

## 1. POLICY STATEMENT

This policy has been developed to ensure that all staff in the ALM Apprentice Academy are working together to safeguard and promote the well-being and welfare of all apprentices.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our apprentices and staff. It identifies actions that should be taken to redress any concerns about safety and welfare, including protecting apprentices and staff from extremist views, vocal or active, which are opposed to fundamental British Values. All opinions or behaviours which are contrary to these fundamental values and the ethos of the organisation will be vigorously challenged.

The Director of Learning and the Director of Learning Operations and People (Pamela Weeden or Jon Weeden) have the ultimate responsibility for safeguarding and promoting the welfare of all apprentices.

Safeguarding and promoting the welfare of all apprentices goes beyond implementing basic child protection procedures, it is an integral part of all activities, functions, culture and ethos of the ALM Apprentice Academy.

In accordance with guidance set out in 'Working together to Safeguard Children 2022 (Updated September 2022)', 'Keeping Children Safe in Education – September 2021' and 'The Prevent Duty', the ALM Apprentice Academy will work in partnership with other organisations where appropriate to identify any concerns about apprentice welfare and take action to address them.

## 2. SCOPE

The ALM Apprentice Academy aims to create and maintain a safe learning environment where all apprentices and staff feel safe, secure and valued and know they will be listened to and taken seriously. Our academy is committed to the principles outlined in 'Working together to Safeguard Children – July 2018 (Updated July 2022)', 'Keeping Children Safe in Education 2022 and 'The Prevent Duty' and implements policies, practices and procedures which promote safeguarding and the emotional and physical well-being of apprentices and staff.

The academy is committed to supporting the delivery of effective early help through multi-agency working, a consistent application of the thresholds and the use of a single agency assessment.

### 3. LEGAL FRAMEWORK

The statutory inquiry into the death of Victoria Climbié and the first joint Chief Inspectors report of safeguarding children highlighted the lack of priority status given to safeguarding. The government response to these findings included the Green Paper Every Child Matters and the provisions in the Children's Act 2004. Section 11 of the Children's Act 2004 places a duty on all agencies to make arrangements to safeguard and promote the welfare of children. No single profession can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes in to contact with them has a role to play in identifying concerns, sharing information and taking prompt action. The ALM Apprentice Academy is committed to the safeguarding of all apprentices including those who do not fall in to the category of children or vulnerable adults.

The ALM Apprentice Academy is committed to the government national framework: Working Together to Safeguard Children.

See also:

- GDPR Policy
- Equality & Diversity Policy
- Health and Safety Policy
- IT Security & Online Safety Policy • Social Networking Policy

### 4. DEFINITIONS

The following definitions apply throughout the Safeguarding & Prevent Policy and associated procedures:

#### **Child or Children:**

The Children Act 2004 defines a child as a person under eighteen for most purposes.

#### **Vulnerable Adult or Adults:**

The Office of the Public Guardian defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs

- a significant reduction in physical or mental capacity

### **Types of abuse and neglect:**

Although these definitions categorise children and vulnerable adults we believe it is our responsibility to protect and support all apprentices in situations of abuse.

#### **Abuse:**

A form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

#### **Physical Abuse:**

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

#### **Emotional Abuse:**

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- Not giving the child or vulnerable adult opportunities to express their views
- Deliberately silencing them or 'making fun' of what they say or how they communicate
- Interactions that are beyond a child or vulnerable adults developmental capability as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children or vulnerable adults to feel frightened or in danger
- exploitation or corruption of children or vulnerable adults

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

#### **Sexual Abuse:**

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. These activities may involve physical contact, including assault by penetration (for example rape or oral sex) and non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. This may also include non-contact activities, such as involving children or vulnerable adults in looking at, or being involved 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Sexual Harassment and Violence:**

There are many different ways to describe people who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. Sexual violence and sexual harassment can occur between two people of any age and sex from primary through to secondary stage and into further education. It can occur through a group of people sexually assaulting or sexually harassing a single person or group of people. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable

### **Neglect:**

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. Neglect may occur during pregnancy 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 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 or vulnerable adults emotional needs.

There are also specific issues which we expect our staff to be aware of, these include:

- Child sexual exploitation
- Forced marriage
- Domestic violence
- Female genital mutilation
- Radicalisation
- Self harm
- Bullying/cyberbullying
- Drugs

- Faith abuse
- Gangs and youth violence
- Violence against women and girls
- Sexting
- Honour Based Violence
- Trafficking

## 5. RESPONSIBILITIES

All members of the ALM Apprentice Academy community, including staff, employers, apprentices and contract staff are responsible for safeguarding and promoting the welfare of all apprentices.

### **All staff:**

All staff that come into contact with apprentices in their everyday work have a duty to safeguard and promote apprentice welfare and well-being. Staff will be trained to understand their responsibilities and be aware of the signs of harassment, abuse, neglect, extremism and radicalisation so that they are able to identify cases of apprentices who may be in need of help or protection.

Staff working at the ALM Apprentice Academy are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of an apprentice, staff members should always act with reassurance that the reports will be taken seriously, and all actions will support their best interests.

Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.

Staff are expected to:

- Undertake full safeguarding training as required (every 3 years)
- Undertake update training (every year)
- Familiarise themselves with the Safeguarding & Prevent Policy and associated procedures
- Safeguard and promote the welfare of all apprentices
- Alert the Designated Safeguarding Officers where they have concerns

Obtain a clear DBS check on joining the company and every 5 years

### **Designated Safeguarding Officers:**

The Designated Senior Members of Staff for Safeguarding & Prevent are Pamela Weeden, Director of Learning, and Jon Weeden, Director of Learning Operations and People. They have a specific responsibility for championing the importance of

safeguarding and prevent and promoting the welfare of all apprentices. The Designated Person will:

- Act as the first point of contact with regards to all safeguarding matters.
- Undertake updated training every two years.
- Provide support and training for staff
- Ensure that the academy actions are in line with the Safeguarding Inter-Agency Procedures.
- Support staff to make effective referrals to the Children and Families Services and any other agencies where there are concerns about the welfare of a child.
- Keep copies of all referrals to Children and Families Services and any other agencies related to safeguarding children.
- Ensure that all staff receive information on safeguarding policies and procedures from the point of induction.
- Ensure that any staff with specific responsibility for safeguarding receive the appropriate training to undertake this role.
- Manage and keep secure the academy's safeguarding records.
- Ensure that all staff understand and are aware of the academy's reporting and recording procedures and are clear about what to do if they have a concern about an apprentice.
- Liaise with the Managing Director about any safeguarding issues.
- Ensure that the Safeguarding & Prevent Policy is regularly reviewed and up-dated.
- Keep up to date with changes in local policy and procedures and are aware of any guidance issued by the DfE concerning Safeguarding & Prevent.

## 6. SAFER RECRUITMENT OF STAFF

The ALM Apprentice Academy undertakes checks to ensure that their staff are fit to work in a training provider setting with apprentices. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

The ALM Apprentice Academy has systems in place to prevent unsuitable people from working with apprentices and to promote safe practice. These systems apply to all new staff and require the following checks to be made prior to appointment:

- a minimum of two references, satisfactory to the ALM Apprentice Academy, one of which should be from a previous employer
- documentary evidence checks of identify, nationality, residency and "right to work" status
- Enhanced DBS (Disclosure & barring service) check with barred list information\*
- documentary evidence of qualifications

- where subcontractors are delivering courses for the ALM Apprentice Academy, the provider must provide written assurance that all relevant staff will be DBS checked

In accordance with the Regulations, records of all checks carried out are kept on a single central record.

\*If a DBS check is delayed for any reason the staff member will not be subject to lone working with apprentices aged under 18. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check.

## **7. WORKING WITH OTHER AGENCIES**

The ALM Apprentice Academy has developed effective links with other relevant agencies, for example, the Local Authority, Children's Social Care, Channel, Police, and the MSP and co-operates as required with any enquiries regarding child protection issues.

## **8. SAFER RECRUITMENT OF LEARNERS**

The ALM Apprentice Academy undertakes checks to ensure that apprentices are suitable to study in a training provider setting. It also reserves the right to refuse entry to any applicants whom it has a reasonable belief may pose a risk to apprentices. To ensure this is addressed appropriately The ALM Apprentice Academy will:

- Help to facilitate DBS checks for apprentices going in to relevant industries (education, working with vulnerable adults, charities, healthcare etc)
- Attend case conferences at all feeder schools & colleges (if required)
- Complete relevant risk assessments of ex-offenders

## **9. WHAT TO DO IF YOU SUSPECT SOMEONE IS BEING ABUSED**

All staff working in direct/online contact with apprentices in the ALM Apprentice Academy environment must be alert to the signs of abuse. Anyone who suspects that abuse is taking place inside or outside of the ALM Apprentice Academy setting, or to whom an apprentice discloses issues relating to safeguarding, should contact one of the Designated Safeguarding Officers immediately.

**The Lead Designated Safeguarding Officers** are: Pam Weeden and Jon Weeden

Staff who are not Designated Safeguarding Officers, but who are approached with concerns about an apprentice, must bring the concerns raised to the attention of the Designated Safeguarding Officers immediately.

Any member of staff receiving a disclosure of abuse, or noticing signs or indicators of abuse, must make an accurate record as soon as possible, noting what was said or seen, putting the event in context, giving the date, time, and location. All records will be dated, signed and will include the action taken. These notes are kept in a confidential file, which is separate to other files, and stored in a secure place. Making the record should not delay referring the disclosure to the DSL or appropriate authority.

The Lead Designated Safeguarding Officers will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or vulnerable adult protection matters, including attendance at case conferences.

## **10. PROFESSIONAL CONFIDENTIALITY, RECORDS AND MONITORING**

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, young people and vulnerable adults particularly in the context of safeguarding. The only purpose of confidentiality in this respect is to benefit the individual. A member of staff must never guarantee confidentiality to a learner nor should they agree to keep a secret. Where there is a safeguarding concern, this must be reported to the Designated Safeguarding Lead and may require further investigation by the appropriate authorities. Learners can be reassured that only the people who 'need to know' will be informed, that this will be the minimum necessary and that information will not become common knowledge.

Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a 'need to know' basis only. Where information is shared with appropriate staff, they must maintain the confidentiality outlined above.

Well-kept records are essential to good safeguarding practice. The ALM Apprentice Academy is clear about the need to record any concerns held about a student, the status of such records and when these records should be passed over to other agencies. Records are kept on the Central Safeguarding Register.

The DSL will have oversight of the record management policy to ensure that issues around safeguarding records are addressed appropriately.

## **11. ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF**

Allegations of abuse, or concerns raised against members of staff, will always be treated seriously. The allegations need to be applied with common sense and

judgement. All cases must be referred to the Designated Safeguarding Officers who will follow the Safeguarding & Prevent Procedures in the same way as for other safeguarding allegations. The Designated Safeguarding Officers will take the appropriate steps to ensure the safety of the apprentice, and any others who may be at risk. The Designated Safeguarding Officers will also inform The MD and Directors in order that training provider procedures may be followed, and an investigation is carried out. If the allegation or concern is against the Designated Safeguarding Officers, it should be reported to the MD. Where there is a complaint against a member of staff, the MD will be informed and involved. This may result in possibly criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services.

## **12. REPORTING CASES TO THE DISCLOSURE AND BARRING SERVICE (DBS)**

The ALM Apprentice Academy has a statutory duty to make reports and provide relevant information to the DBS where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the DBS lies with the Designated Safeguarding Officers.

## **13. RESIGNATIONS**

If, during the course of an investigation relating to safeguarding, an employee tenders their resignation, or ceases to provide their services, the ALM Apprentice Academy is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of apprentices, including those where the person concerned refuses to co-operate with the process.

## **14. WHISTLEBLOWING**

The ALM Apprentice Academy has an established Whistleblowing Policy for enabling staff to share, in confidence with an appropriate person, concerns they may have about instances of suspected malpractice in the ALM Apprentice Academy. Malpractice can include fraud and financial irregularities, criminal offences being committed, that have been committed or that are likely to be committed, endangering the health or safety of individuals, and can also include concerns around the protection of apprentices. The policy is intended to provide safeguards to enable members of the ALM Apprentice Academy staff to raise concerns without fear of adverse repercussions. The ALM Apprentice Academy recognises that it may be difficult to express concerns about colleagues and is fully supportive of Whistleblowing for the sake of an apprentice and will provide support and protect those who "blow the whistle". It is also intended to promote throughout the ALM

Apprentice Academy a culture of openness and a shared sense of integrity by inviting all employees to act responsibly to uphold the reputation of the ALM Apprentice Academy and maintain public confidence.

See also: Whistleblowing Policy

## **15. SUPPORT FOR STAFF**

The ALM Apprentice Academy is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with one of the Designated Safeguarding Officers or with a trained counsellor. Staff wishing to be referred for counselling should discuss with their line manager.

## **16. PREVENT, RADICALISM AND EXTREMISM**

The ALM Apprentice Academy values the fundamental rights of freedom of speech, expression of beliefs and ideology and tolerance of others which are the core values of our democratic society. However, all rights come with responsibilities and free speech or beliefs designed to manipulate the vulnerable or which advocate harm or hatred towards others will not be tolerated. The ALM Apprentice Academy seeks to protect its apprentices and staff from all messages and forms of violent extremism and ideologies including those linked to, but not restricted, to the following: Far Right/Neo Nazi, White Supremacist ideology, Islamic Extremist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights groups.

Protecting staff and students from the risk of radicalisation is part of the ALM Apprentice Academy' wider safeguarding duties and is similar in nature to protecting young people from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

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.

As with managing other safeguarding risks, staff should be alert to changes in young people’s behaviour which could indicate that they may be in need of help or protection. Staff should use their professional judgement in identifying young people who might be at risk of radicalisation and act proportionately.

Staff will receive annual Prevent training and will complete new starter e-learning Prevent training.

### **Prevent**

From 1 July 2015 specified authorities, including all schools and Colleges (as defined in the summary of Keeping Children Safe in Education, 2022), 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’ (“the Prevent duty”).

The statutory Prevent guidance summarises the requirements on further education institutes in terms of seven general themes: external speakers and events, working in partnership, risk assessment, action plans, staff training, welfare and pastoral care and IT policies.

### **Channel**

Safeguarding staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA Act sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism. In England and Wales, this duty is met through Channel panels. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual.

The ALM Apprentice Academy is clear that exploitation and radicalisation will be viewed as a safeguarding concern and will be referred to the appropriate safeguarding agencies.

## **Training**

Our Designated Safeguarding Officers will take a lead role in upskilling themselves and other staff members in this important area. All staff will complete Prevent training every two years and demonstrate effective CPD to confirm they have a good understanding of the signs of radicalisations etc. Raising staff and learner awareness will be promoted in meetings and via other communications.

If our staff suspect any activity, they are not happy with they will report this immediately to our Designated Safeguarding Officers and Prevent Leads – Pam Weeden and Jon Weeden

## **17. ONLINE SAFETY**

The ALM Apprentice Academy has an Online Safety Policy which recognises that Online Safety is a safeguarding issue not an ICT issue. The purpose of internet use in the academy is to help raise educational standards, promote apprentice achievement, and support the professional work of staff as well as enhance the academy's management information and business administration.

The internet is an essential element in 21st century life for education, business and social interaction and the ALM Apprentice Academy has a duty to provide apprentices with quality access as part of their learning experience.

It is the duty of the ALM Apprentice Academy to ensure that every apprentice in its care is safe and this applies equally to the 'virtual' or digital world.

The ALM Apprentice Academy will ensure that appropriate filtering methods are in place to ensure that apprentices are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material. This will be in line with the 'Prevent Duty'.