

- A monthly meeting is held between the designated safeguarding lead, deputy safeguarding lead and male safeguarding officer.
- Implementing safeguarding plans
- Planning training for staff, learners and employers
- Discussing the themes from current cases

### **14. Control Measures**

- 14.1 Apprenticeship Connect believes that everyone has rights as individuals and should be treated with dignity and respect. Apprenticeship Connect strives to provide a safe environment for any child or vulnerable adult in its care whilst they are studying, visiting premises or participating in Apprenticeship Connect activity.

- 14.2 Activities at Apprenticeship Connect that involve children or vulnerable adults are risk-managed and will be supported by risk assessments and reasonable, proportionate adaptations to their activities as appropriate will be made.
- 14.3 As a condition of admission to certain programmes of study where they will come into close contact with children and vulnerable adults may be required to undergo a DBS check before the commencement of placement/training activity. Apprenticeship Connect is obliged to refuse admission if the DBS disclosures disqualify the applicant from practising in their chosen field.
- 14.4 Apprenticeship Connect has published procedures for reporting cases of suspected abuse of children and vulnerable adults. A full copy is set out in Appendix 1 of this document.
- 14.5 These procedures are issued to all members of staff and all new learners to the organisation during their induction. Further staff training (mandatory) is provided to all Apprenticeship Connect staff and renewed annually.
- 14.6 All Apprenticeship Connect staff members, contractors and volunteers are advised to minimise physical contact with learners, except for reasons of health and safety, or where physical contact may be necessary as part of their learning.

## **15. Safer Recruitment**

- 15.1 Apprenticeship Connect has written recruitment and selection procedures contained within the Safer Recruitment Policy. The policy and procedures are designed to safely recruit staff and provide a safe environment for children and vulnerable adults to learn in. Key aspects of the procedures and processes are as follows:
1. Job descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding and promoting the welfare of learners having due regard to Apprenticeship Connect's Safeguarding Policy.
  2. A person specification setting out the key selection criteria is available for all roles. The person specification includes demonstrating a commitment to safeguarding policies and the suitability to work with children and vulnerable adults.
  3. Advertising of posts externally as appropriate.
  4. A requirement for those appointed to produce documentary evidence of academic/vocational qualifications.

5. Standard interview questions for candidates who work with children and vulnerable adults to explore their suitability. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicants.
  6. Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be the applicants existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no work experience.
  7. A policy on the recruitment of ex-offenders.
  8. A policy on obtaining a satisfactory Disclosure and Barring Service (DBS) and 'barred list' check for appropriate positions as a condition of employment at Apprenticeship Connect.
- 15.2 Apprenticeship Connect reserves the right to deny employment to individuals where permitted criminal record checks suggest they may pose a danger to the learning community.
  - 15.3 Apprenticeship Connect also reserves the right to suspend and/or dismiss staff members from employment or undertaking a specific role if the information was withheld, when requested, about their criminal record at the point of employment, or a criminal record acquired during employment.
  - 15.4 DBS disclosures will be obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Service Act 2000) with children, young people or vulnerable adults as per IAS guidelines; Apprenticeship Connect where appropriate evaluates information to determine individuals' appropriateness to work in such activity.

## **16. Promoting Safeguarding**

- 16.1 The organisation is determined to foster a culture of safeguarding and to achieve this the safeguarding policy is publicised on the website, intranet and in all courses, accessible to learners.
- 16.2 All learners will receive communications at various stages about safeguarding at Apprenticeship Connect including:
  - Information, advice and guidance during the induction including educating about what safeguarding is, the designated safeguarding person's details and how to report an issue.



- Access to the Safeguarding Policy in the ‘policies’ section’ in the learner’s Canvas course.
  - Dedicated resources in the Information Advice and Guidance module in the learner’s Canvas course.
  - Frequent reference to safeguarding throughout on-programme learning.
  - Communications are sent out notifying learners of any changes, updates and information relating to safeguarding.
- 16.3 The teaching, learning and assessment team embed safeguarding throughout all learners’ taught curriculum.
- 16.4 Progress reviews for learners (every 12 weeks) including wellbeing and welfare, and safeguarding sections.
- 16.5 Learners complete quizzes and knowledge checks during the programme to verify whether they know how to seek help from the safeguarding team.
- 16.6 The e-learning system Canvas features a ‘help’ button allowing direct access to the safeguarding team.
- 16.7 Tutor team meetings include a safeguarding meeting item at least quarterly to support the promotion of safeguarding across the provision.
- 16.8 Quarterly email communications will be issued to employers of current apprentices to advise about safeguarding and detail the support that Apprenticeship Connect can offer to help develop their safeguarding provision.
- 16.9 All employers are required to sign a Services Agreement recognising and committing to the Safeguarding Policy.
- 16.10 All staff members are required to confirm that they have read, understood and accepted the Safeguarding Policy.

## **17. Training and Development**

- 17.1 All Apprenticeship Connect staff receive a safeguarding induction in their first week of employment delivered by the designated safeguarding lead.
- 17.2 Members of the safeguarding team will each undertake safeguarding training at least annually.

- 17.3 The designated safeguarding lead will undertake designated safeguarding person training at least every two years.
- 17.4 Staff in the teaching, learning and assessment team will undertake training general training on safeguarding at least annually.
- 17.5 Staff in the teaching, learning and assessment team will undertake topic specific-training in the risk areas identified under 'Safeguarding Risk Areas' above, annually.
- 17.6 All staff in the organisation will undertake safeguarding training at least annually.
- 17.7 The designated safeguarding lead will regularly update staff on implementing safeguarding reporting procedures in monthly team meetings as required.

## **18. Staff Safeguarding**

- 18.1 A staff member at Apprenticeship Connect that is a child will automatically be provided with enhanced support and supervision based on their needs, job role duties and vulnerabilities. Parental/guardian consent will be obtained where required.
- 18.2 Any staff member who considers themselves to be a vulnerable adult can seek support from Apprenticeship Connect's designated safeguarding lead, the business manager, HR assistant, or their line manager as they see most appropriate.

## **19. IT & Online Safety**

- 19.1 The organisation will at its discretion monitor the usage of its IT systems to prevent access to inappropriate materials by setting appropriate levels of filters on its network.
- 19.2 The organisation will set filter levels to protect users within its network.
- 19.3 Accessing illegal, illicit sites on the company hardware, during lessons or through company software is strictly prohibited and individuals identified to have done so will be disciplined under the Disciplinary Policy and codes of conduct.
- 19.4 The organisation enforces the following policies to protect users and learners:
  - Cyber-security Policy
  - Cyberbullying Policy

- Data Breach and Incident Reporting Procedure
- Data Protection Policy
- Electronic Communications Policy
- Email & Internet Policy
- Internet Access Policy
- Social Media Policy

# Appendix 1

Procedures for reporting cases of suspicion of abuse.

## 1. THE DUTY TO REPORT

1.1 Apprenticeship Connect and all its members of staff have a legal duty to report cases of suspected abuse. If you, as a member of staff, have concerns that a person has been abused, you **MUST** report this.

## 2. WHAT TO DO IF YOU NOTICE ABUSE

2.1 You may become aware of potential abuse in two main ways:

1. You may observe signs in a learner (or any person) that lead you to suspect that they have been physically, emotionally or sexually abused, suffered severe neglect, are becoming radicalised; or in addition in the case of a vulnerable adult, that they may be experiencing financial, discriminatory or institutional abuse.

2. The learners (or any person) themselves may disclose to you that they have been abused.

2.2 The tables below give examples that may indicate that an individual is being abused. In addition to these, a person may be being abused by virtue of their race, gender, age, disability, sexual orientation or marital status protected characteristics) which would indicate discriminatory abuse. Similarly, any examples listed may be an indication of institutional abuse if the individual receives organised care.

### a. Possible signs of physical abuse include:

- Unexplained injuries or burns, particularly if they are recurrent
- Over compliant behaviour with a 'watchful' attitude
- Refusal to discuss injuries
- Fear of medical help
- Improbable explanations for injuries
- Running away
- Untreated injuries or lingering illnesses not attended to
- Significant changes in behaviour without explanation
- Admission of punishment which appears excessive
- Unexplained patterns of absence may serve to hide a physical injury
- Shrinking from physical contact
- Deterioration of work
- Fear of undressing
- Fear of returning home or of parents being contacted

b. Possible signs of psychological/emotional abuse include

- Continual self-deprecation
- 'Neurotic' behaviour
- Fear of new situations
- Air of detachment
- Inappropriate emotional responses to painful situations
- Social isolation
- Self-harming or mutilation
- Eating problems—including overeating or lack of appetite
- Compulsive stealing/scrounging
- Depression/withdrawal
- Drug/solvent abuse

c. Possible signs of sexual abuse include:

- Bruises, scratches, burns or bite marks on the body
- Promiscuity, prostitution, provocative sexual behaviour
- Scratches, abrasions or persistent infection in the anal or genital regions
- Self-injury, self-destructive behaviour, suicide attempts
- Sexual awareness inappropriate for the person's age
- Pregnancy - particularly in the case of young people
- Frequent public masturbation
- Recoiling from physical contact
- Attempts to teach others about sexual activity
- Eating disorders
- Refusal to stay with certain people or go to certain places
- Tiredness, lethargy, listlessness
- Withdrawal from friends
- Genital discharge, irritation
- Aggressiveness, anger, anxiety and tearfulness
- Unexplained gifts of money

d. Possible signs of neglect include:

- Constant hunger
- Low self-esteem
- Poor personal hygiene
- Poor social relationships
- Inappropriate clothing
- Compulsive stealing or scrounging
- Frequent lateness or non-attendance for a teaching session
- Constant tiredness
- Untreated medical problems

e. Possible signs of financial abuse include

- Loss of jewellery and personal property
- Lack of money to purchase basic items
- A bill not being paid when money is entrusted to a third person
- Misuse of benefits
- Unexplained withdrawal of cash
- Inadequate clothing
- Over-protection of money or property
- Theft of property
- Loss of money from a wallet or purse

f. Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual is observed downloading, viewing or sharing extremist propaganda from the web
- The individual becomes increasingly intolerant of more moderate views
- The individual becomes withdrawn and focused on one ideology
- The individual expresses a desire/intent to take part in or support extremist activity
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups

2.3 If a learner discloses to you that they (or indeed another person) have been, or are being abused/radicalised -

## DO

- Listen very carefully to what they tell you
- Take what is said seriously and accept what you are told
- Stay calm and reassure the learner that they have done the right thing by talking to you
- Write down as soon as you can exactly what you have been told
- Tell them that you must pass this information on but only to those that need to be told. Tell them to whom you will report the matter

## DO NOT

- Panic
- Promise to keep things secret. You must refer a child or vulnerable adult who is at risk
- Lie or say that everything will be fine now that they have told you
- Criticise the abuser, especially if it is a parent or carer
- Ask lots of detailed questions. Instead, ask open questions such as ‘anything else to tell me?’
- Press for answers that the learner is unwilling to give
- The person to whom the disclosure is made mustn't investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.

2.4 It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. All written records should be handled confidentially.

2.5 If a child or vulnerable adult discloses to you that they or another have been abused/radicalised, or if you suspect from what you observe that they are being abused, **YOU MUST REPORT THIS** to the designated safeguarding lead or in their absence the deputy safeguarding lead.

2.6 If a disclosure/concern involves a member of Apprenticeship Connect staff, you must contact and report it to the designated Safeguarding Lead.

- 2.7 If for any reason you are unable to contact a member of the designated team and the matter is urgent, then contact the local authority or the Police directly and report the matter to the designated safeguarding lead at the next available opportunity.
- 2.8 In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support rather than to worry alone or do nothing.

### **3. Referral and Case Management**

#### **3.1 Procedure**

##### **1. Referral**

A referral can be made by any individual including:

- The person that is at risk, or has been abused or harmed
- The person that abused, harmed or put another person at risk
- A member of the Apprenticeship Connect staff
- A visitor
- A parent
- A contact at an employer
- An external agency
- A partner

A referral will normally be made via telephone to the designated safeguarding lead. However, all safeguarding referrals must be followed up by using the Safeguarding Reporting Form, a confidential ticket system in the intranet MyAC. If a referral is made by a person that doesn't have access to the intranet, the designated safeguarding person will record the report. The designated safeguarding lead may select another member of the team to be responsible for the case.

##### **2. Investigation**

The designated safeguarding person will investigate the report thoroughly.

##### **3. Referral**

The designated safeguarding lead will take the appropriate action based on the investigation which may include referral to an external agency such as the local authority or the Police.



When a member of staff refers a case of suspected abuse to a member of the designated safeguarding team, the designated person decides whether or not the situation should be referred to the local authority, the Police or Channel, or whether some other course of action is more appropriate. In deciding what action to take the member of the designated team may take advice from Apprenticeship Connect's contacts at the local authority. If they consider that abuse/harm/radicalisation has taken place, or that a child or vulnerable adult is at risk of abuse/harm/radicalisation, they will formally notify the local authority, the Police or Channel about this.

At this point, the local authority takes over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the Police.

Involvement in cases of suspected abuse/radicalisation can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone (a colleague, a friend or a partner) they should avoid this to respect the confidentiality of the child or vulnerable adult concerned. If a member of staff feels that they need to talk to someone, they should contact their line manager.

Disclosure of, or being the subject of, abuse is a very difficult and distressing time for the child or vulnerable adult, who needs to be offered continued support by Apprenticeship Connect. The child or vulnerable adult should be made aware of the support available to them and helped to initiate contact with this support if so desired.

#### **4. Actions**

The designated person will carry out and advise of the actions to take by all relevant persons and/or follow the instructions of the local authority Policy or Channel.

#### **5. Case management**

The designated person will keep comprehensive records of all communication, action and records relating to the case and determine the duration of ongoing monitoring and action plans based on the individual circumstance.

A confidential record will be kept of all cases referred to the designated safeguarding team, including details of cases referred to the local authority, the Police, Channel or other services. These written records will be kept securely, with any paper information held securely by the designated safeguarding lead.

#### **6. Closure of safeguarding cases**

Safeguarding cases will remain open until the designated person is satisfied that the individual is no longer at risk or vulnerable. The organisation will retain records of all safeguarding cases.

## Policy Review

The organisation will review this policy at least annually or sooner if required.

## Related Policies

- Prevent Policy
- Safer Recruitment Policy
- Disclosure and Barring Service (DBS) Policy
- Whistleblowing Policy
- Cyber-security Policy
- Cyberbullying Policy
- Data Breach and Incident Reporting Procedure
- Data Protection Policy
- Electronic Communications Policy
- Email & Internet Policy
- Internet Access Policy
- Social Media Policy
- External Speaker Policy

## Contact Us

- Email: [help@apprenticeshipconnect.co.uk](mailto:help@apprenticeshipconnect.co.uk)
- Designated safeguarding lead number: 07960 287 476