

### UKTD Safeguarding Policy

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<b>Approved by:</b> Senior Management Team / Lead DSO	Signature 	<b>Review Date:</b> October 2019

# Safeguarding Policy

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### **POLICY STATEMENT**

1. UKTD will carry out its responsibilities under current legislation and guidance for the protection of children, young people and adults at risk (formerly vulnerable adults).
2. UKTD is committed to creating a culture of safety and ensuring that all staff understand that safeguarding is everyone's responsibility.
3. UKTD follows safer recruitment procedures in order to deter, reject or identify people who may harm or abuse children, young people or adults at risk.
4. UKTD will provide safeguarding and child protection training for all staff in line with current legislation, and ensure that everyone knows how to report a concern regarding suspected, observed or divulged.
5. UKTD has in place a strict code of conduct for all staff, which is discussed and reinforced as part of safeguarding training.
6. UKTD will advise all learners, during their induction, about the standard of behaviour and conduct they can expect from staff and what to do if they experience or suspect abuse.
7. UKTD will ensure that employer partners, trainers and staff working with learners on employer's premises understand their responsibilities for safeguarding and follow the UKTD Employer's Guide to Safeguarding.
8. UKTD recognises and reinforces that it is the responsibility of all staff and employers to act upon any concern no matter how small or trivial it appears.
9. UKTD makes it a priority to ensure that the health, safety and wellbeing of all learners is in place throughout the learning programme.
10. UKTD will work with appropriate agencies and in particular Safeguarding Partners (replacing LSCBs) to ensure a co-ordinated approach to identifying concerns, sharing information and taking prompt action.
11. UKTD recognises that any child, young person or adult at risk can be subject to abuse and all allegations of abuse will be taken seriously and treated in accordance with UKTD procedures.
12. UKTD recognises its responsibility in implementing, maintaining and carrying out regular reviews to ensure that the procedures work to prevent or notify of suspected abuse.
13. UKTD will prepare and implement an action plan to ensure that it fulfils our duty to protect all of our learners.

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## SCOPE AND PURPOSE

This Safeguarding Policy, together with the accompanying Safeguarding Procedure applies to all employed staff, freelance contractors, volunteers, employer partners, staff and trainers in the workplace and others who work in or on behalf of UKTD.

UKTD is committed to and will promote the protection and safeguarding of children, young people and adults at risk. The purpose of this policy and accompanying procedure is to ensure that:

- Staff are clear about their responsibilities for safeguarding and protecting the children, young people and adults at risk who access our delivery/apprenticeship services.
- Staff are clear about UKTD's Safeguarding Code of Conduct and their individual responsibilities.
- Staff are provided with the knowledge and support to be able to recognise, effectively report and escalate safeguarding concerns to the Designated Safeguarding Lead or their Local Designated Safeguarding Officer (DSO).
- Safeguarding concerns are dealt with appropriately and only closed when we are certain the matter has been dealt with fully and the learner is now safe.
- Employers and managers at the work placements where we offer our services understand their responsibilities for safeguarding and follow procedures that are set.

UKTD has appropriate procedures in place for responding to situations in which they believe that a child, young person or adult at risk has been abused or is at risk of being abused. This also covers circumstances in which a member of staff, volunteer or other worker is accused of, or suspected of, abuse.

UKTD also recognises that children, young people and adults at risk may suffer harm from sources outside the company's control. Where signs of such harm are apparent, UKTD encourage these to be reported to the appropriate external agency.

### **This policy aims to:**

- Establish and maintain an environment where all learners feel secure, are encouraged to talk, and are listened to when they have a worry or concern.
- Ensure all learners know that there are staff at UKTD whom they can approach if they are concerned.
- Ensure that all learners are taught about safeguarding at induction and throughout their training and given opportunities to discuss any concerns.
- Include opportunities for UKTD learners to develop the skills they need to recognise and stay safe from abuse, including online safety.
- Inform staff, employers and others working at UKTD about their responsibilities for safeguarding and ensure that learners are not put at risk by non UKTD visitors and that relevant checks will be carried out.
- Enable everyone to have a clear understanding of how these responsibilities should be carried out.

## LEGAL FRAMEWORK

UK Training and Development (UKTD) recognises its legal duty to ensure so far as is reasonably practicable, the health, safety and welfare of children, young people and adults at risk.

In order to protect all learners from harm, UKTD will act in accordance with current legislation and guidance given by the Department for Education (DfE), including:

- Keeping Children Safe in Education (DfE Sep 2018)
- Working Together to Safeguard Children (DfE July 2018)
- What to do if you're worried a child is being abused (DfE Mar 2015)
- Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers (Jul 18)
- The Children Act (1989/2004)
- Children and Social Work Act (2017)
- Education Act 2002 (s175)
- The Equality Act (2010)
- Child Sexual Exploitation (DfE Feb 2017)
- Counter-Terrorism and Security Act (2015) / CONTEST (Jun 2018)
- Serious Crime Act (2015)
- Safeguarding Vulnerable Groups Act (2006)

## SAFEGUARDING LEGISLATION & GUIDANCE CHANGES 2018

In recent months, the Department for Education (DfE) has published two updated statutory guidance documents, setting out new legal requirements and strengthened safeguarding arrangements. In addition to Keeping Children Safe in Education (Sep 2018) and Working Together to Safeguard Children (July 2018), the new Data Protection Act 2018 also came into force on 25 May 2018, incorporating EU GDPR principles and guidance regarding information sharing.

The following sections highlight the key changes and updates that have been made to both guidance documents:

- Keeping Children Safe in Education (DfE Sep 2018)
- Working Together to Safeguard Children (DfE July 2018)

### **Keeping Children Safe in Education (KCSIE - Sep 2018)**

This document revises and replaces the 2016 guidance and sets out **what schools and colleges must do** to safeguard and promote the welfare of children and young people under the age of 18. Keeping Children Safe in Education 2018 has been drafted in line with revised Working Together to Safeguard Children to reflect these new arrangements. (NSPCC – Knowledge and Information Service).

An overview of key points and updates:

- Designated Safeguarding Lead – New guidance reinforces the importance of the role of Designated Safeguarding Lead and deputies and emphasises the importance of staff raising concerns directly. If in exceptional circumstances the Designated Safeguarding Lead and deputies are not available, staff will be advised to speak to the Managing Director or member of the senior team.

- Local Safeguarding Children Board (LSCB) – References to LSCB have been replaced with local multi-agency safeguarding arrangements (3 Safeguarding Partners) to reflect the changes detailed in the revised Working Together to Safeguard Children (July 2018).
- Children with SEN and Disabilities – New guidance highlights that children with special needs can face additional challenges and barriers to receiving the support they need, as safeguarding warning signs may be missed or perceived as a part of their condition. Recommendation for extra pastoral support to be considered, if required.
- Care Leavers – Designated Safeguarding Lead should liaise with the Local Authority Personal Advisor, appointed to guide and support the care leaver.
- Peer on Peer Abuse – Staff should recognise that children are capable of abusing their peers and have procedures for dealing with such abuse. This may include bullying/cyber-bullying, physical abuse (e.g. hitting, kicking, biting, pulling hair), sexual violence/sexual harassment, sexting. Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.
- Child-on-child Sexual Violence and Sexual Harassment – A new Part 5 has been added to ‘Keeping children safe in education’ to cover this form of peer-on-peer abuse. The Designated Safeguarding Lead is to liaise with children’s social care and specialist services as required.
- Children Missing Education – This may be a warning sign of a safeguarding concern. Where reasonably practicable, organisations should hold more than one emergency contact number to give additional responsible adult options if contact is required.
- Child Sexual Exploitation – This can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. The victim may have been sexually exploited even if the sexual activity appears consensual. It may not always involve physical contact and can also occur via technology / online.
- Child Criminal Exploitation: County Lines – New information highlighting the grooming and criminal exploitation of children and young people by organised gangs or drugs networks, to carry drugs and money from urban areas to suburban, rural, seaside and market towns. Can also affect adults at risk.
- Female Genital Mutilation (FGM) – All staff are required to speak to the Designated Safeguarding Lead regarding FGM concerns and there is a specific legal duty on teachers to report concerns to the police.

- Information Sharing – Early information sharing may be vital and fears regarding privacy rules must not stand in the way of protecting the welfare and safety of a child. “The Data Protection Act (2018) and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe” (KCSIE Sep 18).
- Online Safety – The increase of technology has become a significant component of many safeguarding issues and categorises three areas of risk: 1) **Content** (being exposed to harmful material). 2) **Contact** (being subjected to harmful online interaction). 3) **Conduct** (online harmful behaviour e.g. online bullying or sending/receiving explicit images).

### **Working Together to Safeguard Children (DfE July 2018)**

This document revises and replaces the 2015 guidance and sets out **what organisations and agencies** must and should do to safeguard and promote the welfare of all children and young people under the age of 18.

An overview of key points and updates:

- Children and Social Work Act 2017 – The Children Acts of 1989 and 2004 have been amended by the Children and Social Work Act 2017. The act’s aim is to improve provision for looked-after children and the safeguarding of children and place new duties on key agencies in a local area. It also replaces Local Safeguarding Children Boards (LSCBs) with new local multi-agency safeguarding arrangements (Safeguarding Partners).
- LSCB changes to Multi-Agency Safeguarding Partners – Local authority areas will have their own ‘Safeguarding Partners’ made up of 3 parties – 1) Clinical Commissioning Groups, 2) Local Authorities and 3) Chief Officers of Police. The partners will work together in a co-ordinated approach to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- Timescales for New Local Arrangements - Details of new local arrangements must be published by the 3 Safeguarding Partners no later than 29 June 2019 and be in place no later than 29 September 2019. **Note:** Until the new arrangements are in place, schools and colleges should continue to work in partnership with the LSCB and follow any relevant local arrangements.
- Making Referrals – New section highlighting that anyone with a concern about a child’s welfare should make a referral to the local authority children’s social care immediately.
- Child Death Reviews - New guidance requiring ‘Child Death Review Partners’ to conduct reviews of child death, in place of previous LSCB responsibilities.

- Organisational Responsibilities – New section on ‘people in positions of trust’ highlighting that organisations and agencies working with children should have clear policies for dealing with allegations against people who work with children.
- Early Help for Children – Highlighting the importance of being alert to the potential need for early help for children who may be vulnerable or have specific additional needs – e.g. disabled or SEN; young carers; at risk of being radicalised; showing signs of being drawn into anti-social or criminal behaviour; is misusing drugs or alcohol themselves or is in a family where this is present.
- Information Sharing – Information sharing is essential for effective safeguarding and the following non-statutory advice has been published by HM Government to support practitioners and senior managers in the decisions they take - ‘*Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*’ which includes the ‘*The seven golden rules to sharing information*’. Further information in UKTD’s Safeguarding Procedure.

## DEFINITIONS

**Children** - in law, a child is anyone under the age of 18. There is no legal definition of a ‘young person’ but UKTD recognise that this term is often used when referring to 16 – 18 year olds.

**Adult at Risk** (formerly Vulnerable Adult) – is someone aged 18 or over who is, or may be, in need of community care by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

**Safeguarding** – is the action that is taken to promote the welfare of children and protect them from harm and is defined as:

- Protecting children from abuse and maltreatment
- Preventing impairment of children’s health or development
- Ensuring that children grown up with the provision of safe and effective care
- Taking action to enable all children/young people to have the best outcomes

**Child Protection** - is part of safeguarding and promoting welfare and refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Neglect** – “*is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development*”. (KCSIE 2018)

**Abuse** - is defined as behaviour towards a person that either deliberately or unknowingly causes that person harm, or endangers their life or their human or civil rights. It can be passive or active and can also be a one-off or something that is repeated, so it is important to be aware. “*Abuse can take place wholly online, or*

*technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children". (KCSIE 2018)*

**Prevent** – Prevent is 1 of 4 parts of the UK Government’s Counter-Terrorism Strategy (known as CONTEST) and *“the purpose of Prevent is at its heart to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism”*. (CONTEST Strategy 2018).

**The Prevent Duty** (part of the Counter-Terrorism and Security Act 2015) - places a duty on the following bodies: local authorities, schools, colleges, higher education institutions, health bodies, prisons, probation service and the police, *“to have due regard to the need to prevent people from being drawn into terrorism”*.

**Channel** - Channel is a process and programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Anyone can make a referral and participation in Channel is entirely voluntary.

**Radicalisation** – *“refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups”*. (KCSIE).

**Extremism** – *“is the vocal or active opposition to our fundamental British Values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs”*. (KCSIE).

**Terrorism** – *“is an action or threat designed to influence the government or intimidate the public. Its purpose is to advance a political, religious or ideological cause”*. (<https://educateagainsthate.com/teachers/terrorism-definition/>)

## RECOGNISING SIGNS OF ABUSE

*“All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.”* (KCSIE, Sep 2018).

As highlighted in the above statutory guidance from the Department of Education (DfE), safeguarding concerns may include, but not be limited to, one or more of the following:

- Sexual abuse, child sexual exploitation, inappropriate relationships
- Grooming, exposure to harmful online material, sexting
- Physical and emotional abuse or neglect
- Domestic violence, gang activity or youth violence
- Inappropriate behaviour by staff
- Bullying, online bullying, peer-on-peer abuse, financial abuse
- Self-harm, risky behaviour
- Unsafe activities and environments
- Being involved in crime, child criminal exploitation
- Forced marriage, honour-based violence, gender-based violence, FGM
- Radicalisation, extremist behaviour or ideologies

- Substance misuse
- Homelessness or unsuitable housing
- Victimisation due to race, sexuality, faith, gender or disability
- Neglect by care givers or self-neglect
- Any form of abuse (as defined in the 'Definitions' section on page 7)

## TYPES OF ABUSE

**Physical abuse** – "...may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child." (Part One, KCSIE 2018)

### Some possible signs of physical abuse:

- Unexplained injuries or burns, particularly if they are recurrent
- Injuries not typical of accidental injury
- Frequent injuries even with apparently reasonable explanations
- Improbable or conflicting explanations for injuries
- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents/carers being contacted
- Bald patches
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of returning home
- Fear of medical help / parents not seeking medical help
- Self-destructive tendencies
- Aggression towards others
- Frequent running away
- Frequently absent from work

**Emotional abuse** – "...is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate". (Part One, KCSIE 2018)

Emotional abuse may be a difficult form of abuse to recognise, as the symptoms may be hidden and the abused person withdrawn, introverted or depressed. It may also involve seeing or hearing the ill-treatment of another.

### Some possible signs of emotional abuse:

- Admission of punishment which appears excessive.
- Over-reaction to mistakes
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations

- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self-mutilation
- Bullying (including cyberbullying)
- Fear of parents/carers being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Frequent running away
- Compulsive stealing. Scavenging for food or clothes
- Continual self-depreciation
- Air of detachment – “don’t care” attitude
- Social isolation – does not join in and has few friends
- Desperate attention-seeking behaviour
- Eating problems, including over-eating or lack of appetite
- Depression, withdrawal

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

*They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.”* (Part One, KCSIE 2018)

Some possible signs of sexual abuse:

- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Acts in a sexually inappropriate/harmful or seductive ways
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn. Outbursts of anger or irritability
- Withdrawal, isolation or excessive worrying
- Being fearful of, or refusing to see, certain adults for no apparent reason; showing dislike of a particular tutor, relative or other adult
- Draws sexually explicit pictures
- Chronic ailments, such as stomach pains or headaches
- Takes over the parental role at home; seem old beyond their years
- Eating disorders, such as anorexia or bulimia
- Depression, suicidal thoughts
- Poor self-image, self-harm, self-hatred
- Uses drugs or drink to excess
- Unexplained pregnancy
- Memory loss

- Frequent running away
- Restricted social activities
- Finds excuses not to go home or to a particular place
- Has recurring nightmares/afraid of the dark
- Unable to concentrate; seems to be in a world of their own
- Has a "friend with a problem" and talks about the abuse of the friend
- Sudden changes in work habits, intermittent or non-attendance
- Unexplained sums of money

**Neglect** – *"... is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.*

*Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs."* (Part One, KCSIE 2018)

Some possible signs of neglect:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing, clothing in a poor state of repair
- Frequent lateness or non-attendance at work
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing
- Constant tiredness
- Emaciation
- Destructive tendencies
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Frequent running away
- Scavenging for food or clothes

**Female Genital Mutilation (FGM)**

(<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>)

A girl or woman who has had female genital mutilation (FGM) may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations

- ask for help, but may not be explicit about the problem due to embarrassment or fear.

### Reporting FGM concerns

FGM is child abuse and it is against the law.

If you suspect a child or woman has experienced FGM you must report your concerns to a Designated Safeguarding Officer, so appropriate action can be taken and the FGM Helpline contacted (0800 028 3550). If a child is in immediate danger the DSO will call the police urgently.

### **Child Sexual Exploitation**

This type of child sexual abuse is typified by some form of power imbalance in favour of those perpetrating the abuse.

Key factors:

- It 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 have sex;
- It can still be abuse even if the sexual activity appears consensual;
- It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- It can take place in person or via technology, or a combination of both;
- It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- It may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- It can be perpetrated by individuals or groups, males or females, children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education

(Annex A, KCSIE 2018)

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## RESPONSIBILITIES

Everyone who works with children has a responsibility for keeping them safe. All UKTD staff and employers, including other workers and volunteers, are particularly well placed to be vigilant and observe outward signs of abuse or changes in behaviour. It is everyone's responsibility to keep learners safe and everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

### Specific Areas of Responsibility:

- **Managing Director** – To take leadership responsibility for UKTD's Designated Safeguarding Team arrangements and to ensure compliance with the law.
  - To ensure UKTD has effective safeguarding and Prevent policies, procedures and online safety measures and that they are followed by all staff.
  - To ensure that sufficient time and resources are allocated to the Designated Safeguarding Team, for them to carry out their roles effectively.
- **Lead Designated Safeguarding Officer (LDSO)** – to have lead responsibility for safeguarding and child protection arrangements. The LDSO is supported by local Designated Safeguarding Officers (DSOs).
  - To co-ordinate action within UKTD and work closely with the local DSOs and Managing Director, to ensure the safe and appropriate escalation and closure of cases, as required.
  - To undergo appropriate training to provide the knowledge and skills to be able to carry out the role, and to have update training every 2 years.
  - To ensure local Designated Safeguarding Officers are sufficiently trained to carry out their supporting role.
  - To co-ordinate company training requirements, identify any development needs and ensure attendance records are being completed.
  - To lead safeguarding meetings and discuss concerns with Managing Director.
  - To liaise with the Safeguarding Partners (transition from LSCBs) and other agencies as required, build relationships and to have awareness of local safeguarding and Prevent risks and threats.

### UKTD's Designated Safeguarding Team will:

- Promote positive safeguarding procedures and practice.
- Provide advice and support to staff on issues relating to safeguarding, child protection and Prevent, including signposting to professional organisations.
- Ensure staff receive robust induction and annual refresher training.
- Ensure concerns are escalated promptly, as required.
- Maintain secure records. Ensure the Safe Learner Tracker is kept up-to-date.
- Be familiar with national and local safeguarding guidance/referral procedures.
- Monitor safeguarding cases in the organisation.
- Maintain own CPD to ensure the roles can be fulfilled competently.

- Carry out investigations where appropriate and refer to Safeguarding Partners

### UKTD DESIGNATED SAFEGUARDING TEAM

Designation	Name	Contact Details
Lead Safeguarding Officer (LDSO)	Helen Blackbourn	07875 665934 <a href="mailto:helen.blackbourn@uktd.co.uk">helen.blackbourn@uktd.co.uk</a>
Local Safeguarding Officers (DSOs)	Helen Blackbourn (East & West Midlands)	07875 665934 <a href="mailto:helen.blackbourn@uktd.co.uk">helen.blackbourn@uktd.co.uk</a>
	Michelle De-Ath (South East & South West)	07791 617816 <a href="mailto:Michelle.de-ath@uktd.co.uk">Michelle.de-ath@uktd.co.uk</a>
	Tracey Holden (North West)	07392 873584 <a href="mailto:tracey.holden@uktd.co.uk">tracey.holden@uktd.co.uk</a>
	Debby Cramphorn-Arnold (East of England)	07875 665781 <a href="mailto:debby.arnold@uktd.co.uk">debby.arnold@uktd.co.uk</a>
Dedicated Safeguarding Email Address	<a href="mailto:safelearner@uktd.co.uk">safelearner@uktd.co.uk</a>	

- **Human Resources** – to ensure safer recruitment practices are carried out, including eligibility to work in the UK, DBS checks as required and references. HR will also manage and maintain the Single Central Record of staff checks.
- **Senior Management Team** – to approve the Safeguarding Policy and Procedure and support the Managing Director in ensuring that they, together with the Staff Code of Conduct, are implemented and adhered to by all staff.
- **All UKTD Staff** - to understand that safeguarding and promoting the welfare of children is everyone's responsibility.
  - To follow UKTD's Safeguarding Policy and Procedures; ask questions if not fully understood; and attend Safeguarding Training as required.
  - To be vigilant to the signs of abuse and raise any concerns with a Designated Safeguarding Officer.
  - To maintain correct behaviour and project a professional image at all times.

#### Learner Contact Staff will also:

- Ensure learners always feel safe and secure during visits.
- Check the safety and welfare of learners at each visit and report back any concerns to a Designated Safeguarding Officer straight away
- Report any issues of concern, or suspicions that are raised during visits.
- Report any learner absence to FCD, for inclusion in the Status Report.

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## CODE OF CONDUCT FOR UKTD STAFF

UKTD recognises that safeguarding and promoting the welfare of learners is everyone's responsibility and by embracing a child-centred approach, we will always be acting in the best interests of the child.

As part of our company framework for supporting and promoting safeguarding, we have a specific Safeguarding Code of Conduct which sets out the standards of behaviours that are expected from all UKTD. This code is not exhaustive and is in addition to UKTD's Safeguarding and Prevent Policies and Procedures.

All staff are required to follow this code and guidance, unless there is a good reason not to follow it in a particular case. In such cases, the reason must be discussed with and agreed by your line manager.

- Staff should display the highest possible standards of professional behaviour when working with learners.
- Avoid any unnecessary physical contact at all times.
- Never be left alone with a learner wherever possible. Always carry out all activities openly within the workplace, centre or a public place.
- Never allow yourself to travel with a learner in a car except in an absolute emergency, and then always inform your line manager at the start of your journey and when you have arrived.
- Always give constructive guidance to learners and use appropriate language, as children and young people can be very impressionable.
- Do not give out personal telephone numbers to learners.
- Do not have personal relationships with learners.
- Do not accept learners as 'friends' on Facebook or other social networking sites. If you wish to use social networking for learning, set up a professional profile under your work email address and ensure that you have the authorisation of your line manager first.
- Ensure that if you wish to post any images of learners that you have their permission and that the UKTD Social Media Consent form is signed and returned to the office **prior** to posting online.
- Do not post messages, status updates or links to material/content that is inappropriate. Inappropriate content includes but is not limited to: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills, terrorism or radicalisation, or materials relating to cults, gambling and illegal drugs.
- Do not browse, download, copy, store or distribute inappropriate content (as detailed above) from the internet, email attachments or social media sites.

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## THE PREVENT DUTY

The Counter-Terrorism and Security Act 2015 places a duty upon all education providers, "to have due regard to the need to prevent people from being drawn into terrorism". (CONTEST 2018) This is known as the Prevent Duty and forms part of the government's wider counter-terrorism strategy called CONTEST.

A newly updated and strengthened CONTEST strategy was published by the government in June 2018, following the 2017 terrorist attacks in London and Manchester and increase in our UK National Threat Level to "SEVERE - which means an attack is highly likely.

**The CONTEST framework** has four work strands and Prevent is one strand:

- **Prevent** – to safeguard people from becoming terrorists or supporting terrorism
- Pursue – to disrupt and stop terrorist attacks from happening
- Protect – to strengthen our protection against a terrorist attack
- Prepare – to mitigate the impact of terrorist attack that cannot be stopped.

Each strand is connected and helps reduce an element of the risk from terrorism. As risks to our national security increase, so our duty to be both vigilant and responsive becomes even more important.

### **Purpose of Prevent** (CONTEST Strategy 2018)

*"The purpose of Prevent is at its heart to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism".*

### **Objectives of Prevent** (CONTEST Strategy 2018)

Are to:

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
- Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to disengage and rehabilitate.

All teaching and training providers have a responsibility to comply with the Prevent Duty as part of an overall safeguarding duty of care, and to play our part in educating, supporting and protecting learners from the risk of radicalisation and extremism.

At UKTD our objectives are to ensure that:

- We have undertaken training and understand our Prevent Duty responsibility.
- We are aware of the possible signs that may indicate a learner or colleague is at risk of being radicalised.
- We know how to act and report our concerns to a Designated Safeguarding Officer.
- We promote British values and help learners understand and relate to them, by building them into our programmes and creating opportunities for discussion.

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**Educate Against Hate website**

The Department for Education and Home Office jointly developed a website called "Educate Against Hate" providing teachers, school leaders and parents with guidance and support to protect children from radicalisation and extremism. The website provides practical advice, support and resources, including a Blog of interesting and helpful posts. Although written originally for schools, it is also a relevant resource for us, to help implement the Prevent Duty and achieve the following aims:

- Protect learners from radicalising influences
- Build learners' resilience to extremist narratives
- Identify any vulnerabilities or worrying changes in behaviour
- Know what to do if concerned about a learner

**British Values** - A key part of the Prevent Duty is to build learner resilience to the threat of radicalisation, challenge extremism and to raise awareness and promote British values. The following fundamental British values were first set out by the Government as part of the Prevent Strategy in 2011:

- Democracy
- Rule of Law
- Individual liberty
- Mutual Respect for and tolerance of those with different faiths or without faith

Ofsted requires all schools, colleges and training providers to promote British values and UKTD recognises the positive contribution we can make towards helping learners have a good understanding and see how these values form an important part of our culture in modern Britain. As part of our apprenticeship programmes, we set activities for learners and encourage discussions that help embed these values and build understanding of how relevant they are in their working lives.

British values are closely linked to equality of opportunity for all. At UKTD we promote inclusion, respect, fairness and the rights of individuals. We oppose and challenge prejudice, discrimination, harassment and unfairness of any kind, treat people as individuals and do all we can to support learners in reaching their goals. Additional development work is planned to further embed British values and E&D into our programmes.

**Freedom of Speech** - The Prevent Duty is not about preventing learners from having political and religious views or concerns, but about supporting them to use those concerns or act on them in non-extremist ways. It does not mean that there cannot be freedom of speech in places of learning, in fact the Counter-Terrorism and Security Act specifies that, alongside the Prevent duty, there must be, "*particular regard to the duty to ensure freedom of speech*". Encouraging children and young people to discuss sensitive subjects and express differing views in open debate, can be, "*one of our most powerful tools in promoting critical thinking and preventing terrorist and extremist narratives taking hold*"

(CONTEST Strategy 2018).

**Radicalisation** – *“refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups”*. (KCSIE).

Radicalisation can happen to anyone at any time; however, one of the biggest platforms where it takes place is via the internet and social media. Young people in particular are so comfortable communicating in this way that they may not be alert to the potential risks of sharing information about themselves online or being drawn into extremist ideologies.

The risk of radicalisation can affect anyone and is the product of a number of factors. Identifying this risk requires that we exercise our professional judgement and seek further support and advice if needed. It may be combined with other vulnerabilities or may be the only risk identified.

Potential indicators may include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

However, if a learner does display one or more of these indicators this does not mean that the learner will necessarily be at risk of radicalisation, but they may be.

If you are unsure or have any concerns, contact your local UKTD DSO for advice.

**Channel** - is a multi-agency approach designed to protect and provide support for vulnerable individuals who have been identified as being at risk of being radicalised or drawn into terrorism. The Channel programme is not a criminal intervention and is a key part of the Prevent strategy which focuses on offering support at an early stage. Anyone can make a referral and participation in Channel is voluntary.

**Online Safety** - *“The internet is a powerful tool which terrorists exploit to radicalise, groom and recruit vulnerable individuals, and to incite and enable terrorist attacks. Terrorist groups make extensive use of different online platforms to communicate with thousands of individuals, spreading their pernicious ideology and propaganda”*. (CONTEST Strategy 2018)

As part of our ongoing commitment to safeguarding and promoting the welfare of all learners, we will do all we reasonably can to limit learners’ exposure to online risks and have filters and monitoring systems in place.

We promote online safety in our awareness activities and training materials/resources and we ask employers to work with us in helping learners to stay safe online.

If a learner experiences any form of cyber-bullying this needs to be reported to a Designated Safeguarding Officer immediately, so that action can be taken.

## REPORTING A SAFEGUARDING OR PREVENT CONCERN

If a staff member has a safeguarding or Prevent concern about a learner, or if a learner has disclosed a concern about themselves, this must be reported to a Designated Safeguarding Officer (DSO) or Lead DSO as soon as possible, so that advice and support can be given or prompt action taken if required. It is essential that all concerns are reported even if you have only heard rumours about abuse, harm or neglect, or you have your own suspicions but do not have any evidence.

**Reporting methods** – reporting your concern can be done in person; by telephone to a DSO or Lead DSO mobile; or via the Safe Learner email address: [safelearner@uktd.co.uk](mailto:safelearner@uktd.co.uk), if non-urgent, and one of the safeguarding team will contact you. If your local DSO or the Lead DSO are not available, you should contact UKTD's Managing Director. Refer to UKTD Safeguarding Procedure for full details. Both the Policy and Procedure must be read alongside each other.

In an emergency situation or out of hours, you can report an incident to the Police (if immediate action is needed) or contact your local area MASH (Multi Agency Safeguarding Hub) for advice and guidance. The **Hertfordshire MASH contact number is 0300 123 4043** and there is also a full list of Safeguarding Reporting Services contact numbers at the back of UKTD's Safeguarding Procedure.

Staff must complete a report as soon as possible after the incident on an SIR form and submit to the [safelearner@uktd.co.uk](mailto:safelearner@uktd.co.uk) email address for referral to the Lead Safeguarding Officer and Managing Director.

### The '5 Rs' - Steps to take if a learner discloses information

A helpful way to remember what steps to take is to follow the '5 Rs'. A description of the full process, together with the procedure flowchart, can be found in UKTD's Safeguarding Procedure. UKTD's Safeguarding Policy and Safeguarding Procedure need to be read together, as they both contain important information and guidance.

The following is an overview of the 5 steps of this process and the key points:

- 1) 'Recognise' – be alert to the signs of abuse
- 2) 'Respond' – listen, accept, reassure, explain, follow procedure
- 3) 'Report' – as soon as possible to your DSO or Lead DSO
- 4) 'Record' – make a written record of what has been alleged/suspected
- 5) 'Refer' – do not try and investigate yourself. DSOs will refer to external agencies, if required.

The Lead Designated Safeguarding Officer will discuss concerns with the Managing Director and a decision is made as to whether an issue needs to be escalated to an external agency or Safeguarding Partner. In the case of a Prevent Duty concern, this may include contacting our local Police Prevent Officer or DfE Regional Prevent Co-ordinator for advice, guidance and access to the Channel process, if required.

UKTD recognises that reporting a safeguarding incident or whistleblowing concern can be both stressful and challenging; however, all staff are required to report any concerns to a Designated Safeguarding Officer for follow up.

## TRAINING AND AWARENESS RAISING

UKTD is committed to supporting and training all staff, particularly those who work with or come into contact with learners. All new staff receive Safeguarding and Prevent induction training and are required to complete online training. UKTD also run in-house Safeguarding and Prevent refresher training sessions and provide ongoing support and guidance as part of one-to-ones, team meetings and CPD.

UKTD's Designated Safeguarding Team undertake additional training, to enable them to be able to deliver training sessions and offer advice and guidance to staff regarding Safeguarding, Child Protection and Prevent matters.

Both learners and staff complete The Education and Training Foundation (ETF) Side by Side: Prevent Duty online modules, which cover the following topics:

- Radicalisation and extremism
- Online safety
- What can you trust?
- British values.

Each module includes a brief final assessment and after successful completion a certificate can be downloaded.

As part of UKTD's ongoing integration of Safeguarding and British Values into our course programmes, they are included in our Learner Handbooks, Employer and Parent Guides, Awareness Activity Booklets and learning resources/videos available on OneFile ePortfolio. These resources are regularly reviewed to ensure our materials are relevant, supportive and assist both learner and staff understanding.

## ENGAGEMENT WITH EXTERNAL PARTNERS

We will ensure that all employers are aware of UKTD Policies and Procedures regarding Safeguarding and Prevent, and understand that they have a responsibility to the learners they employ. This has formed part of the employer contract from May 2017. It also forms part of the Employer Handbook and UKTD will work with employers to ensure they undertake their responsibilities, including:

- To understand what is meant by safeguarding and promote the welfare, safety and wellbeing of all learners.
- Be aware of their duty of care towards the welfare of learners on apprenticeship programmes.
- To ensure that employees who work alongside learners are of sound character and judgement and will not pose any threat or danger to learners.
- To be familiar with UKTD policy guidance and expectations, and report any concerns following [The '5 Rs'](#) safeguarding reporting procedure.
- To understand what is meant by **PREVENT** and the signs to look out for, which may indicate that a person is being radicalised.

In order for us to carry out our duty of care responsibilities effectively, we work closely with employers, to safeguard our learners and provide information, support and guidance where it is required. Health and safety vetting of an employer's

premises is completed at sign up and monitored on an annual basis. Learners also receive Health & Safety training as part of induction and their qualification.

**External Speakers** - It is the responsibility of any UKTD staff member who organises external speakers or events, to ensure that a safe learning environment is provided for learners by completing and submitting to the Lead Safeguarding Officer, a completed External Speaker/Event Risk Assessment form (FS0276), as part of the Safeguarding and Prevent risk assessment process.

## ALLEGATIONS AGAINST A MEMBER OF STAFF

UKTD recognises that an allegation of child abuse against a member of staff may be made for variety of reasons and the facts of the allegation may or may not be true.

Any allegations received will be taken seriously; treated with sensitivity and care; dealt with in a fair and consistent way; and investigated promptly and thoroughly. It is also essential that the handling of any allegation of abuse *“provides effective protection for the child and at the same time supports the person who is the subject of the allegation.”* (KCSIE 2018)

### Possible reasons for an allegation to be made

Such an allegation may be made against a member of staff, volunteer, employer or anyone working with learners, identifying that he or she has:

- Behaved in a way that has, or may have harmed a child, young person or at risk adult.
- Possibly committed a criminal offence against/related to a child, young person or at risk adult.
- Behaved towards a child, young person, or at risk adult in a way that indicates he/she is not suitable to work with these groups.

The person learning of the allegation should record the nature of the disclosure using the SIR form and provide any other relevant information; immediately report it to the Lead DSO or Local DSO who will escalate it to UKTD’s Managing Director and HR Manager for investigation.

Following the findings of the internal investigation, UKTD’s Disciplinary Procedure may be commenced or, if serious, external agencies or the Police may be involved. UKTD’s Lead Designated Officer will be the main point of contact for communications with a local Safeguarding Partner. Further details can be found in UKTD’s Safeguarding Procedure.

**Support for staff member** – Support will be given to any member of staff who is facing an allegation and the individual will be informed about any concern or allegation as soon as possible, with an explanation of the likely course of action (unless asked not to by the Police or Children’s Services). If an employee is suspended, they will be provided with a named contact for throughout the process. The individual will also be advised to contact their trade union representative if they have one or a colleague for support, and be given access to welfare counselling.

**If the allegation involves an employer** - Where the situation involves a learner's employer, the Lead DSO will discuss the allegation with UKTD's Managing Director and agree a course of action. This could include a meeting being arranged between the employer and the Designated Safeguarding Officer (Regional Manager), to discuss and try to resolve the issue. Or if a more serious matter, the Lead DSO may consult with a local Safeguarding Partner and escalate, if required. The best interests of the learner must be the highest priority when handling this situation.

## WHISTLEBLOWING POLICY

UKTD encourages a responsible and transparent approach to working with children and at risk groups, and will promptly respond to all concerns raised under this Policy and Procedure. The purpose of the Whistleblowing Policy is to provide a means of making serious allegations about standards, conduct, or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in good faith from being victimised, discriminated against or disadvantaged.

UKTD staff should feel able to raise concerns about poor or unsafe safeguarding practice(s), following these procedures, with the Lead Designated Safeguarding Officer or a member of the Senior Management Team. If a whistleblower feels unable to raise their concern(s) with UKTD's appointed persons, then external whistleblowing channels are available.

The NSPCC provides a free **Whistleblowing Advice Line** which offers advice and support to professionals who are concerned about how child protection is being handled within their organisation. The Advice Line can be contacted on **0800 028 0285** or by email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

UKTD recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers that make serious allegations in good faith have nothing to fear because they are doing their duty either to their employer and/or to those for whom they are providing a service (eg learners). UKTD will take appropriate action to protect a whistleblower that makes a serious allegation in good faith from any reprisals, harassment or victimisation.

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower requests otherwise. However, if the matter is subsequently dealt with through other UKTD procedures such as the Disciplinary Procedure, the whistleblower's identity may have to be revealed in accordance with that procedure if the matter is to be dealt with effectively. Similarly, if the allegation results in court proceedings then the whistleblower may have to give evidence in open court, if the case is to be successful.

## SAFER RECRUITMENT OF UKTD STAFF

UKTD are committed to creating a culture of safety and wellbeing and have appropriate safer recruitment procedures and checks in place, in order to help deter and reject people who might pose a risk of harm from working with children, young people or at risk adults.

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The purpose of the Safer Recruitment Policy is to set out the requirements of UKTD's recruitment process which aims to:

- Clearly convey to any prospective applicants that UKTD are committed to the safeguarding of children, young people and at risk adults
- Deter prospective applicants who are unsuitable to work with children / young people or at risk adults
- Attract the best possible applicants to vacancies
- Identify and reject applicants who are unsuitable to work with children and young people or at risk adults

As part of our safer recruitment measures and according to the positions being offered, we will request an Enhanced DBS check on all our learner-facing staff but, where the vetting agency refuses to carry out such a check on the grounds that our tutors and managers are not in regulated activity, we will ask the applicant to undertake a Basic Check on their own behalf. References will also be taken up and checked. A Single Central Record is held in the Human Resources Department detailing the checks carried out on all staff, including DBS clearance if applicable.

UKTD recruitment advertisements, reference requests and job descriptions will include a statement confirming UKTD's commitment to safeguarding and detailing specific responsibilities, as appropriate.

### **UKTD SAFEGUARDING COMMITMENT**

UKTD wish to promote ways in which individual staff members, and also the employers with whom we work, can put their own measures into practice to ensure, so far as is reasonably practicable, the health, safety and welfare of children and vulnerable groups.

This will be achieved by:

- Ensuring UKTD's Safer Recruitment Policy is followed and that a clear message is sent out that UKTD is committed to safeguarding.
- Providing new staff with robust training during induction on UKTD Safeguarding, Health & Safety and Equality & Diversity Policies.
- Providing a clear Code of Conduct for staff to follow, to avoid poor professional practice and also to protect staff from the risk of false allegations of abuse.
- Providing staff with ongoing refresher training and opportunities to undertake further development in Safeguarding and Equality & Diversity.
- Ensuring opportunities are available for learners to participate in learning in an enjoyable and safe environment, regardless of their age, culture, disability, gender, language spoken, racial origin, religious belief, sexual orientation, or financial circumstances.
- Taking all reasonable steps to protect children, young people and at risk adults from harm by abuse (physical, sexual, psychological, emotional or financial) neglect or discrimination and to respect their rights, wishes and feelings.
- Taking swift action and appropriate measures to investigate all suspicions, allegations of poor practice or abuse.

- Ensuring all learners are given the opportunity of developing their skills and understanding towards becoming a safe learner.

#### **RELATED POLICIES AND PROCEDURES**

HS0005	UKTD Safeguarding Procedure
HS0007	UKTD Prevent Policy
HS0001	UKTD Health & Safety Policy
HS0002	UKTD Safer Recruitment Policy
PP0047a	UKTD Whistleblowing Procedure
HR0007	UKTD Disciplinary Procedure
HR0010	UKTD Grievance Procedure
HS0005	UKTD SIR Report Form