

Safeguarding Policy

1. Policy statement

Apprenticeship Connect is committed to safeguarding and promoting the welfare of all learners, apprentices, staff and visitors. We operate a whole provider approach to safeguarding, underpinned by prevention, identification, early help, effective multi-agency working and a robust culture, systems and training. Learners and apprentices are taught to stay safe (including online) and to keep others safe. Everyone shares responsibility for safeguarding.

This policy applies to all staff (including contractors and guest speakers), learners/apprentices of all ages, employers/organisations, subcontractors and visitors in any setting where Apprenticeship Connect provides education or training.

At Apprenticeship Connect, safety and respect come first. We recognise that some learners may be more vulnerable, for example, due to SEND or disability, protected characteristics and we respond thoughtfully and promptly. Inclusion isn't an add-on but how we work in all aspects of our provision.

2. Legal and statutory framework

We act in accordance with relevant legislation and guidance, including:

- *Keeping Children Safe in Education* (KCSIE) (current edition).
- *Working Together to Safeguard Children* (current edition).
- Children Act 1989 & 2004
- Education Act 2002
- Education and Inspections Act 2006.
- *Prevent Duty Guidance* under the Counter-Terrorism and Security Act 2015.
- Care Act 2014 and Care and Support Statutory Guidance (safeguarding adults).
- Equality Act 2010
- Data Protection Act 2018/UK GDPR.
- Safeguarding Vulnerable Groups Act (SVGA) 2006
- Protection of Freedoms Act 2012
- DBS Code of Practice
- Sexual Offences Act 2003
- SEND Code of Practice.

Where national guidance is updated, we will update this policy and practice accordingly.

3. Definitions

Child - anyone under 18.

Adult at risk - any person aged 18+ who has needs for care and support, is experiencing or is at risk of experiencing abuse or neglect.

Regulated activity - work a barred person must not do, as defined in SVGA 2006

Low-level concern - any concern about a staff member's conduct that does not meet the harm threshold but needs recording and appropriate action.

Child-on-child abuse - abuse between children, including bullying, physical or sexual violence/harassment, upskirting, and online harm.

Significant harm - the threshold for intervention under the Children Act 1989, meaning the child's health or development is being or is likely to be impaired.

Early help - support offered to address emerging needs before problems escalate, provided with consent and coordinated through multi-agency working.

4. Whole-provider safeguarding

4.1 Core principles

- **Leadership and accountability**

Apprenticeship Connect ensures effective leadership and management of safeguarding provision. Safeguarding is strategically led by the Designated Safeguarding Lead (DSL), supported by the Safeguarding Strategic Adviser, with oversight from the Board Safeguarding Lead. Leaders and governors maintain visibility of safeguarding performance, culture, risk and compliance across the whole provider.

- **Safer recruitment and conduct**

The organisation operates safer recruitment and vetting processes for all staff, contractors and volunteers, supported by a comprehensive single central record. Safe professional conduct is modelled through clear policies, codes of conduct and ongoing supervision.

- **Professional development**

Awareness of safeguarding is raised throughout the whole organisation, ensuring that all staff understand their duties, are equipped with the skills and knowledge to identify concerns early, and know how to take effective action. Role-specific and annual training ensures practice remains current and reflective of emerging risks.

- **Education, empowerment and learner voice**

Apprenticeship Connect equips and educates all learners and apprentices to understand risk, stay safe (including online and at work) and know how to seek help. Learners are encouraged to share their experiences and contribute to improving safeguarding practice.

- **Early identification and prevention**

The organisation seeks the early recognition of vulnerabilities and risk factors, including attendance, engagement, behaviour, mental health and online indicators. Concerns are acted on promptly through the "Recognise, Respond, Record, Report,

Refer (5Rs)” approach, with access to early help and multi-agency support where appropriate.

- **Partnership, reporting and multi-agency working**

Apprenticeship Connect maintains effective systems for identifying, recording, reporting and referring safeguarding concerns. Strong links are held with local safeguarding partnerships, regional Prevent teams and relevant health and social care agencies to ensure coordinated and timely intervention.

- **Culture and continuous improvement**

A culture where safeguarding is everyone’s responsibility is promoted. Safe environments are established where learners and staff feel secure and respected. The organisation continually reviews incidents, audits and case outcomes to strengthen systems, training and culture.

4.2 The organisation recognises 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:

- Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to
- Ensure learners know that there are designated staff within Apprenticeship Connect whom they can approach if they are concerned or worried
- Include opportunities within our ongoing teaching, learning and assessment for learners to develop the skills they need to recognise and stay safe from abuse
- Ensure that we have a designated person for safeguarding who has received appropriate training and support for this role
- 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.
- Ensure that effective safeguarding procedures are developed and implemented and monitored to ensure their effectiveness.
- Ensure that we develop effective links with relevant external agencies and local safeguarding partnerships and cooperate with any requirements of any safeguarding referral matters.
- Ensure that we keep written records of any safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Ensure all records are stored securely and in accordance with the Data Protection Act 2018.

5. Roles and responsibilities safeguarding

5.1 Key roles

- **Safeguarding Strategic Advisor** - Gem Stansfield
Provides *expert strategic advice and quality assurance* to the DSL. Leads on policy review, annual safeguarding audits, and continuous improvement planning. Acts as a critical advisor to ensure best practice and compliance with statutory guidance.
- **Designated Safeguarding Lead (DSL)** - Heidi Kurjan
Holds *overall operational responsibility* for safeguarding, Prevent and case management. Leads referrals, multi-agency working, staff training, and the management of safeguarding data and trends. Ensures timely escalation, recording and reporting in line with statutory guidance.
- **Deputy DSL** - Megan Hickman
Deputises for DSL and leads on daily case coordination.
- **Mental Health First Aider** - Janah Dar-Ince
Immediate MHFA support and signposting. Supporting DSL and DDSL in cases of mental health concern.

5.2 The role of the DSL

The designated safeguarding lead is a member of Apprenticeship Connect's leadership 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.

5.3 Staff supervision and well-being

At Apprenticeship Connect, staff involved in case management are offered regular supervision and well-being support via the safeguarding strategic advisor to mitigate vicarious trauma.

5.4 All staff and volunteers

Are trained, vigilant and empowered to act; model safe, respectful conduct; use the 5Rs; escalate concerns without delay; and understand Prevent, online safety, attendance/engagement risks and whistleblowing procedures.

5.5 Employers and subcontractors

Must comply with this policy and maintain safe environments, risk assessments and reporting routes, provide written confirmation of appropriate staff checks and cooperate with investigations.

6. Safer recruitment and single central record (SCR)

- Advertisements and job descriptions state safeguarding responsibilities.
- Interviews probe safeguarding attitudes and resolve employment history gaps.
- Pre-appointment vetting and barred-list/DBS checks are completed proportionate to role and setting, with risk assessment where checks are pending or exceptional.
- Additional checks for overseas history and for those in regulated activity.
- Maintained SCR evidence of all required pre-appointment checks for staff and, where relevant, volunteers and contractors.
- Allegations and conduct issues are managed in line with LADO/Local Authority procedures, with referrals to DBS where thresholds are met.

7. Training, awareness and culture

7.1 Empowering and educating learners

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 learning platform
- Frequent reference to safeguarding throughout on-programme learning.

- Communications are sent out notifying learners of any changes, updates and information relating to safeguarding.
- The teaching, learning and assessment team embed safeguarding throughout all learners taught curriculum.
- Progress reviews for learners (every 12 weeks), including wellbeing and welfare, and safeguarding and prevent sections.
- 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
- Periodic campaigns that reinforce awareness of reporting routes and emerging and current risks.

7.2 Creating a safeguarding culture

Apprenticeship Connect promotes an open and positive safeguarding culture in which learners, apprentices, staff, employers and parents/carers feel confident to raise concerns and trust that leaders will take appropriate action.

Leaders and managers ensure that safeguarding policies and procedures are clearly understood and consistently applied. Apprenticeship Connect maintains purposeful links with local safeguarding partnerships and relevant agencies, reviews incidents and casework to identify learning, and uses outcomes to strengthen practice and training.

All staff are supported to understand their safeguarding responsibilities, including Prevent and whistleblowing procedures, and to model safe and respectful conduct in every aspect of their role.

8. Early help, additional needs and inclusion

- **Identification and assessment**
Emerging needs are identified swiftly (attendance/engagement dips, behaviour changes, online activity risks). Risk factors are identified and monitored.
- **Graduated approach (assess-plan-do-review)**
Reasonable adjustments, targeted support and timely specialist input, where needed.
- **SEND and high needs**
EHC plans and support plans are implemented and reviewed with learners, parents/carers (where appropriate) and professionals.

9. Specific provision for 16-18 learners (children)

9.1 Parental/carers engagement

The organisation proactively involves parents/carers in the learner starting point meetings, progress reviews, support plans, attendance/escalation conversations and safeguarding casework. Balancing information sharing with the child's wishes, safety and legal rights. Safeguarding newsletters with up-to-date safeguarding information are shared quarterly. Regular update emails (every 12 weeks minimum) are sent to parents to inform them of their child's educational developments.

9.2 Attendance and children missing in education

The organisation tracks attendance across all lessons and cohorts. Unexplained absence triggers same-day contact/escalation, welfare checks with employers/parents/carers and, where risk is suspected, immediate safeguarding actions and referrals.

9.3 Child-on-child abuse

Clear reporting routes and immediate risk assessments and safety planning for victims, alleged perpetrators and affected peers. The curriculum addresses respectful relationships, consent and online harm.

9.3 Health, relationships and online safety education

Age-appropriate content is shared throughout the curriculum, including but not limited to sexual harassment, image sharing, extremism, county lines, exploitation, consent, healthy relationships and healthy workplaces.

10. Learners who are looked after, care-experienced or known to social care

Obtaining and maintaining care plans ensures learners are supported appropriately to their needs. DSL/ DDSL will attend review meetings as required to align our support with ongoing external agency work. The sharing of information with social workers contributes to enhanced pastoral and academic support.

Where a learner has an EHC plan/care plan or is open to a social worker/early help, Apprenticeship Connect will:

- Appoint a case coordinator, usually the DSL
- Agree a written plan covering needs, outcomes, adjustments, interventions, review dates and roles.
- Put attendance and safety monitoring in place (including workplace checks);
- Complete review meetings at agreed intervals or sooner if risk escalates.
- Ensure smooth transitions into the apprenticeship programme, placement, assessments and destinations.

11. Curriculum

Our curriculum (including 1:1 support sessions and reviews) equips learners/apprentices to:

- Recognise abuse, grooming, exploitation and harmful sexual behaviour
- Build digital resilience
- Identify radicalisation/extremism and how to seek support
- know rights and responsibilities at work, whistleblowing and speaking up
- Manage mental health, healthy relationships and consent
- Report concerns and access help promptly.
- Local and national risks and how to safeguard themselves and others.

12. Safeguarding risk areas (non-exhaustive)

- physical
- emotional
- sexual abuse
- neglect
- domestic abuse
- child-on-child abuse
- online harm
- child sexual/criminal exploitation (incl. county lines)
- FGM
- forced marriage
- 'honour'-based abuse
- radicalisation/extremism
- bullying/cyberbullying
- serious violence and weapons
- self-harm and suicide
- mental-health
- homelessness
- substance misuse
- financial
- discriminatory
- organisational abuse (adults at risk)
- faith-based abuse
- trafficking and modern slavery
- missing from education
- discriminatory harassment including racism, sexism, homophobia, biphobia and transphobia.

Each case is considered in context. The organisation recognises vulnerabilities including SEND, high needs, disability, care experience, prior NEET, socio-economic

disadvantage and other individual needs. Further information on each risk type is provided in Appendix A.

13. Reporting and case management

13.1 Recognise → Respond → Record → Report → Refer

- **Recognise** - be alert to indicators, disclosures, patterns of absence/non-engagement, online alerts and employer feedback.
- **Respond** - listen; reassure; do not promise confidentiality; avoid leading questions; consider immediate safety; contact emergency services if risk is imminent.
- **Record** - make a factual record in the secure system, including verbatim words where possible and include analysis and rationale for decisions.
- **Report** - notify the DSL/Deputy without delay via the secure safeguarding telephone number and ticket system.
- **Refer** - the DSL decides on early help, social care/police/Channel referrals, LADO consultation, and notifies relevant professionals/employers/parents as appropriate.

Further guidance on the reporting procedure is provided in Appendix B.

13.2 Allegations and low-level concerns

Allegations or concerns about staff, volunteers/ guest speakers, contractors or supply staff are reported immediately to the head of education. If the concern involves the head of education, it is reported directly to the CEO and the board safeguarding lead. Apprenticeship Connect follows the local authorities' LADO procedures and makes referrals to DBS (where appropriate) when thresholds are met. All low-level concerns are recorded, reviewed for patterns and escalated when appropriate.

13.3 Child-on-child incidents

All reports are taken seriously, and immediate support is provided for victims and alleged perpetrators. Consideration will be taken of how it has impacted the wider cohort. Engagement with parents will take place (where appropriate) and with relevant agencies.

13.4 Escalation and professional challenge

Apprenticeship Connect promotes a culture where all staff can raise concerns about safeguarding practice, culture or conduct without fear of reprisal. Concerns may be raised internally via the Whistleblowing Policy, or externally via the local authority, Protect (independent whistleblowing charity), Department for Education (DfE) or Ofsted's Whistleblowing Hotline (depending on the nature of the concern).

14 Attendance, engagement and children missing in education

The organisation has a clear oversight of attendance and engagement across delivery in all cohorts with all learners; unexplained absence triggers same-day checks and escalation. Repeated or concerning patterns are treated as safeguarding risks and may lead to early help or statutory referrals. The organisation coordinates with employers and parents/carers (where appropriate) to locate learners swiftly and to confirm their safety and re-engagement plans.

15 Professional boundaries

Staff follow the Code of Conduct and report any boundary concerns immediately to the head of education (or the CEO if this concerns the head of education). The code of conduct can be found in the Quality Assurance Policy and Procedure.

16 Quality assurance and continuous improvement

- Monthly safeguarding leadership meetings (DSL and strategy advisor) discuss strategy, action plan, case themes, audits, data and impact.
- Monthly Safeguarding Management Meeting (DSL, deputy, mental health lead) reviewing operational delivery, training, communications, themes and improvement actions.
- Audits are completed annually by the strategy advisor, reviewing case file quality, case outcomes and overall quality/ compliance of the safeguarding provision.
- Annual audits, policy updates and strategic plans are all presented to the board for scrutiny
- Safeguarding outcomes and case review findings inform the annual self-assessment report, quality action plans and staff CPD planning.

17 Multi-agency working and Prevent duty

Apprenticeship Connect works proactively with external safeguarding partners to protect learners and apprentices. The Designated Safeguarding Lead (DSL) and Deputy DSL coordinate this partnership work and ensure that all referrals are made promptly, followed up, and outcomes are recorded.

Under the Prevent Duty (Counter-Terrorism and Security Act 2015), Apprenticeship Connect takes action to identify and respond to the risk of radicalisation and extremism by:

- Maintaining a Prevent risk assessment and action plan, reviewed at least annually or sooner if local or national threat levels change.

- Ensuring all staff receive annual Prevent awareness training and understand referral pathways
- Embedding British values, critical thinking and online-safety education throughout the curriculum
- Referring concerns about radicalisation or extremism to the DSL, who will assess the risk, consult with the police Prevent team, and, where appropriate, make a Channel referral
- Recording and monitoring all Prevent concerns and reviewing emerging themes in monthly safeguarding management meetings.
- Liaising with the regional Prevent Co-ordinators for guidance and training.

These partnerships and processes ensure a coordinated, proportionate response to safeguarding and Prevent risks and promote a culture of shared responsibility across the organisation and the wider safeguarding and prevent network.

More guidance on Prevent can be found in the Prevent policy

18 Filtering, monitoring and online safety

18.1 Apprenticeship Connect recognises that most learners and apprentices access their learning using personal or employer-provided devices and networks that are outside the organisation's direct technical control. As such, our approach focuses on education, awareness, and proportionate oversight rather than direct network filtering.

- All Apprenticeship Connect systems and learning platforms are protected by secure authentication, restricted access, and content moderation controls.
- Learners receive guidance during induction and throughout the curriculum on staying safe online, digital footprint, safe use of social media, recognising scams, extremist or harmful content, and how to report online concerns.
- Learners complete Prevent training, which includes online risks they could be exposed to. This is completed within the first month on the programme.
- Teachers actively discuss digital conduct and online risk during progress reviews and lessons.
- Employers are encouraged to ensure appropriate workplace IT safety and are reminded of their safeguarding responsibilities in the quarterly communications.
- Leaders monitor safeguarding themes and online-safety concerns reported by learners, employers or staff, and review the effectiveness of education and reporting arrangements termly through safeguarding meetings.

This approach ensures that even when learners operate on external networks, they are equipped, informed and supported to recognise and respond to online risks.

18.2 Keep learners safe in a remote learning environment

Apprenticeship Connect applies clear standards to make sure all online and remote learning is safe, professional and supportive. This includes protecting learners' privacy, wellbeing and dignity, and ensuring staff maintain appropriate boundaries.

Expectations and measures include:

- **Observed location** - learners keep cameras on so teachers can verify attendance, engagement and safety in the learning space.
- **Recorded lessons** - recorded sessions provide clear proof that interactions between tutors and learners are professional and in line with safeguarding policies. Knowing lessons are recorded discourages inappropriate behaviour from both learners and staff. These recordings can be viewed if there are concerns about a learner's wellbeing, changes in behaviour, or attendance patterns.
- **Environment check** - teachers confirm the learner is in a safe, distraction-free location and that no unauthorised persons are present during lessons or assessments.
- **Healthy learning environment** - teachers build in regular breaks, encourage good healthy habits, and check on learners' wellbeing during long sessions.
- **Professional boundaries** - teachers and learners use only approved platforms and official communication channels (e.g. Apprenticeship Connect accounts). Personal numbers, social media and messaging apps are not used.
- **Privacy and data security** - staff use secure log-ins, password-protected links and waiting rooms to control access. No session links are shared publicly.
- **Behaviour expectations** - all participants follow the Code of Conduct and online etiquette guidance covering respectful language, attire and background visibility.
- **Safeguarding visibility** - safeguarding contact details are displayed on virtual learning platforms and reminded during induction, lessons and progress reviews.
- **Incident response** - any online concern (e.g. distress, inappropriate content, intrusions) is reported immediately to the DSL and recorded in MyAC.

19 Information sharing and record-keeping

Apprenticeship Connect shares safeguarding information lawfully and proportionately under the Data Protection Act 2018 and UK GDPR. Records are factual, timely and auditable, with clear analysis and rationale for all decisions. Safeguarding case records are retained securely and in line with statutory retention schedules.

Safeguarding records are held on the organisation's internal system, MyAC, with role-based access.

Information sharing with parents/carers for children (16-18) at the time of enrolment to the programme, information will be shared where it is in the child's best interests,

unless this would place them at increased risk. For adults (19+), consent is sought unless there is a risk of significant harm (including missing from education) or another lawful basis to share without consent.

20 Policy governance

An annual safeguarding self-assessment report is submitted to the board and summarises safeguarding activity, emerging risks, audit outcomes, case data, Prevent performance and key priorities for the following year. The Board Safeguarding Lead receives annual safeguarding and Prevent training and all other governors complete safeguarding/Prevent training within 3 months of appointment.

Approval and publication

- The policy is approved by the board of governors and the CEO
- Once approved, the policy is published on the website and learner/staff platforms.

Communication

- This policy is reinforced with learners via induction, lessons, progress reviews, and employer/parent communications.
- Policy updates are communicated via the internet or learning platform.
- Training internally.
- Curriculum updates.

Policy review

The organisation will review this policy at least annually or sooner following statutory updates, serious incidents or inspection feedback.

Related policies

- Prevent Policy
- Quality assurance policy (contains code of conduct)
- 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

Designated safeguarding lead number: 020 3398 6992.

Out-of-hours emergencies

- Immediate danger: **999**
- Non-emergency police: **101**
- Non-emergency NHS: **111**

Appendix A

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 (2023) 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 (2023) 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

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

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

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.

Child-on-child 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 (2023) 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

Appendix B

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 who 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 who is at risk, or has been abused or harmed
- The person who 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 who 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.