

# Safeguarding Policy

## KEY CONTACTS AND CONTACT DETAILS

Key Contacts and Contact Details (internal)
<p><b>Designated Safeguarding Lead</b>  <b>Director of Business</b>            Gary Munson Pike <a href="mailto:safeguarding@apt4u.training">safeguarding@apt4u.training</a></p>
<p><b>Designated Safeguarding Lead</b>  <b>Training Coordinator</b>            Christine Mayley- <a href="mailto:safeguarding@apt4u.training">safeguarding@apt4u.training</a></p>
<p><b>Anglia Professional Training - Safeguarding Governor</b>            Rachel Nicholls. Principal and Deputy CEO Inspire Education Group</p>

Key Contacts and Contact Details (external)
<p><b>Lincolnshire</b>            Local Authority Designated Officer (LADO) Tel: 01522 554 674</p> <p><b>Lincolnshire Safeguarding Children Board</b>            To report a concern, call the Children Services Customer Service Centre (CSC) on 01522 782111. Outside of office hours contact the Emergency Duty Team (EDT) on 01522 782333</p> <p><b>Cambridgeshire</b>            Local Authority Designated Officer (LADO) <a href="mailto:LADO@cambridgeshire.gov.uk">LADO@cambridgeshire.gov.uk</a>            Tel: 01223 727967            Named Senior Officer for allegations Senior Education Adviser – Diane Stygal Tel: 01223 507115</p> <p><b>Peterborough</b>            Local Authority Designated Officer (LADO) Gisela Jarman Tel: 01733 864038            Jane Bellamy Tel: 01733 864790</p> <p><b>Cambridgeshire and Peterborough Safeguarding Partnership Board</b>            To report a concern, contact MASH on:</p> <p><b>Cambridgeshire</b>            Children’s Services: 0345 045 5203            Adult Services: 0345 045 5202            Emergency Duty Team (Out of Hours) 01733 234724            Early Help: 01480 376 666 <a href="mailto:early.help@cambridgeshire.gov.uk">early.help@cambridgeshire.gov.uk</a></p> <p><b>Peterborough</b>            Children’s Services: 01733 864180            Adult Services: 01733 747474            Emergency Duty Team (Out of Hours) 01733 234724.            Early Help: 01733 863649, <a href="mailto:earlyhelp@peterborough.gov.uk">earlyhelp@peterborough.gov.uk</a></p> <p><b>Norfolk</b>  <a href="mailto:Local Authority Designated Officer (LADO) - Norfolk Safeguarding Children Partnership (norfolkscb.org) LADO@norfolk.gov.uk">Local Authority Designated Officer (LADO) - Norfolk Safeguarding Children Partnership (norfolkscb.org) LADO@norfolk.gov.uk</a>.</p> <p><b>Norfolk Adult services</b> <a href="#">Contact our adult social care team - Norfolk County Council</a> Tel: 03448008020</p>

## **Purpose**

Anglia Professional Training (APT) is committed to safeguarding and promoting the welfare of all its learners, staff, volunteers, visitors, contractors and partners. Any reference in the policy to a child, young person or learner applies to all those aged under 18. Anglia Professional Training's legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone over the age of 18 who may, for a variety of reasons, need community services and/or unable to protect him or herself from significant harm or exploitation.

Anglia Professional Training has developed procedures in line with, and taking account of, guidance issued by the Department for Education, the Association of Colleges (AoC) and other relevant bodies. Anglia Professional Training operates in line with the requirements of the Cambridgeshire and Peterborough Safeguarding Partnership Board (Children and Adults) and the Norfolk Adult Social care Team to cover our subcontracted services through Training Factor in Norwich.

The Director of Business is the named Designated Safeguarding Lead (DSL) who is responsible for ensuring organisational compliance to this policy and its procedures. There is a member of the Governing Body with specific responsibility for safeguarding issues. There is also a Deputy Designated Safeguarding Lead (DDSL) whose role it is to monitor staff training and to initially follow up any safeguarding concerns or referrals.

## **Scope**

This policy applies to all learners and particularly children, young people and adults who may need support and all staff, volunteers, partners and families living and working at APT, other external facilities, in the workplace or distance learning.

To help ensure that children, young people and adults at risk are protected from abuse, all complaints, allegations or suspicions will be taken seriously and under this policy detailed herein.

Anglia Professional Training has incorporated child protection into the whole organisation approach to safeguarding and the term safeguarding is deemed to include child protection in all policies and procedures.

## **The Policy Statement**

### **1. Legislative Framework**

Anglia Professional Training operates its Safeguarding for All Policy through its acknowledgement and acceptance of its responsibilities set out in the Education Act 2002, Care Act 2014 and the Education and Training (Welfare of Children) Act 2021. Anglia Professional Training acknowledges its responsibility to adhere to other statutory frameworks and bodies including:

- [Keeping Children Safe in Education \(2021\)](#)
- [Working together to Safeguard Children \(2018\)](#)
- [Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018, 2021](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(2020\)](#)
- [Prevent Duty Guidance \(2015, 2021\)](#)
- [NPCC When to Call the Police \(2020\)](#)
- [Peterborough and Cambridge Safeguarding Board 'Inter-Agency Procedures'](#)

### **2. Responsibilities**

#### **2.1 Duties**

All APT staff and volunteers should be aware of their responsibilities for safeguarding, child protection and appropriate behaviours as set out under this policy and the Anglia Professional Training Professional Standards. They should be prepared to identify children, young people and vulnerable adults who may benefit from early help.

Early help means providing support as soon as a problem emerges. The Early Help Assessment is a single assessment that is created with the family. It should reflect their views, wishes and feelings and what they want to change. It is shared when appropriate (and where there is consent) with other professionals who are working in a co-ordinated way to support the family. Early Help Assessments are completed by any professional or partner agency who comes into direct contact with families, and who has identified more than one unmet need that would benefit from a multi-agency support approach. In the first instance staff should discuss early help requirements with the designated safeguarding person. Staff may be required to share information to support other agencies and professionals in an Early Help Assessment.

Staff are also responsible for raising any concerns about safeguarding through the appropriate channels as identified in this policy, and if for any reason they are not able to do so, to raise them through the Anglia Professional Training Whistleblowing Policy.

Staff should in particular be alerted to the potential need for early help for a young person who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a Young Carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is privately fostered.

Any referrals will normally be made by the Deputy Designated Safeguarding Lead, as this aids consistency and careful monitoring.

For young people under the age of 18 years, Anglia Professional Training will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'.

## 2.2 Anglia Professional Training will:

- Have a nominated Governor on the Board whose role is to ensure that APT has an effective policy, locally agreed procedures are in place and that the policy and structures supporting safeguarding are reviewed annually
- Establish and maintain an environment where learners feel safe, including in a digital context and are encouraged to talk and are listened to
- Engage fully in the Early Help process to maximise the opportunity for timely intervention
- Ensure learners know that there are members of staff whom they can approach if they are worried about a safeguarding issue and that their concerns will be taken seriously and acted upon as appropriate
- Include opportunities in the curriculum for learners to develop the skills they need to recognise abuse and stay safe
- Ensure the role of the Designated Safeguarding Lead (DSL) is undertaken by the Director of Business. The DSL will take the lead for responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy

Designated Safeguarding Lead, DDSL), the lead responsibility for child protection remains with the DSL. The role of DSL and DDSL will be explicit in the role holder's job description with time and training to undertake their duties

- Ensure that the DSLs and all deputies (DDSLs) undertake the appropriate training and that this is updated every two years. In addition, that knowledge and skills are refreshed at regular intervals throughout the year

### 2.3 The Designated Safeguarding Lead will:

- Take the lead responsibility. During term time and Anglia Professional Training hours they will ensure a Designated Deputy will always be available and can be contacted. See Appendix 1 for key contacts and detail
- Ensure they and any deputies liaise with the three safeguarding partners (Local Authority, Clinical Commissioning Group and Police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018.
- Liaise with the Principal of Peterborough College to inform him/her of any issues and ongoing investigations
- As required, liaise with the 'case manager' and the designated officers at the local authority (LADO) for child protection concerns in cases which concern a staff member
- Undertake Prevent Lead training and ensure training and processes are in place for case referral to the Channel programme where there is a radicalisation concern. Where appropriate attending the Channel panel to help with this assessment
- Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing/have experienced with teachers
- Ensure that Anglia Professional Training has a clear, usable safeguarding policy that is updated annually. Ensure each member of staff has access to and understands the safeguarding policy especially new or part-time staff who may work with different establishments
- Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required but at least annually.
- Ensure that every member of staff and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the point of induction
- Ensure that all staff recognise their duty and feel able to raise concerns about poor or unsafe practice concerning children and that such concerns are addressed sensitively and effectively promptly following the Whistle Blowing Policy
- Ensure that Anglia Professional Training operates within the legislative framework and recommended guidance
- Provide a report to the Governors annually detailing any changes to policy and procedures, training undertaken and other relevant issues.

### 2.4 The Deputy Designated Safeguarding Lead will:

- Oversee safeguarding matters daily
- Decide upon the appropriate level of response to specific concerns about a child or vulnerable adult e.g. discuss with parents or employers, offer an Early Help Assessment or refer to Children's Social Care
- Act as a source of support, advice and expertise within APT when deciding whether to make a referral by liaising with relevant agencies
- Undertake duties to support the DSL with those outlined above
- Be available to provide advice and support to other staff on safeguarding issues
- Have particular responsibility to be available to listen to children, young people and vulnerable adults studying at Anglia Professional Training

- Deal with individual cases, including attending case conferences and review meetings as appropriate
- Liaise with Children's/Adult Social Care and/or Police (and/or any other appropriate agencies as necessary to safeguard the welfare for children, young people and vulnerable adults
- Represent Anglia Professional Training in Multi-Agency working
- Gather information from all relevant sources to contribute to an assessment at Core Group meetings/Children in Need meetings. Co-ordinate the implementation for any aspects of the Child Protection Plan/Child in Need Plan to which we have agreed
- Help staff to devise and co-ordinate strategies to support learners who are particularly vulnerable including notifying Children's Services when there is an unexplained absence for a child who is the subject of a Child Protection Plan, a child/young person/vulnerable adult is missing from education or if a learner who is the subject of a Child Protection Plan is excluded
- Ensure that accurate safeguarding records relating to individual learners are kept separate from the academic file in a secure place
- Have received appropriate training and that this is updated every two years. In addition, that knowledge and skills are refreshed at regular intervals throughout the year
- Deliver training to staff as required.

2.5 All Anglia Professional Training staff will:

- Know the name of the designated person and her/his role
- Know that they have individual responsibility for referring safeguarding concerns to a designated member of the Safeguarding Team and understand the procedure. See Appendix 2 - Flowchart For dealing with concerns, suspicions or disclosures of harm, abuse, risk of radicalisation, peer on peer abuse or any other safeguarding concern
- Know where the Safeguarding Policy is located
- All staff are required to read and understand Part 1 of the 'Keeping Children Safe in Education' 2021 statutory guidance for schools and colleges.
- Attend training from the point of their induction and undertake annual refreshers, so they know:
  - Their personal responsibility
  - The need to be vigilant in identifying cases of abuse
  - How to support and to respond to a child, young person or vulnerable adult who tells of abuse
  - In addition, staff will receive regular updates on local and national themes.

2.6 The Governing Body will:

- Designate a Governor for child protection and safeguarding who will oversee the APT policy and practise and champion safeguarding issues
- Review safeguarding policies and procedures annually
- Liaise closely with the Designated Safeguarding Lead to monitor procedures and practice, and ensure compliance with Norfolk, Cambridgeshire and Peterborough Safeguarding Partnership Boards (Children and Adults) 'Inter-Agency Procedures'
- Ensure a robust policy is in place around safer recruitment and audit the Single Central Record
- Ensure safe and timely management of concerns and allegations
- Ensure deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- Understand that information on individual child protection cases or situations is confidential and will not be discussed.
- Keep up to date with Prevent and Safeguarding training
- Will receive an annual Safeguarding Report

### 3. The Prevent Duty

Prevent is one of the four elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that need to be dealt with.

The strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

The Home Office uses a range of measures to challenge extremism in the UK, including:

- Where necessary, preventing apologists for terrorism and extremism from travelling to this country
- Giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- Funding a specialist police unit that works to remove online content that breaches terrorist legislation
- Supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- Supporting people who are at risk of being drawn into terrorist activity through the Channel process

#### 4. Channel

Channel is a voluntary, confidential support programme that focuses on providing support at an early stage to those who are vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will determine the individual's vulnerability and consider the appropriate support.

Channel Contact Details
Lincolnshire <a href="mailto:prevent@lincs.pnn.police.uk">prevent@lincs.pnn.police.uk</a> <a href="mailto:channel@lincs.pnn.police.uk">channel@lincs.pnn.police.uk</a>
Cambridgeshire <a href="mailto:prevent@cambs.pnn.police.uk">prevent@cambs.pnn.police.uk</a>

##### 4.1 The Counter-Terrorism and Security Act (2015):

- This Act places a duty on specified authorities, including Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty)
- APT is committed to supporting vulnerable learners through its safeguarding policies and procedures and recognises that this can support the organisations contribution to the Prevent Duty
- Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral.

#### 5. Supporting Learners at Risk

APT recognises that all learners can be at risk of harm and 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. In addition, certain groups of learners have the potential to be more vulnerable and at risk. These are:

- Children requiring mental health support
- Care Leavers
- Children in Care and those previously in care
- Children and adults with Special Educational Needs and or Disabilities

### 5.1 Learners with Special Educational Needs and/or Disabilities

Evidence suggests that learners with Special Education Needs and/or Disabilities (SEND) are more likely to suffer neglect or be abused. Anglia Professional Training safeguards all learners but it is particularly aware of the need to protect and safeguard this vulnerable group. Learners with SEND are identified and recorded on MIS systems. Learner files are read by all staff who work with the young person. Educational, Health and Care Plan (EHCP) outcomes are also recorded and regularly reviewed with the learner's parent/guardian/carer and Local Authority.

Children with SEND can face specific challenges that staff should be aware of:

- Higher risk of being left out
- The disproportionate impact of bullying
- Difficulties with communication can make disclosures and investigations difficult
- Awareness that behaviour, mood and injury may relate to abuse and not just their SEND

Additional support, mentoring, space for quiet reflection, tutorials to build resilience and develop communication skills are very important strategies that are used to mitigate these challenges.

The organisation recognises that learners who have been abused or witness to abuse can find it difficult to develop a sense of self-worth or view the world as a positive place. APT may be the only stable, secure and predictable element of an 'at risk' learner's life. However, it is important to note that the behaviour of learners at risk may present as challenging, defiant or withdrawn.

Anglia Professional Training aims to identify learners at risk through a variety of methods:

- Application and enrolment screening
- School liaison and references
- EHCP consultations and review process
- Induction process
- Student finance application form screening
- Disciplinary referrals
- Academic and support staff reporting and monitoring
- Self-referral

Anglia Professional Training aims to support learners by:

- Forging excellent working partnerships with other education providers and agencies which, in turn, can help to inform as to a learner's specific issues and needs. For example; learners who are 'Looked after Children' or who are subject to a 'Child Protection' or 'Child in Need' plan when they come to APT
- A curriculum which encourages confidence, self-esteem and self-motivation
- A whole organisation 'culture of safety' which promotes a positive, supportive and secure environment which provides all with a sense of being respected and valued
- Consistent implementation of learner codes of conduct and behavioural policies which ensure that learners know that some behaviour is unacceptable
- Strong links with external partners as well as local and national agencies to ensure a multi-disciplinary approach to support for learners
- Development of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations
- Effective absence reporting, which can be an early indicator of concern

- Learners being encouraged to state how 'safe' they feel via learner voice opportunities and
- pastoral tutorials which also encourage learners to adopt safe and responsible practices
- Collecting two emergency contact details at the point of enrolment

5.2 Induction activities are also organised to support the development of learners' awareness of these issues and how to keep themselves safe.

### 5.3 Early Help

If early help is appropriate, the DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help Assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

### 5.4 Safeguarding Issues

**All** staff should have an awareness of safeguarding issues that can put children and vulnerable adults at risk of harm. Behaviours linked to issues such as drug-taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

**All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children/young people outside of these environments. All staff, but especially the DSL and deputy should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### 5.5 Peer on Peer Abuse

As part of the new 'Keeping Children Safe in Education 2021' the definition of peer on peer abuse is much clearer. APT will robustly deal with all allegations or suspicions of peer on peer abuse and appropriate safeguarding and learner disciplinary processes will be followed.

**All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting (part of the Voyeurism (Offences) Act, April 2019), typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals.

**All** staff should be clear about the APT policy and procedures with regards to peer on peer abuse.

### 5.6 Professional Confidentiality

A member of staff must never agree with a learner to keep a secret and where there is a safeguarding concern, this must be reported to a member of the Safeguarding Team and may require further investigation by the appropriate authorities.



Staff will be informed of relevant information in respect of individual cases on a 'need to know basis' only. Any information shared with a member of staff in this way must be held confidentially by themselves.

#### 5.7 Working in Partnership

Anglia Professional Training will assist the Local Authority, Police and Clinical Commissioning Groups to exercise their statutory functions. Where provision is provided by APT to a partner organisation such as a sub-contractor, APT will liaise with staff in the partner organisation to ensure that local procedures and protocols are adhered to.

In terms of partner agencies, awareness and appreciation of the role of others are essential for effective collaboration between practitioners and their organisations. Inter-agency and collaborative work are central to good practice in safeguarding.

They will refer concerns that a child or young person might be at risk of significant harm to the appropriate agency.

Safeguarding of children and individuals at risk is a processing condition that allows for the sharing of 'special category personal data. As such data and information can be shared by practitioners even without consent where there is good reason to do so. Sharing of information will enhance the safeguarding of a child in a timely manner, it is not reasonably expected that consent can be gained or to gain consent would place the child at risk.

#### 5.8 Links and Referrals within the Local Authority

Any external referral for a learner must be made to the local authority in which they reside. The Safeguarding Team have the relevant contact details and key contacts are on page 1.

#### 5.9 Mental Health

It is important to promote positive mental health and wellbeing, which is necessary to support young people to engage in learning. All APT staff are well placed to observe young people day to day in class and also during online sessions and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a staff member has a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken, and raised with the DSL or DDSL. The DDSL will continue to signpost learners and engage with local authorities and voluntary sector mental health organisations to ensure specialist support is in place.

### 6. **Preventing Unsuitable People from Working with Children**

The Board is responsible for ensuring that Anglia Professional Training follows safe recruitment processes, including:

- Ensuring that staff responsible for recruitment have the necessary guidance on how to conduct safer recruitment, including that they keep the required records of interviews and questions asked etc. in line with the Safer Recruitment and Selection Policy. Staff responsible for recruitment are required to access the guidance available from HR at Peterborough College and seek their advice as required
- Operating safe recruitment practices for its employees and visitors including ensuring appropriate DBS, self-declaration, identity, right to work, health and reference checks are undertaken according to Part 3 of 'Keeping Children Safe in Education' (2021).
- Ensuring any recruits who do not have a valid DBS disclosure will not be allowed unsupervised access to children under the age of 18 or vulnerable adults until this has been received. A risk assessment will be undertaken and agreed upon by the Director of Business on every occasion before the member of staff can commence employment
- Ensuring the upkeep of a single central record of all staff, supply staff<sup>1</sup>, volunteers, Governors and frequent visitors (visiting associates) following government guidance and the Disclosure

- and Barring Service Policy
- Referring to the DBS and any other relevant professional bodies anyone who has harmed, or poses a risk of harm, to a child/young person/vulnerable adult
- Ensuring existing staff complete and sign an annual self-declaration asking whether, since their last DBS check, they have received a conviction, caution, reprimand or a warning which has been recorded on a police central record, (includes 'spent' and 'unspent' convictions) or if any information has been held locally by police forces that are grounds to be considered relevant. This also includes any information that may be held on the DBS's children and adults barred list.

### 6.1 Allegations of Abuse against a Staff Member

"Low level concerns" about a staff member's conduct will be raised with the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead in the first instance. Examples could include, but are not limited to:

- Being over-friendly with a child/young person/vulnerable adult
- Having favourites
- Taking photographs of children/young adults/vulnerable adults on their mobile phone
- Engaging with a child/young adult/vulnerable adult on a one to one basis in a secluded area or behind a closed door or
- Using inappropriate, sexualised, intimidating or offensive language

Any allegation of abuse made against a member of staff (including supply staff<sup>1</sup> volunteers) will be reported straight away to the Director of Business. In cases where the Director of Business is the subject of an allegation, it will be reported to the Board. APT will follow the procedures set out in Part 4 of 'Keeping Children Safe in Education' (2021).

The Designated Safeguarding Lead, in liaison with Human Resources at Peterborough College will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, supply staff<sup>1</sup> or volunteer, where the allegation meets the criteria set out in Part 4 of 'Keeping Children Safe in Education', (2021).

Anglia Professional Training will inform the Education Skills Funding Agency (ESFA) directly if the institution itself, or one of its subcontractors, is the subject of an investigation by the Local Authority or the police in connection with a Prevent issue or safeguarding related concern. In such circumstances, the Director of Business will email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk) with appropriate details.

Anglia Professional Training will ensure that any disciplinary proceedings against staff, supply staff, volunteers Governors and frequent visitors relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Consideration must be given to the needs of the child and a recognition that a learner may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

### 6.2 Training

APT Safeguarding Policy

Review: Feb 2022

Author: Director of Business

Approval: Board and Governance

All staff will receive training to familiarise themselves with child protection issues and responsibilities alongside APT's procedures and policies. Anglia Professional Training will undertake a rolling programme of training aimed at ensuring the availability of training at induction, for refreshers and relating to legislation updates, local and national themes.

Anglia Professional Training will ensure that all staff, supply staff and volunteers:

- Are aware of the need for maintaining appropriate and professional boundaries in their relationships with learners and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019)
- As part of the Induction process receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children and young people, especially those with a disability or who are vulnerable
- Are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust)
- Are aware communication between learner and staff, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny
- Are aware of their whistleblowing responsibilities to promptly report any concerns in the interests of protecting learners and staff from poor practice and/or unsuitable behaviour. This includes the requirement to self-disclose any personal issues which may impact on their suitability to work in an education setting.

Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, the NSPCC whistleblowing helpline is available on 0800 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### 6.3 Records and Monitoring

APT will maintain up-to-date and accurate records of any cause for concern in regards to learners. There is also an indication of the status of each individual case and when it is deemed appropriate to pass this information to other agencies.

Members of staff receiving a disclosure of or noticing signs of abuse should refer to the DSL or DDSL as soon as possible, recording these concerns accurately and factually, without opinion or judgement. All records are kept up-to-date, securely, with restrictions on access limited to Safeguarding and appropriate personnel only. This database also provides statistics that help to inform the nature of support and where extra resources may be needed.

## 7. **Workplace Learning**

- Organisations that offer work-based/workplace learning for Anglia Professional Training apprentices will be vetted and risk assessed for their suitability to do so
- Organisations will be made aware of their specific responsibilities in relation to safeguarding apprentices who are 16-18 years of age. (up to the age of 18)
- When the assessment suggests that an employer does not have safeguarding policies or awareness of safeguarding issues, or where there is any evidence of risks to a learner's safety, APT will ensure that no apprentices are placed with that employer until assurance is provided that suitable policies and procedures are in place
- Employers will be given details of who to contact should they have concerns and support with any signposting, information advice and guidance where appropriate
- Young people and vulnerable adults who are placed with employers will be given clear advice about whom to contact if they are worried or uncomfortable about the surroundings, or if they suffer abuse.

## 8. Online Safety

It is important that all staff who interact with learners, including working online, continue to look out for signs a child or young person may be at risk. Any such concerns should be dealt with in accordance with Anglia Professional Training Safeguarding for All Policy and where appropriate, the DDSL should be notified and made aware of any concerns.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views.
- **Contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying

Guidance is available to staff around safe teaching and learning when working remotely.

Anglia Professional Training has acceptable use policies for staff and learners which should be considered in line with this policy.

## 9. Appendices

- Appendix 1 - Flow Chart for dealing with Concerns, suspicions or disclosures of harm or abuse
- Appendix 2 - Key Definitions and Concepts

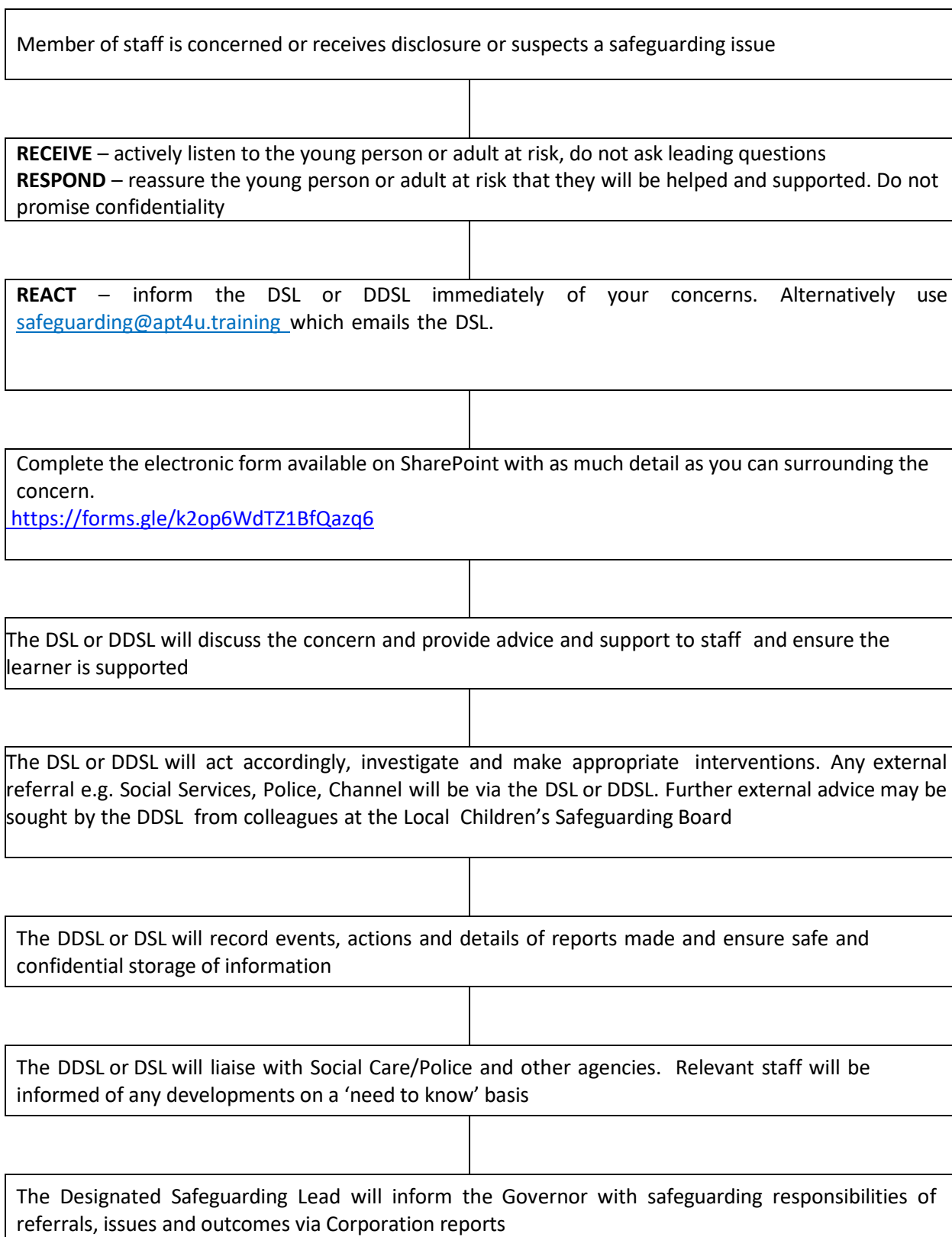
### Related Procedures and Documentation

- Confidentiality and Data Protection Policy
- Whistle Blowing Policy
- Maintaining Professional Boundaries
- Bullying & Harassment Policy
- Staff Recruitment
- Equality and Diversity Policy
- Staff Disciplinary policy
- Risk Assessment for Visiting Speakers

### Responsibility

This policy is the responsibility of the Director of Business supported by the Deputy Designated Safeguarding Lead

## FLOWCHART: FOR DEALING WITH CONCERNS



## KEY Definitions

<b>CHILD</b>
Within the context of this policy a “child” is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002). Further APT additional duties regarding support, protection and safeguarding also extends to learners within the 14 to 18 age range in addition to infants and young children in its child care provision.
<b>ADULT</b>
<p>Adult at Risk - It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) APT uses the following indicators to identify an adult who is, or may become “at risk” whilst they are registered with APT. The individual:</p> <ul style="list-style-type: none"> <li>• Is or may be in need of community care services by reason of mental or other disability, age or illness</li> <li>• Is or may be unable to take care of himself or herself</li> <li>• Is unable to protect himself or herself against significant harm or serious exploitation. Whilst not definitive, the main categories of people covered by the definition of “adult at risk” include those who: <ul style="list-style-type: none"> <li>○ have a learning disability</li> <li>○ have a physical or sensory impairment</li> <li>○ have a mental illness including dementia</li> <li>○ are old and frail</li> <li>○ are detained in custody or under a probation order</li> <li>○ are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker)</li> </ul> </li> </ul>
<b>Children in Need of Protection</b>
Children in Need of Protection and early help - Some children and young people are in need because they are suffering or likely to suffer “significant harm”. Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person, this can be done through contacting the early help team (FFAP) to share concerns and ensure the early identification of needs within families.
<b>Children in Need</b>
Children and young people who are defined as being “in need” under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a Child in Need.
<b>Child Sexual Exploitation (CSE)</b>
CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non- penetrative acts) and non-contact sexual activity and 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). (DoH 2014).
<b>Child Criminal Exploitation (CCE)</b>
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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving

drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of 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.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

### **Extremism**

Extremism is defined by the Crown Prosecution System (CPS) as: “The demonstration of unacceptable behaviour by using any mean or medium to express views, which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts
- Foster hatred which might lead to inter-community violence in the UK”

### **Female Genital Mutilation (FGM)**

FGM comprises of 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.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the Police, cases where they discover that an act of FGM appears to have been carried out. As per the requirements set out in ‘Keeping Children Safety in Education 2016’ teachers who fail to report such cases will face disciplinary action.

### **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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties, for example). In addition, some communities use religion and culture as a way to coerce a person into marriage.

### **Honour-Based Abuse**

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBA are abuse (regardless of motivation) and should be handled as such. If in any doubt, staff should speak to the learners.

### **Radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other

forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental 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.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 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.

### **Safeguarding and Child Protection**

These terms are used interchangeably, and they have different meanings. Safeguarding is what we do for all children and young people, whilst Child Protection refers to the procedures we use for children and young people at risk of significant harm or who have been harmed.

Where local authorities believe a young person is suffering, or likely to suffer significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person.

### **Significant Harm**

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the Police to take emergency action to protect a young person from significant harm.

### **Vulnerable Adult**

A vulnerable adult definition used is: 'A person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation.'

- Receives personal care, or nursing, or support to live independently in their own home or in a care home
- Receives any health or social services support
- Has substantial learning or physical disability
- Has a physical or mental illness, chronic or otherwise, including addiction to alcohol or drugs
- Has a substantial reduction in physical or mental capacity due to advanced age or illness.

### **Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

### **Types of Abuse and how to recognise signs**

The following explanations of possible signs of abuse are taken from Working Together to Safeguard Children.

Lists of signs and symptoms cannot provide a definitive diagnosis of abuse and many children or young people at some time of their life may exhibit one or maybe more of them. However, such signs and symptoms may suggest abuse if a young person exhibits either several of them, perhaps within a short space of time, or an extreme form of a particular symptom, or if a pattern of signs and symptoms emerges.



It is important that practitioners are aware of the signs and symptoms and, whilst they may be indicative of some other problem or issue, the possibility that the young person is being abused should not be discounted. Any concern about a young person who is showing signs of abuse or of being at risk of abuse should be followed up with the learners.

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse when they witness it at home and/or suffer it in an intimate personal relationship. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### **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.

#### Possible Signs

- Bruises and scratches to face and head
- Pinch bruises or bite bruises
- Bruising around both eyes simultaneously
- Torn frenulum (skin linking upper jaw and lip)
- Fingertip bruising on front and back of chest (gripping)
- Finger or hand marks on any part of the body
- Ligature marks on either neck, arms or legs
- Cigarette burns
- Linear or shaped burns or bruises (e.g. iron/radiator)
- 'Non-cascade' scalds
- Head injury, may be no outward sign of injury
- Poisoning
- Bald patches
- Recurrent unexplained/untreated injuries or lingering illness

#### Possible Behaviour

- Explanation inconsistent with injury
- Refusal to discuss injuries
- Fear of going home or parents being contacted
- Arms and legs kept covered in hot weather or fear undressing
- Frozen watchfulness/cowering/flinching at sudden movements
- Withdrawal from physical contact
- Fear of medical help
- Admission of excessive punishment
- Running away
- Self-destructive tendencies

### **Emotional Abuse**

Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development? It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may

include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### Possible Signs

- Speech delay, poor verbal ability, lack of communication skills
- Bed wetting, soiling (without physical cause)
- Lack of concentration, learning problems
- Unreasonable fear of new situations
- Eating disorders (over eating and under eating)
- Inappropriate emotional responses to stressful situations
- Low self-esteem
- Self-mutilation
- Alcohol, drugs, solvent misuse

#### Possible Behaviour

- Over reaction to mistakes
- Obsessive behaviour (e.g. rocking, twisting hair, sucking thumb)
- Withdrawal from relationships with other children
- Fear of parents being contacted
- Extremes of passivity or aggression
- Attention seeking
- Chronic running away
- Compulsive stealing, scavenging for food or clothes
- Impaired capacity to enjoy life

## **Neglect**

Is the persistent failure to meet a child's basic physical and/or psychological need, likely to result in a serious impairment of the child's health or 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 a child from physical harm and external harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect or, or unresponsiveness to a child's basic emotional needs.

### Possible Signs

- Unkempt appearance, poor personal hygiene
- Poor skin/hair condition
- Drop through height/weight centiles
- Small stature (where not a family characteristic)
- Constant tiredness
- Repeated accidents
- Untreated medical conditions
- Inappropriate clothing
- Constant hunger
- Frequent lateness, or non-attendance at school
- Accidental self-poisoning

### Possible Behaviour

- Chronic running away
- Compulsive stealing
- Scavenging of food and clothes
- Low self-esteem
- Neurotic behaviour (e.g. rocking, thumb sucking, hair twisting)
- Inability to make social relationships
- Tendency to destroy things

## **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

## Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

### Possible Signs

- Wetting and soiling themselves
- Sudden drop in College performance/poor concentration
- Obsessed with sexual matters as opposed to normal exploration
- Changes from being happy and active to being fearful and withdrawn
- Unexplained sources of money/gifts
- Urinary infections, bleeding or soreness in the genital/anal areas
- Vaginal discharge – vaginal warts
- Soreness and bleeding to the throat
- Chronic ailments e.g. stomach pains, headaches without obvious cause
- Eating disorders
- Becomes severely depressed
- Has a poor self-image
- Uses drugs/alcohol to excess
- Not allowed to have friends around or to go out on dates
- Fearful of undressing for physical education
- Venereal infection
- Pregnancy

### Possible Behaviour

- Overly compliant behaviour
- Behaves in a sexually inappropriate way in relation to their age
- Withdrawn and unhappy, insecure and “clingy”
- Plays out sexual acts in too knowledgeable a way for their age
- Regresses to behavioural pattern of much younger children
- Say of themselves that they are bad or wicked
- Arriving early at school/College and leaving late with few, if any, absences
- Excessive masturbation – exposing themselves
- Drawings of sexually explicit nature
- Attempts to sexually abuse another child
- Recurring nightmares and/or fear of the dark
- Had a “friend who has a problem” and then tells about the abuse of “a friend”
- Self-mutilates/attempted suicide
- Running away
- Prostitution