SAFEGUARDING AND CHILD PROTECTION POLICY



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Our Mission Statement

Aim to deliver an engaging, positive learning experience every time.

Our Values

Our values encompass the achievement of all of our learners. Our values are HONESTY, INTEGRITY, SUPPORT, ETHICAL BUSINESS AND EQUALITY OF OPPORTUNITY FOR ALL. We support PREVENT, SAFEGUARDING, BRITISH VALUES, EQUALITY, DIVERSITY & INCLUSION and this policy is at the heart of and supports these core values in aiming to safeguard staff and learners.

Our Vision

To be the provider of choice for apprentices and clients, creating bespoke education and training that maximises opportunity and investment, both for now and in the future.

Contents

Section	Item	Page
1	Introduction and overview	3
2	Rational and scope	3
3	Roles and responsibilities	3
4	How this policy will be communicated	3
5	Complaints	3
6	Our Aims	4
7	Safeguarding Policy	4
8	Patterns of Abuse	5
9	Previously Looked After Children and Young Carers	8
10	Alert Procedures	10
11	Reporting Abuse or Concerns	10
12	Sharing Information	10
13	Confidentiality	11
14	Record Keeping and Referrals	11
15	Allegations Against Staff Members and Disclosures for Staff	12
16	Staff Concerns about Safeguarding Practices	13
17	Delivery Partners	13
18	Related Policies	14

1 - Introduction and Overview

Our centre is committed to protecting all persons who come into contact with our staff directly or who attend our courses. The welfare of children, young people and vulnerable adults is of primary concern.

Our Safeguarding and Child Protection Policy is designed to meet all legal requirements and is supportive of our commitment to Equality and Diversity reflected in our policies on this.

2 - Rationale and Scope

This policy applies to all children, young people and adults, regardless of age, class, ethnicity, gender, religion, disability or sexual orientation, who may be participating in training, courses or other activities provided by the centre.

The policy is applicable to all staff – this being defined for the purpose of this policy as all employees, sub-contractors and anyone in part or un-paid work on behalf of the centre.

This policy covers The NVQ Training Centre Ltd, The Apprenticeship Centre Ltd and Apprenticeship EPA Centre.

3 - Roles and responsibilities

Our SMT (senior management team) take overall responsibility for the provision of all policies within the centre. The directors, Mark Webber and Peter Carey, take overall responsibility for this policy, its application and sharing of appropriate information.

Our Safeguarding Lead and Deputy also have responsibilities to ensure learners are safeguarded and policies are adhered to. All staff have a responsibility for supporting the safeguarding and the welfare of staff and students they work with, to the best of their ability.

Our Governing Body will abide by their responsibilities as outlined in Keeping Children Safe in Education September 2025. They must have regard to this guidance, ensuring that policies, procedures and training in the Centre is effective and complies with the law at all times. Governors also have specific responsibility for ensuring that the Centre monitors the impact of its work and learns lessons from Serious Case Reviews.

4 - How this Policy will be Communicated

- Our SMT will review policies and update as required
- Our policy will be made available on our website if applicable
- Our policy documents will form part of the induction for all staff to the centre
- When suitable, policies will be uploaded to OneFile resources for access by all appropriate users
- Training for all staff will be implemented where required, with training matrix and CPD's updated accordingly.
- We may email policy updates to staff as required or use OneFile system announcements
- Review practices against this policy will take place during standardisation and SMT meetings

5 - Complaints

Any complaints in relation to this policy or relating to this policy or conflicts of interest should be made to the SMT or the Directors, who can be contacted via our Head Office on 08452235020 or email info@apprenticeship-centre.co.uk.

6 – Our Aims

The purpose of this policy is to set out aims and objectives for the protection of children, young people and vulnerable adults involved in training and courses or other services that are provided by the centre. We take a coordinated approach to safeguarding following the statutory guidance 'Working Together to Safeguard Children'.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge,
- protecting children from maltreatment, whether that is within or outside the home, including online,
- preventing the impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

To ensure the welfare of all persons who come into contact with our staff.

To increase staff awareness of the issues regarding children, young people and vulnerable adults, providing full, regular training on required areas.

Outline the procedures to follow in the event of any concerns or incidents.

7 – Safeguarding Policy

Managers have overall responsibility for ensuring that this policy is applied within their own area and ensuring that all employees are made aware of this policy.

The Designated Safeguarding Lead is responsible for ensuring that the management team are aware of relevant multi-agency procedures. Such multi-agency procedures will normally involve local Health Care, Police and Social Care organisations who have been given specific responsibility for dealing with complaints, or suspicions, of abuse of children, young people or vulnerable adults.

The Designated Safeguarding Lead is responsible for maintenance, regular review and updating of this policy. The policy will be reviewed at least on an annual basis.

All members of staff have a responsibility to comply with this policy, not just those who might specifically be working with children, young people or vulnerable adults.

All staff have a responsibility to provide a safe environment in which children and young people can learn.

Any staff member who has any concerns about a child's welfare should refer them to the safeguarding team, following all protocols strictly.

Definitions

1.1 **Child or Young Person** – a person under the age of 18 years. From here on referred to as "young person".

1.2 **Vulnerable Adult** - is described as someone who is unable to effectively protect him or herself from harm or exploitation. This is a person of 18 years and above who may have some sort of physical, mental or sensory disability.

1.3 **Abuse** – the misuse of power and authority by one person over another. Abuse may be:

- Discriminatory
- Physical
- Sexual
- Emotional/psychological
- Financial/material
- Neglect

8 – Patterns of Abuse

Patterns of Abuse - sometimes it is possible to identify a pattern of how the abuse is taking place, examples include:

- Serial abusing: in which the abuser seeks out and 'grooms' a young person or vulnerable individual. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse.
- Long-term abuse: in the context of an ongoing family relationship such as domestic violence between spouses or generations.
- Opportunistic abuse: such as theft occurring because money has been left around.
- Situational abuse: arising because pressures have built up in a relationship. This can sometimes be because of difficult or challenging behaviour or due to neglecting a person's needs because the carer has difficulties. These could be debt, alcohol or mental health problems.

This list is not exhaustive. If you are in any doubt of any instance of abuse you should seek advice from the Designated Safeguarding Lead.

Indicators of Abuse and Neglect

Abuse: Is a form of maltreatment. Somebody may abuse or neglect a child, young personal or vulnerable adult by inflicting harm or by failing to act to prevent harm. They may be abused in a family or in 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. They may be abused by an adult or adults or another young person or young persons. All staff will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Centre and/or can occur between young people outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) will consider whether young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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 young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person.

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them 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 the young person. These may include interactions that are beyond the young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing young person frequently to feel frightened or in danger, or the exploitation or corruption of a young person. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone

Sexual abuse: Sexual abuse involves forcing or enticing a young person to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the young person may not be 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 young person in looking at, or in the production of, sexual images, watching sexual activities, encouraging young person to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people.

Neglect: Neglect is the persistent failure to meet a young person s basic physical and/or psychological needs, likely to result in the serious impairment of the young person'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:

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

It may also include neglect of, or unresponsiveness to a young person's basic emotional needs. All staff will have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put a young person in danger.

Faith-Based Abuse – including Female Genital Mutilation and Forced Marriage: faith-based abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community including Female Genital Mutilation (FGM), forced marriage and practices, such as, breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of so-called faith-based/honour-based abuse should be referred to the Designated Safeguarding lead.

Female Genital Mutilation: This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. Since October 2015, there is a specific, legal duty on staff to personally report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Information on when and how to make a report can be found at: Mandatory Reporting of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on the Multi Agency Statutory guidance on FGM.

Forced Marriage: A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines. Centre staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases the abuse will be in exchange for something the victim needs or wants, and/or for the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, young persons or adults, and can include children who have been moved (commonly referred to as trafficking). This may constitute modern slavery, of which further information can be found within the Modern Slavery statutory guidance. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not be, be accompanied by violence or threats of violence. Victims can be exploited even when the activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place on line.

Young People missing from education, who run away or are missing from home: All staff should be aware that young people going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of young people criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a young people going missing in future.

Domestic Abuse: The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

All young people can witness and be adversely affected by domestic abuse in the content of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Controlling behavior is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for

independence, resistance and escape and regulating their everyday behavior. Coercive behavior is: an act or a pattern of acts of assault, threats,
humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim."

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Some young people may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to the Dedicated Safeguarding Lead who will liaise with the Multi Agency Safeguarding Hub (MASH) and/or the Counter Terrorist Unit (CTU) for advice. If appropriate, a referral will then be made to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal.

Financial or Material Abuse: This relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Peer on Peer Abuse: young people can abuse other young people (often referred to as peer-on-peer abuse). This is most likely to include, but not limited to:

- bullying (including cyber bullying),
- physical abuse, such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault.
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse.
- sexting (also known as Youth Produced Sexual Imagery - YPSI).
- Initiation/hazing type violence and rituals.

Sexual Violence and Sexual Harassment between Young People: Sexual violence and sexual harassment can occur between two young people or children of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people. young people or children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. We will not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "boys being boys" or "just having a laugh". These examples can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment, and 'normalise' this behaviour, preventing others from reporting concerns. Staff will be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk further information and guidance can be found in the DfE Guidance Sexual Violence and Sexual Harassment between Children in Schools and Colleges. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, which are, rape, assault by penetration and sexual assault. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and in the context of young person on young person sexual harassment. Sexual harassment is likely to violate a young persons dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include the following:

- sexual comments, such as: telling stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual jokes or taunting.
- Escalating misogyny
- Coercion and exploitation
- physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature and.
- on-line sexual harassment, standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - non-consensual sharing of sexual images and videos.
    - sexualised online bullying.
    - unwanted sexual comments and messages, including on social media.
    - sexual exploitation; coercion and threats; and
    - Up-skirting.

Serious Violence – All staff should be aware of indicators, which may signal that young people are at risk from or are involved with serious violent crime. These may include, increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that they have been approached by or are involved with individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the

measures in place to manage these. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence). Advice for schools and colleges is provided in the Home Office's Preventing Youth Violence and Gang Involvement and its Criminal Exploitation of children and vulnerable adults: county lines guidance.

YPSI - Sexting (YPSI) is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery' ('Sexting' does not include the sharing of sexual photos and videos of under-18-year-olds with or by adults. This is a form of child sexual abuse and must be referred to the police. Staff will never view, download or share the imagery, or ask a child to share or download it – this is illegal.

The restriction on creating, possessing, or sharing nude or semi-nude imagery of any individual under the age of 18 explicitly includes content that has been generated, modified, or digitally altered using Artificial Intelligence (AI) or "nudification" tools. Under UK law, any AI-generated or AI-altered image that depicts a child indecently is treated as child sexual abuse material (CSAM). Any discovery, allegation, or suspicion involving AI-generated or manipulated images must be reported immediately to the Designated Safeguarding Lead (DSL) and will be handled under our standard child protection and statutory reporting pathways.

If staff have viewed the imagery by accident (e.g. if a young person has shown it before being asked not to), this must be reported to the Designated Safeguarding Lead.

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm a referral should be made, by the Designated Safeguarding Lead, to children's social care and/or the police immediately.

Young People with special education needs and disabilities: Young people with special educational needs and disabilities can face additional safeguarding challenges. Students within this cohort can be disproportionately impacted by things like bullying without showing any signs, they can also be more prone to peer group isolation than other children. All staff should be vigilant to ensure that they are mindful of signs of abuse which could include changes in behavior, mood and/or injury and should be aware that there may be communication barriers which may make it more difficult for these students to share concerns and issues. It is important for staff to be aware that assumptions can be made about possible abuse, mood and injury and that this could relate to the child's disability without further exploration.

Child Criminal Exploitation – county lines: Criminal exploitation of young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: it is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phones lines or other form of "deal line". Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a person's welfare. Indicators that a family may be at risk of homelessness include household debt, rental arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. In most cases we will be considering homelessness in the context of children and young people who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home and will require a different level of intervention and support. Children's services will be the lead agency for these young people and appropriate referrals should be made based on the child's circumstances.

Online Safety: The use of technology has become a significant component of many safeguarding issues. Child or young person sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers the Centre to protect and educate the Centre community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content – being exposed to illegal, inappropriate or harmful material, such as, pornography, fake news, racist or radical and extremist views.
- Contact - being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults.
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as, making, sending and receiving explicit images, or online bullying.

Mental Health: all staff will be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting

impact throughout childhood, adolescence and into adulthood. We will work with young people to encourage them to talk about mental health in a positive way, however, only appropriately trained professionals should attempt to make a mental health diagnosis.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Staff should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

If staff have a concern about a child's mental health that is also a safeguarding concern, follow strict internal protocols and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Children in Need - Where a learner's health, education, or development is being significantly impaired by safeguarding or welfare concerns, they may be identified as a "Child in Need" under Section 17 of the Children Act 1989. As a training provider, our role is strictly identifying and reporting, not investigating. Any concern or suspicion that a learner requires this level of support will be logged immediately by the Designated Safeguarding Lead (DSL), who will make a formal referral to the local authority's Children's Social Care team for further assessment.

9 – Previously Looked After Children and Young Carers

Where a learner is a previously looked after child/care leaver, they remain potentially vulnerable. This should be highlighted pre-enrolment, so staff are able to act accordingly and understand potential risk factors. All staff must take prompt action to safeguard these children in the case of any concerns arising.

Where appropriate, staff members/DSL should work closely with local authorities, appointing a Personal Advisor to develop a pathway plan for the young person, providing regular updates, review on progress, and liaise with them regarding any issues or concerns.

The centre is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

10 – Alert Procedures

If you see something that concerns, you or you are given information that causes you to be concerned about a young person or vulnerable person you should:

- Keep calm; this will help the person
- Make sure that the person is safe
- Listen carefully to what is said
- Reassure and take care of the person
- Get help as soon as possible

If a young person or vulnerable adult comes to you with a report of apparent abuse, you should listen carefully to him/her, using the following guidelines. When listening to the young person or vulnerable adult staff must:

- Allow the young person or vulnerable adult to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Never coach or lead the vulnerable adult in any way

- Reassure the young person or vulnerable adult, let them know you are glad they have spoken up and that they are right to do so
- Always ask enough questions to clarify your understanding, but do not probe or interrogate – no matter how well you know the young person or vulnerable adult – spare them having to repeat themselves over and over
- Be honest - let the young person or vulnerable adult know that you cannot keep this a secret, you will need to tell someone else
- Try to remain calm – remember this is not an easy thing for them to do
- Do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- Let the young person or vulnerable adult know that you are taking the matter very seriously
- Make the young person or vulnerable adult feel secure and safe without causing them any further anxiety.

11 – Reporting Abuse or Concerns

You must report your concerns if at any time you think that a vulnerable person is being abused or is at risk of abuse so that they can be looked into. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still raise your concerns to the DSL and/or deputy DSL.

- You must tell, so that others can help if you come across a situation where you think a young person or vulnerable person is at risk of abuse. You must not ignore the information. Do not assume that others know what you know.
- You have a duty of care to ensure the rights and needs of the young person or vulnerable person is your main consideration. Remember that young people and vulnerable adults have human rights. You should not try to investigate the matter on your own.
- You should call for an ambulance or arrange for a doctor to see the person at the earliest opportunity if at any time you feel the person needs urgent medical assistance.
- You should call the police if at the time you have reason to believe the vulnerable person is in immediate and serious risk of harm or if you suspect that a crime has been committed.
- Staff should maintain an appropriate level of confidentiality, and involve only those who need to be involved. This means the Safeguarding team, and where appropriate, the local authorities children's social care.
- You must record the facts of what happened. Remember you will need to record everything that you saw, heard and did and ensure that any evidence indicating that abuse is or may be occurring is preserved.
- You should inform the family and/or carers of the young person or vulnerable adult, where it is safe to do so (i.e. where they are not implicated in the abuse), of the incident.
- You must pass on any concerns immediately to the Designated Safeguarding Lead. The rights and needs of the young or vulnerable person are your main consideration.

12 – Sharing Information

It should be made clear that where the staff member has a reason to be concerned for the welfare of a vulnerable person and/or others they have to share the information with someone who is in a position to act or take responsibility.

The young person or vulnerable adult should be told with whom the information will be shared, and that their views and wishes will be considered.

Any views or wishes expressed by the young person or vulnerable adult should be recorded and reported with their concerns by the staff member.

Concerns should be reported at the earliest possible opportunity.

Our Designated Safeguarding Lead (Julie Gardner) can be contacted on:
safeguarding@apprenticeship-centre.co.uk
Mobile 07534 852 484

13 – Confidentiality

All personal data will be processed in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018., and in line with the Data Protection Policy and GDPR.

Where under-18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people or children, this may include a duty to make a referral for example. Parents' or legal guardians' permission should generally be sought before speaking to children, but not in circumstances that would either put a person at risk or compromise evidence.

When dealing with a child or young person if consent is refused, and it is decided that confidential information is to be shared without consent, it should be explained to the person withholding consent that the information will be shared and the reasons for the decision.

Unlike young people under the age of 18, adults can insist on confidentiality unless there are circumstances in which a vulnerable adult's wishes may be overridden. As a general principle you must act in accordance with the wishes of the vulnerable adult wherever possible.

As a matter of best practice, vulnerable adults should not be offered nor promised confidentiality by a member of staff. It is important for staff to be able to share concerns and seek help from others at least within the company and this must be explained to the learner.

Where there is reasonable suspicion of abuse and the adult has capacity to withhold consent and does not wish the information to be shared, then the adult must be offered all appropriate support from the Centre.

If there is reason to believe a crime has been committed, seek the vulnerable adult's consent to inform the police. If the vulnerable adult gives permission, ensure the situation is discussed with your line manager, who may then contact the police.

If the vulnerable adult does not give permission to involve the police, this information should be passed on to your line manager as soon as possible and clearly recorded.

If the person lacks the capacity to give consent and there is reason to believe a crime has been committed, consult your line manager.

Other staff may need to be alerted to concerns in order to monitor concerns or gather further evidence or to assist with support. Any discussions must be kept confidential between those directly involved and only shared on a strict need to know basis and within a professional context.

14 – Record Keeping and Referrals

Any disclosure from a learner or another member of staff must be recorded clearly and comprehensively. This will cover:

- Learner and staff details
- Reason for the concern
- Any apparent physical signs of abuse
- An account given to you of abuse by the learner concerned, as accurately as you are able to record it
- Dates and times of incident
- Date and time of when notes were made.

The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible and as accurately as you are able to record it. If you are unsure about what to write, you can get advice from the Designated Safeguarding Lead.

The report may, eventually, form part of a criminal investigation.

The report should be signed, dated, and passed as soon as possible or at the latest within 24 hours to the Designated Safeguarding Lead, who will keep a copy stored in a secure place, to maintain confidentiality.

Referral to external agencies

When the Designated Safeguarding Lead receives a Concern Report, they will need to carefully consider the information contained on the form.

If no referral has already been made, (i.e., via use of hospital, GP or Police), the Designated Safeguarding Lead will need to consider the next appropriate step.

The decision to proceed with further action should take account of such factors as:

- The vulnerability of the person
- Who is the alleged perpetrator?
- The nature and extent of the abuse
- The length of time it has been occurring.
- The risk of repeated or increasingly serious acts involving other vulnerable people
- The wishes of the young person/vulnerable adult.

It is also important that an early decision is taken about which agencies should be involved, how and when. If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

Considering all the information available, the Designated Safeguarding Lead will decide on the next steps, which may include taking no further action. Where the Designated Safeguarding Lead decides that further action is necessary, this may be to:

- Refer case to Family Help support
- Seek further advice from Social Services
- Make a referral to Social Services
- Report the incident to a designated Social Worker
- Report the matter to the police if a crime is suspected.

15 – Allegations Against Staff Members and Disclosures for Staff

There are occasions where a young person or vulnerable adult may accuse a member of staff of abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

In the event that any member of staff suspects any other member of staff of abusing a learner, it is their responsibility to bring these concerns to the attention of the Designated Safeguarding Lead and Managing Director. The decision to refer to outside agencies, such as LADO, will follow the same process as any other disclosure or suspicion of abuse. Where the concern has been raised about the Managing Director, this should be referred to the chair of Governors. Where this could potentially raise a conflict of interest, it will also be reported to LADO.

If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under The NVQ Training Centre Ltd.'s disciplinary procedures and a Formal Internal Investigation will be conducted. The member of staff will be informed of: The allegation against him/her. His/her entitlement to be represented by a Trade Union representative or work companion during any investigation or subsequent formal action. In any case where a dismissal or removal has taken place due to safeguarding concerns, this will be referred to the relevant bodies, such as the Disclosure and Barring Service (DBS).

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately, and arrangements made for the member of staff to return to work. The adult at risk of harm making the allegation and/or their parents/carers will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to work of the member of staff (if suspended). The Directors will consider what information will be made available to the general population of the Centre.

Other Students
Should an allegation be made against another student the person hearing the disclosure will follow the Training Providers Safeguarding Procedure for supporting students. The Designated Safeguarding Lead, Quality Manager and Director will assess immediate risk and take any necessary decision to suspend. The Designated Safeguarding Lead will seek advice from the appropriate external agents and make the referral if required. If no action is required, the Centre will follow its normal procedures following suspension of a student.

Disclosures for staff
All members of staff who will, or are likely to, come into direct contact with learners will be DBS checked on appointment.

- Staff checks will be renewed every three years.
- On receipt of a positive DBS check (i.e. one which indicates a criminal record) the Quality Manager will be responsible for completing a risk assessment – see Appendix 3 for further guidance.

16 – Staff Concerns About Safeguarding Practices.

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the centre's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.

Appropriate whistleblowing procedures are in place for such concerns to be raised with the senior leadership team.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:
• general advice on whistleblowing can be found at whistleblowing for employees, and
• the NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the centre. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk19

17 – Delivery Partners

Delivery Partners will be required to comply with the contractual requirement to carry out DBS checks (at their own expense) in order to ensure that they have done everything reasonable within their powers to only employ suitable people to provide services on behalf of The NVQ Training Centre Ltd.

Delivery Partners will need to show they have policies or procedures in place to carry out DBS checks and that they use an appropriate umbrella body in this respect. The NVQ Training Centre Ltd is able to refer Delivery Partners to a suitable umbrella body on request.

Where a Delivery Partner is a sole trader or self-employed The NVQ Training Centre Ltd is able to manage the disclosure on their behalf.

We acknowledge that the DBS process can sometimes be a lengthy one. In this case the Delivery Partner may wish to give a start date before the DBS check is complete provided the following conditions are met when working with The NVQ Training Centre Ltd.'s learners:

- Staff without valid DBS checks are supervised at all times by other staff
- There is no one to one contact with any learner who is either under the age of 18 or known to be vulnerable.

18 – Related Policies

The NVQ Training Centre Ltd will have regard to Safeguarding when developing other policies in particular:

- Safer Recruitment
- Equality & Diversity
- Radicalisation
- GDPR (Data Protection)
- Learner IAG
- E-Safety
- Staff Behaviour
- DBS
- Whistleblowing
- Peer on Peer Abuse
- Safer Recruitment