UKTD

UKTD Safeguarding Policy		
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Safeguarding Policy

SAFEGUARDING AND COVID-19

In March 2020 the government issued interim safeguarding guidance for schools, colleges and other providers due to the coronavirus outbreak and national lockdown. This covered the many additional challenges of Covid-19 including home schooling, protecting vulnerable children, online safety and mental health awareness.

Although this guidance was withdrawn at the end of July due to the expectation that education settings would reopen in September as normal, the government continues to monitor the situation and will apply specific local or national interventions as required.

In September 2020 the Department for Education (DfE) published an update of Keeping Children Safe in Education (KCSIE). This UKTD policy document has been reviewed and updated to include the changes, and key areas include an additional focus on: mental health and its link to safeguarding; keeping children safe online; and child criminal and sexual exploitation. An overview of the key points and updates are shown on page 4.

UKTD 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 <u>everyone's</u> responsibility.

3. UKTD follows safer recruitment procedures in order to deter, reject or indentify 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 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 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 when required, 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 and/or take action if any suspected abuse.

POLICY SCOPE AND PURPOSE

This policy applies to all employed staff, contract or supply staff, volunteers, employer partners, their staff and trainers in learner workplaces, 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 standards of behaviour expected.

- 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.

UPDATED STATUTORY SAFEGUARDING GUIDANCE 2020

In September the Department for Education (DfE) published an updated version of *Keeping Children Safe in Education* (KCSIE), setting out new statutory requirements and safeguarding arrangements.

Keeping Children Safe in Education (September 2020)

This guidance replaces KCSIE 2019 and sets out **what schools and colleges** must have regard to when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

An overview of the key points and updates:

• <u>Mental health and safeguarding</u> – the new guidance makes a clearer link between mental health and safeguarding, and stresses the role that we play in detecting possible problems and supporting good mental wellbeing. "*All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation*." (KCSIE 2020)
• <u>Contextual safeguarding</u> – updated to highlight that all staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside family, school or college. "*Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.*" (KCSIE 2020)
• <u>Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)</u> – a new paragraph added to Part One of KCSIE with information for staff about these two forms of abuse. More detailed information is given on page 12 of this document.
• <u>So-called Honour Based 'Violence' changed to 'Abuse'</u> – wording has been changed to recognise non-violent forms of this abuse; now abbreviated HBA.
• <u>Role of the Designated Safeguarding Lead</u> – this is covered in detail in Annex B including additional advice on the needs of children with a social worker; suggestions on how to help promote educational outcomes by sharing safeguarding and welfare information; and supporting teaching staff to identify the challenges these children may face and how best to support them to do well.
• <u>'When to call the police' guidance</u> – newly published support guidance for DSLs, deputies and senior leadership teams on what to bear in mind when considering contacting the police if an incident has taken place and a crime potentially committed. It does not cover child protection or safeguarding incidents and UKTD's Safeguarding Policy and reporting procedures must be followed in these cases.
• <u>Safeguarding partners</u> – local area arrangements should now be in place and the three partners include 1) the local authority, 2) clinical commissioning group, 3) chief officer of police for each particular area. "*The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children*." (KCSIE 2020)
• <u>Managing all concerns or allegations about staff</u> – updated to clearly state that processes must also apply to agency supply teachers/staff. An additional point also added covering where someone '*behaved or may have behaved in a way that indicates they may not be suitable to work with children*'. (KCSIE 2020) This relates to a possible 'transferable risk' e.g. a domestic violence at home situation.

- Teaching safeguarding – this has been updated in KCSIE Part Two (Management of Safeguarding) with reference to RSHE (Relationship and Sex Education, and Health Education) becoming compulsory in schools from September 2020. DfE Guidance – https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

- Domestic abuse – additional information has been provided at Annex A to make clear how children may be adversely affected by witnessing this in the context of their home life. Operation Encompass is a system between the majority of police forces and schools, where they work together to provide practical and emotional support for those children who have been affected. https://www.operationencompass.org/school-participation

- County lines – additional information is provided at Annex A.

- Upskirting – additional information is provided at Annex A.

- Education Inspection Framework - reference made to Ofsted's EIF inspection document and that '*Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective*.' (KCSIE 2020)

- Information sharing – updated guidance in Part One on data protection principles and GDPR in relation to the sharing (and withholding where appropriate) of information. A link to "Data protection: a toolkit for schools" has been added.

- Online safety – additional guidance and links added to Annex C including education at home during coronavirus. https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19

- Preventing radicalisation – updated information has been added to Annex A including the addition of a definition of terrorism (see definitions section below) and information on Channel.

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 statutory guidance, legislation and advice:

- Keeping Children Safe in Education (DfE Sep 2020)
- 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)
- Sexual Violence & Sexual Harassment Between Children in Schools & Colleges (DfE May 2018)
- Promoting Children and Young People's Emotional Health and Wellbeing (PHE Mar 2015)
- Criminal exploitation of children & vulnerable adults: County Lines guidance (Home Office Sep 2018)
- When to Call the Police: Guidance for Schools & Colleges (NPCC Feb 2020)
- Multi-agency Statutory Guidance on Female Genital Mutilation (HM Gov Jul 2020)
- Prevent duty guidance: for FE in England & Wales (HM Gov Mar 2015/ Apr 2019)
- Work based learners and the Prevent statutory duty (DfE Sep 2018)
- Information sharing: advice for practitioners (HM Gov Jul 18)
- Serious Violence Strategy (HM Gov Apr 2018)

Acts of law

- The Children Act 1989/2004
- Education Act 2002 (Section 175)
- The Children and Social Work Act 2017
- The Children and Young Persons Act 2008
- Safeguarding Vulnerable Groups Act 2006
- The Equality Act (2010)
- Counter-Terrorism and Security Act (2015) / CONTEST (Jun 2018)
- Serious Crime Act (2015)
- Counter-Terrorism and Border Security Act 2019

DEFINITIONS

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

Adult at Risk – is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and/or support**.**

Safeguarding – is the action that is taken to promote the welfare of children and protect them from harm. The updated definition of safeguarding in KCSIE 2020 includes children's mental and physical health and is defined in full as:

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

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.

Abuse - is a form of maltreatment towards a child or individual that deliberately or unknowingly causes that person harm, or endangers their life through neglect by failing to prevent harm. It can be passive or active, a one-off or something that is repeated, and take place in person or online. "*Children may be abused by an adult or adults or by another child or children*" (Peer-on-peer abuse). (KCSIE 2020)

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 2020)

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 – "*is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.*" (KCSIE 2020)

Radicalisation – "*refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups*". (KCSIE 2020)

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 2020)

Terrorism – "*is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause*."

(KCSIE 2020)

RECOGNISING SIGNS OF ABUSE

"Knowing what to look for is vital to the early identification of abuse and neglect." (KCSIE 2020)

It is important to recognise that abuse, neglect and safeguarding issues are rarely stand-alone events and there may be multiple issues that overlap. The list below shows some of the many forms of abuse and areas where there is cause for concern.

Safeguarding concerns may include, but not be limited to, one or more of the following:

- Sexual abuse, child sexual exploitation (CSE), child criminal exploitation (CCE)
- Grooming, exposure to harmful online material, sexting, upskirting
- Physical and emotional abuse or neglect
- Sexual violence or sexual harassment between children
- Domestic violence or abuse, gang activity, knife crime, youth violence
- Inappropriate behaviour by staff
- Bullying, online bullying, peer-on-peer abuse or harm
- Mental health problems, self-harm, risky behaviour
- So-called 'honour-based' abuse - forced marriage, FGM, breast ironing
- Radicalisation, extremist behaviour or ideologies
- Substance misuse, drug taking, alcohol abuse
- Homelessness or unsuitable housing, unsafe activities and environments
- Victimisation due to race, sexuality, faith, gender or disability
- Neglect by care givers or self-neglect

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 2020)

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 – "...*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*". (KCSIE 2020)

A child may be starved of love and affection or be constantly criticised or humiliated. This form of abuse may be difficult to recognise as the symptoms may be hidden and the abused person is withdrawn, introverted or depressed. It may also involve seeing or hearing the ill-treatment of another e.g. domestic abuse.

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-harm
- Bullying (including cyberbullying)
- Fear of parents/carers being contacted
- Witnessing domestic abuse
- Extremes of passivity or aggression
- Drug/solvent abuse

- Frequent running away or absence from work
- 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".*

It may be physical contact or non-contact 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 2020)

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. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs." (KCSIE 2020)

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' ABUSE (HBA)

The Crown Prosecution Service (CPS) give the following definition of HBA:

"***an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community's code of behaviour***."

CPS - https://www.cps.gov.uk/about-cps

All forms of HBA are abuse (regardless of the motivation) and this includes female genital mutilation (FGM), forced marriage and practices such as breast ironing. It is important that crimes of this nature are handled with cultural sensitivity, and local police forces have specialist officers who can investigate and support victims. Contact 101 or dial 999 in an emergency.

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

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 2020)

FGM can also be known as 'female circumcision' or 'cutting', and a 'cutter' is the name given to someone who carries out FGM. It is a serious crime that is not required by any religion and there are no health benefits of FGM.

Indicators of FGM - A girl or woman who has had female genital mutilation 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.

Statutory Duty to Report Cases of FGM

"*On 31 October 2015 a new duty was introduced that requires health and social care professionals and teachers to report 'known' cases of FGM in girls aged under 18 to the police*." (Home Office)

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 <u>does not</u> 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).

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

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 2020)

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)
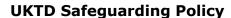
The pressure put on people to marry against their will may be:
- physical – for example, threats, physical violence or sexual violence
- emotional and psychological – for example, making someone feel like they are bringing 'shame' on their family

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

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 SEXUAL EXPLOITATION (CSE) & CHILD CRIMINAL EXPLOITATION (CCE)

"Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity." (KCSIE 2020)

Some of the following signs may be indicators of CSE or CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- 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

Child Sexual Exploitation (CSE)

"CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator." (KCSIE 2020)

In addition to the above possible indicators of child sexual exploitation, additional signs might be:
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant

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

Key factors of CSE:

- 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);

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- 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.

Child Criminal Exploitation (CCE)

"*CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence*". *(KCSIE 2020)*

Children can be groomed and exploited by organised criminal gangs or networks to carry out tasks on their behalf in return for money, gifts, food, shelter or protection. This includes the growing area of county lines activity, explained below. 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.

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.

COUNTY LINES AND SERIOUS VIOLENCE

"***County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of 'deal line'***." (KCSIE 2020)

Vulnerable children and adults are at risk of being targeted and recruited to store or move drugs or money from urban areas to suburban and rural areas, market and seaside towns. This form of exploitation may take place online or in a school or college environment. It may involve grooming and the giving of money or gifts and criminals may use threats or violence to control and ensure compliance of their victims, who feel trapped and fearful.

There has been a significant 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 that being part of these groups is the only way that they can be accepted and protect themselves.

The Government published its *Serious Violence Strategy* which aims to tackle county lines and the misuse of drugs, and focus on 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 following indicators may signal a child is at risk of or is involved in county lines or serious crime:

- increased absence from school or college
- change in friendships or relationships with older individuals or groups
- a significant decline in performance

- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions

PEER ON PEER / CHILD ON CHILD ABUSE

"*Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals*." (KCSIE 2020)

Child on Child Sexual Violence and Sexual Harassment

The Department for Education published its '*Sexual violence and sexual harassment between children in schools and colleges*' guidance in May 2018 to provide staff with advice and information on what this might like look and what to do if they have a concern or receive a report. https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges

In 2018 the NSPCC published their helpline report which showed that in 2016/17 the service provided over 3000 counselling sessions to children and young people concerned about being sexually assaulted by their peers. Experiences of this kind can be traumatic and distressing and it is essential that victims are reassured that they are being taken seriously, and will be given support and kept safe. It is also important that the wishes of the victim are considered, in terms of how they want to proceed.

- **Sexual violence refers to the offences under the Sexual Offences Act 2003:** rape, assault by penetration, sexual assault.

- **Sexual harassment includes**: unwanted conduct of a sexual nature, sexual remarks, lewd comments, sexual jokes or taunting, displaying photos/images of a sexual nature, deliberately brushing against someone or interfering with someone's clothes, and sexual harassment that takes place online, including sexualised bullying, non-consensual sharing of sexual images or videos, upskirting, unwanted sexual comments on social media, and sexual exploitation.

KCSIE also states that all staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

MENTAL HEALTH

UKTD recognises the important role it plays in supporting the mental health and wellbeing of all learners, particularly in these current times when worries about coronavirus (Covid-19) and feelings of stress, anxiety or depression may be heightened. Everyone's response to stress is different and a key role that all staff play is to be alert to any changes in behaviour or coursework progress and to recognise this may be a sign that a learner is struggling emotionally, experiencing a mental health problem, or is at risk of developing one. UKTD promote good mental and physical wellbeing through our 'British Values and Wellbeing Activities' and online tasks, giving learners opportunities to access information, support them on a number of topics and have discussions with their tutors.

Staff are not expected to be experts on mental health or to try and diagnose a condition, however, we are required to raise any concerns with a designated safeguarding officer and to report details of any concerning observations.

It is also important for all staff to recognise that mental health problems may be a possible indicator of a safeguarding concern:

> **"All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation."** (KCSIE 2020)

Guidance and support will be given by DSLs and UKTD safeguarding processes will be followed, including referring the learner to their GP; providing details of organisations who offer self-help and online support; wellbeing assessment tools e.g. NHS Every Mind Matters https://www.nhs.uk/oneyou/every-mind-matters; and ensuring the learner has emergency crisis support line details. DSLs will maintain contact with the learner and tutor throughout any periods of concern and will escalate to safeguarding partners or external agencies, as required. <u>If the learner is in immediate danger of harming themselves or others around them please contact the police immediately</u>.

The following Public Health England and Department for Education documents also give excellent advice and guidance:

- *Promoting children and young people's emotional health and wellbeing* (PHE 2015)
- *Mental health and behaviour in schools (DfE 2018)*

ONLINE SAFETY

The use of and access to technology has increased so much in modern times, and even more so during the current coronavirus pandemic where remote education, home working and online communication has increased hugely.

Online harm has become a significant component of many safeguarding issues and there are three areas of risk:

1) **Content** (being exposed to harmful material).

2) **Contact** (being subjected to harmful online interaction).

3) **Conduct** (harmful behaviour e.g. online bullying, sending/receiving explicit images).

As part of our ongoing commitment to safeguarding and promoting the welfare of all learners, we provide resources, awareness activities and online tasks to educate learners on the risks associated with using technology and how to stay safe. We also ask employers to work with us in helping learners to stay safe online, and we do all we reasonably can to limit learner exposure to online risks and have filters and monitoring systems in place.

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

Professional standards for online teaching and meetings

Staff should always maintain appropriate professional standards when teaching learners or holding meetings online, and this includes displaying the same standards of dress, appearance and conduct as would be expected in the workplace. Additional information regarding safeguarding and remote education during coronavirus can be found at: https://swgfl.org.uk/resources/safe-remote-learning.

RESPONSIBILITIES

Everyone who works with children has a responsibility for keeping them safe. All UKTD staff and employers, including supply or 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:

- **UKTD 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, and 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.
  - To ensure relevant staff follow the data protection principles regarding information sharing, which allow them to share (and withhold where appropriate) personal information in accordance with Data Protection Act 2018 and GDPR.

- **UKTD Advisory Board** – to ensure UKTD meets its safeguarding responsibilities under statutory guidance, advise on policy development and approve updates.

- **UKTD Lead Designated Safeguarding Officer** (LDSO) **–** to have lead responsibility for safeguarding and child protection records and training. The LDSO will be supported by the local Designated Safeguarding Officers (who will also deputise) and will:
  - Co-ordinate safeguarding/child protection 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.

- Act as the main point of contact with the three safeguarding partners and liaise with other agencies, as required.

- Manage any referrals of suspected abuse to the local authority children's social care and refer radicalisation concerns to the Channel programme, as required.

- Lead safeguarding meetings and discuss concerns with the Managing Director.

- Hold and share any safeguarding or welfare information about a child who has a social worker, as appropriate, to help promote their educational outcomes and support tutors to identify any individual challenges and plan how best to give support.

- **UKTD Designated Safeguarding Team** (Lead DSO and DSOs)

- Provide advice, support and expertise to staff on issues relating to safeguarding, child protection and Prevent, including signposting to professional organisations.

- Promote positive safeguarding procedures and practice.

- 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.

- Build relationships with agencies and awareness of local safeguarding and Prevent risks and threats.

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
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 for those in regulated activity 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** (including contracted and supply staff) - to understand that safeguarding and promoting the welfare of children is <u>everyone's</u> 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.

  <u>Learner contact staff will also</u>**:**

  - 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.

  - Promote awareness activity discussions with learners, signpost to help and support, and raise any concerns.

  - Report any learner absence to FCD, for inclusion in the Status Report.

- **Learner Employers** – to follow UKTD Safeguarding and Prevent Policies and Procedures and understand their duty of care to the learners they employ.

UKTD STAFF CODE OF CONDUCT

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

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

- Staff should display the highest possible standards of professional behaviour and conduct when working with learners, and this includes any remote online education.

- Always maintain professional standards of dress and appearance, including when teaching learners remotely or holding meetings online.

- 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 you have the authorisation of your manager first.

- Ensure that if you wish to post any images of learners, 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 - this 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 staff and learners. UKTD's Learner Code of Conduct is on OneFile for learners to read and agree to. Tutors will also discuss this with learners during induction and whilst on programme.

SAFEGUARDING AND 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"**. This is known as the Prevent Duty and forms part of the government's wider counter-terrorism strategy called CONTEST. One of the objectives of Prevent and a key area where we can play our part is:

- To safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.

All teaching and training providers have a responsibility to comply with the Prevent Duty, as part of their overall safeguarding duty of care, and to educate, support and protect as much as is reasonably possible all learners from the risk of radicalisation and extremism.

British values

Children and young people may be vulnerable to extremist ideology and radicalisation and there is no single way of indentifying who might be likely to be susceptible. A key part of the Prevent Duty is to build learner resilience to the threat of radicalisation, challenge extremism, raise awareness and promote the following fundamental British values:

- Democracy
- Rule of law
- Individual liberty
- Mutual respect and tolerance of those with different faiths or without faith

UKTD

Radicalisation online

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 personal information 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."

(CONTEST Strategy 2018)

Staff should be alert to any changes in behaviour that may be an indicator that a child or young person is at risk of radicalisation, and to raise any concerns immediately with a designated safeguarding officer.

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

> **Refer to the UKTD Safeguarding Procedure for the full reporting process**

However, if a learner does display one or more of these indicators this does not automatically mean that the learner is 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 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 current and informative posts - https://educateagainsthate.com/teachers/.

UKTD Prevent Duty objectives are to ensure we:

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

UKTD's Prevent Policy must be read alongside the Safeguarding Policy and Procedure.

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.

UKTD's Safeguarding Procedure document must be followed, and a summary of the key areas is shown below.

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 the Managing Director.

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 a full list of local Safeguarding Reporting Services contact numbers at the back of the UKTD Safeguarding Procedure.

Important: Staff must complete a report on a SIR form as soon as possible after an incident or when any concern is raised, and submit it 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'. Please refer to the UKTD Safeguarding Procedure for full details.

The following is an overview of the 5 steps of this process and 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 - https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/99-accessibility-script.html

Safeguarding training and awareness raising

UKTD is committed to supporting and training all staff, particularly those who work with or who come into contact with learners. All new staff receive Safeguarding and Prevent induction training and are required to complete online training. UKTD also runs in-house Safeguarding and Prevent refresher training sessions and provides 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 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, British Values and Wellbeing activity booklets, and learning resources/videos available on OneFile ePortfolio. These resources are regularly reviewed to ensure the materials are relevant and 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 them 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, which include:

➢ 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 to 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 their induction and qualification.

External Speakers - it is the responsibility of any UKTD staff member, who may organise 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 a 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 2020)

If an allegation being dealt with is regarding a supply tutor or contracted staff, it should still be dealt with properly and UKTD safeguarding procedures apply. Part 4 of KCSIE 2020 guidance covers this in detail.
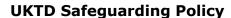
Possible reasons for an allegation to be made

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

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If a staff member has a concern or an allegation is made regarding another member of staff, this should be referred to UKTD's Managing Director immediately and recorded on a SIR form. The Managing Director will discuss the matter with the Lead DSO and HR Manager and, if serious, contact will be made with external agencies or the police, as appropriate. 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 the 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 this 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 nature, content and context of the allegation with UKTD's Managing Director and agree a course of action. This may include a meeting being arranged between the employer and Lead DSO to investigate the matter, gather further information and escalate if required. If a more serious matter, contact will be made with a safeguarding partner, children's social care services or the police, as appropriate. In all cases, the best interests of the learner must be the highest priority when handling these situations.

Legal duty to refer to the DBS - if a member of staff in a regulated activity is dismissed or removed due to safeguarding concerns, or would have been had they not resigned, a referral must be made by the HR Manager to the Disclosure and Barring Service (DBS). Referrals should be made as soon as possible, and this would normally be on conclusion of an investigation. Further information can be found at:
https://www.gov.uk/government/collections/dbs-referrals-guidance--2

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 the 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 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 copy of the full UKTD Whistleblowing Policy can be requested from the HR Manager.

SAFER RECRUITMENT POLICY

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. However, 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 where 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 helped to develop their safeguarding knowledge and understanding of how to be 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 2020)

- 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)