

Safeguarding and The Prevent Duty Policy and Procedures v15.1

1. What to do if you have a Welfare, Safeguarding or Prevent Duty Concern – Flowchart

Why are you concerned?

- Disclosure
- Learner's appearance or behaviour
- Witnessed concerning behaviour or incident

Immediately inform the Designated or Deputy Safeguarding Lead

Safeguarding Lead (interim): Nicole Smith – 07562 508299

Deputy Safeguarding Lead: Hazel Ballantyne-Clark – 07753 747150

Record your initial concern(s) on the Safeguarding Incident Record, this can be found on SharePoint and email to safeguarding@impactfutures.co.uk

Designated Safeguarding Lead or Deputy Safeguarding Lead will nominate a Safeguarding Officer within 2 hours to carry out a full investigation with all relevant parties.

Update safeguarding log and set up an electronic safeguarding file for the learner

Full Investigation to be conducted by the nominated Safeguarding Officer within 24 hours

- Refer to Safeguarding Policy and supporting documents for guidance
- Conduct a full investigation with all relevant parties
- Complete a full write up on the safeguarding incident record
- Return updated safeguarding incident record to Safeguarding Lead within 24 hours

Designated Safeguarding Lead or Deputy Safeguarding Lead will evaluate the safeguarding incident record to ascertain if any further action is to be taken, refer to other agencies and inform the ESFA via the Contact Form: [Education and Skills Funding Agency \(ESFA\) enquiry form - Customer type - DFE Online Forms](#) using UKPRN 1002278 for learners on the TCC contract and UKPRN 10018916 for learners on the Impact Futures contract, update the central safeguarding log and learner electronic safeguarding file accordingly.

Designated Safeguarding Lead will provide a safeguarding update to the Senior Leadership Team on a monthly basis and quarterly to the Board.

2. Introduction and Ethos

- 2.1 The Childcare Company and Impact Futures are committed to taking every reasonable step to ensure the safety and welfare of children, young people and adults within their remit. Our intent is to exceed our social and moral responsibilities to protect in accordance with the law and where appropriate, with the support of relevant external agencies.
- 2.2 All children, young people and adults, without exception, have the right to protection from abuse regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender, sexual orientation or socio-economic background. We will uphold and teach others to uphold the **British Values of Democracy, Rule of Law, Individual Liberty and Respect** as well as promoting principles that support of **Equality of Opportunity** for all.
- 2.3 We instill a safer recruitment policy led by our Director of Finance and HR ensuring all employees are carefully selected, trained, supervised and have an appropriate level of DBS check in place where required. We will ensure that all employees adopt and abide by all Company policies and procedures at all times. Once they have a current DBS and the DBS is for the relevant sector they are working in, they can contact and meet learners, however we will still apply for a TCC/IF DBS. If someone joins the Organisation without a current DBS they must not, under any circumstances, have access to learner records or make lone visits to learners. Although they can accompany a member of staff who has a DBS but that member of staff must never leave the non-DBS member of staff alone with a learner(s).
- 2.4 We recognise that certain national and local incidents could have a temporary or long-term impact on learners and members of staff, and as such we ensure these are monitored and considered by all in relation to our safeguarding responsibilities. Notably in 2020 the entire country went into lockdown due to the COVID-19 Pandemic and this was followed by a range of local restrictions. Our policy takes these additional worries, concerns and risks into consideration.

3. **Our Commitment**

- 3.1 We promote the welfare of every learner and the keep them safe.
- 3.2 We are committed to practice in a way that protects every learner.
- 3.3 We believe that learners should never experience any form of abuse, discrimination, harassment or victimisation.
- 3.4 We will protect learners from radicalization and extremism by responding swiftly where learners are vulnerable to these issues.
- 3.5 We will provide staff and volunteers with regular updates and annual training on Safeguarding and Prevent.
- 3.6 We will record and check the details of all visitors to all our premises.
- 3.7 We recognise that ignoring abuse is not an option and all staff must report any concerns for the wellbeing of learners in accordance with this policy.
- 3.8 We also commit to keeping a Safeguarding and Prevent action plan/risk register.

4. **Aims**

- 4.1 Promote fundamentals British Values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages every learner to raise any concerns.
- 4.2 Encourage learners to develop a sense of autonomy and independence in their learning and development.
- 4.3 Work with employers to build their understanding of a commitment to the principles of safeguarding and Prevent duty.
- 4.4 Liaise with other statutory agencies to ensure legislative procedures are current.
- 4.5 Liaise with external agencies to support staff and learners where required.

5. Scope and Purpose

5.1 This policy applies to:

- (a) The Childcare Company, Impact Futures learners and customers.
- (b) All employees (on all basis).
- (c) Employers (organisations that work in partnership with us).
- (d) Suppliers (external partners who are in receipt of and/or provide TCC/IF training/delivery).
- (e) External stakeholders and visitors (please see visitor invitation form).

6. Context

6.1 This policy has been developed in accordance with the principles established by the Children Acts, other relevant Acts and related guidance. This includes:

- (a) Education and Training (Welfare of Children) Act 2021 - [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2021/12/section/1)
- (b) Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2021 - [Keeping children safe in education 2021 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/95131/ksce-2021.pdf)
- (c) Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2021 Part 1 Annex: Further Information - [Keeping children safe in education 2021 \(part one only\) \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/95131/ksce-2021-part-one-annex.pdf)
- (d) Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (*HM Government*) July 2018 - [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721417/working-together-to-safeguard-children-2018.pdf)
- (e) What to do if you're worried about a child being abused (*HM Government*) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/421417/what-to-do-if-youre-worried-about-a-child-being-abused-2015.pdf)
- (f) Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads)

September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

- (g) Prevent duty guidance: DfE for further education institutions in England and Wales April 2021 - [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- (h) Security Act 2015 section 29 Counter-Terrorism and Security Act 2015
- (i) Ofsted – Inspecting safeguarding in early years, education and skills settings, Education Inspection Framework 2019

7. Definition of Safeguarding and The Prevent Duty

7.1 Safeguarding

- (a) "Safeguarding is not just about protecting learners from deliberate harm. It includes a wide range of issues relating to learner's welfare, health and safety."
- (b) Safeguarding is defined as:
 - (i) Protecting children and venerable people form maltreatment.
 - (ii) Preventing impairment of children's and vulnerable learner's health or development.
 - (iii) Ensuring that children and vulnerable learners are growing up in circumstances consistent with the provision of safe and effective care.
 - (iv) Acting to enable all children and vulnerable learners to have the best life-chances.
- (c) Significant Harm
 - (i) Harm means ill treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of others.
 - (ii) Development means physical, intellectual, emotional, social or behavioral development.
 - (iii) Health means physical or mental health.

- (iv) Ill treatment includes physical & Sexual abuse and forms of ill treatment which are not physical (s.31 (9) Children Act 1989 as amended by the Adoption and Children Act 2002).
- (d) Welfare is defined as a child or vulnerable learner in need of universal help from those already involved or from a single or multiple agency response.
- (e) All safeguarding policies will be reviewed on an annual basis by the Designated Safeguarding Lead and Senior Leadership Team which has responsibility for oversight of company safeguarding and child protection systems.
- (f) The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Board of Directors. The Board of Directors will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.
- (g) The Childcare Company and Impact Futures acknowledges that this policy will incorporate a range of safeguarding issues including:
 - (i) Neglect.
 - (ii) Physical abuse.
 - (iii) Child Sexual Exploitation (CSE).
 - (iv) Sexual abuse, violence, and harassment.
 - (v) Emotional abuse.
 - (vi) Bullying, including online bullying and prejudice-based bullying.
 - (vii) Racist, disability and homophobic or transphobic abuse .
 - (viii) Gender-based violence/violence against women and girls.
 - (ix) Peer-on-peer abuse, such as sexual violence and harassment.
 - (x) Radicalisation and/or extremist behaviour.
 - (xi) Child Criminal Exploitation (CCE), including trafficking and county lines.
 - (xii) Serious violent crime.

- (xiii) Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exportation or radicalisation; and risks of accessing and generating inappropriate content, for example 'sexting'.
 - (xiv) Teenage relationship abuse.
 - (xv) Upskirting.
 - (xvi) Substance misuse.
 - (xvii) Issues that may be specific to a local area or population, for example gang activity and youth violence.
 - (xviii) Domestic abuse.
 - (xix) Female genital mutilation.
 - (xx) Forced marriage.
 - (xxi) Fabricated or induced illness.
 - (xxii) Poor parenting.
 - (xxiii) Homelessness.
 - (xxiv) So-called honour-based violence.
 - (xxv) Other issues not listed here but pose a risk to learners and vulnerable young adults.
- (h) Every member of staff at The Childcare Company and Impact Futures recognise that learners experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting learners from any other risks.

7.2 The Statutory Framework

- (a) The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Schools, Colleges and Providers have a legal obligation to work with investigating agencies acting on behalf of children in need guidance was published in 'Safeguarding Children in Education' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children and underpinned our common law duty of care.
- (b) This was replaced and extended in January 2007 by 'Safeguarding Children and Safer recruitment in education', which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of staff. The responsibility for carrying out their duties in compliance with the arrangements set out by TCC/IF, we are not the investigating agency. This function is carried by local authority Children Services, or other agencies with statutory powers. The Children Act 1989, and subsequent legislation and guidance, and concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire a degree of legal capacity and maturity prior to their 18th birthday, and that there are learners over 18 who continue to be vulnerable due to a learning difficulty and/ or disability.
- (c) Children are defined in the Children Act 1989 and 2004, as a person under the age of 18. The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable learner as a person aged 18 or over and:
- (i) Teenagers.
 - (ii) Children and young people missing from education.
 - (iii) Those at risk of FGM (Female Genital Mutilation).
 - (iv) Those at risk of Forced Marriages.
 - (v) Those at risk of Honor Based Violence.

- (vi) Trafficked children and young people.
 - (vii) Those in the 'Looked After' system.
 - (viii) Children and young people living away from home.
 - (ix) Children from some minority ethnic groups.
 - (x) Those with abuse and trauma in their past.
 - (xi) Those living in sheltered accommodation, detained in custody or under a probation order.
 - (xii) Those living with domestic violence, parental substance misuse and/or parental mental health, receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or Mental Health conditions.
- (d) This policy and related procedures are driven by the following legislation and guidance:
- (i) The Children Act 1989.
 - (ii) The Children Act 2004.
 - (iii) Working Together to Safeguard Children 2018.
 - (iv) What to do if you are worried a child is being abused 2015.
 - (v) Keeping Children Safe in Education (KCSIE) 2018 & 2021.
 - (vi) Protection of Freedoms Act 2012
 - (vii) Care Act 2014.
 - (viii) Keeping Learners Safe 2015.
 - (ix) Safeguarding Children: Working Together Under the Children Act 2004.
 - (x) Disqualification under the Children Act 2006 (2018).

- (xi) Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/97222/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges.pdf))

7.3 The Prevent Duty

- (a) Section 26(1) of the Counter-Terrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.
- (b) TCC/IF understand their duties and conditions of funding and comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners. Requirements include:
 - (i) Policy and management of external speakers and events.
 - (ii) Partnership management, including employer partners and specialist trainers, covering DBS and other checks.
 - (iii) Risk assessment relating to the scope of our business and associated risk.
 - (iv) Action planning as a result of the risk assessment.
 - (v) Staff training is part of the new starter induction process and annual refresher training is planned as part of our CPD policy. We take the opportunity to use news items both nationally and locally to enhance the training of staff and support them to pass this knowledge to their learners and Apprentices.
 - (vi) Welfare and pastoral care for learners, additional support needs identified and implemented.
 - (vii) IT policies.

- (viii) Monitoring and enforcement – the Designated Safeguarding Lead (DSL) leads in this area and report back to the Board quarterly.
- (c) In 2011, the Government published a Prevent Strategy which raised awareness of the specific need to safeguard children, young people and families from extremism and radicalisation.
- (d) Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to deter them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- (e) Prevent is about safeguarding our learners to keep them both safe and within the law. The Prevent Duty is not about preventing learners from having political views and concerns but about supporting them to use those concerns or act on them in non-extreme ways.
- (f) Radicalisation & Extremism
- (i) The holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL/ white supremacy groups, anti – gay groups, Islam/Christian ideology. The Counter Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children’s service providers, 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 current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The Childcare Company / Impact Futures is clear that this exploitation and radicalization should be viewed as a Safeguarding concern and that protecting children from the risk of radicalisation is part of the company’s’ safeguarding duty.
- (ii) Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- (iii) Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

8. Key Responsibilities

- 8.1 Everyone who comes into contact with learners and their families has a role to play in safeguarding.
- 8.2 The Childcare Company and Impact Futures have a Designated Safeguarding Lead (DSL), a Deputy DSL and team of Safeguarding Officers (named below). The DSL will take the lead role in ensuring that The Childcare Company and Impact Futures have an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding are reviewed at least annually. Contact details of all safeguarding personnel are available through the contact information on SharePoint. The Board Director – Safeguarding represents the Board and has responsibility for ensuring the Board are furnished with relevant and timely information, is the liaison between the DSL and provides the DSL with appropriate support and challenge.
- 8.3 Board Director - Safeguarding
- (a) Louise Ranford, Operations Director
- 8.4 Designated Safeguarding Lead (DSL)
- (a) Nicole Smith, Quality Director (DSL)
- 8.5 Deputy Designated Safeguarding Lead (DDSL)
- (a) Hazel Ballantyne-Clark, Director of Higher Education
- 8.6 Designated Safeguarding Officers (DSO)
- (a) Sandra Evans, Development Coach
 - (b) Sophie Hayter, Quality Manager
 - (c) Leanne Gartland, Development Coach
 - (d) Rachel Panton, Internal Quality Assurer
 - (e) Helen Eveleigh, Registration & Certification Manager
 - (f) Alison Gregory, Engagement Lead

- 8.7 The DSO list and contact details can be found on the poster in head office and on our HR system Breath for staff and for Apprentices and learners on Smart Assessor. Additionally, we have an emergency safeguarding phone for Apprentices and learner to use in the event of a safeguarding emergency. This can be accessed at any time of the day, every day. The number is displayed on our e-portfolio system home page and is easily accessible.
- 8.8 The Board is accountable for ensuring that the Designated Safeguarding Lead has ongoing training and support to develop resources. The DSL is responsible for the training and updates for the Deputy Safeguarding Lead and Safeguarding Officers.
- 8.9 **Designated Safeguarding Lead (DSL)** and Deputy Designated Safeguarding Lead (DDSL)
- (a) The Childcare Company and Impact Futures have appointed a member of the Senior Leadership Team (**Nicole Smith**) as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems across our organisation and its related activities.
- (b) The Designated Lead is responsible for ensuring that:
- (i) There are a sufficient number of trained and competent colleagues with designated responsibility for safeguarding.
 - (ii) All colleagues receive adequate training in order to identify potential safeguarding issues and to respond appropriately to disclosures.
 - (iii) Robust policies are maintained, and all other relevant information and material is effectively communicated across the organisation.
 - (iv) Record keeping is accurate and secure.
 - (v) Providing the Board with a quarterly written report and attend Board meetings by invitation.
- (c) The organisation has appointed a Deputy Safeguarding Lead and additional Safeguarding Officers to support the DSL (see list at 8.6). The Deputy Safeguarding Lead and Safeguarding Officers will undertake appropriate training to enable them to fulfil this role effectively.

- (d) It is the role of the DSL (Deputy DSL in absence of DSL) to:
- (i) Act as the central contact point for all staff to discuss any safeguarding concerns.
 - (ii) Maintain a confidential recording system for safeguarding and learner protection concerns.
 - (iii) Liaise with other agencies and professionals in line with Working Together to Safeguard learners.
 - (iv) Represent, or ensure the organisation is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences).
 - (v) Be available to discuss any safeguarding concerns.
 - (vi) Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2021)
 - (vii) Ensure that locally established procedures are followed and making referrals to other agencies as necessary.

8.10 Finance and HR Director and The HR Team

- (a) The Childcare Company and Impact Futures operate using a safer recruitment process and that the appropriate checks are carried out on all new staff joining the organisation.
- (b) As part of our approach to Safer Recruitment the HR and Recruitment Assistant (HRRRA) is responsible for ensuring all new employees have a current DBS check at the level appropriate for their role. This includes working with the individual to submit a check or checking on the Update Service. We expect all employees to enrol for the Update Service. The HRRRA will pass any disclosures onto the Finance and HR Director and / or the Operations Director in order that a decision can be taken about the continuation of a job offer or employment.
- (c) The HRRRA carries out checks to confirm that they are eligible to work in the UK and they carry out identity checks using documents such as birth certificates, marriage/divorce certificate, passports, bank statement and utility bills.

- (d) The HRRA also take up references for all new starters, this is important because there might be something of relevance to safeguarding or the Prevent Duty that needs to be considered in relation to confirming employment with TCC/IF.
- (a) The HRRA ensures that we adhere to our safer recruitment process which includes guidelines for advertising roles, clearly stating our commitment to safeguarding and identifying the DBS requirement, CV check and checking gaps in employment history, a completed application form (we will only progress applicants that complete our application form) and qualification checks. When shortlisting candidates, the HR Administrator ask the candidate to declare in writing, if they have a criminal record or if they are on the barred list.

8.11 All Staff

- (a) The welfare and safety of learners is the responsibility of all staff across The Childcare Company and Impact Futures.
- (b) All members of staff have a responsibility to:
 - (i) Provide a safe environment in which learners can learn.
 - (ii) Ensure all learners are able to develop appropriate strategies to recognise and respond to risk and build resilience.
 - (iii) Identify and recognise learners who may be in need of additional support, who are suffering, or are likely to suffer significant harm.
 - (iv) Provide support and assistance for learners, where appropriate and reasonable.
 - (v) Take appropriate action to prevent safeguarding concerns escalating and work with other services as needed.
 - (vi) Safeguard learner's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
 - (vii) Safeguard learner's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
 - (viii) Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the learner.

- (ix) Respond to and refer any concerns about learners or other members of the community in accordance with this policy.
- (x) Contribute towards, read and adhering to the organisation policies.
- (xi) Any concern for a learner's welfare MUST always be reported to the Designated Safeguarding Lead.

8.12 Employers and where relevant parents can obtain a copy of The Childcare Company and Impact Futures Safeguarding Policy and other related policies on request.

9. Staff Induction Awareness and Training

9.1 All members of staff have been provided with a copy of part one of the **"Keeping Children Safe in Education"** (*DfE statutory guidance for schools and colleges*) 2021 which covers Safeguarding information and have received the appropriate training relevant to their role within the organisation as part of their induction training.

9.2 Definition of Channel General Awareness Prevent Training:

- (a) Channel training supports identification of who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity.
- (b) All staff members will receive regular safeguarding, channel, prevent and learner protection updates, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively.
- (c) The Senior Leadership Team identify in their monthly meeting any Prevent, safeguarding issues, developments or training requirements, the DSL provides advice and guidance on Prevent and Safeguarding monthly staff CPD sessions. However, should there be a Prevent development that needs sharing as a matter of priority this is shared immediately.

- 9.3 Staff training is designed to ensure that all staff can:
- (a) **Recognise** potential safeguarding and learner protection concerns involving students and adults (colleagues, other professionals and parents/carers).
 - (b) **Respond** appropriately to safeguarding issues and take action in line with this policy.
 - (c) **Record** concerns in line with The Childcare Company and Impact Future policy.
 - (d) **Refer** concerns to the DSL and be able to seek support external to The Childcare Company and Impact Futures if required x

10. Safe Working Practices

- 10.1 All members of staff are required to work within clear guidelines on Safe Working Practice.
- 10.2 Learners may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding learner protection or potential allegations and work within professional boundaries. All staff having direct contact with learners must ensure there is an appropriate environment with learners e.g. in their workplace in view of other people. Please refer to section 13 for more detail.
- 10.3 Physical intervention should only be used when the learner is endangering themselves or others and such events should be recorded and signed by a witness.
- 10.4 Full advice and guidance can be found in the guidance document listed in point 4.1, which includes the online links.
- 10.5 Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in the guidance document listed in point 4.1, specifically "**Keeping Children Safe in Education**" (*DfE statutory guidance for schools and colleges*) 2021.

10.6 Record Keeping

- (a) Staff will record any welfare concerns that they have about a learner on The Childcare Company and Impact Futures Safeguarding Incident Record. This can be identified by the form of disclosure, learner's appearance or behaviour or witnessed concerning behaviour or incident.

10.7 A learner's appearance, behaviour or symptom can include the following:

- (a) Sudden mood swings e.g. withdrawal, rage, fear.
- (b) Seems distracted or distant at odd times.
- (c) Depression, anxiety.
- (d) Drug and alcohol abuse.
- (e) Self-injury.
- (f) Suicide attempts.
- (g) Sudden change in eating habits.
- (h) Goes missing from work and home and cannot be contacted.
- (i) Thinks of self or body as repulsive.
- (j) Lack of money to buy basic items.
- (k) Malnutrition.
- (l) Inadequate personal hygiene.
- (m) Running away from home.
- (n) Fear of intimacy or closeness.
- (o) Other issues not listed here but pose a risk to learners and vulnerable young adults.

- 10.8 All staff should make notes on the safeguarding incident form as soon as possible, use the learner's own words and submit to the DSL immediately once complete. During periods of lockdown, extended working from home, furlough and similar approach that keeps people isolated, staff should use their skills of observation and listening to identify any potential safeguarding issues that are as a result of the restrictive conditions and take action in line with this policy.
- 10.9 The following areas should be considered:
- (a) Date, time, place.
 - (b) Accept what you are being told.
 - (c) Listen without displaying shock or disbelief.
 - (d) Reassure the learner.
 - (e) Acknowledge their courage talking to you.
 - (f) Do not promise confidentiality.
 - (g) Do not promise that everything will be alright.
 - (h) Avoid leading questions but ask open ended ones.
 - (i) Clarify anything that is not clear or you do not understand.
 - (j) Check to see if any others may be at risk.
 - (k) Explain what you will do next, i.e. inform DSL.
 - (l) In all incidences the DSL will make a decision as to if the concern requires referral to an outside agency.
- 10.10 If, at any point, there is a risk of immediate serious harm to a learner a referral should be made to the police or to social services immediately and can be made by any member of staff.
- 10.11 Once reported the DSL will agree a designated safeguarding officer to take responsibility of the matter and will take all the necessary actions in a timely manner.

- 10.12 All safeguarding concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing.
- 10.13 A log of all Safeguarding concerns raised is kept electronically and accessible only to the DSL and deputy DSL.
- 10.14 Safeguarding records are kept for individual learners and separate from all other records relating to the learner. They are retained centrally and securely by the DSL and are shared with staff on a 'need to know' basis only. The CEO will be kept informed of all issues by the DSL, however learners names won't be disclosed to maintain confidentiality.
- 10.15 Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary in accordance with the policy. Staff must never promise confidentiality and learners should understand when we need to share information to protect them or access support.
- 10.16 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" (*DfE statutory guidance for schools and colleges*) 2021.

11. Working with Agencies

- 11.1 The Childcare Company and Impact Futures recognise and are committed to its responsibility to work with other professionals and agencies both to ensure learners' needs are met and to protect them from harm. We will endeavour to identify those learners and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, as appropriate.
- 11.2 Training Providers are not the investigating agency when there are learner protection concerns and The Childcare Company and Impact Futures will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise that a crucial part of this may be in supporting the learner while these take place.
- 11.3 The Childcare Company and Impact Futures recognise the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family.

- 11.4 The Childcare Company and Impact Futures Senior Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.
- 11.5 Guidance can be found at 4.1.c “**Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children**” (*HM Government*) July 2018.

12. Confidentiality and Information Sharing

- 12.1 The Childcare Company and Impact Futures recognise that all matters relating to learner protection are confidential. The DSL will only disclose information about a learner to other members of staff on a need-to-know basis.
- 12.2 All members of staff must be aware that whilst they have a duty to keep any information about learners, families and colleagues (which they have access to as a result of their role) confidential, they also have a professional responsibility to share information with other agencies in order to safeguard learners. All staff must be aware that they cannot promise a learner to keep secrets which might compromise the learners’ safety or wellbeing.
- 12.3 The General Data Protection Regulation (GDPR) and Data Protection Act provides further detail.

13. Complaints

- 13.1 The Childcare Company and Impact Futures has a **Complaints Procedure** available to learners, employers and members of staff as an additional method by which to report concerns.
- 13.2 All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff will be dealt with by the Director of Finance and HR and line manager directly.

14. Allegations Against Members of Staff

- 14.1 We recognise that it is possible for staff to behave in a way that might cause harm to learners and takes seriously any allegation received. Such allegations should be referred immediately to the DSL who will contact the appropriate line manager and Director of Finance and HR to agree further action to be taken in respect of the learner and staff member. In the event of allegations of abuse being made is against the DSL then staff are advised that allegations should be reported directly to the CEO. Once the initial investigation has been completed, should it be evident that the allegation against a member of staff is credible, as well as following the company disciplinary policy the company has a duty to report the incident to the relevant external authority and the ESFA using the Contact Form: [Education and Skills Funding Agency \(ESFA\) enquiry form - Customer type - DfE Online Forms](#) using UKPRN 1002278 for learners on the TCC contract and UKPRN 10018916 for learners on the Impact Futures contract, about incidents and referrals.
- 14.2 All staff should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Senior Leadership Team.
- 14.3 All members of staff are made aware of The Childcare Company and Impact Futures whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- 14.4 Members of staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding learner protection failures internally. Staff can call: 0808 800 5000.
- 14.5 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" (*DfE statutory guidance for schools and colleges*) 2021.

15. Allegations Against Learners

- 15.1 The Childcare Company and Impact Futures recognise that young people are capable of abusing their peers. Peer on peer abuse can take many forms, including (but not limited to) bullying, cyberbullying, hazing (initiation type violence), sexualised bullying and violence and sexting. The Childcare Company and Impact Futures is mindful that some potential issues may be affected by the gender, age, ability and culture of those involved. We believe that abuse is abuse and it will never be tolerated, dismissed or minimised.

- 15.2 We will ensure that appropriate curriculum time is dedicated to enable learners to develop an awareness and understanding of abusive behaviour and to ensure that young people recognise warning signs and sources of support both within company and externally.
- 15.3 Learners who have experienced peer on peer abuse will be supported by:
- Offering them an immediate opportunity to discuss the experience with a member of staff of their choice.
 - Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
 - Providing reassurance and continuous support.
 - Working with the wider community and local/national organisations to provide further or specialist advice and guidance.
- 15.4 Learners who are alleged to have abused other learners will be helped by:
- Discussing what happened, establishing the specific concern and the need for behaviour to change.
 - Informing employers to help change the attitude and behaviour of the individual.
 - Providing appropriate education and support.
 - Speaking with police or other local services (such as early help or children's specialist services) as appropriate.
- 15.5 The Childcare Company and Impact Futures are aware of and will follow the LSCB procedures (www.lscb.co.uk) for supporting learners who are at risk of harm as a result of their own behaviour.
- 15.6 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" (DfE *statutory guidance for schools and colleges*) 2021.

16. Safeguarding Learners with Special Educational Needs and Disability

- 16.1 The Childcare Company and Impact Futures acknowledge that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- 16.2 We will ensure that learners with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- 16.3 Members of staff are encouraged to be aware that learners with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the learner's disability and be aware that learners with SEN and disabilities may not always outwardly display indicators of abuse.

17. Online Safety

- 17.1 It is recognised by The Childcare Company and Impact Futures that the use of technology presents particular challenges and risks to learners both inside and outside of the training provision.
- 17.2 The Childcare Company and Impact Futures identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk;
- (a) **Content:** being exposed to illegal, inappropriate or harmful material
 - (b) **Contact:** being subjected to harmful online interaction with other users
 - (c) **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm
- 17.3 We have identified that during any period of lockdown, extended working from home, furlough and other similar situations which keep people away from others present a greater risk of online abuse and we are vigilant to this end.

- 17.4 The Childcare Company and Impact Futures will ensure that appropriate filtering and monitoring systems are in place when learners and staff access organisational systems and internet provision. We will be careful to ensure that these systems do not place unreasonable restrictions on internet access or limit what learners can be taught with regards to online teaching and safeguarding. We acknowledge that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our role. Learners and staff may have access to systems external to our control such as mobile phones and other internet enabled devices and technology. By upholding this policy and providing training about these risks associated with being online, including accessing and downloading inappropriate material and images, keeping personal and financial information safe, having secure and different passwords, as well as the risks associated with grooming, we will meet our commitment to take every reasonable step to ensure the safety and welfare of children, young people and adults within their remit.
- 17.5 Guidance can be found at 4.1.b “**Keeping Children Safe in Education**” (*DfE statutory guidance for schools and colleges*) 2021.

18. Appendices

- 18.1 Appendix 1: Categories of Abuse
- 18.2 Appendix 2: Specific safeguarding Issues
- 18.3 Appendix 3: Additional Advice and Support
- 18.4 Appendix 4: Safeguarding Referral Form

19. Appendix 1: Categories of Abuse

- 19.1 Abuse is a behaviour towards a person that either deliberately or unknowingly causes a person harm, endangers their life, human or civil rights. It can be passive, e.g. failing to take action or to care for someone, failing to raise the alarm about or abuse; or active e.g. hitting, stealing or doing something that causes harm.
- 19.2 Abuse can be a one-off or something that is repeated. Abuse can be triggered or made worse by an incident or event such as the COVID-19 pandemic in 2020.
- 19.3 Abuse can be:
- (a) Physical.
 - (b) Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition
 - (c) Sexual (including peer on peer abuse involving sexual violence or sexual harassment).
 - (d) Financial.
 - (e) Psychological/emotional (including the use of text, social networks and email).
 - (f) Violation of rights e.g. preventing an individual speaking his/her thoughts and opinions.
 - (g) Institutional e.g. failure to provide a choice of meals or failure to ensure privacy or dignity; or
 - (h) Discriminatory in nature e.g. racial, sexual or religious harassment.
 - (i) On-line abuse: cyberbullying, intimidation, exploitation, grooming, radicalisation.
 - (j) Child criminal exploitation including children being used to carry drugs or money from urban to rural areas. In the case of at-risk adults, it may also include physical abuse such as inappropriate restraint, forcing, forcible administration of medication, neglect or abandonment.

- (k) Financial abuse such as exerting improper pressure to sign over money from pensions or savings, etc.

19.4 Sexual Abuse:

- (a) Sexual abuse includes sexual violence, sexual harassment and Criminal Sexual Exploitation (CSE).
- (b) Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the learner 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 learners in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners to behave in sexually inappropriate ways, or grooming a learner 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 learners.
- (c) All safeguarding referrals and investigations relating to sexual abuse must be report the ESFA using the Contact Form:
<https://www.gov.uk/government/organisations/education-and-skillsfunding-agency>

19.5 Signs can be;

- (a) Sudden changes in behaviour and educational performance.
- (b) Displays of affection which are sexual and age inappropriate.
- (c) Self-harm, self-mutilation or attempts at suicide.
- (d) Alluding to secrets which they cannot reveal.
- (e) Tendency to cling or need constant reassurance.
- (f) Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby.
- (g) Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger.

- (h) Unexplained gifts or money.
- (i) Depression and withdrawal.
- (j) Fear of undressing for PE.
- (k) Sexually transmitted disease.
- (l) Fire setting.

19.6 Physical Abuse:

- (a) A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a learner. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a learner.

19.7 Signs can be;

- (a) Bruises and abrasions around the face.
- (b) Damage or injury around the mouth.
- (c) Bi-lateral injuries such as two bruised eyes.
- (d) Bruising to soft area of the face such as the cheeks.
- (e) Fingertip bruising to the front or back of torso.
- (f) Bite marks.
- (g) Burns or scalds (unusual patterns and spread of injuries).
- (h) Deep contact burns such as cigarette burns.
- (i) Injuries suggesting beatings (strap marks, welts).
- (j) Covering arms and legs even when hot.
- (k) Aggressive behaviour or severe temper outbursts.
- (l) Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

19.8 Emotional Abuse:

- (a) The persistent emotional maltreatment of a learner such as to cause severe and adverse effects on the learner's emotional development. It may involve conveying to a learner 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 learner 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 learners. These may include interactions that are beyond a learner's developmental capability as well as overprotection and limitation of exploration and learning or preventing the learner participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing learners frequently to feel frightened or in danger, or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a learner, although it may occur alone.

19.9 Signs can be;

- (a) Over reaction to mistakes.
- (b) Lack of self-confidence/esteem.
- (c) Sudden speech disorders.
- (d) Self-harming.
- (e) Eating disorders.
- (f) Extremes of passivity and/or aggression.
- (g) Compulsive stealing.
- (h) Drug, alcohol, solvent abuse.
- (i) Unwillingness or inability to interaction with others.
- (j) Excessive need for approval, attention and affection.

19.10 Neglect:

- (a) The persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a learner 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 learner's basic emotional needs.

19.11 Signs can be;

- (a) Constant hunger.
- (b) Poor personal hygiene.
- (c) Constant tiredness.
- (d) Inadequate clothing.
- (e) Frequent lateness or non-attendance at the training centre.
- (f) Untreated medical problems.
- (g) Poor relationship with peers.
- (h) Compulsive stealing and scavenging.
- (i) Rocking, hair twisting and thumb sucking.
- (j) Running away.
- (k) Loss of weight or being constantly underweight.
- (l) Low self esteem.

19.12 Peer on peer abuse:

- (a) Peer on peer abuse is behavior by an individuals or group of individuals which can be a one-off incident or repeated over time. Peer on peer abuse is behaviour that intentionally hurts another individual or group wither physically or emotionally. All peer-on-peer abuse is unacceptable and will be taken seriously. Peer on peer abuse can take on many forms including serious bullying (including cyberbullying), relationship abuse, domestic abuse, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and /or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person.

19.13 Sign can be;

- (a) Race.
- (b) Religion.
- (c) Gender.
- (d) Sexual orientation.
- (e) Special educational needs or disabilities.
- (f) Where a child is adopted, in care or has care responsibilities.
- (g) Is suffering from health problems.
- (h) Has an actual or perceived difference (e.g. physical or cultural difference).

19.14 Bullying and Harassment

- (a) Bullying can include a variety of behaviors from one individual/group to another individual/group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way.

20. **Appendix 2: Specific Safeguarding Information for Staff (See Annex A of Keeping Children Safe in Education 2021 – Policy reference 4.1.b)**

20.1 Children Missing Education

- (a) The Childcare Company and Impact Futures recognise that all learners, regardless of their circumstances, are entitled to education which is suitable to their age, ability, aptitude and any special educational needs they may have. The Childcare Company and Impact Futures is aware that a learner going missing from education is a potential indicator of abuse or neglect.
- (b) The Childcare Company and Impact Futures has a procedure in place for responding to unauthorised absence and for dealing with learners that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

20.2 Child Sexual Exploitation (CSE)

- (a) The Childcare Company and Impact Futures identifies that CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.
- (b) The Childcare Company and Impact Futures are aware that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexting, sexual bullying including cyberbullying and grooming. However, it is important to recognise that some young people who

are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.

- (c) Every member of staff at The Childcare Company and Impact Futures recognises that learners at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting learners from other risks.

20.3 'Honour Based' Violence (HBV)

- (a) Members of staff at The Childcare Company and Impact Futures are aware that 'Honour-based' violence (HBV) encompasses a range of 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.
- (b) The indicators of HBV and associated factors will be covered with staff within the safeguarding training. All members of staff are alert to the possibility of a learner being at risk of HBV, or already having suffered HBV. All members of staff are aware that all forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with the DSL if they are concerned about HBV.
- (c) All members of staff will follow the business and LSCB procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

20.4 Forced Marriage

- (a) The Forced Marriage Unit has published [Multi-agency guidelines](#), focusing on the role of schools, colleges and training providers. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151.

20.5 Radicalisation

- (a) The Childcare Company and Impact Futures recognise that exposure of learners to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence.
- (b) Radicalisation of young people can be compared to grooming for sexual exploitation.
- (c) The Childcare Company and Impact Futures will ensure all staff complete an e-learning training package in conjunction with the College of Policing which includes guidance on how to identify people who may be vulnerable to being drawn into, and how to refer them into the Channel process.
- (d) Every member of staff at The Childcare Company and Impact Futures recognise that learners exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting learners from other risks.
- (e) All members of Staff should report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.

20.6 County Lines

- (a) County Lines is the exploitation of young and vulnerable people through:
 - (i) **Grooming & recruitment** – vulnerable children are targeted, befriended, given money, made to feel like a family and they belong, they have the things they've always wanted and then they are exploited.
 - (ii) **Property – Cuckooing** is when a vulnerable person has their property taken over by drug dealers and mules from outside of the county.

- (iii) **Drugs** – the primary target is buying cheap drugs in major cities such as London, using vulnerable children and young people to cross several county lines to deal.
- (iv) **Weapons** – more recently the movement of weapons has become another commodity.
- (v) **Violence** – the children and young adults can't escape it, they are threatened, they experience violence, and they often go on to be perpetrators of violence.
- (vi) **Sex** – whilst sexual exploitation is a risk, authorities hat those involved in County Lines are at no greater risk than other vulnerable children and young adults.
- (vii) **Gangs** – once recruited these vulnerable children are gang members, it's highly likely they will remain in the gang, move up the ranks and become institutionalised gang members and possibly gang leaders of the future.
- (viii) **Crime** – most fall into a life of crime, starting with small convictions and sentences, progressing to serious crime and serving time in jail – it's almost impossible for them to break the cycle.

20.7 When a young learner goes missing, and we don't know why and after all usual attempts to contact them, including through their parents and/or guardian, we need to consider the risk that they may have got caught up in County Lines and actually living outside of the area and in need of help. Not all people that go missing are involved in County Lines, but it is an ever-increasing problem across the UK.

20.8 Cyber bullying and e-safety

- (a) The safe and responsible use of technology, is sometimes presented as primarily a child or vulnerable learner protection issue. Whilst children, young people and vulnerable learners do need support to keep themselves safe online the risks associated with the use of technology (e.g. internet, text, or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them. There is also the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

20.9 Domestic Violence

- (a) Can be physical, emotional, sexual neglect. This category also covers forced marriages and honour-based violence. Some learners may experience issues with drugs or alcohol to self-medicate or via dependence.

20.10 Female Genital Mutilation (FGM)

- (a) Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted to them, so sensitivity should always be shown when approaching the subject. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the serious crime act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a girl under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes of labor or birth. For the purposes of the duty, the relevant age is the girl's age at the time of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she has FGM when she was under 18).

20.11 Modern Slavery

- (a) Encompasses slavery, human trafficking, forced labor and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

20.12 Sexting

- (a) This is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in a relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young people are not aware that they could be committing a crime offence under the sexual offence act 2003. Any direct disclosure by a learner (anyone that identifies themselves as male, female, non-binary) will be taken very seriously.

20.13 Initiation/Hazing

- (a) Hazing is a form of initiation ceremony which is used to induct newcomers into an organization such as a school or sports team etc. Hazing can also be used as initiation into a street or other 'gang'. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something common with older established members of the organisation or 'gang', because they are all experienced this as part of a 'rite of passage'. Many rituals involve humiliations, embarrassment, abuse and harassment.

21. Appendix 3: Additional Advice and Support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2	DfE Advice
Abuse	Domestic abuse: Various Information/Guidance https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2	Home Office
Abuse	Faith based abuse: National Action Plan https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE Advice
Abuse	Relationship abuse: Disrespect nobody https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/	Home Office
Bullying	Preventing bullying including cyberbullying https://www.gov.uk/government/publications/preventing-and-tackling-bullying	DfE Advice
Children in the courts	Advice for 12-17 year old witnesses in criminal courts https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds	MoJ Advice
Children missing from education, home or care	Children missing education https://www.gov.uk/government/publications/children-missing-education	DfE Statutory Guidance
Children missing from education, home or care	Children missing from home or care https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care	DfE Statutory Guidance
Children missing from education, home or care	Children and adults missing strategy https://www.gov.uk/government/publications/missing-children-and-adults-strategy	Home Office Strategy
Children with family members in prison	National Information Centre on Children of Offenders https://www.nicco.org.uk/	Barnardo's in partnership with HMP and HMPPS
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines	Home Office Guidance
Child Exploitation	Child sexual exploitation: guide for practitioners https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners	DfE Advice

Child Exploitation	Trafficking: safeguarding children https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance	DfE and HO Guidance
Drugs	Drugs: advice for schools https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf	DfE and ACPO Advice
Drugs	Drugs strategy 2017 https://www.gov.uk/government/publications/drug-strategy-2017	Home Office Strategy
Drugs	Information and advice on drugs https://www.talktofrank.com/	Talk to Frank Website
Drugs	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention http://mentor-adepis.org/	Website developed by Mentor UK
"Honour Based Violence"	Female genital mutilation: information and resources https://www.gov.uk/government/collections/female-genital-mutilation	Home office
"Honour Based Violence"	Female genital mutilation: multi agency statutory guidance https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation	DfE, DH and HO Statutory guidance
"Honour Based Violence"	Forced marriage: statutory guidance and government advice https://www.gov.uk/guidance/forced-marriage	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced	DfE , Department for Health and Home Office
Health and Wellbeing	Rise Above: Free PSHE resources on health, wellbeing and resilience https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources	Public Health England Resources
Health and Well-being	Medical-conditions: supporting pupils at school https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3	DfE Statutory Guidance
Health and Well-being	Mental health and behaviour https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2	DfE Advice
Homelessness	Homelessness: How local authorities should exercise their functions https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities	MHCLG
Online	Sexting: responding to incidents and safeguarding children https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis	UK Council for Child Internet Safety

Radicalisation / Terrorism	Prevent duty guidance for Further Education (FE) https://www.gov.uk/government/publications/prevent-dutyguidance/prevent-duty-guidance-for-further-education-institutions-inengland-and-wales	DfE Guidance
Radicalisation / Terrorism	Prevent duty guidance https://www.gov.uk/government/publications/prevent-duty-guidance	Home Office Guidance
Radicalisation / Terrorism	Prevent duty advice for schools https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty	DfE Advice
Radicalisation / Terrorism	Educate Against Hate Website https://educateagainsthate.com/	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence	Home Office Advice
Violence	Ending violence against women and girls 2016-2020 strategy https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020	Home Office Strategy
Violence	Sexual violence and sexual harassment between children in schools and colleges https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges	DfE Advice
Violence	Serious violence strategy https://www.gov.uk/government/publications/serious-violence-strategy	Home Office Strategy

22. Appendix 4: Referral Form

Please complete the sections highlighted in **BLUE**, it **MUST** be password protected and emailed to your Safeguarding Team safeguarding@thechildcarecompany.co.uk
safeguarding@impactfutures.co.uk
The password **MUST** be sent in a separate email.

Stage 1 – Safeguarding / Prevent Referral Form

To be completed by a member of staff as soon as an issue has been raised

Issue Type:	Choose an item..
Name of Apprentice:	
DOB:	
Job Title:	
Employer Details: (Name, Branch)	
Is the relevant person aware of the referral?	Choose an item.
If <u>yes</u>, has a meeting been conducted and by whom?	
Name of person making the referral:	
Date:	Click or tap to enter a date.
Time:	_____
Please include a full and factual description of concern or incident/ reason for referral: This should be factual and in chronological order and include any actions taken so far	
Remember that confidentiality is essential – think twice before passing on any confidential or sensitive information to anyone, please check with the Safeguarding Officer before doing so.	
Action taken so far: This section is to be completed by the Safeguarding Officer: (further info. requested/reported to authorities etc)	Is a 'child'/young person at risk? (16-18) Yes/ No Actions taken:

For Office Use Only:

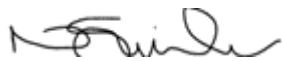
Incident:	
Safeguarding Team Member:	Choose an item.
Date Logged:	Click or tap to enter a date..

Checklist for a good record:

- ✓ Structured and easily accessible
 - ✓ Legible
 - ✓ Clear and concise
 - ✓ Writers meaning clearly conveyed
 - ✓ Includes all relevant information
 - ✓ Free from jargon and abbreviations
 - ✓ Separates fact from opinion
 - ✓ Signed, dated and timed
- **Be specific** – what is the exact nature of the concern and which category of abuse does it suggest?
 - **Show the evidence** – what did you see, hear? Who said what, when, how?
 - **Be precise** with time words – what do ‘always’, ‘frequently’, ‘never’ mean?
 - State your **professional judgement**

23. Document control

Document Reference	WO006
Document Title	Safeguarding and The Prevent Duty Policy and Procedures
Version	15
Original Author	Debbie Gardiner MBE
Authors Title	Non-executive Director
Policy Owner	Quality Director
Original Issue	August 2021
Review Date	August 2022
Author of Revision	Nicole Smith / Debbie Gardiner MBE
Date of Revision	20 th December 2021
Revision Number	15.1
Reason for Revision	Merge policy versions 14.2 & 15
Amendments	DSO updated to Nicole Smith, Quality Director. New section 3: Our Commitment. New section 4: Aims. 7.1: Definition of Safeguarding updated. 7.2: Statutory Framework added. New bullets: 7.3.c-f. Appendix 2: new bullets 20.8-20.13. New appendix 4: Referral Form added.

Signed 

Printed Name Nicole Smith

Job Title Quality Director

Date 20th December 2021