

UKTD Safeguarding Policy		
Issued By: Theresa Wisniewski	Issue No: v13a	Date of Issue: November 2019
Approved by: UKTD Advisory Board	Signature (hard copy signed)	Review Date: November 2020

Safeguarding Policy

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POLICY STATEMENT

1. UKTD will carry out its responsibilities under current legislation and statutory guidance for the protection of children, young people and adults at risk.
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 and ensure that everyone knows how to report a concern.
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 tell learners during 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 placement employers, trainers and staff working with learners on employer 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 Safeguarding Partners 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 any allegations will be taken seriously and treated in accordance with the Safeguarding Procedure.
12. UKTD recognises its responsibility in implementing, maintaining and carrying out regular reviews to ensure procedures work to prevent or notify of suspected abuse.

SCOPE AND PURPOSE

This policy applies to all employed staff, contractors, volunteers, employer partners, staff and trainers in the learner's workplace, and to others who work in or on behalf of UKTD.

The purpose of this policy and accompanying Safeguarding Procedure is to ensure that:

- Staff are clear about their responsibilities for safeguarding and protecting all learners who access our delivery/apprenticeship services.
- Staff are clear about the UKTD Code of Conduct and the standards expected.

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- 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 a 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 safe.
 - Employers and managers at learner work placements understand their responsibilities for safeguarding and follow the procedures that are set.

UKTD has procedures in place for responding to situations in which it is believed that a learner has been abused or is at risk of being abused. This also covers circumstances in which a member of staff or other worker is accused 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 encourages these to be reported to an appropriate external agency.

This policy aims to:

- Inform all staff, employers and others working for or with UKTD regarding their responsibilities for safeguarding.
- Establish and maintain an environment where learners feel secure, are encouraged to talk, and are listened to when they have a worry or concern.
- Ensure all learners know there are staff at UKTD whom they can approach if they are concerned.
- Ensure 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 and knowledge they need to recognise and stay safe from abuse, including online safety.
- Enable everyone to have a clear understanding of how these responsibilities should be carried out.

LEGAL FRAMEWORK

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.

This policy has been reviewed and updated in accordance with the following key legislation and statutory guidance:

- Keeping Children Safe in Education (KCSIE DfE Sep 2019)
- Working Together to Safeguard Children (HM Gov Jul 2018)
- What to do if you're worried a child is being abused (HM Gov Mar 2015)
- Work based learners and the Prevent statutory duty (DfE Sep 2018)
- Prevent duty guidance: for FE in England & Wales (Home Office Apr 19)
- Information sharing: advice for practitioners (HM Gov Jul 18)
- Teaching online safety in school (DfE Jun 2019)
- Criminal exploitation of children & vulnerable adults: County Lines guidance (Home Office Sep 2018)
- Serious Violence Strategy (HM Gov Apr 2018)

- The Children Act (1989/2004) / Education Act (2002)
- The Children and Social Work Act (2017)
- Safeguarding Vulnerable Groups Act (2006)
- The Equality Act (2010)
- Counter-Terrorism and Security Act (2015) / CONTEST (Jun 2018)
- Counter-Terrorism and Border Security Act (2019)
- Serious Crime Act (2015)

SAFEGUARDING UPDATED GUIDANCE 2019

In 2018 the Department for Education (DfE) published new versions of *Keeping Children Safe in Education* (Sep 18) and *Working Together to Safeguard Children* (Jul 18), which set out new legal requirements and strengthened safeguarding arrangements. The 2018 Data Protection Act also came into force in May 2018 and incorporated EU GDPR principles and guidance regarding information sharing.

In September 2019, a further updated version of *Keeping Children Safe in Education* came into force and must be followed.

Keeping Children Safe in Education (KCSIE Sep 2019)

This document replaced the 2018 statutory guidance and sets out **what schools and colleges** must have regard to when carrying out their duties to safeguard and promote the welfare of children.

An overview of the key points and updates:

- Upskirting – Added to the guidance as is now a criminal offence. Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Serious Violence - Awareness raising for staff regarding recognising the indicators that children might be at risk from or involved in serious violent crime. Linked to County Lines activities, drug networks and knife and gun crimes. (See page 12 for further information.)
- Updated to reflect new Ofsted Framework - Safeguarding inspections will be in line with the 2019 updated KCSIE document.
- So-called Honour-Based Violence - Increased reference to Female Genital Mutilation and Forced Marriage. Reference to breast ironing added. (See pages 9-11 for further information)
- NSPCC helpline - Updated link at paragraph 53 in KCSIE Part One.
- Multi-agency working - Terminology updated to reflect new local Safeguarding Children Partnerships (replacing Local Children’s Safeguarding Boards (LSCBs).
- Online Safety - Additional link to new DfE guidance for schools, *Teaching online safety in school*, which is also valuable information for post-16 education.
- Data Protection Act / GDPR - Updated to make it clear that in certain situations (eg a child in a refuge) education data may be withheld if in the interests of the child.

Working Together to Safeguard Children (DfE July 2018)

This document replaced the 2015 guidance and sets out **how organisations and agencies** should take a co-ordinated approach to ensure that children are effectively safeguarded.

An overview of key points and updates:

- Children and Social Work Act 2017 – The Children Acts of 1989 and 2004 have been amended by this act, to improve safeguarding provision for looked-after children and to place new duties on key agencies in local areas.
- LSCBs changing to Safeguarding Partnerships – Local authority areas will each have their own safeguarding partnerships, made up of 3 parties – 1) Clinical Commissioning Groups, 2) Local Authorities and 3) Chief Officers of Police.
- Making Referrals – New section highlighting that anyone with a concern about a child's welfare should make a referral to the children's social care immediately.
- Child Death Reviews – New guidance requiring 'Child Death Review Partners' to conduct child death reviews, in place of previous LSCB responsibilities.
- Positions of Trust – 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 early help being available for vulnerable children and those who have specific additional needs – e.g. disabled or SEN; young carers; those at risk of being radicalised or showing signs of being drawn into anti-social or criminal behaviour; those misusing drugs or alcohol themselves or 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 Gov 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*' including the 'Seven golden rules to sharing information'.

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 grow 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 2019)

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”* (Peer-on-peer abuse). (KCSIE 2019)

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 2019).

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 2019).

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 2019)

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, upskirting
- 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 6)

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.” (KCSIE, Sep 2019)*

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 or absence 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”.* (KCSIE, Sep 2019)

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
- An air of detachment – don’t care attitude
- Social isolation – does not join in and has few friends
- Continual self-depreciation or 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. ...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.”* (KCSIE, Sep 2019)

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

- 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
- Frequent running away
- 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 – *"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."* (KCSIE, Sep 2019)

Some possible signs of neglect:

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

SO-CALLED 'HONOUR BASED' VIOLENCE (HBV)

"So-called 'honour based' violence or abuse is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community." (<https://www.herts.police.uk/>).

All forms of HBV are abuse (regardless of the motivation) and this includes female genital mutilation (FGM), forced marriage and practices such as breast ironing. It may occur when there is a belief that a relative has shamed the family and/or community by breaking their honour code. Acts of HBV are often committed with some degree of approval and/or collusion from family and/or community members.

It is important that crimes of this nature are handled with cultural understanding and sensitivity, and local police forces have specialist officers who can investigate and support victims of this type of crime. Contact 101 or dial 999 in an emergency.

Reporting HBV - If a staff member has a concern that a learner may be at risk of HBV or has suffered HBV, they must speak to the Lead Designated Safeguarding Officer (or local DSO) immediately, for action and escalation as required.

1) Female Genital Mutilation (FGM)

"FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences." (KCSIE, Sep 2019)

FGM is a form of child abuse and a criminal offence in the UK. It can also be known as 'female circumcision' or 'cutting', and a 'cutter' is the name given to someone who carries out FGM. It can happen in the UK or abroad and the Home Office has identified girls and women from certain communities as being more at risk: Somali, Ethiopian, Kenyan, Nigerian, Indonesian, Yemeni, Sudanese, Sierra Leonean, Egyptian, Kurdish, and Eritrean.

Statutory Duty to Report Cases of FGM

All teachers, tutors and regulated health/social care professionals in England and Wales have a statutory duty to personally report to the police any cases where FGM appears to have been carried out on a girl under 18. This may be discovered through disclosure by the victim or visual evidence (this would be rare for teachers and must not involve any form of examining).

The above duty does not apply in relation to at risk or suspected cases or in cases where the woman is 18 or over. In these cases, you must report your concerns to a Designated Safeguarding Officer, so appropriate action can be taken and the FGM Helpline contacted (0800 028 3550).

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.

Further details regarding FGM can be found on the NSPCC website - <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm>

2) Forced Marriage

"Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage." (KCSIE, Sep 2019)

Threats can be physical or emotional and psychological and can include:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not)

The pressure put on people to marry against their will may be:

- physical – for example, threats, physical violence or sexual violence
- emotional and psychological – for example, making someone feel like they are bringing 'shame' on their family

A forced marriage is very different to an arranged marriage, which is entered into freely by both people, although their families take a leading role in the choice of partner.

3) Breast Ironing

Breast ironing is a form of physical abuse carried out on girls at the start of puberty (as early as from 9 years old) with the aim of flattening and delaying the development of the breast tissue. It could potentially happen anywhere in the world although evidence has been found of it being practised in Cameroon and countries of western central Africa, Kenya and Zimbabwe.

In many cases the practice of flattening, ironing, pummelling or pounding the breasts is carried out by the child's mother, who believes that it is a good thing to protect their child, make them look less womanly and deter unwanted attention.

CHILD EXPLOITATION

1) Child Sexual Exploitation

"Child sexual exploitation is a form of child sexual abuse that 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." (KCSIE, Sep 2019)

It does not have to involve physical contact for it to be classed as sexual exploitation and, with the growth of the internet and advances in technology, it can take place and be facilitated online.

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 indicate 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
- (KCSIE 2019)

2) Child Criminal Exploitation – County Lines

Children can be groomed and exploited by organised criminal gangs and networks to carry out tasks on their behalf in return for something, e.g. money, gifts, food, shelter or protection. This includes the growing area of County Lines activity, where children, young people and vulnerable adults are being exploited to carry drugs or money from urban areas to suburban and rural areas, market and seaside towns.

It may not be immediately apparent to the child or young person that they are being exploited and they may feel they have found new friendships, emotional support and understanding or a sense of belonging from those who are exploiting them. The key factor in all cases is that there is an imbalance of power and the individual is being coerced, manipulated or deceived into criminal activity.

Visible signs of a child or young person being exploited in this way can be similar to the indicators of child sexual exploitation.

If a staff member is concerned about any form of child exploitation, it must be reported to a Designated Safeguarding Officer immediately, for referral as appropriate.

CHILDREN AND SERIOUS VIOLENCE

There has been a significant recent increase in the number of serious violent crimes taking place involving children and young people, including knife and gun crime. These incidents may be linked to County Lines activities, drug dealing and drug misuse or to gang memberships, and some young people may believe it is the only way that they can be accepted and protect themselves.

The Government has published its *Serious Violence Strategy* which aims to tackle County Lines and the misuse of drugs, and focus on early intervention and prevention, supporting young people to stay away from crime.

"The strategy focuses on early intervention and prevention which can help catch young people before they go down the wrong path, encouraging them to make positive choices." (HM Gov 2018)

The 2019 version of *Keeping Children Safe in Education* also refers to the importance of staff awareness, in spotting early signs and getting children the help that they need.

"All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals." (KCSIE 2019)

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).

As part of our ongoing commitment to safeguarding and promoting the welfare of all learners, we will do all we reasonably can to limit learner exposure to online risks and have filters and monitoring systems in place. We promote online safety in our awareness activities and training resources and ask employers to work with us in helping learners to stay safe online.

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

RESPONSIBILITIES

Everyone who works with children has a responsibility for keeping them safe. All UKTD staff and employers, including other workers, 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 creating a culture of safety and promoting the safeguarding and welfare of the children, young people and adults at risk to all who use our services.
 - 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.
- **UKTD Advisory Board** – to ensure UKTD meets its safeguarding responsibilities under statutory guidance, advise on policy development and approve updates.
- **Lead Designated Safeguarding Officer (LDSO)** – to have lead responsibility for safeguarding and child protection records and training. The LDSO, supported by the local Designated Safeguarding Officers (DSOs), will:

- Co-ordinate safeguarding action within UKTD and ensure the safe and appropriate escalation and closure of cases, as required.
 - 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.
 - Ensure local Designated Safeguarding Officers are sufficiently trained to carry out their supporting role.
 - Co-ordinate company training requirements, identify any development needs and ensure attendance records are being completed.
 - Lead safeguarding meetings and discuss concerns with the Managing Director.
 - Liaise with Safeguarding Partners and other agencies, as required, build relationships and awareness of local safeguarding and Prevent risks and threats.
- **Designated Safeguarding Officers 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 helen.blackbourn@uktd.co.uk
Local Safeguarding Officers (DSOs)	Helen Blackbourn (East & West Midlands)	07875 665934 helen.blackbourn@uktd.co.uk
	Tracey Holden (North West)	07392 873584 tracey.holden@uktd.co.uk
	Debby Cramphorn-Arnold (East of England)	07875 665781 debby.arnold@uktd.co.uk
Dedicated Safeguarding Email Address	safelearner@uktd.co.uk	

- **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.

- **UKTD Managers** – to demonstrate their commitment to safeguarding by upholding the principles of this policy and promoting British values within their every day roles. Leading by example and ensuring the required standards of professional conduct are demonstrated within their teams.
- **UKTD Employees** - to understand that safeguarding and promoting the welfare of children is everyone's responsibility.
 - To follow UKTD Safeguarding and Prevent Policies 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 learner absence to FCD, for inclusion in the Status Report.

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.

UKTD's Safeguarding Code of Conduct sets out the standards of behaviours that are expected. This code is not exhaustive and is in addition to UKTD 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 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.

Code of Conduct for Learners

UKTD is committed to providing the best possible learning experience and setting clear, high and consistent standards of behaviour for both our staff and learners. UKTD's new Learner Code of Conduct will be on OneFile ePortfolio for learners to read and agree to. Tutors will also discuss with learners during induction and whilst on programme.

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 new Counter-Terrorism and Border Security Act 2019 came into force in April 2019, giving police greater powers to prevent and tackle terrorist activity. It also made it an offence to obtain or view terrorist material online without justifiable reason e.g. research for study purposes.

An updated and strengthened CONTEST strategy was published by the government in June 2018, following the 2017 terrorist attacks in London and Manchester which increased the UK National Threat Level to 'SEVERE' meaning an attack was highly likely.

On 4th November 2019, the Home Office announced that the national threat level had been reduced from Severe to 'Substantial'. This still means that an attack could take place without warning and our continued vigilance is required.

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. Risks to our national security are still a real and ongoing concern, so our duty to be both vigilant and responsive is vitally 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)

- To tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
- To safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
- To enable those 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.

UKTD objectives are to ensure:

- 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.

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 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 our learners develop a good understanding and see how these values form an important part of our culture in modern Britain.

Radicalisation – 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 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)

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.

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, support and help to achieve 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

Their website provides practical advice, support and resources, including a blog of interesting and helpful posts - <https://educateagainsthate.com/teachers/>.

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).

REPORTING A SAFEGUARDING OR PREVENT CONCERN

If a staff member has a Safeguarding or Prevent concern, 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.

Refer to UKTD's Safeguarding Procedure for full reporting process

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 (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's Safeguarding Procedure for full details. Both the policy and the 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 child protection advice and guidance. The **Hertfordshire 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 an incident, on a SIR form, and submit to the 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 can be found in UKTD's Safeguarding Procedure. UKTD's Safeguarding Policy and Procedure need to be read alongside the Prevent Policy, as each document contains 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 an external agency, if required.

The "Notice, Check, Share" procedure would also apply for a Prevent concern.

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.

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

RUN, HIDE, TELL - Keeping safe in an incident

The National Counter Terrorism Security Office recommends three key steps for keeping safe in the event of a gun, knife or terrorist attack. The advice is, if caught up in an incident, to **RUN** to safety, **HIDE** if you can't, and **TELL** the police when you're safe. These safety precautions are included in the Learner Handbook and tutors discuss with learners at the beginning of their course programme.

The following training videos give clear guidance on what to do and how to stay safe in an incident situation:

- **'What to do in a terrorist attack'**
Counter Terrorism Policing / PSHE Association / Girl Guiding
<https://www.youtube.com/watch?v=jmYmLg-jQjc>
- **'Stay Safe, Firearms & Weapons Attack'**
National Police Chiefs Council (NPCC)
<https://www.npcc.police.uk/NPCCBusinessAreas/WeaponAttacksStaySafe.aspx>

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 since 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 to promote the welfare, safety and wellbeing of all learners.
- To 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 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 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 2019)

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 harm 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.

If a staff member has concerns or an allegation is made regarding another member of staff, this should be referred to the Lead DSO for discussion with the Managing Director. The Managing Director will also discuss the matter with the HR Manager and, if serious, external agencies or the Police may become involved. Please refer to the UKTD Safeguarding Procedure for full details.

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 approach a colleague for support, and be given access to welfare counselling.

If the allegation involves an employer – In this situation, the Lead DSO would discuss the allegation with UKTD's Managing Director and agree a course of action. This may include a meeting being arranged between the employer and a Designated Safeguarding Officer to discuss and try to resolve the issue. If a more serious matter, the Lead DSO may consult with a local Safeguarding Partner. In all cases, the best interests of the learner must be the highest priority when handling these situations.

WHISTLEBLOWING POLICY

UKTD staff should feel able to raise concerns about any poor or unsafe safeguarding practice(s) or arrangements and know that they will be taken seriously. The Whistleblowing Policy provides a means of making a serious allegation in a way that will ensure confidentiality and protect those making such an allegation in good faith from being victimised, discriminated against or disadvantaged.

Every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. 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.

Whistleblowing allegations will be managed by UKTD's Reporting Officers:

- Managing Director, Theresa Wisniewski
- Human Resources (HR) Manager, Janice Dutton

The NSPCC also 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** 8am to 8pm, Monday to Friday or by email: help@nspcc.org.uk

A summary of the Whistleblowing Procedure can be found in UKTD's Safeguarding Procedure, and please refer to the UKTD Whistleblowing Policy for full details.

SAFER RECRUITMENT OF UKTD STAFF

UKTD is committed to creating a culture of safety and wellbeing and has appropriate safer recruitment procedures and checks in place. 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 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.

References will also be taken up and checked. Recruitment adverts, reference requests and job descriptions will include details of UKTD's commitment to safeguarding and promoting learner welfare.

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 SAFEGUARDING COMMITMENT

UKTD wish to promote ways in which all staff, including 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 a Safer Recruitment Policy is followed and a clear message is sent out that UKTD is committed to safeguarding.
- Providing new staff with robust training during induction on Safeguarding, Health & Safety and Equality, Diversity and Inclusion 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 and Diversity.
- Ensuring opportunities are available for all learners to participate in learning in an enjoyable and safe environment, regardless of 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
HS0005	UKTD SIR Report Form

KEY REFERENCE SOURCES

- Keeping Children Safe in Education (DfE Sep 2019)
- Working Together to Safeguard Children (HM Gov Jul 2018)
- Work based learners and the Prevent statutory duty (DfE Sep 2018)
- Prevent duty guidance: for further education institutions in England & Wales (Home Office Apr 19)
- What to do if you're worried a child is being abused (HM Gov Mar 2015)