UKTD Safeguarding Policy		
Issued By: Theresa Wisniewski	**Issue No**: v15	**Issue Date** **8ᵗʰ September** 2021
Approved by: UKTD Advisory Board	**Signature**	**Next Review Date**: September 2022
Policy to be amended & updated annually or as required by the issuer by reviewing current legislation, guidelines and advice.		

Safeguarding Policy

In September 2021 the Department for Education (DfE) published an update of Keeping Children Safe in Education (KCSIE).

This is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002 and the Education and Training (Welfare of Children) Act 2021. Schools and colleges in England must have regard to it 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

This included an added reference to the Education and training (Welfare of Children) Act 2021

This legislation, enacted in April 2021 amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 to impose safeguarding duties on 16 to 19 academies and further education in essence ensuring that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.

This UKTD policy document has been reviewed and updated to include the changes in KCSIE and Working together to safeguard Children, using department advise on What to do if you are worried a child is being abused and Sexual violence and sexual harassment between children.

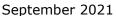An overview of the key points and updates are shown on page 5.

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 particularly important, as they are in a position to identify concerns early, provide help for children and young people, promote childrens welfare and prevent concerns from escalating.

- 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.
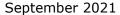
UKTD has procedures in place for responding to situations in which it is believed that a learner has been abused or is at risk of being abused. This also covers circumstances in which a member of staff or other worker is accused or suspected of abuse.

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 2021

Working Together to safeguard Children (Dec 20)

While technically not a new edition of Working Together, retaining the same date, there are many significant changes in the new guidance.
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.

Keeping Children Safe in Education (September 2021)

In 2021 the Department for Education (DfE) published an updated version of *Keeping Children Safe in Education* (KCSIE), setting out new statutory requirements and safeguarding arrangements.
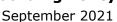
This guidance replaces KCSIE 2020 and sets out **what schools and colleges** must have regard to when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

An overview of the key points and updates: KCSIE

- Part one: Safeguarding information for all staff.
- Peer-on-peer abuse – updated to highlight that policy and procedure should include procedures to deal with peer on peer abuse, and the behaviour policy (Code of conduct) should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- The section on peer-on-peer abuse has been increased to provide more explicit information about this form of abuse, including widening of the definition to include "abuse in intimate personal relationships between peers."
- Bullet point added in the peer-on-peer section to reinforce the need to ensure children and young people have systems available to them to report abuse. Further bullet points added to set out that there should be a statement that there is a zero-tolerance approach, and that even if there are no reported cases, staff must not take the view that it does not happen in their settings. There is also additional information provided clarifying the government's view of what constitutes peer-on-peer abuse.
- Online safety - a new Addition of text to convey that child protection training at induction should also include online safety, and that there should be regular updates in relation to this as required and at least annually.
- New paragraph added to reflect the impact of technology in safeguarding and wellbeing issues, and that children and young people can be victims and perpetrators of the abuse.
- The section on online safety has been substantially rewritten bringing in the contents of the Annex C from the previous version of Keeping Children Safe in Education, therefore mainstreaming this as opposed to it being viewed an additional section.

- Exploitation – new wording-When ensuring that all staff know what to do when a child discloses, exploitation has been specifically included with abuse and neglect. Also a Paragraph amended to include an expectation that staff are aware of specific safeguarding issues "such as child criminal exploitation and child sexual exploitation."

- Inclusion of sexual abuse and county lines as examples of extra-familial harms that children can be vulnerable to.

- The section relating to CSE and CCE has been substantially increased, with both sexual exploitation and criminal exploitation getting their own sub-sections setting out clearly what each entails.

- Sexual harassment and sexual violence - A new paragraph has been added which reads:
  "All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report."

- Sexual Abuse - The definition of sexual abuse has been amended so that there is no longer a reference to a "high level of violence", instead now reading "Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence".

- Early help - When considering whether a child is in need of early help, the remit in relation to disability and specific additional needs has been expanded to include "certain health conditions". The same list has also been expanded to include children who have a mental health need, are at risk of 'honour'-based abuse, has a parent in prison (or is affected by parental offending) or are persistently missing from education. The issue of county lines is also now specifically mentioned along with a widening of the term exploitation to "sexual or criminal exploitation".

- Reporting concerns - Emphasis added to the paragraph about multiple issues overlapping so that it is now clear that "staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy)."

- Information Sharing – Clarification added that the expectation is that staff should share concerns as soon as possible, regardless of whether a child is open to Children's Services or not, and regardless of the level of any involvement (e.g. CP Plan, in care).

- Contextual Safeguarding - Addition of paragraph setting out that any assessment by Children's Social Care should consider wider family and environmental factors, and that it is therefore important that when information is shared staff consider what else they know about the context the child or young person lives in.

- Recording - Section on record keeping expanded to include need to keep information secure and confidential, as well as setting out what information records should include:
  - a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved;
  - a note of any action taken, decisions reached and the outcome.

- Managing all concerns or allegations about staff –

- Expansion on section about what to do when there are concerns about another staff member so that contractors are included and emphasising that settings should have

processes and procedures in place for any such concerns.

- Part Two: The management of safeguarding.
- Oversight – Emphasis added around the role of the governing body or proprietor having "strategic leadership responsibility for their school's or college's safeguarding arrangements". It further clarifies that it is the head teacher or principal's role to ensure that staff understand and follow policies and procedures agreed by the governing body or proprietor. The expectation is set out of there being facilitation of a "whole school approach to safeguarding" whereby safeguarding and child protection underpin all relevant policy and processes. The guidance states that all systems should "operate with the best interests of the child at heart", and that school leaders and governors should ensure that there are suitable means by which children can say what is happening to them and know that they will be heard.
- Send Oversight - The section relating to children with special educational needs and disabilities or physical health issues (SEND) has been bolstered to include children with certain health issues. There is also an explicit requirement on governors and proprietors to ensure their child protection policy reflects the additional risks this cohort may face and how they will address the challenges this presents.

- Safeguarding policies and procedures – The guidance around what should be in child protection policies has been enhanced, with the emphasis now being on an effective policy reflecting a number of different areas:
  - Effective child protection policy
  - A behaviour policy (staff code of conduct)
  - Staff behaviour policy (code of Conduct)
  - Appropriate safeguarding arrangements.

- Staff Training– Two new paragraphs added, setting out expectations about staff training and this building on the whole school / college approach and is an integral part of wider staff training and curriculum planning. Reference also made to the Teacher's Standards and the expectations within the standards around behaviour and understanding of the needs of all Learners.

- Teaching Safeguarding – Addition of text that sets out the potential need to adopt a more personalised approach when teaching safeguarding and online safety, emphasising that one size does not necessarily fit all.
- Further specific resources added that may help staff teach about safeguarding.

- Allegation against a staff member - Paragraph added to introduce how low-level concerns about staff should be dealt with and referring readers to section 2 of Part four of the document.
- Paragraph added to reinforce the need to consider referring teachers to the Secretary of State via the TRA if the teacher is dismissed or released from their contract (or would have likely been had they not left before that happening) due to serious misconduct,

- Part Three: Safer recruitment.
- Safer recruitment - Significant revision of part three from previous versions to be more explicit about the safer recruitment process and ensuring the guidance fits with the different stages of the process that schools are expected to go through, with an emphasis on the need to ensure that those involved in recruitment and

employment of staff have received safer recruitment training.

As well as reframing the existing section to be more explicit about each step of the process, there is an additional section about ensuring the ongoing safeguarding of children and legal reporting duties on employers which consolidates existing expectations to refer to various bodies if there are concerns about an individual. Main body now also incorporates what was originally in Annex G (i.e. information about the types of disclosure and barring service checks that are available).

- The document is however clear that there are no changes to legal duties.
- Information added about the use of birth certificates (identified as best practice) to check candidate's names.

- 16-19 providers – paragraph 212 Reinforcement of the additional provisions bought in for 16-19 providers and further education by the Education and Training (Welfare of Children) Act 2021.

Part Four: Allegations made against/ concerns raised in relation to teachers.
- In the notes about the changes, the guidance states: "Following requests via the consultation for further information on low level concerns, we have separated Part four into two sections – Section one for allegations that may meet the threshold and Section Two for allegations/concerns that do not meet the threshold i.e. low level concerns.   - As such we have included in Section Two, information about concerns that do not meet the harm threshold. This includes what a low-level concern is, making the link between low level concerns, staff code of conduct and safeguarding policies, and recording and sharing information with relevant parties including whether this information should be included in references."   - As with Part three, there has been a rearranging of this part with some clarifying information, however the context has changed little.
Initial response - This section covers the initial response to an allegation – it has been expanded to be clear that when an allegation is made there is a need to consider the welfare of the child(ren) concerned as well as investigating and supporting the person subject to the allegation.

Part five: Child on Child sexual violence and sexual harassment
- Sexual violence and sexual harassment - Additional paragraphs 428-434 setting out that such abuse can happen in or outside of the setting as well as online and the need for an "it could happen here" approach. The paragraphs reinforce the need for all reports to be taken seriously and that the victims are supported throughout. Readers are also reminded of the separate Sexual Violence and Sexual Harassment guidance.   - Two new paragraphs 435-436 reinforcing the earlier position that there needs to be acknowledgement and understanding of the scale of harassment and abuse, and that non-recognition / downplaying the scale and scope leads to a dangerous culture in the setting.   441 is a new paragraph which identifies that children and young people may not always make a direct report and information may come from overheard conversations or observed behaviour changes. Paragraph 442 identifies that if the setting responds poorly to a report this can undermine the confidence of others to report what is happening to them. This is then reinforced in paragraph 448.   - Additions made to paragraph 450 provide clarity that the expectation is of a zero-tolerance approach to all reports / actions. The need for a zero-tolerance approach is then reflected further throughout this section.   - New paragraph 452 sets out that "decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt".   - Paragraph 454-455 New section on unsubstantiated, unfounded, false or

malicious reports which provides a reminder about recording concerns and what to do when a report is found to be unsubstantiated, unfounded, false or malicious including the need to consider whether the person making the allegation did so as a cry for help, or whether disciplinary action (in line with the behavioural policy) is indicated.

- Section on the ongoing response added to in order to provide recognition that for the victims of sexual assault there can be a number of physical and mental health implications which may require additional support.
- Paragraph 464 Section in relation to supporting the alleged perpetrator added to in order to provide further information about harmful sexual behaviour and provide signposting to sources of support.

Annex A: Safeguarding information for school and college staff
- The guidance notes advise that Annexe A is:
- "A new condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children."
- The summary has also had a paragraph added clearly stating that the responsibility to ensure staff are supported to understand and discharge their role and responsibilities under Part one sits with governors and proprietors asking more of governors by setting out the expectation that they put in place a 'whole school and college approach to safeguarding', ensuring safeguarding underpins **all** aspects of process and policy. The policy framework itself has been tightened and this theme runs throughout the document.

Annex B: Further information
- What was originally Annex A in the previous guidance has been bolstered slightly with additional information in relation to exploitation, modern slavery (and the National Referral Mechanism), county lines, peer-on-peer abuse and preventing radicalisation. There are two new areas added in relation to child abduction and cybercrime.
- Domestic Abuse : This section has been added to in order to reflect the implications of the Domestic Abuse Act 2021. As the guidance notes:
- "The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act)."

Annex C: Role of the designated safeguarding lead
- Working with others: This section has been bolstered to set out the expectations about the working relationships the DSL should have, and where they should provide support. Whilst this does not look too different to the role that a DSL will be doing already, it is important to note that this is recognition of the scope of working relationships and the light in which the DSL is seen.
- Information Sharing: This section builds on the previous "Child protection file" section and now not only covers the transferring of records when a child leaves school, but also the requirements around storing of records and access to those records with the expectation that the DSL will oversee this. A new 5-

day window is introduced for the transferring of the child protection file.
- Understanding the views of children: A new section that identifies that the DSL should be supported in developing knowledge and skills to encourage a culture of listening and reducing barriers to disclosure.
- Holding and sharing information: Building on the previous section about information sharing, this section reinforces the expectation that the DSL should understand the importance of information sharing, the regulations around information sharing and the need to keep accurate and detailed records.

Annex D: online safety
- With the majority information about online safety now being in the main body of the document, this annex now is a source of useful resources to help support DSLs in ensuring that online safety is considered throughout the setting.

An overview of the key points and updates: Working Together to safeguard Children

- <u>Contextual safeguarding</u> - as with Keeping Children Safe in Education 2020, has been renamed Assessment of risk outside the home. The section (p25) now includes teenage relationship abuse as a specific threat.
- New section on notifications of serious incident, rapid review and local child safeguarding practice review on page 96.
- The definition of safeguarding and promoting the welfare of children has been updated in line with KCSIE to specify "mental and physical" health (p7)
- References to domestic abuse have been strengthened throughout the document with explicit and repeated reference to controlling and coercive behaviour. The section on child centred approach to safeguarding now explicitly mentions domestic abuse and controlling and coercive behaviour (p9), it is cited as an example for Police (p65). The definition of abuse in the glossary has changed to now include: "Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse" (p106) and definitions of domestic abuse and coercive and controlling behaviour have been added to the glossary (p110-111)
- The section on identifying families in need of early help states multi-agency training is important in identifying need, but adds and to understand "the services available to support children and young people" p13. It then adds to the additional areas practitioners should develop their knowledge in around new and emerging threats. In addition to online abuse, grooming, CSE and radicalisation the updated guidance adds CCE, domestic abuse and controlling and coercive behaviour and its impact on children (p14)
- Being alert to need for early help now includes having a parent or child in custody (p14) and, in line with KCSiE, recognises mental health problems can be an indicator of abuse. Only appropriately trained professionals should diagnose, but Working Together specifies school staff as well placed to observe and identify risk. It highlights the importance that school staff are aware of impact of ACEs. (p15). There is a new paragraph saying where a young person is admitted to mental health facility there should be consideration of a social care referral (para 20, p18). Local protocols for assessment should pay additional care to children in mental health inpatient settings (p27)
- Information sharing triggers increased from where children go missing to those at risk of going missing (p19)
- The much quoted section on "Fears about sharing information <u>must not be allowed</u> to stand in the way of the need to promote welfare" has had the underlining
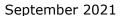
removed and a reference to GDPR inserted (p19). The bullet point on aiming to seek consent has been removed and replaced with a GDPR analysis around the appropriate legal base as a 'legal obligation' or 'public task' as the bar for consent under GDPR is higher than under the DPA 1998. The remainder of this section adapts around this (p20). The myth busting guide on p21 has been similarly adapted.

- P23 brings a new section on the homelessness duty under the Homelessness Reduction Act 2017. This places a duty on all social services functions (inc early help and leaving care) to refer to a housing authority service if service users are or may be homeless, or are threatened with homelessness, with the consent of the service user. (p23).

- The fourth bullet point in respect of allegations about people in positions in trust added in KCSiE has been added to working together (p60)

- There is a wider notification requirement for armed service children who are made subject to a child protection plan (p72)

- Violence reduction units have been added to the list of strategic partnerships that should be considered (p76) in forming safeguarding partnerships. The requirement to publish the organisations and agencies they consider relevant and involve has been downgraded to "should".

- The link to the Child Safeguarding Online Notification form has changed to https://www.gov.uk/guidance/report-a-serious-child-safeguarding-incident (p86)

- The link to the FII guidance has been removed from the sources of further information and the following have been added:

  Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation Department for Education and Ministry of Housing, Communities & Local Government (p112)

  o Child Exploitation Disruption Toolkit Home Office (p113)

  o Commissioning framework for CSA support Home Office (p113)

  o Draft Domestic Abuse Statutory Guidance Framework Home Office (p113)

  o Homelessness code of guidance for local authorities Ministry of Housing, Communities and Local Government (p114)

  o Guide to General Data Protection Regulations (GDPR) – Information Commissioner's Office (ICO) (p115)

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 2021)
- Working Together to Safeguard Children (HM Gov Jul 2018)(updated Dec 2020)
- 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 Sept 2021)
- Promoting Children and Young People's Emotional Health and Wellbeing (PHE Feb 2021)
- Criminal exploitation of children & vulnerable adults: County Lines guidance (Home Office Feb 2020)
- 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 April 21)
- Work based learners and the Prevent statutory duty (DfE May 2021)
- Information sharing: advice for practitioners (HM Gov Jul 18)
- Serious Violence Strategy (HM Gov May 2021)

Acts of law

- The Children Act 2004
- Education Act 2002 (Section 175)
- Apprenticeships, Skills, Children and Learning Act 2009
- Education and training (Welfare of Children) Act 2021
- 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 definition of safeguarding in KCSIE 2021:

- 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.
- Children includes everyone under the age of 18

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*".

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*".

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 *All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.*
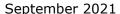
Channel – "*is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.*"

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

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 This also includes calling for the death of members of the armed forces*".

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.*"

RECOGNISING SIGNS OF ABUSE

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

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."*

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)

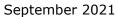The Crown Prosecution Service (CPS) give the following definition of HBA:

"***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
•

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.

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."

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)

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);

- 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*".

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 using dedicated mobile phone lines or other form of 'deal line'***." This activity can happen Locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Vulnerable children and adults are at risk of being targeted and recruited to store or move drugs or money. 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***."

Child on Child Sexual Violence and Sexual Harassment

The Department for Education updated its '*Sexual violence and sexual harassment between children in schools and colleges'* guidance (September 2021) 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. Everyone's response to bereavement, loss, anxiety, stress and trauma 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."**

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. If the learner is in immediate danger of harming themselves or others around them please contact the police immediately.

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 following Coronavirus 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 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 <mark>three safeguarding partners</mark> 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
	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 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.

  - 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 statutory 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

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
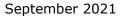- Know what to do if concerned about a learner

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 2021)

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 2021 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.
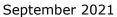
Whistleblowing allegations will be managed by UKTD's Reporting Officers:

- 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 2021)

- Working Together to Safeguard Children (HM Gov Jul 2018-Updated Dec 2020)

- Work based learners and the Prevent statutory duty (DfE Sep 2018- updated May 2021)

- Prevent duty guidance: for further education institutions in England & Wales (Home Office Apr 2021)

- What to do if you're worried a child is being abused (HM Gov Mar 2015)