



Safeguarding Children, Young People and Vulnerable Adults Policy

Area: Safeguarding

VERSION 2.0 Effective September 2018

Safeguarding Children, Young People and Vulnerable Adults Policy

Policy Statement:

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

1.2 This policy has been developed in accordance with the principles established by the Children Act 1989 2004; the Education Act 2002 and in line with government publications. [Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting welfare of children].

1.3 This policy is in line with statutory guidance for schools; colleges and further education; Keeping Child Safe in Education (2018), Working Together to Safeguard Children (2018), London Child Protection Procedures (5th Edition), 'What to do if You are Worried a Child and Being Abused' 2015.

1.4 There are five main elements to our policy:

1. Ensuring that we operate safer recruitment practices in accordance with the legislative document: Safer Recruitment and Safeguarding Children in Education (2011).
2. Raising awareness of safeguarding throughout the organisation and ensuring staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.
3. Raising awareness of safeguarding to all our learners and ensuring that learners who are the most vulnerable are equipped with the skills and knowledge to keep them safe.
4. Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse.
5. Establishing safe environments in which vulnerable groups can learn and develop.

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

1. Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to.

2. Ensure learners know that there are designated staff within Apprenticeship Connect whom they can approach if they are concerned or worried.
3. Include opportunities within our ongoing teaching, learning and assessment for learners to develop the skills they need to recognise and stay safe from abuse.

We recognise and adhere to the statutory requirements within the following important and relevant pieces of safeguarding legislation;

- Working Together to Safeguard Children (2015)
- Children's Act (1989, 2004)
- Safeguarding Children and Safer Recruitment in Education (2011)
- Safeguarding Vulnerable Groups Act SVGA (2006)
- Protection of Freedoms Act (2012)
- Disclosure and Barring Services Code of Practice (2015)
- Sexual offences Act (2003)
- Every Child Matters (2004)
- Equality Act (2010)

1.5 To support our commitment to the safeguarding and well-being of all our learners with regard to the above legislation we will;

1. Ensure that we have a Designated Person for Safeguarding who has received appropriate training and support for this role. The Designated Person for Safeguarding is Elaine Holt (Designated Safeguarding Officer). Other staff members with specific responsibilities for safeguarding is Deborah Evans (Deputy Safeguarding Officer) and Rafiq Adebambo (Board Safeguarding Representative).
2. Ensure that all staff are aware and understand their responsibilities in relation to safeguarding, being alert of the signs and indicators of abuse, and for referring any concerns directly to the Designated Person for Safeguarding.
3. Ensure that effective safeguarding procedures are developed and implemented and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of Recognition, Response, Record, Report, Refer.
4. Ensure that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters.
5. Ensure that we keep written records of any safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
6. Ensure all records are stored securely and in accordance with the Data Protection Act 2018.

Apprenticeship Connect recognises its responsibility with regard to the safeguarding of young and vulnerable learners from abuse and from inappropriate and inadequate care, and is committed to responding in all cases where there is concern. Due to the nature of our work, Apprenticeship Connect may be in the front line of work with some children, young learners, vulnerable learners and vulnerable adults. This may mean we are the first to know a child, young or vulnerable learner or adult is being, or has been, abused or that we are concerned about a person's well-being. Everyone has an equal responsibility to ensure that individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests with The Board, management team and Designated Person but also with every individual member of staff employed or volunteering within our organisation whilst at work, at an employer's premises or at home.

2. Understanding Safeguarding

2.1 Safeguarding is a proactive process of protecting and ensuring the safety and well-being of young and vulnerable learners.

2.2 Safeguarding may involve instances in which a young or vulnerable learner is suffering or likely to suffer from harm.

2.3 Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with children of vulnerable adults.

2.4 The benefits of effective safeguarding include;

- Learners are appropriately protected and all issues are dealt with effectively
- Staff are clear about individual responsibilities, roles and boundaries
- Staff are protected from malicious and misplaced allegations
- Learners can rely on those in positions of trust
- When learners feel safe and secure they can concentrate on learning

2.5 How do we define young/vulnerable learners?

- Young Learners are defined as any learner who has not yet reached their 18th birthday (Children's Act 1989, 2004)
- The Safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving these activities. The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies that activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at the particular time.

- An adult is a person aged 18 years and over. There are six categories within the definition of regulated activity;
 1. Health care
 2. Personal care
 3. Providing social work
 4. Assistance with general household matters
 5. Assistance in the conduct of a person's own affairs
 6. Conveying

Apprenticeship Connect recognises that, in the context of safeguarding learners, any adult can be subject to abuse and they do not have to be 'vulnerable' as defined by the Act in order for Apprenticeship Connect's safeguarding procedures to be implemented.

2.6 Definition and Types of Abuse or Neglect

'Child abuse and neglect' is a generic term encompassing all ill-treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the person's health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young or vulnerable learners may be abused in the family or an institution or community setting by those known to them or, more rarely, by a stranger. Further, an adult or adults or another child or children may abuse them.

Working Together to Safeguard Children (2013) sets out definitions and examples of the four broad categories of abuse:

1. **Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately includes illness.
2. **Emotional Abuse** is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effect on his or her emotional development. It may involve conveying to a child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child or person concerned. It may involve causing that child or person to feel frightened, in danger, exploited or corrupted. Emotional or other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.
3. **Sexual Abuse** involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware it is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving children or vulnerable adults in looking at, or the production of, pornographic material, watching sexual activities

or encouraging them to behave in inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images.

4. **Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.

2.7 In respect to vulnerable adults, Apprenticeship Connect recognises a further three signs of abuse:

1. **Financial Abuse** is defined as the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or deception; or the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and any unreasonable restriction on a person's right to control over their lives to the best of their ability.
2. **Discriminatory Abuse** is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation or marital status.
3. **Institutional Abuse** is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of providers rather than the persons acquiring the service.

2.8 The grooming of children and young people for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed when there are concerns that a child or young person is at risk of additional types of abuse and unsafe activities which we recognise and have become more prevalent in recent times are:

- Bullying and harassment
- Discriminatory abuse
- Financial abuse
- Domestic abuse
- Alcohol and drugs
- Crime
- Cyber bullying

2.9 Signs and indicators of possible abuse

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, there are a number of possible indicators. However, there may also be a perfectly reasonable explanation so it is important to remain vigilant but not overzealous or jump to conclusions. There may also be no signs or indicators of abuse, however this does not mean that a report of abuse is false.

2.10 Suggested signs of abuse are detailed in Appendix 1 to this document.

3. Prevent and Safeguarding Guidance

3.1 The grooming of children, young people and vulnerable adults for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed where there are concerns that a child or young person is at risk of radicalisation or has already been radicalised.

3.2 The Government defines extremism as ‘vocal or active opposition to fundamental British Values including democracy, respect and tolerance of different faiths and beliefs.’ Also included in the definition of extremism is calling for death of a family member of the armed forces.

3.3 Radicalisation is the process by which people come to support terrorism and violent extremism and, in some cases, then participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism, or a single indicator of when a person may support or adopt extremist ideas. Possible indicators that a person is at risk of being or has been radicalised can be found in Appendix A.

3.4 Children, young people and vulnerable adults can be exposed to harmful, extremist ideology in the immediate family through the impact of extreme beliefs held by family members including parents/carers or relatives/family friends who live outside the family home but have an influence over the child's life. Older children or young people might be radicalised over the internet.

3.5 The Government's strategy to reduce the risk from terrorism identifies the need not only to stop terrorist attacks, but also prevent people from becoming terrorists. The Government's strategy for countering international terrorism is CONSENT and the Prevent strategy forms part of this.

3.6 Prevent addresses all forms of terrorism and non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. The Prevent strategy makes clear that preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups.

Work to safeguard children and adults, including the provision of early intervention to protect and divert people away from being drawn into terrorist activity is central to the Prevent strategy.

3.7 Staff who observe any behaviour, who hear, or are told anything significant by a child, young person or others, must report their concerns to the designated named safeguarding person(s).

3.8 If Apprenticeship Connect has any significant concerns about a learner, or others beginning to support terrorism and /or violent extremism, it is required to discuss them with the local police so they can be part of further work to address the issues.

3.9 Apprenticeship Connect works to the Prevent element of the Government's Counter-Terrorism Strategy, and where deemed appropriate, seeks external support through referrals to the Channel Programme.

Channel provides a mechanism for assessing and supporting people who may be targeted by violent extremists or drawn into violent extremism. Channel use existing collaboration between local authorities, the police, statutory partners and the local community to:

1. Identify individuals at risk of been drawn into violent extremism
2. Assess the nature and extent of the risk
3. Develop the most appropriate support for the individual concerned

4. Female Genital Mutilation

4.1 Female Genital Mutilation is a form of child abuse and is such dealt with under the Providers Safeguarding Children, Young People and Vulnerable Adults Policy. At Apprenticeship Connect, The Board expect safeguarding to be everybody's responsibility and expect all staff to adhere to and follow these policies.

4.2 The World Health Organisation defines FGM as below:

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

4.3 Apprenticeship Connect have taken information from several documents including the Government Home Office guidelines and the Ofsted Guidelines for "Inspecting Safeguarding"

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

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation and the child's right to life, their right to their bodily integrity, as well as their right to health. The UK government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the child"

"UK communities that are most at risk of FGM includes Kenyans, Somalis, Sunanese, Sierra Leoneans, Egyptians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani Women"

4.5 Indications that a child or young person is at risk of FGM:

1. The family come from a community that is known to practice FGM
2. In conversation, a child or young person may talk about FGM
3. The child or young person may express anxiety about a special ceremony
4. A child or young person may talk or have anxieties about forthcoming holidays to their country of origin

4.6 Where Apprenticeship Connect have any concerns that a child or young person is at risk of Female Genital Mutilation then we refer to local councils for advice.

4.7 Where a child or young person discloses that they are victims, or may be victim of FGM, Apprenticeship Connect's procedure for reporting suspected abuse to children, young peoples and vulnerable adults is followed.

5. Children Missing in Education

5.1 The London Child Protection Procedures define a child as missing if their whereabouts are unknown, whatever the circumstances of their disappearance. Sometimes children stay out longer than agreed as a boundary testing activity. These children have taken unauthorised absence, and would not usually come within the definition of missing.

5.2 According to police figures, around 360,000 children/young people run away each year, although the real number is likely to be more, as not all cases are recorded. Children looked after are three times more likely to run away than other children.

5.3 The child/young person may be missing from care or home because they are suffering physical, sexual or emotional abuse and/or neglect. Children/young people who go missing may be victims of sexual exploitation and trafficking. In addition, young people who are missing may be fleeing forced marriage or 'honour' based violence.

5.4 Many of these young people stay with friends or family members, but some do not have access to support and could be at risk of significant harm through physical or sexual abuse. They may end up in potentially harmful situations including sleeping rough.

5.5 Children/young people missing from education are also at risk of harm.

5.6 Apprenticeship Connect has drawn up this policy to deal with children or young people who miss training in these circumstances, particularly on repeat occasions and for these children and young people who leave their training programme without clear indications of where they will be continuing their education.

5.7 Apprenticeship Connect have taken information from the DfE guidance including Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges 2018.

5.8 Apprenticeship Connect recognises that the high majority of all training takes place of site at an Employers premises and it is recognised that there may be occasion when a child or young person will need to cancel an appointment. This policy covers those instances of absence where:

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

In these instances, Apprenticeship Connect's safeguarding officer or deputy safeguarding officer should be consulted. Where a child or young person is deemed to be at risk, Apprenticeship Connect's procedure for reporting suspected abuse to children, young people and vulnerable adults is followed.

6. Sexting

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

6.2 If you have a report (or you suspect) a sexting incident remember that intimate images are typically considered to be illegal images which is why incidents need very careful management for all those involved.

6.3 Apprenticeship Connect's policy is for all members of staff to report any suspected cases, or cases of sexting to Apprenticeship Connect's Designated Safeguarding Officer.

6.4 Apprenticeship Connect's Designated Safeguarding Officer will record all incidents of sexting. This includes actions that are taken and actions that are not taken, together with justifications.

7. Child Sexual Exploitation (CSE)

7.1 Child exploitation is a form of child sexual abuse. It occurs 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 (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears to be consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

7.2 Child sexual exploitation

1. Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to sexual intercourse
2. Can still be abuse even if the sexual activity appears consensual
3. Can include both contact and non-contact sexual activity
4. Can take place in person or via technology, or combination of both
5. Can involve force or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence
6. May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and put on social media, for example)
7. Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse may be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
8. Is typified by some form of power imbalance in favour of those perpetrating abuse

8. Peer-on-peer Abuse

8.1 Apprenticeship Connect are committed to protecting children, young people and vulnerable adults from peer-on-peer abuse.

8.2 Peer-on-peer abuse includes:

- Young people aged 16 and 17 who experience physical, emotional, sexual and/ or financial abuse, and coercive control, in their intimate relationships
- Young people aged under 18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age, including another young person
- Any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development
- Serious youth violence including murder, rape, and GBH between young people under the age of 18

8.3 Apprenticeship Connect's policy is for all members of staff to report any suspected cases of peer-on-peer abuse to Apprenticeship Connect's Designated Safeguarding Officer.

9. Honour Based Violence

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

9.2 It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs or their culture. For example, honour based violence might be committed against people who:

1. Become involved with a boyfriend or girlfriend from a different culture or religion
2. Want to get out of an arranged marriage
3. Want to get out of a forced marriage
4. Wear clothes or take part in activities that might not be considered traditional within a particular culture

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

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

9.3 Apprenticeship Connect's policy is for all members of staff to report any suspected cases of honour based violence to Apprenticeship Connect's Designated Safeguarding Officer.

10 Forced Marriage

10.1 A person may be at risk of forced marriage if their family belongs to a community which practices arranged marriage—but this does not necessarily mean any marriage will be forced.

10.2 Indicators may be that their family makes preparations for a holiday, they talk about going abroad and/or a ceremony taking place with a sense of reluctance, they say goodbye to friends with a sense of this being permanent or they seem distressed or tearful.

10.3 Apprenticeship Connect's policy is for all members of staff to report any suspected cases of honour based violence to Apprenticeship Connect's Designated Safeguarding Officer.

11. Safeguarding Structure and Responsibilities

11.1 Apprenticeship Connect has in place an organisation structure for safeguarding children and vulnerable adults. Key senior staff with designated responsibility include:

- Designated Safeguarding Officer
- Deputy Safeguarding Officer
- Male Safeguarding Officer
- Board Safeguarding Representative

11.2 The Designated Safeguarding Officer is a member of Apprenticeship Connect's management team. They have a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people and the promotion of a safe environment for children, young people and vulnerable adults within the provider.

This includes:

1. Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the Council's Department of Children and Young People's Services, or other agencies (such as the Police or Channel) as appropriate
2. Providing advice and support to other staff on issues relating to child/vulnerable adult protection
3. Maintaining a proper record of any child/vulnerable adult protection referral, complaint or concern (even when the concern does not lead to a referral)
4. Ensuring that all staff receive basic training in child/vulnerable adult issues and are aware of the providers Child/Vulnerable Adult Protection Procedure

11.3 In those areas where staff and learners work with children and vulnerable adults as part of their roles, a manager is nominated to have safeguarding responsibility in this area.

11.4 Apprenticeship Connect takes the view that all staff and learners are required to take shared responsibility for the protection and safety of children, young people and vulnerable adults on site. They must be aware of, and abide by, Apprenticeship Connect's Codes of Good Practice.

11.5 It is expected that all parents/guardians (either learners or from the general public) who bring children into Apprenticeship Connect's sites or any external facilities/events abide by the Code of Behaviour as well as Health and Safety Regulations.

11.6 Processes are in place to check suitability of staff and learners working directly with children and young people. Some staff and learners across the company will be in regular or significant contact with children, young people or vulnerable adults in the course of their teaching or other work. There is a commitment that such staff and learners have a satisfactory Disclosure and Barring Service (DBS) enhanced check in place. In line with recommendations from 'The Birchard Inquiry report (2004)' - recommendation 19 'New arrangements should be introduced requiring those who wish to work with children or young adults, to be registered.'

11.7 Apprenticeship Connect has processes in place to ensure that external speaker/trainers on site are checked.

12. Control Measures

12.1 Apprenticeship Connect believes that children, young people and vulnerable adults have rights as individuals and should be treated with dignity and respect. Apprenticeship Connect strive to provide a safe environment for any young person or vulnerable adult in it's care whilst they are studying, visiting premises or participating in Apprenticeship Connect activity.

12.2 Activities at Apprenticeship Connect that involve children/young people or vulnerable adults organising teaching and delivery of services are risk managed and will be supported by risk assessments and reasonable, proportionate adaptations to their activities as appropriate will be made.

12.3 Where adaptations are reasonable and proportionate, Apprenticeship Connect puts into place a number of 'control measures' in order to safeguard the well-being of children, young people and vulnerable adults. These are kept under review and added to as necessary.

12.4 As a condition of admission to certain programmes of study where they will come into close contact with children, young people and vulnerable adults (typically in initial teacher education, health and social care), learners (may or will be) required to undergo a DBS or Enhanced Disclosure and Barring Service check prior to the commencement of placement/training activity. Apprenticeship Connect is obliged to refuse admission if the DBS disclosures disqualifies the applicant from practicing in their chosen field.

12.5 Apprenticeship Connect has published procedures for reporting cases of suspected abuse of children, young people and vulnerable adults. A full copy is set out in Appendix 1 to this document.

12.6 These procedures are issued to all members of staff and all new learners to the Provider during their induction. Further staff training (mandatory) is provided to all Apprenticeship Connect staff and renewed annually.

13. Safeguarding Structure and Responsibilities

13.1 Apprenticeship Connect has written recruitment and selection procedures which can be found on the shared drives. The policy and procedures are designed with the aim of safely recruiting staff and providing a safe environment for children, young people and vulnerable adults to learn in. Key aspects of the procedures and processes are as follows:

1. Job descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding and promoting the welfare of learners having due regard to Apprenticeship Connect's Child and Vulnerable Adult protection policy
2. A person specification setting out the key selection criteria is available for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with children, young people and vulnerable adults
3. Advertising of posts externally as appropriate
4. A requirement for those appointed to produce documentary evidence of academic/vocational qualifications
5. Standard interview questions for tutor appointments and other key staff who work with children, young people and vulnerable adults exploring their suitability in this respect. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicants
6. Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be the applicants existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no work experience
7. A policy on the recruitment of ex-offenders
8. A policy on obtaining a satisfactory Disclosure and Barring Service (DBS) and 'barred list' check for appropriate positions as a condition of employment at Apprenticeship Connect

13.2 All Apprenticeship Connect staff members, contractors and volunteers are advised to minimise physical contact with learners, except for reasons of health and safety, or where physical contact may be necessary as part of their learning.

13.3 Apprenticeship Connect reserves the right to deny employment to individuals where permitted criminal record checks suggest they may pose a danger to the learning community.

13.4 Apprenticeship Connect also reserves the right to suspend and/or dismiss staff members, in accordance with its employment procedures, from employment or undertaking a specific role with respect to that employment. This may apply if information was withheld, when requested, about their criminal record at the point of employment, or a criminal record acquired during employment.

13.5 All members of staff working closely with children, young people and vulnerable adults have to be alert to the possibilities of abuse, radicalisation and any concerns about the behaviour of any adult with respect to that child, young person or vulnerable adult should be reported in accordance with procedures. This will be supported by relevant training, skills development and updates to ensure recognition, response, reporting, recording and referral are all to the required standard.

13.6 Any staff member who considers themselves to be a vulnerable adult, can seek support from Apprenticeship Connect's senior management who will, as required, support with appropriate occupational health screening or counselling.

13.7 DBS disclosures will be obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Service Act 2000) with children, young people or vulnerable adults as per IAS guidelines; Apprenticeship Connect where appropriate evaluate information to determine individuals' appropriateness to work in such activity.

13.8 Where staff are not engaged in regulated positions, but are involved in activities that may involve children, young people and vulnerable adults, a risk management approach is taken to delivery of learning and teaching, and activities involving the wider public.

APPENDIX 1

PROCEDURES FOR REPORTING CASES OF SUSPECT ABUSE INVOLVING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS

1. THE DUTY TO REPORT

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

2. WHAT TO DO IF YOU NOTICE ABUSE

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

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

2. The learners themselves may disclose to you that they have been abused

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

a. Possible signs of physical abuse include:

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

b. Possible signs of psychological/emotional abuse include

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

c. Possible signs of sexual abuse include:

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

d. Possible signs of neglect include:

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

e. Possible signs of financial abuse include

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

f. Possible signs of radicalisation include:

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

2.3 If a learner discloses to you that they (or indeed another child, young person or vulnerable adult) have been, or are being abused/radicalized -

DO

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

DO NOT

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

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

2.5 If a child, young person or vulnerable adult discloses to you that they or another have been abused/radicalised, or if you suspect from what you observe that they are being abused, YOU MUST REPORT THIS to the Designated Safeguarding Officer or in their absence the Deputy Safeguarding Officer.

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

2.7 If for any reason you are unable to contact a member of the designated team and the matter is urgent, then contact the Local Authority or the Police directly and report the matter to the Designated Safeguarding Officer at the next available opportunity.

2.8 In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support rather than to worry alone or do nothing.

3. THE OPERATION OF THE DESIGNATED SAFEGUARDING TEAM

3.1 When a member of staff refers a case of suspected abuse to a member of the designated safeguarding team, he or she decides whether or not the situation should be referred to the local authority, the Police or Channel, or whether some other course of action

is more appropriate. In coming to a decision about what action to take the member of the designated team may take advice from Apprenticeship Connect's contacts at the Local Authority. If they consider that abuse/radicalisation has taken place, or that a child, young person or vulnerable adult is at risk of abuse, they will formally notify the local authority, the Police or Channel about this.

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

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

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

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