



Asset Training & Consultancy Ltd

Children, Young People and Vulnerable Adults Safeguarding & Prevent Policy and Procedures

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| Author | Stacey Hurley | | |
| Reviewer | Ruth Smith | | |
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At ATC our learners well-being is paramount and are committed to ensuring that all learners are kept safe so they can enjoy and achieve while participating in learning. To ensure our learners safety and happiness ATC have been working with other professionals around the community and across Liverpool to deliver a consistent safeguarding approach.

ATC always act in the best interest of the children and learners by helping them to feel protected and safe both on and off the premises. Learners are regularly updated with the contact information for the DSL via monthly bulletins and learner surveys so that they confidently know who they can contact or communicate with if they have any safeguarding concerns or issues

To deliver the best safeguarding training sessions for our learning facilitators the DSL joined a live staff safeguarding training day through St Silas Primary School and Croxteth Primary School. This was to ensure that ATC are training their staff to a high level in line with government legislation and the local authority to keep our children, young people and vulnerable adults safe.

The DSL regularly attends live webinars through the safeguarding network like peer on peer abuse, sexual harassment and key changes to keeping children safe in education to ensure that knowledge and skills are kept fresh and up to date and the correct information is being taught to our own staff on safeguarding training days. Also links have been made with the local council for access to their training calendar so that ATC and the local authority are working as one unit to protect our children, young people and vulnerable adults.

Purpose of the Policy

Asset Training and Consultancy Ltd have devised this policy in line with government legislation and statutory guidance. We are committed to ensuring that all learners and apprentices are kept safe so they can enjoy and achieve while participating in learning. We therefore comply too guidance as specified in:

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education 2021
- The Children's Act 1989 and 2004
- The Education Act 2011
- Safeguarding Vulnerable Groups Act 2006
- The Care Act 2014
- The Equality Act 2010.

In following the above guidance, Asset are ensuring that we are safeguarding and promoting the welfare of children, young people, vulnerable adults and apprentices to ensure that our learning environment is a safe place for all learners, where abuse or mistreatment is not tolerated and individuals have the confidence to raise concerns should abuse occur, safe in the knowledge that those concerns will be dealt with appropriately and fairly. We will regularly review this policy and ensure that any change to the law and government legislation will be reflected and implemented into our own with immediate effect.

Asset is committed to the values and practises of safeguarding and the welfare and safety of all learners and staff is paramount. We expect all those involved with Asset to share this commitment.

The policy extends to:

- All learners, staff members (this includes volunteer and temporary staff) and employers
- Arrangements for placement, work experience, subcontracting and work based training
- The processes, actions, reporting arrangements, documentation and record keeping within related procedures
- Training, updating and other continual professional development related to safeguarding, sexual harassment, peer on peer abuse, online safety, child criminal exploitation, child sexual exploitation and equality and diversity
- Management and leadership arrangements
- Arrangements for engaging learners; seeking and acting upon feedback regarding safeguarding from all involved.

In addition, the policy commits Asset to being proactive in promoting learner safety, including safeguarding and health and wellbeing.

All staff will continue to be supported and be suitably trained so that they can operate effectively in this area and keep their knowledge and skills fresh in relation to government guidance. This will effectively contribute to an excellent experience and support for learners.

General Policy Statement

Asset is fully committed to the values and practices of safeguarding. We have a statutory and moral duty to ensure the organisation functions with a view to safeguarding and promoting the welfare of vulnerable adults, children and young people.

In accordance to legislation, the aim of this policy is to establish a whole provider approach to safeguarding in order to:

- Provide a safe learning environment and protect learners and apprentices from abuse and harm
- Identify vulnerable adults and children who may benefit from early help, or who are suffering or suspected to be suffering from harm
- Identify appropriate action to preserve their safety both at home and at work.
- Ensure we respond to concerns

Asset have a duty of care to safeguard all people who work, learn and complete work experience placements both on and away from their premises. It is therefore, the responsibility of everyone involved in the learner's journey to ensure their safety and wellbeing is met at all times. This includes protecting them from incidents of abuse, bullying, sexual harassment, peer on peer abuse and any form of abuse, as detailed within the policy.

When such issues arise, Asset is committed to ensuring that we:

- Take appropriate action to see that such children, young people and/or vulnerable adults are kept safe whilst undertaking training.
- Ensure that the person is reassured and know they are being listened to.
- The victim is supported and protected to ensure that they are ok and their education can continue as best it can
- Also the alleged perpetrator will be supported and protected and provided with education with any sanctions followed up as they could also be suffering from abuse.

In pursuit of these aims, we will approve and annually review policies and procedures with the aim of:

- Being alert to potential indicators of abuse
- Raising staff awareness of issues relating to the welfare of children, young people/vulnerable adults and the promotion of a safe environment in learning
- Aiding the identification of children, young people/vulnerable adults who could benefit from early help or who are at risk of significant harm and providing procedures for reporting concerns
- Understanding our responsibility to alert other agencies to individuals who we feel are at risk, or who are suffering abuse of any sort
- Contribute to whatever articles are needed to safeguard the person who is at risk
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff
- The safe recruitment of staff.

In ensuring learners are aware of safeguarding, during the induction process and on programme, we will:

- Discuss safeguarding at each review stage within a learner's and apprentices training course
- Enrich their knowledge and skill base with Assets online learning modules to help learners gain a more thorough understanding of safeguarding
- Monitor IT usage and discuss technological issues and the impact on health and well being
- Ensure safeguarding is included as part of the overall risk assessment process
- Provide learners with the designated safeguarding lead's contact number and email to ensure they know who to contact if they have any safeguarding concerns or issues

Assets always act in the best interest of the children and learners by helping them to feel protected and safe both on and off the premises. Learners are regularly updated with the contact information for the Designated Safeguarding Lead (DSL) through monthly bulletins and learner surveys so that they confidently know who they can contact or communicate with if they have any safeguarding concerns or issues

Our Commitment

This policy is based on the following principles:

- Everybody has the right to live their life free from violence, fear and abuse
- Everybody has the right to be protected from harm and exploitation
- Everybody has the right to independence, which may involve a degree of risk.

Safeguarding is a term used to denote the duties and responsibilities that those providing health, social care or education to carry out/perform in order to protect individuals from harm.

Through our commitment, we:

- Have a DSL who is on hand to support with any issues you may experience
- Ensure every individual is treated with respect in an environment that is free from harm and discrimination, radicalisation and extremism
- Conduct Health and Safety assessments on the premises of all employers to ensure they are demonstrating safe working practices, providing a safe learning environment.
- Ensure our Health and Safety monitoring forms are checked in-house and reviewed annually to ensure we have the most up to date information
- Work with learners, employers and other agencies to promote a safe and healthy culture
- Ensure we prevent slavery and human trafficking in our corporate activities, and that our supply chains are free from slavery and human trafficking (see Slavery and Human Trafficking policy)
- Develop partnerships to proactively protect vulnerable adults from harm, abuse and radicalisation
- Train staff to the appropriate level to ensure they have a clear understanding of personal safety, good safeguarding practices and understand the correct steps to follow if a disclosure is made
- Work with learners to promote their own personal health, wellbeing and safety, including their safety online and with peers
- Provide learners with confidential advice, guidance and support for a range of issues that they may face
- Conduct relevant DBS checks on all staff engaging with learners or having access to learner information. These records will be held in accordance to the General Data Protection Regulation and reviewed in accordance with government recommendations
- Adhere to the General Data Protection Regulation at all times, ensuring careful management of data; storing, processing and retaining data that is absolutely necessary for the requirements of abiding by regulatory bodies and supplying the highest possible qualifications.

Asset will not tolerate the abuse of learners by other learners or staff members. This policy relates to all service users and partners.

Information Sharing and the General Data Protection Regulation (GDPR)

There may be circumstances where the welfare or safety of an individual may take precedence over confidentiality. ATC are dedicated to following the 6 Rs framework and have built this around General Data Protection Regulation requirements. Staff understand the framework and understand that data protection is not a barrier to sharing information and must not be allowed to stand in the way of the need to safeguard and promote the welfare of children

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children, young people and vulnerable adults safe. The Act includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared legally without consent of an individual if it cannot be reasonably expected to gain consent or to gain consent could place a child or vulnerable adult at risk. Therefore, in ensuring information is shared effectively and in accordance with GDPR and the Data Protection Act 2018, we adhere to the following necessary processing conditions for the purpose of:

- Protecting an individual from neglect or physical, mental or emotional harm
- Protecting the physical, mental or emotional well-being of an individual
- The individual is aged under 18 and/or aged 18 or over and at risk
- The processing is carried out without the consent of an individual for one of the reasons as listed below:
 - In the circumstances, consent to the processing (of information) cannot be given by the individual
 - The processing must be carried out without the consent of the individual because obtaining consent would prejudice the provision of protection
 - In the circumstances it cannot be reasonably expected to obtain consent from the individual.

For individuals who are 18 or over and 'at risk' the Data Protection Acts defines this as:

- The individual has needs for care and support
- The individual is experiencing, or at risk of neglect or physical, mental or emotional harm and
- As a result of those needs is unable to protect him or herself against the neglect or harm or risk of it.

Information can therefore lawfully be shared without consent for the purpose of:

- Protecting the economic well-being of an individual at *economic risk (* an individual who is less able to protect his or her economic well-being by reason of physical or mental injury, illness or disability) who is aged 18 or over
- Health.

Asset ensures, when sharing information, it is done so at all times, to safeguard and promote the welfare of children, young people and vulnerable adults at risk of abuse and neglect. Keeping Children Safe in Education 2021 and Working Together to Safeguard Children 2018 clearly define that 'fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children'.

Our commitment

In ensuring information sharing is understood, Asset adhere to 'the seven golden rules to sharing information' (Information Sharing Advice for Practitioners providing safeguarding services to children, young people, parents and carers):

- General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners, or information governance lead, if in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 we may share information without consent if, in our judgement, there is a lawful basis to do so, such as where safety may be at risk. We will base our judgement on the facts of the case. When we are sharing or requesting personal information from someone, we will be clear of the basis upon which we are doing so. Where we do not have consent, we will be mindful that an individual might not expect information to be shared.
- Consider safety and well-being: we will base our information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information we share is necessary for the purpose for which we are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- Keep a record of our decision and the reasons for it – whether it is to share information or not. If we decide to share, then we will record what we have shared, with whom and for what purpose.

Recording, sharing of information and consent issues

- Documents relating to an investigation will be retained in a secure place, together with an electronic or written record of the outcomes and if disciplinary action is taken; details will be retained on members of staff and confidentially filed
- If a member is dismissed or resigns before the disciplinary process is completed he/she will be informed about the organisations statutory duty to inform the Disclosure and Barring Serviced (DBS)
- Records will be kept updated as and when information is received, including action taken, as a young person/vulnerable adult can request their records, until official consent has been sought we need to be sensitive as to what we record
- All written records which may need to be referred to at a later stage, or to be kept as evidence, are to be locked away in a secure designated location.
- Consent to share information should not be sought under the following specific circumstances:
 - If this would put the child, young person or vulnerable adult at greater risk of significant harm
 - Interfere with criminal enquiries
 - Raise concerns about the safety of staff.

Responsibilities

All staff have a responsibility to provide a safe environment in which learners can progress and develop

It is the responsibility of all staff, to adhere to the Safeguarding policy, and for all learners to behave and act in accordance with the guidance issued. The designated person(s) are responsible for appropriate communication, cooperation and contact with third parties in relation to referrals and other matters.

Asset is not an investigative authority. It is therefore essential that all referrals be made, in accordance with the reporting procedure, as set by Local Safeguarding Children's Board. Designated Safeguarding Lead (DSL) will make aforementioned referrals.

Designated Safeguarding Lead (DSL)

The DSL for Asset is Stacey Hurley who is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations
- Providing advice and support to other staff on issues relating to children, young people and vulnerable adult's protection
- Maintaining a proper record of any child, young person and vulnerable adult protection referral, complaint or concern (even when that concern does not lead to a referral)
- Liaising with other appropriate agencies
- Liaising with external partners who refer learners to the organisation to ensure that appropriate arrangements are in situ
- Reporting child protection issues to the Local Authority Designated Officer (LADO) within 24 hours of the disclosure being made
- For making contact with the relevant enforcement agencies such as the police in the event that immediate action should be required for any child protection issues
- Keeping individuals informed about outcomes in the investigation process.
- Ensuring staff receive basic training in child protection and vulnerable adult issues and are aware of (and adhere to) the organisation's relevant safeguarding policies and procedures, including child protection arrangements.
- Ensuring that SMT and the DSL have a 6 monthly review to keep up to date with any changes

The DSL has been granted key responsibility for child protection and safeguarding issues, in the absence of the DSL, the other members of the Safeguarding team will take the lead.

Senior management team (SMT)

The senior management team consists of Ruth Smith, Lisa Tyrer and Sara Smith who are responsible for

- Ensuring that the principles and standards referred to in this document are followed in all aspects of their employment
- Be responsible for ensuring the procedures for complaints and whistle-blowing are clearly understood and easily accessible, by learners, employers and staff.

Staff

It is not the responsibility of staff to decide whether or not child abuse has taken place. All staff, however, have a responsibility to act on any concerns by reporting them to the DSL or to a member of the senior management team.

All staff must report any of the following situations to the DSL:

- Any concern about actual or suspected staff misconduct and/ or criminal activity involving the abuse of a child/ children, young person or vulnerable adult whether or not they are known to Asset must be reported to DSL as per allegations procedure
- No staff member must agree to keep information regarding actual or suspected abuse 'confidential'. We will seek to discuss our concern with the young person in a way that is appropriate to their age and understanding, and seek their and that of their parent or carer agreement if making a referral to the relevant agency. However, in situations where this may place the young person in immediate danger, the DSL may make a decision to refer to the relevant agency without informing the young person and without obtaining the consent of their parents/ carer.

Remote learning

At ATC we always act in the best interests of our learners by ensuring their safety both on and off the premises and this reflects on our approach during and after the pandemic and any future disruptions we may face. ATC staff always ensure that our most vulnerable learners are kept safe either through face to face visits or remote work. ATC have a duty of care to make sure that contact is made on a regular basis to know that learners are healthy and safe which is overseen by the DSL. If problems arise then ATC staff know to contact the DSL or a member of the welfare team immediately and let them know their concerns. The DSL or a member of the welfare team will then try to make contact including a visit to the home or workplace. As we have a duty of care to our learners their safety is paramount and we as a company want to ensure they feel safe and protected along their learning journey even through any disruptions.

Definitions of abuse

Abuse: Abuse is a violation of an individual's human and civil rights by any other person or persons: *No Secrets* (DH/Home Office 2000).

It includes:

- **Physical:** Is the non-accidental use of force that results in bodily injury, pain, or impairment and is when someone hurts or harms a child or young person on purpose.

It includes:

- Hitting with hands or objects
- Slapping and punching
- Kicking
- Shaking
- Throwing
- Poisoning
- Burning and scalding
- Biting and scratching
- Breaking bones
- Drowning.

It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

- **Emotional or psychological:** The intended act of mental or emotional anguish by threat, humiliation, intimidation or other abusive conduct. It may involve serious bullying (including cyberbullying)
- **Domestic:** Violence or other abuse by one person against another in a domestic setting, such as in marriage or cohabitation
- **Neglect:** Includes withholding the necessities of life, such as: food, drink and love and shelter, and exposing them to unacceptable risk
- **Self-neglect:** A wide range of behaviour; neglecting to care for one's personal hygiene, health or surroundings and includes behaviour, such as: hoarding. This could be also be an indication into a developing mental health condition
- **Sexual abuse:** Is any form of non-consensual sexual contact. Sexual abuse can happen to men or women of any age
- **Mental Health:** Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

- **Child Criminal Exploitation:** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- **Child Sexual Exploitation:** Is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Organisational: Neglect or poor care practice within an institution or specific care setting, such as a hospital or care home

- **Financial and material:** Improper use of an individual's funds, property, or resources by another individual
- **Radicalisation:** Is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups
- **Extremism:** Is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.
- **Discriminatory:** Forms of harassment, slurs or similar treatment because of: race, gender, gender identity, age, disability, sexual orientation or religion
- **Peer on Peer:** This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse, abuse in personal relationships between peers, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence, sexual harassment, upskirting and harmful sexualised behaviour; sexting (also known as youth produced sexual imagery); and initiation/ violence and rituals.

- **Sexual Harassment and Peer-on-Peer Abuse:** If anyone has any concerns over an individual regarding sexual violence or sexual harassment, they must report it to the DSL in the first instance, and in the absence of the DSL this will need to be reported to a member of the Safeguarding team.
- When responding to concerns and/or allegations of peer-on-peer abuse (which includes sexual violence and sexual assault), ATC will consult the relevant Local Safeguarding Children Board (LSCB) for support and practice guidance. ATC adopts a *contextual safeguarding approach in preventing and responding to peer-on-peer abuse, one which focuses on all forms of peer-on-peer abuse and across a range of behaviour.
- Contextual safeguarding is an approach to understanding and responding to children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships.

Online safety

At Asset all staff are aware that technology is a major issue in many safeguarding and wellbeing issues. Staff are also aware that children and young people can be at risk of abuse both online and face to face including abuse by their peers. An online framework was developed called the 3C's to recognise risk. This outlines the risks a child may experience when they are online.

- **Contact**

Social networking sites, chatrooms and phone apps allow people to meet new friends but unfortunately not everyone is who they claim to be. Never give personal information out as this could make you vulnerable to: radicalisation, exploitation, bullying or sexual aggression and harassment. Never feel you need to keep new relationships a secret. A real friendship and/or new relationship would not need to be kept a secret, and there may be a hidden agenda to this, putting you at risk.

- **Conduct**

This behaviour can be by or towards individuals and can include cyberbullying and cyberstalking. Behaviours can also include racism and piracy. When using equipment provided by ATC and or your employer (learner's employer) you have a right to be protected and a duty to behave honestly and responsibly. Never do anything that makes you vulnerable to malicious software or charges of bad behaviour. Incorrect use of equipment including downloading or passing on illegal or inappropriate content can result in the user committing a criminal offence. Any inappropriate act, that offends or harms others, is taken very seriously and will be reported to the police. This is both in and outside of work. Never share information that is considered private and confidential, this could result in dismissal and potential legal ramifications.

- **Content**

This includes downloading information, some of which may be illegal, contain extremist material, and be dishonest or inappropriate. This presents risks to the learner/ staff member and your employer/ training provider if using their equipment. Posting personal information can also pose risks as previously mentioned in the 'contact' category.

Potential data breaches and non-following of data protection law is a big risk in regards to the 'content' of data. This is inclusive of sharing, controlling, processing and even holding/storing data – there needs to be a rationale for the processing, sharing and storing of content/data – this always needs to be considered when collecting information, as does the timeframe for storage along with the security.

Asset always act in the best interest of the children and learners by helping them to feel protected and safe both on and off the premises and follow the guidance as set out in keeping children safe in education 2021.

Children missing in Education

This is about Children who go missing from education on a regular basis which can be a vital warning sign that there is a safeguarding concern. It is important that all staff have regular contact with their learners at least once a month to ensure their safety and to plan teaching and learning sessions for learners to attend. If a learner was not responding to any correspondence with their tutor then Asset staff are trained to follow the correct steps of reporting it to the DSL who will contact learner's emergency contacts. This also applies to learners that don't attend their scheduled classroom learning sessions. The DSL will liaise with the employer to see how they have been in the workplace, contact the learner or their emergency contact to check on their well-being and also the welfare officer will go out and engage with them to ensure they are safe.

Extremism and Radicalisation – Prevent

The Prevent Duty

Section 6 (1) of the Counter-Terrorism and Security Act 2015 imposes a statutory duty on 'specified authorities' when exercising their functions, "to have due regard to the need to prevent people from being drawn into terrorism". Asset are a specified authority.

The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are "to safeguard vulnerable people to stop those becoming terrorists or supporting terrorism".

Asset is fully committed to safeguarding and promoting the welfare of all its staff and learners. Every staff member recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability individuals may face.

Aims and objectives

This policy aims to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. We are committed to ensure our staff are trained to be able to identify safeguarding issues and this policy clearly sets out how we will deal with such incidents and how our ethos underpins our actions, to ensure apprentices/learners and staff are protected.

The objectives are that:

- All governors, senior managers and staff have an understanding of what radicalisation and extremism are and why we need to be vigilant
- All governors, senior managers and staff will be trained and understand our policy on tackling extremism and radicalisation and will follow the guidance promptly when issues arise, such as, extremist views; helping learners and apprentices build resilience against these and ensuring they know how to protect themselves
- All learners will be taught, the broad types of extremism that exist in modern Britain

Staff trained to deal with any issues raised by learners, apprentices or staff.

In accordance with government Prevent strategy Asset use the following accepted governmental definition of extremism which is:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

There is no place for extremist views of any kind within Asset, whether from internal sources; learners and/or staff, or external sources such as community, external agencies, partners or individuals.

Indicators

There are a number of behaviours which may indicate an individual, particularly a young person is at risk of being radicalised or exposed to extreme views. These include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to conform to the group
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of materials or symbols associated with an extremist cause
- Attempts to recruit others to the group/ cause
- Communications with others that suggests identification with a group, cause or ideology
- Using insulting to derogatory names for another group.

Increase in prejudice-related incidents committed by that person – these may include:

- Physical or verbal assault
- Provocative behaviour
- Damage to property
- Derogatory name calling
- Possession of prejudice-related materials
- Prejudice related ridicule or name calling
- Inappropriate forms of address
- Refusal to co-operate
- Attempts to recruit to prejudice-related organisations
- Condoning or supporting violence towards others.

Reporting procedures

It is important for us to be constantly vigilant and remain fully informed about the issues which affect the areas, cities and society in which we deliver work based learning. All staff are reminded to suspend any 'professional disbelief' that radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns to the appropriate external agencies. We believe that it is possible to intervene to protect people who are vulnerable.

Dealing with referrals

We are aware of the potential indicating factors that a learner or a staff member is vulnerable to being radicalised or exposed to extreme views, including peer pressure, influence from other people or the internet, bullying, crime and anti-social behaviour, homelessness vulnerability, family tensions, race/ hate crime, lack of self-esteem or identity, prejudicial behaviour and personal or political grievances the following system will be followed:

All incidents of prejudicial behaviour will be reported directly to the DSL or a representative of the Safeguarding team

All incidents will be fully investigated and recorded in accordance with our safeguarding reporting procedure

Parents/carers (where applicable) will be contacted and the incident discussed in detail, aiming to identify motivating factors, including; any changes in circumstances at home, parental views of the incident and to assess whether the incident is serious enough to warrant a further referral.

All records of the meeting will be kept alongside the initial referral form

The DSL (or a member of the Safeguarding team in their absence) will follow-up four weeks after the incident to assess whether there is a change in behaviour and/or attitude.

A further meeting with parents would be held if there is not a significant positive change in behaviour

All referrals will be handled with due care; stored and processed in line with the GDPR.

If deemed necessary, serious incidents involving children will be discussed and referred to their local children's safeguarding board.

In the event of a referral relating to serious concerns about potential radicalisation or extremism, Asset will also contact a regional Prevent coordinator.

Reporting Modern Slavery

- As with other concerns, modern slavery should be reported to the DSL as soon as possible in the first instance (unless the individual is in immediate danger, then 999 should be called first). The DSL will follow the below:

The Salvation Army and National Referral Mechanism (NRM) processes:

Modern Slavery is a serious crime and includes slavery, servitude, forced or compulsory labour and human trafficking. The NRM is the process by which an individual is identified as a victim of modern slavery. Referral to the NRM can only be made by authorised agencies known as First Responders. The Salvation Army is a First Responder and they have authority to make referrals to the NRM.

- When seeking advice or to refer a potential victim of modern slavery, the DSL will contact:

The Salvation Army 24/7 confidential referral helpline: 0300 303 8151 or

The Home Office Helpline: 0800 0121 700 or

Report online at: www.modernslaveryhelpline.org

If an individual is in immediate danger call 999.

- The government's NRM team have five working days to respond from receiving a referral, to decide if there are reasonable grounds to believe an individual is a potential victim of modern slavery.

Process following NRM decision that an individual is a potential victim:

A place will be offered at a safe house and the individual will be provided with a period of recovery and reflection of a minimum of 45 days

During the 45 day recovery and reflection period care and support is provided by the Salvation Army

The 45 day period can be extended if the individual requires the support of the safe house for a longer period or if the decision making process takes longer

Additional information is obtained, during this time, relating to the referral from the First Responder and other agencies

The NRM team will then decide if the individual is indeed a victim of modern slavery. The decision is targeted to be made within the 45 day recovery period.

For children and young people who are potential victims of trafficking, the DFSL will refer to Local Safeguarding Children's Boards and the NSPCC Child Trafficking Advice Centre on 0808 800 5000.

- It is important to note there may be instances where reporting a suspected trafficking/modern slavery case puts the potential victim at risk. Therefore it is highly critical The Salvation Army, as First Responder is contacted as a priority so they can evoke their legislative duty, reporting to the NRM team and ensures protection of an individual; this also includes children and young people who are potential victims of modern slavery.
- Further information regarding First Responders and NRM processes can be found at:
- <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

Female Genital Mutilation (FGM)

As defined within statutory guidance Keeping Children Safe in Education 2021, under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (teachers is defined within the Act as 'qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions') along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students (learners), but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

The FGM Act 2003 provides the following definition regarding relevant age, 'as the girl's age at the time of the disclosure/identification of FGM (ie it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18)'.

Reporting FGM

Asset asks that all concerns around FGM are reported to the DSL as soon as possible and they will follow the correct protocols as stipulated below.

The FGM Act 2003 places as duty that reports should be made as soon as possible after a case is discovered, best practice is for reports to be made by the close of the next working day unless there is an exceptional reason. For the purpose of continuity and recording purposes.

The FGM Act 2003 defines an exceptional reason as ' a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made'.

Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

In line with the statutory reporting duty, Asset have consulted with the LSCB (Local Safeguarding Children Board) to ensure local arrangements are adhered to. In abiding to LSCB advice, in the event of a disclosure/ discovery of a 'known case' of FGM the following process is to be undertaken:

Disclosure/discovery made by a staff member

Report directly to the DSL or in absence, a member of the Safeguarding team

The DSL (or alternative individual in their absence) will then:

Report to 101 (adhering to the reporting process above)

Report to LSCB

All internal reports will be completed in line with standard safeguarding practice, which will also include when and how the case was reported to the police, the LSCB and the case reference number.

When reporting FGM the girl and her parents/carers/guardians should be contacted in order to explain why a report is being made. It should not be discussed however, if it is of the belief that informing the child/parents of the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country.

The DSL will always seek advice from the police and LSCB before contact is made to a girl and her parents/guardians. Local MASH (Multi Agency Safeguarding Hub) teams can also be contacted for advice regarding FGM.

ATC ensure that all staff are taught about the signs to look out for if a child/young person/vulnerable adult who is a learner, is being neglected or abused before any concerns are made by receiving the correct up-to-date government legislation updates.

This is implemented by:

All relevant staff completing safeguarding and sexual harassment Assets online courses to keep knowledge and understanding current and fresh

Staff receive policy updates with new and current legislation through relevant training once a quarter which ensure that knowledge has embedded in

Asset staff are trained on how to handle reports of harmful sexual behaviour between learners, both on and outside of the provider premises, including criminal exploitation, radicalisation, bullying and when a child goes missing from education and to report any concerns to the DSL.

Responsibilities

All staff must be aware of the processes for reporting concerns about individuals and/ or groups. They must have the confidence to challenge, intervene and ensure that they maintain strong safeguarding practices based on the most up-to-date guidance and best practice.

The DSL (or a member of the Safeguarding team in their absence) will deal promptly with any referrals made by staff or with concerns reported by staff.

They will agree the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed.

As with any child protection referral, staff must be made aware that if they do not agree with a decision not to refer, they can make the referral themselves and will be given the contact details to do this.

Tutors will be fully briefed about what to do if they are concerned about the possibility of radicalisation relating to a learner, or if they need to discuss specific learners whom they consider to be vulnerable to radicalisation or extremist views.

The Safeguarding team will work with external agencies to decide the best course of action to address concerns which arise.

Child Protection

Asset ensure that there is a whole provider approach to safeguarding and child protection by making sure it is at the forefront of all relevant aspects of processes and policy development. This includes any child or learner who may benefit from early help, including learners who have a mental health illness, a young carer, is frequently missing from care or home.

Aim

The aim of child protection is to ensure children and young people are protected from abuse and exploitation by:

Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children have the best outcomes

Providing young people with the appropriate level of safety and protection whilst undertaking training, employment or work experience

Ensuring staff are suitably trained to identify signs and symptoms of abuse, and staff understand the importance of early help

Ensuring staff are fully aware of our safeguarding policies and procedures.

Allowing all staff to make informed and confident responses to specific child protection issues.

Ensuring Asset are able to respond appropriately to allegations made against an adult who works with children or young people, or referring to the local children's safeguarding board.

At Asset, all suspicions, allegations of abuse and poor practice will be taken seriously and responded to promptly and appropriately, in line with early help protocol.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

Protecting children from maltreatment

Preventing impairment of children's health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes.

Early help definition: Providing support as soon as a problem emerges at any point in a child's life, from the foundation years to the teenage years. When considering child protection, it is important that everyone involved have a shared understanding of what it really means. It is unlikely that we will be successful in our efforts, if we do not fully understand what we are protecting children and young people from.

Identification for early help for a Child

As defined within Working Together to Safeguard Children 2021, staff are to be aware of indicators for children who may require early intervention and therefore should be alert to a child who:

Is disabled and has specific additional needs

Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)

Is a young carer

Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups

Is frequently missing/goes missing from care or from home

Is at risk of modern slavery, trafficking or exploitation

Is at risk of being radicalised or exploited

Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

Is misusing drugs or alcohol themselves

Has returned home to their family from care

Is a privately fostered child (Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer).

Parental impacts

It is fundamental that wherever a concern is held for a child or vulnerable adult that confidentiality is respected; however, if the concern must involve the parent/carer for safeguarding reasons then it is good practise to work together. Local safeguarding boards will inform when unsure of involvement.

Safeguarding Children Boards

Local Safeguarding Children Boards (LSCB) have been set up by the local authority and all have strategic roles to play in protecting children.

The role of the LSCB is to: coordinate what is done by everyone on the LSCB to safeguard and promote the welfare of children in the area and make sure that each organisation acts effectively when they are doing this.

Procedures for dealing with child abuse may be different in different local authority areas and Asset will work with each board accordingly.

In adherence with "Keeping children safe in education, 2021", Asset will obey to all five parts of the legislation which are:

Part 1: Safeguarding information for all staff

Part 2: The management of safeguarding

Part 3: Safer recruitment

Part 4: Allegations made against teachers and other staff

Part 5: Child on child sexual violence and sexual harassment

Mental Capacity Act

This policy also adheres to the Mental Capacity Act 2005 (MCA) which provides a statutory framework for individuals who lack capacity to make decisions for themselves or who have the capacity and want to make preparations for the future, should they lack the capacity later in their life. The underpinning concept of the Act is to ensure individuals who lack capacity are the focus of any decisions made, or actions taken on their behalf. It requires an individualistic, person centred approach signifying the interests of the person, not the views or requirements of those caring for and supporting the individual.

The Act is supported by a Code of Practice; to be used as a guide for those working with and/or supporting young people and adults who may lack the capacity to make certain decisions. All involved within supporting individuals who may lack capacity are to follow the guidance within the Codes of Practice; if the Codes of Practice are not adhered to, staff will be expected to provide justifiable reasoning as to why. This can lead to staff being held accountable for non-compliance in a court of law, tribunal or via an abuse investigation (the Codes of Practice can be located at:

Mental Capacity Act Code of Practice - GOV.UK (www.gov.uk)

Under the MCA, ill treatment or wilful neglect of a person who lacks capacity, is a criminal offence. In the result of a conviction; individuals may be served a custodial sentence or be fined.

Learner Entitlement

Learners are entitled to:

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with appropriately in line with our policies and procedures
- The right to process an allegation against a Asset representative following the allegation procedure
- Learn in an environment free from bullying or harassment
- Be made aware of some of the basic principles of safer learning and safeguarding relevant to the programme they are completing
- Be made aware of how to access support on personal issues from within Asset or from outside agencies to receive the right help at the right time to address risks and prevent issues escalating
- Be provided with up-to-date information for issues relating to Health and Safety, safeguarding and equality and diversity
- To the opportunity to provide feedback on how they feel Asset promotes and maintains wellbeing and personal safety
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment
- Be offered free online training covering radicalisation and extremism, British values, sexual harassment and e-safety.

Local Authority Designated Officer (LADO)

Section 11 of the Children Act 2004 places duties on a range of organisations, agencies and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

Chapter 2 of "Working Together 2018" provides that county level and unitary local authorities should have a Local Authority Designated Officer (LADO) to be involved in the management and oversight of individual cases. The LADO should provide advice and guidance to ATC, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO should be informed within one working day of all allegations that come to Asset attention or that are made directly to the police.

The LADO is located within the Local Safeguarding Children Board and should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against children, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The LADO role applies to any person who works with children in a paid or unpaid capacity, this can be direct staff members, volunteers, casual or agency staff, or anyone self-employed.

The LADO is responsible for considering concerns, allegations or offences emanating from within or outside of work.

Safer Recruitment

Aims

Asset recognise that our staff are our single most valuable resource. The recruitment of the right personnel for the needs of the organisation is therefore of paramount concern and should be achieved within a policy framework that recognises the importance of this area.

Asset is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff to share this commitment. Asset also recognises its staff as being fundamental to its success. A strategic and professional approach to recruitment processes help enable the organisation to attract and appoint staff with the necessary skills and attributes to fulfil its strategic aims values. As an organisation, Asset implores all staff to embrace and adhere to the vision and values as set out throughout the organisation.

Achieving this objective requires systems designed to:

- Prevent unsuitable people working with young people and vulnerable adults
- Promote safe practice and challenge poor or unsafe practice
- Identify instances in which there are grounds for concern about a young person or vulnerable adults' welfare, and initiate or take appropriate action to keep them safe; and contribute to effective partnerships with agencies providing services for young people and vulnerable adults.

One of the main purposes of this policy is to ensure that all recruitment and employment decisions follow a standard process which is a fair, rigorous, consistent, transparent and a legitimate assessment of whether an individual should be prevented from working with children and young people/or vulnerable adults. It aims to ensure that people who work, apply to work and/or are associated with for Asset are not discriminated against.

Statement

Safe recruitment is central to the safeguarding of children and young people. All organisations which employ staff or volunteers to work with children and young people have a duty to safeguard and promote their welfare. This includes ensuring that the organisation adopts safe recruitment and selection procedures which prevent unsuitable persons from gaining access to children.

Asset provide adequate and appropriate staffing resources and training to meet the needs of learners.

All staff are informed that their job falls under the DBS requirements for an enhanced check under section 128 of the Education Skills Act 2008; those in management roles need to have an additional check to ensure they are not prohibited from teaching. This is in addition to the DBS check.

There are 3 types of checks:

- Standard - this checks for spent and unspent convictions, cautions, reprimands and final warnings
- Enhanced - this includes the same as the standard check, plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (adult, child or other workforce)
- Enhanced with list checks - this is like the enhanced check, but includes a check of the DBS barred lists.

Asset always ensure the safe recruitment of staff by carefully selecting the right candidates and ensuring all staff complete enhanced DBS checks. Any issues or concerns would be reported to LADO and followed through by the DSL. Asset also manage allegations about adults who may be a risk to children and vulnerable adults by following the correct procedures and referrals process.

All staff have access to a copy of Keeping Children Safe in Education 2021

During the first week of employment, newly appointed staff will commence the Asset Induction programme and will commence a 6-month probation period. A robust induction into the safeguarding of children, young people and adults at risk procedures is provided when they join the organisation, this includes mandatory reading of the internal and external policies and e-learning modules.

Probation is a period of both professional development and review. It provides a fair opportunity for a staff member to understand the organisation, the standard of performance required and to be given the guidance and support needed to be effective in his or her new role. It also allows the manager of the newly appointed staff member to assess objectively whether the new recruit is suitable for the role, taking into account the individual's overall capability, skills, performance and general conduct in relation to the job in question.

We ensure that all staff are made aware of the standards expected of them and implements the appropriate support, training feedback to achieve these standards. When supporting and working with our employers and also partners, we endeavour to give guidance and recommendations to those that request/need support on recruiting suitable people.

Teaching, Learning and Assessment

Staff and learners are informed about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are. Asset ensure that the safety and welfare of learners is paramount and that safeguarding procedures remain effective for those who are receiving remote education and those in self-isolation, as well as those attending face-to-face sessions and that vulnerable learners are prioritised for face-to-face education

Learners complete core modules on Assets online learning to aid them with awareness and knowledge in regards to these areas. At present, learners complete modules on equality and diversity, prevent, nutrition, safeguarding, mental health and sexual harassment in the workplace.

Asset always act in the best interest of the learners by teaching them about sexual harassment including peer-on-peer abuse and that all harmful sexual behaviour is unacceptable.

This is implemented by ensuring:

- Learners complete the safeguarding and sexual harassment Asset online courses to keep knowledge and understanding fresh and up-to-date
- Learners receive a monthly bulletin which gives information about how to report any safeguarding issues or concerns, as well as local, national and international news to help keep them aware of what is going on around the world and closer to home
- That during classroom taught session, learners are taught about the importance of reporting concerns about sexual harassment and violence and online sexual abuse to their tutor or to the DSL because this kind of behaviour is unacceptable
- It is made clear to learners that Asset guarantee that all concerns are taken seriously and dealt with swiftly, appropriately and in a timely manner, including next steps so that learners fully understand what will happen. Asset also ensures that any concerns or safeguarding issues are recorded and records are kept up-to-date with the relevant ongoing information. Information is always kept confidential and stored securely.

Asset have updated and adapted the curriculum to successfully deliver relationships, sex and health education (RHSE) sessions to ensure that learners gain a more thorough knowledge and understanding about healthy relationships, consent and being safe.

Training, Supervision and Support

Once an individual has been recruited, they need to be adequately trained and supervised to ensure that any risks to learners are minimised. This aim will be achieved by:

- All staff undertaking basic safeguarding training and continuously updating their awareness of social issues via a robust CPD programme
- All staff are informed about the Safeguarding policy (encompassing child protection), and given the opportunity to discuss its implications for them with both their line manager and/or the Safeguarding team as part of their induction
- Not allowing staff to work alone with a young person somewhere which is isolated or where they cannot be observed. It is acceptable for staff to work alone with a young person where there are visibility panels/ windows in doors
- Supervising all learner activities. All learning activities will be completed by a qualified and eligible member of staff. They should always be trained with the necessary skills and qualifications for the work/ role undertaken. All checks must be cleared before any work with young people is approved
- Where Asset arranges a placement for a young person they should never be left unsupervised throughout the duration
- No training or placement is undertaken with young people without written permission of their parents/carers
- Staff should be informed about all policies in relation to the use of technology (such as: computers and mobile phones), and understand that they must not use this technology for the purpose of accessing, producing or distributing any information or violent or sexual images that are harmful to children. This includes adult pornography
- When working with subcontractors ask for information on how the organisation works to protect young people (such as their policy on child protection)
- Through organisational team meetings, and ongoing resources from the DSL, we will ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; that they are aware of the process of radicalisation and how this might be identified and are aware of how we can provide support as both an employer and training provider to ensure that our learners and staff are resilient and able to resist involvement in radical or extreme activities.

Reporting Procedures and Protocols

Protection Procedure

Alerting or raising a concern about abuse means:

- Recognising signs of abuse or ongoing bad practice.
- Responding to a disclosure.
- Reporting a concern, allegation or disclosure.
- Working strictly in accordance with anti-discriminatory practice.

If any of the above applies, remember, you are:

- Not being asked to prove or verify that information is true
- Required to record your concerns and report them to your manager (Only the police have the responsibility to establish whether a criminal offence has been committed)

You will not be criticised at any point for following this procedure.

If you raise a concern about any organisation or individual and you are acting in good faith, you will be supported regardless of the outcome of the investigation.

Failure to report a concern, allegation or disclosure will be regarded as colluding with the abuse and may result in any or all of the following:

- Criticism of practice
- Disciplinary action
- Suspension
- Dismissal.

Individuals will be expected to co-operate with any investigation and may be required to provide a statement, attend a strategy meeting or a police interview.

DBS Disclosure Policy and Procedure

Asset adhere to strict government legislation following the procedures as outlined by the Disclosure and Barring Service (DBS) which states:

- Any person who is barred from working with children and vulnerable adults is breaking the law if they work or volunteer, or try to work or volunteer with those groups. An organisation which knowingly employs someone who is barred to work with these groups will also be breaking the law
- Asset abide by the legislative requirements (as stated by DBS) that if we (an organisation) work with children, young people or vulnerable adults and dismiss a member of staff because they have harmed a child, young person or vulnerable adult, or would have done so if they had not left, will by law inform the Disclosure and Barring Service (DBS)

In the instance of a disclosure that **does not involve a person barred** with said groups the following process will be adhered to:

- The DSL will be notified immediately
- DSL will liaise with the MD and hiring manager, to confidentially discuss the issues raised
- The MD/hiring manager/DSL will confidentially discuss with the individual the issues raised.
- A confidential record of discussion will be kept and held securely
- The situation will be monitored on an on-going basis for a reasonable period of time as advised and arranged by the hiring manager
- In the result of an incident in relation to the individual, the staff disciplinary procedure will be implemented by hiring manager to address the incident/issues
- The hiring manager and in consultation with the MD, will be responsible for all matters relating to disclosure issues and any subsequent suspension or termination of contract relating to the individuals(s) employment at Asset.

Reporting and Dealing with Allegations of Abuse against Members of Staff

Asset recognise that an allegation of abuse made against a member of staff may be made for a variety of reasons and the facts of the allegation may or may not be true. Therefore, when dealing with an allegation, it is imperative that an open mind is maintained and the investigations are thorough and not subject to delay.

We recognise:

- The welfare of the individual is the paramount concern
- Making hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the organisation will do so with sensitivity and will act in a careful, measured way.

If a member of staff has behaved inappropriately but does not meet the threshold for a referral to the LADO then the SMT will talk to the individual and explain why the behaviour is unacceptable and goes against company policy. The DSL will then retrain staff on company policies and safeguarding to ensure that they have a balanced approach for their learners and in their teaching and learning sessions.

If an allegation is made or there is a concern that a member of staff is abusing a learner or another adult, this must be discussed immediately with the DSL.

Receiving an allegation from a child, young person or vulnerable adult

A member of staff who receives an allegation about another member of staff should report the allegation immediately to DSL, who will raise with SMT, unless the person whom the allegation is made is a member of SMT. In this case, the DSL would raise solely with the MD.

The DSL should obtain written details of the allegation from the person who received it; this must be signed and dated. Then written details should be countersigned and dated by the DSL.

Information should be recorded on: times, dates, locations and names of potential witnesses.

Initial Assessment by the DSL

The DSL should make an initial assessment of the allegation, consulting with SMT.

Where the allegation is considered to be either a potential criminal act or indicates that the young person/vulnerable adult has suffered, is suffering or is likely to suffer **significant harm**, the matter should be reported immediately to the police/social services.

All allegations against people who work with children, young people and/or vulnerable adults which meet the below specific criteria should be reported within one working day to the Local Authority Designated Officer (LADO):

- Staff who have behaved in a way that has harmed a child, young person or vulnerable adult
- Staff who have possibly committed a criminal offence related to a child, young person or vulnerable adult
- Staff who have behaved towards a child/children, young person/s and vulnerable adult/s in a way that indicates that they are unsuitable to work with children.

It is important that the DSL does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime or a cause of significant harm to the child, young person or vulnerable adult. The matter therefore will be addressed in accordance with internal disciplinary procedures.

Enquiries and investigations

Asset shall hold its own internal enquires while the formal police or social services investigations proceed. Any internal enquiries shall conform to the existing staff disciplinary procedures which would be a risk assessment against the harm test. If a member of staff posed a risk of harm to children or young people then the alleged member of staff would be suspended without pay. If the member of staff did not meet the threshold for the harm test then Asset would refer to SMT.

Asset shall hold its own internal enquires while the formal police or social services investigations proceed. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example, the police, the DSL or member of SMT may be involved in and contribute to investigatory discussions.

The DSL is responsible for ensuring that the organisation provides every assistance with the agencies enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries in the interests of the member of staff about whom the allegation is made. The DSL or member of SMT shall advise the member of staff that they should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the DSL (or member of SMT shall):

- Inform the individual making the allegation that the investigation is taking place and what the likely process will involve
- Ensure the parents/carers of the child, young person/vulnerable adult making the allegation have been informed that an allegation has been made and inform of the process involved
- Inform the member of staff against whom the allegation was made of the fact an investigation is taking place and advised what the likely process will involve
- Inform SMT (if this has not been undertaken) of the allegation and the investigation
- Keep a written record of the action taken in connection with the allegation.

Suspensions of staff

Suspensions should not be automatic. In respect of staff, suspension can only be carried out by SMT.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of or withdrawal from specified duties.

Suspensions should only occur for a good reason: For example:

- Where a child, young person/vulnerable adult is at risk
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of misconduct
- Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example a trade union.

Prior to making the decision to suspend, the SMT should interview the member of staff. This should occur with the approval of the appropriate agency, if the police are engaged in an investigation, the officer in charge of the case should be consulted.

The member of staff should be advised to seek advice and/or assistance of their trade union (if any) and should be informed that they have the right to be accompanied by a friend/person of their choice.

The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be provided with as much information as possible, in particular the reasons for any proposed suspension, provided that in doing so, it does not interfere with the investigation into the allegation.

The interview is not intended to establish the member of staff's innocence or guilt but to provide the opportunity for the member of staff to make representations about possible suspensions. The member of staff should be given the opportunity to consider any information given to them at the meeting and prepare a response

If SMT considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation of the suspension with reasons shall be despatched as soon as possible, ideally within one working day.

The parents/carers of the child, young person or vulnerable adult making the allegation should be informed of the suspension. They should be asked to treat the information as confidential

SMT/the DSL shall consider carefully and review the decisions as to who is informed of the suspension and investigation. External investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.

The suspension will remain under review in accordance with internal disciplinary procedures

Disciplinary investigation

The disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

The member of staff will be informed of:

- The disciplinary charge against them
- Their entitlement to be accompanied or represented by a trade union or a friend.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The individual making the allegation and /or their parents and carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return of the member of staff if suspension has occurred.

Consideration to what information should be made available to the general population of the centre will be made by SMT.

Allegations without foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given for a referral to be made to external safeguarding authorities so they may act upon it.

Further to this:

- The member of staff against whom the allegation is made is to be informed orally and in writing that no further disciplinary or child protection action will be taken. It may be appropriate to offer counselling
- The parents/carers of the alleged victim are to be informed that the allegation has no foundation and advise of the outcome
- A report is to be prepared outlining the allegation and giving reasons for the conclusion that the allegation had no foundation and confirming the above action has been taken.

Monitoring effectiveness

When an allegation has been made against a member of staff, at the conclusion of the investigation and any disciplinary procedures, consideration will be given to any improvements required in Asset, including the training needs of staff.

Relevant Policies and Procedures

This policy works in conjunction with the following policies and procedures:

Relevant policies and documents:

- E-Safety
- Prevent; Extremism and Radicalisation
- Recruitment, Fair and Safe Selection
- Slavery and Human Trafficking
- Safeguarding Code of Conduct (for staff)
- Safeguarding Behaviours, Attitudes and Code of Conduct (for learners)
- Asset Definitions and Signs of Abuse Guide
- Dealing with a Safeguarding Concern DSL (process)
- Raising a Safeguarding Concern – Staff (process)
- Raising a Safeguarding Concern – Learners (process)
- Working Together to Safeguard (process)

Appendix A - Safeguarding contact numbers for advice and referral
In an emergency call 999.

| Liverpool City Region Local Safeguarding Children's Boards | | |
|---|---|--|
| Name | Number | Out of hours number |
| Liverpool Safeguarding Children's Board | 0151 233 3700 (Careline) | 0151 233 3700 |
| Sefton Safeguarding Children's Board | 0345 140 0845 | 0151 934 3555 |
| Wirral Safeguarding Children's Board | 0151 606 2008 | 0151 677 6557 |
| St Helens Safeguarding Children's Board | 01744 676 600 | 0345 050 0148 |
| Knowlsey Safeguarding Children's Board | 0151 443 2600 (MASH team) | 0151 443 2600 |
| Liverpool City Region Local Safeguarding Adults Boards | | |
| Name | Number | Out of hours number |
| Liverpool Safeguarding Adults Board | 0151 233 3800 (Careline) | 0151 233 3800 |
| Sefton Safeguarding Adults Board | 0845 140 0845 | 0151 920 823 |
| Wirral Safeguarding Adults Board | 0151 514 2222 | 0151 677 6557 |
| St Helens Safeguarding Adults Board | 01744 676 600 | 0345 050 0148 or 0845 050 0148 |
| Knowlsey Safeguarding Adults Board | 0151 443 2600 | 0151 443 2600 |
| Area Wide Local Safeguarding Boards | | |
| Name | Number | Out of hours number |
| Halton Local Safeguarding Children Board (covering Widnes and Runcorn) | 0151 907 8305 | 0345 050 0148: LADO: 0151 511 7229 |
| Halton Local Safeguarding Adults Board (covering Widnes and Runcorn) | 0151 907 8306 | 0345 050 0148 |
| West Cheshire Local Safeguarding Children Board (covering Ellesmere Port) | 0300 123 7034 | 01244 977 277 |
| West Cheshire Local Safeguarding Adult Board (covering Ellesmere Port): | 0300 123 7034 (Gateway team) | 01244 977 277: General enquiries: 0300 123 8 123 |
| Northumberland Local Safeguarding Children Board: | Children's team: 01670 536 400 14+ team: 01670 622 930 | 0345 600 5252 |
| Northumberland Local Safeguarding Adults Team | 01670 536 400 | 0345 600 5252 |
| Local Authority (HSC)/ Public Services Safeguarding Teams | | |
| Careline: | 0151 233 3800 (Adults) | |
| Careline: | 0151 233 3700 (Children and Young People) | |
| Merseyside Police: | 0151 709 6010 or 101 or 999 in an emergency. | |

| Modern Slavery | |
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| The Salvation Army: | 0300 303 8151 |
| The Home Office Helpline: | 0800 0121 700 |
| Report online at: | www.modernslaveryhelpline.org |
| NSPCC Child Trafficking Advice Centre: | 0808 800 5000 |
| Call 999 in an emergency | |
| Prevent and Channel Referrals | |
| Merseyside PREVENT Team: | 0151 777 8506 |
| Email: | prevent@merseyside.police.uk or msoc.prevent@merseysidepolice.uk |
| Careline: | 0151 233 3700 (Children and Young People) and 0151 233 3800 (Adults) (Contact Careline for PREVENT & CHANNEL referrals) |
| MASH team Liverpool (Children and Young People) (PREVENT & CHANNEL referrals) | 0151 233 2273 |
| Female Genital Mutilation (FNG) | |
| NSPCC FGM helpline: | 0800 028 3550 |
| Merseyside Police: | 101 |
| Childline: | 0800 1111 |
| Savera Liverpool: | 0800 107 0726 / info@saverauk.co.uk |
| Honour Based Violence | |
| Merseyside Police: | 101 |
| Karma Nirvana: | 0800 5999 247 (Lines open 9:30am to 5pm) |
| Savera Liverpool: | 0800 107 0726 |
| Forced Marriage | |
| Forced Marriage Unit: | 0207 008 0151 / fmu@fco.gov.uk |
| Freedom Charity: | 0845 607 0133 |
| Childline: | 0800 1111 |
| NSPCC: | 0808 800500 |
| Savera Liverpool: | 0800 107 0726 |
| Hate Crime | |
| Stop Hate UK: | 0800 138 1625 |
| For practical advice and support call: | 101 and ask to speak to your local hate crime team |
| Crimestoppers: | 0800 555 111 |
| CSE Guidance | |
| www.ceop.police.uk/safety-centre | |
| www.saferinternet.org.uk | |
| www.nationalworkingtogethergroup.org | |
| www.safeguardingchildren.co.uk | |
| Or contact Missing People: 116 000 | |



Safeguarding draft for consultation 2022

- ATC understand the importance that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in that way. ATC are conscious of this when managing any incident and use a term with which the individual child, young person or adult is most comfortable with. And where a child is suffering or likely to suffer from harm a referral will be to the local authority children's social care immediately.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognize their experiences as harmful. All staff at ATC are able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are made to feel ashamed for making a report.
- Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. At ATC all staff are aware that technology is a significant component in many safeguarding and wellbeing issues and regularly teach children, young people and adults about the importance of staying safe online through Teacher led sessions.
- At ATC all staff are aware of indicators of abuse and neglect through ongoing staff training and understand that children can be at risk of harm inside and outside of the premises. This includes exploitation like extra-familial harms like sexual abuse, domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalization.
- Abuse – harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others like domestic abuse.
- Child on child abuse – at ATC all staff are aware that children can abuse other children and that it can happen both online and offline and on and off the premises. This includes bullying, teenage relationship abuse, physical abuse, sexual violence, sexual harassment, sharing of nude or semi-nude images upskirting and initiating/hazing type violence and rituals. This kind of

behavior is not accepted at ATC and all learners are taught through teacher led sessions to keep themselves safe using technology and also in everyday life with news updates through our bulletins.

- Sexual violence – at ATC we have a zero tolerance approach to sexual violence and sexual harassment and it will not be tolerated. This includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent. Staff at ATC receive safeguarding training once a quarter to keep their skills and knowledge fresh and up to date so they can recognize signs and also help support and advise our learners.
- Domestic abuse – domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. ATC understand that children can also be victims of domestic abuse as they could see, hear or experience the effects of this kind of abuse at home or in their own personal relationships. Any concern about a child/children, young person or vulnerable adult must be reported to DSL as per allegations procedure.
- ATC staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professional should attempt to make a diagnosis of a mental health problem. ATC staff, however, are well placed to observe children, young people and vulnerable adults day to day and identify those whose behavior suggests that they may be experiencing mental health problem or be at risk of developing one. ATC support our learners through different mental health sessions and catch ups with our mental health advocate to ensure health and well-being.
- ATC are aware of the indicators, which may signal children are at risk from, or are involved with, serious violence crime. These may include increased absence from school or college, 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 children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. ATC staff regularly attend safeguarding training to keep their knowledge and skills fresh to ensure that they can keep our learners safe against serious violent crimes. Learners are also taught through teaching and learning sessions about how to keep themselves safe and protected and also a bulletin goes out to each learner about local crime so they have a knowledge of what is going on around them.
- At ATC if early help is appropriate, the designated safeguarding lead will generally lead on liaising with parents, other agencies and setting up an inter-agency assessment as appropriate. This includes supporting other agencies and professionals in an early help assessment to ensure the safety and well-being of our learners. Alongside this is working with outside agencies to help and support the alleged perpetrator whilst following our own policies and procedures.

- If there was an allegation made about another member of staff posing as a risk of harm to children then this must be reported to the DSL. The allegations no matter how small would be dealt with through ATC policy and procedures or reported directly to the LADO.
- Equality – at ATC our learners are considered our most prized asset and we value their independence and characteristics like sexual orientation, gender reassignment and race. This is supported through our enrichment teaching sessions and through the welfare team. ATC also have a whole training provider approach on preventative education through teaching sessions on life in modern Britain, boundaries and consent, healthy relationships, consent, equality and sexual harassment. This is so our learners have an understanding of their worth and how to keep themselves safe.