



Safeguarding and Prevent Policy

Introduction

SR Apprenticeships places the highest importance on safeguarding and the safety and wellbeing of learners is paramount. This policy sets out SR Apprenticeships commitment and approach to action, in relation to its duty to safeguard and promote the wellbeing of young people and adult at risks.

This Policy aims to detail the framework for promoting and ensuring the safeguarding and protection of all applicants and apprentices. Safeguarding means “recognising that the needs, well-being and safety of all our applicants and apprentices are considered at all times and that actions relating to this are in line with legislation, recommendations and guidelines”. All adults who work with children and young people are accountable for the way in which they exercise authority, manage risk, use resources and safeguard children and young people.

A duty is placed on SR Apprenticeships to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with children and young people are competent, confident and safe to do so.

Our aims are to:

- 🌿 Promote fundamental 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.
- 🌿 Encourage all learners to develop a sense of autonomy and independence in their learning and development.
- 🌿 Enable all learners to have the self-confidence and the vocabulary to resist inappropriate approaches.
- 🌿 Work with employers to build their understanding of and commitment to the principles of Safeguarding and Prevent duty.
- 🌿 Liaise with other statutory agencies to ensure Safeguarding and Prevent duty legislative procedures are current.
- 🌿 Liaise with external agencies to support staff and learners where a Safeguarding and/or Prevent concern require it.

Policy Statement

The purpose of this policy is to ensure that all apprenticeship learners are protected through the awareness, preventative and reactive action of all SR Apprenticeships staff who assist in the teaching/delivery, support and guidance of apprenticeship learners.

SR Apprenticeships takes seriously its responsibility to safeguard and promote the welfare of our apprenticeship learners; and to work together with all staff, associates, employers and external agencies to promote a multi-agency approach to safeguarding.

We understand that any of our learners may experience outcomes or barriers to their learning which may be a cause for concern. We ensure that all staff who are responsible for teaching, delivery, supporting or interacting with learners are trained to recognise behaviours, signs and symptoms of significant harm or need and will act appropriately and in the interest of the learner, when required. This policy covers the legislative requirements and recommendations pertaining to the protection of children, young people and adults at risk in the UK, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education.

The Safeguarding Policy of SR Apprenticeships reflects the importance of safeguarding and promoting the welfare of children (those under the age of 18), young and adult at risks. SR Apprenticeships will carry out its responsibilities under all relevant legislation, regulations and formal guidance for the protection of children and adult at risks.

There is also very useful guidance given by the following which have informed the contents of this policy:

- 🌿 The Government entitled "[Keeping Children Safe in Education](#)". Please note we are following the latest release KCSIE Sept 2022.
- 🌿 The British Council entitled "[Safeguarding Under 18s](#)".

This Policy is based on the guidance issued by the Department of Education to include:

- 🌿 The Children Acts, 1989, provides the legal framework for the protection of people under 18 in the UK, specifically sections 17 & 47
- 🌿 Statutory guidance on making arrangements to safeguarding and promote the welfare of people under 18 in the UK under section 11 of the Children Act, 2004
- 🌿 Section 93 of the Education and Inspections Act, 1996, guidance on the use of reasonable force and section 26 of the Equality Act, 2010
- 🌿 Education Act 2002 and 2011
- 🌿 Working Together to Safeguard Children (March 2015)
- 🌿 Safeguarding Children and Vulnerable Groups Act (2006)
- 🌿 Safeguarding Children and Safer Recruitment in Education (2012)
- 🌿 Counter Terrorism and Security Act 2015

- 🌱 Multi-Agency child protection procedures and practice guidelines.

Policy Scope

This policy deals with the protection of children and adult at risks. Children are those under 18 years of age and will include those aged 16 - 18 on Apprenticeship courses.

SR Apprenticeships:

- 🌱 Believes that all staff, particularly those working with apprenticeship learners, have a collective and individual duty to provide a caring, safe and supportive environment that positively promotes the health and wellbeing of each individual learner along with their social, physical and moral development
- 🌱 Recognises that all staff, have a responsibility to protect our apprenticeship learners from harm whilst ensuring a consistent learner-centred approach to assessing and supporting, based on a clear understanding of learners' individual needs.

This policy statement applies to all staff who are responsible for teaching, supporting or interacting with apprentices, and is aligned to the Safeguarding Framework and Reporting Procedure and supporting documentation.

Safeguarding

Safeguarding is defined as the protection of learners and the promotion of their welfare.

Safeguarding comprises four main aims:

1. Protection from maltreatment or significant harm
2. Preventing impairment of health or development
3. Ensuring all learners have the opportunity to experience circumstances consistent of safe and effective care
4. Taking action to enable people to achieve the best outcomes

Working Together to Safeguard Children, 2015 defines maltreatment as; 'Inflicting harm or failing to prevent harm'

The Children Act, 1989, 2004 defines harm as; 'Ill-treatment or the impairment of health or development'

Significant can be defined as; 'Compared to the health and development of another with that which could be reasonably expected of a similar person (child, young person, adult or learner)'

The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable learner as a person aged 18 or over and:

- 🌱 Teenagers
- 🌱 Children and young people missing from education
- 🌱 Those at risk of FGM (Female Genital Mutilation)
- 🌱 Those at risk of Forced Marriage
- 🌱 Those at risk of Honour Based Violence

- 🍁 Trafficked children and young people
- 🍁 Those in the 'Looked after system'
- 🍁 Children and young people living away from home
- 🍁 Children from some minority ethnic groups
- 🍁 Those with abuse & trauma in their past
- 🍁 Those living in sheltered accommodation detained in custody or under probation order
- 🍁 Those living with domestic violence, parental substance misuse and/or parental mental ill health, receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions

SR Apprenticeships understands that there are numerous recognised barriers to learning and categories of significant harm or maltreatment which a learner may experience, such as:

- 🍁 Harassment and bullying
- 🍁 Forced marriage
- 🍁 Physical abuse
- 🍁 Sexual abuse
- 🍁 Emotional abuse
- 🍁 Neglect
- 🍁 Domestic violence
- 🍁 Financial abuse
- 🍁 Institutional abuse
- 🍁 Discriminatory abuse

SR Apprenticeships:

- 🍁 Adopts an inclusive approach to safeguarding. We understand the importance of recognising the signs and symptoms of potential maltreatment or significant harm and how to report and refer a concern
- 🍁 Recognises that a learner who is abused, experiences bullying or is witness to violence may feel alone, frightened and confused. We understand our responsibility to provide a stable, encouraging and safe environment
- 🍁 Accepts that experiencing harm may significantly affect the behaviour of a learner, ranging from what is perceived to be normal to aggressive or withdrawn. Additional information on safeguarding and detailed definitions of the above categories can be found in the Safeguarding and Prevent Framework and reporting procedure.

Under 18's General

- 🍁 No member of staff should be left alone with an U18/young person where they cannot be observed by others;
- 🍁 Physical contact between adults and under 18's is usually not acceptable except in extenuating circumstances;
- 🍁 It is an offence under the Sexual Offences Act 2003 for any person in a Position of Trust to engage in sexual activity of any sort with students under the age of 18 even though the legal age of consent is 16;
- 🍁 Under no circumstances should visitors be allowed access to the premises unaccompanied when students who are under 18 are present;

- 🍁 Staff should be alert to strangers frequently waiting outside workplace premises with no apparent purpose;
- 🍁 Students receive a regular U18 meeting with an appropriately trained interviewer with a select question bank approved by the designated officer;
- 🍁 There are regular welfare slots at team meetings for updates;
- 🍁 No member of staff should contact a student under the age of 18 on social media either before, after or during the student's course of study (please see the **social media Policy** for further details);
- 🍁 Socializing with students outside of workplace at activities or events which are not arranged by SR Apprenticeships is permitted provided all of the students in the group are over 18.

Whistleblowing

Whistleblowing is an important aspect of a safeguarded institution whereby staff and volunteers are encouraged to share concerns about a colleague's behaviour in confidence, with the Workplace or Safeguarding Officer, line manager or senior manager or Head Office HR as appropriate.

Working with vulnerable groups including minors and young people places staff and volunteers in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

There may be situations whereby staff or volunteers have concerns about the conduct of a colleague towards a participant. All members of SR Apprenticeships have the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, students or others, which may be harmful to those in their care and will receive appropriate support when doing so.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers. Refer to SR Apprenticeships' **Whistleblowing Policy** for further details.

How to handle a disclosure by a student under the age of 18

In the event that a student makes an allegation or disclosure of abuse against an adult or another student or young person, it is important that you:

- 🍁 Listen to them;
- 🍁 Let them know that you take what they are saying seriously;
- 🍁 Do not attempt to question or interview them yourself;
- 🍁 Let them know that you will need to tell someone else in order to help them.
- 🍁 Do not promise to keep what they tell you secret but stress anyone you inform will not tell others unless necessary and the aim will be to support and help the young person
- 🍁 Inform your LSL & DSL as soon as possible;
- 🍁 Make a written record of the incident or events.




Sometimes you may just feel concerned about a student but do not know whether to share your concerns or not. In this situation it is always advised to raise concerns with the Safeguarding Officer, who will signpost or assist as appropriate.

Prevent

Following statutory guidance issued under Section 29 of the Counter-terrorism and Security Act 2015, a duty is placed upon SR Apprenticeships in exercising our undertakings to have 'due regard to the need to prevent people (staff, learners and associates) from being drawn into terrorism'.

In complying with the Prevent Duty, we aim to demonstrate an awareness and understanding of the risk of radicalisation within SR Apprenticeships. This risk may vary greatly and can change rapidly, but no area within SR Apprenticeships is entirely risk free.





There are three themes for consideration:

-  Effective leadership
-  Working in partnership
-  Appropriate capabilities.

This is set out in our Prevent procedure and Risk Assessment.

An important part of Prevent, is also the promotion of British values. These are the norms that shape our society and which are enshrined in law, through legislation such as the Equality Act 2010.

British values are described as:

-  Democracy
-  The rule of law
-  Individual liberty
-  Mutual respect and tolerance for those with different faiths and beliefs, and no faith/belief.

Learners are encouraged to explore British Values as part of their apprenticeship programme, and contextualised within their programme of study.

What is Extremism?

The Government has defined extremism 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". This also includes calls for the death of members of the British armed forces.

On Monday 19 December, the Government announced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017. The multifaceted, diverse, and continually evolving nature of the terror threat within the UK has necessitated the change.

We are aware through engagement with industry that, without legal compulsion, counter terrorism security efforts often fall behind legally required activities. The prioritisation, consideration and application of security processes and measures is currently inconsistent. Martyn's Law will place responsibility on public venues to consider the threat of terrorism to their venue and implement appropriate and proportionate mitigation measures.

Due to working locations and Premises utilised by both Apprentices and Employees within SR team will ensure consideration will be taken by the DSL/DSO of any steps needed to ensure safety of individuals during working activities.

What are British Values?

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs". Training providers are expected to encourage young people to respect other people regarding the protected characteristics set out in the Equality Act 2010.

Responsibilities of Staff

All staff have a responsibility to:

- 🌱 Undertake training bi-annually which is formally recorded by the HR Team
- 🌱 Be aware of when it is appropriate to refer concerns to the Designated Safeguarding Manager
- 🌱 Exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their day-to-day work ethic and practice
- 🌱 Read the Equality Act 2010 Policy

The Counter Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education, and other children's services 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")

Prevent is about keeping our learners both safe and within the law. The Prevent Duty is not about preventing learners from having political and religious views, rather to support them to develop and discuss those views or act on them in non-extremist ways.

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 normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

SR Apprenticeships is clear that this exploitation and radicalisation should be viewed as a Safeguarding concern and that protecting young/ vulnerable learners from the risk of radicalisation is part of our Safeguarding duty.

Responding to suspicions of radicalisation and extremism

We are alert to changes in a learner's behaviour or attitude which could indicate that they need help or protection.

When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the On-Duty Designated Safeguarding Officer for investigation and action.

Staff take care not to influence the outcome either through the way they speak to or question learners.

We will continue to welcome the learner whilst investigations are being made. The learner may choose to withdraw from learning activities whilst investigations take place.

We follow the procedures as set by the Local Safeguarding Board in relation to the delivery of services and designated roles and tasks in supporting the learner, family, and employer, subsequent to any investigation.

All suspicions and investigations are kept confidential and shared only with those who need to know.

Any information is shared under the guidance of the Regional Prevent Coordinator.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship, or drug/alcohol issues.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter- Terrorism Unit, and it aims to:

- 🌱 Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- 🌱 Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.
- 🌱 Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Training Providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE.

SR Apprenticeships responsibilities

All staff have a responsibility to follow the guidance laid out in this policy and related documents, and to respond to any concerns using the specified procedures. We expect all staff to promote good practice by being excellent role models, contribute to discussions about safeguarding and the Prevent Duty positively and to be actively involved in promoting best practice. Staff responsibilities for Safeguarding and Prevent are explicitly defined in their job descriptions.

- 🌱 SR Apprenticeships will carry out its responsibilities under all relevant legislation, regulations, and formal guidance for the protection of children and adult at risks
- 🌱 Support the development of every apprentice in ways which will foster security, confidence, and independence
- 🌱 Provide an environment in which apprentices feel safe, valued, and respected
- 🌱 Implement preventative safeguarding measures to help raise awareness of safeguarding and protect apprentices from maltreatment or harm
- 🌱 Ensure that employers are aware of their safeguarding obligations, through guidance and training
- 🌱 Maintain open channels of communication with each employer. Apprentices may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people
- 🌱 Ensure that safe recruitment measures are implemented for staff working in regulated activity with learners, specifically those under 18
- 🌱 Employ designated members of staff responsible for raising awareness of safeguarding and prevent, providing specialist support to staff, learners and clients when necessary
- 🌱 Support all staff affected by their experiences of safeguarding concerns and protect learners by encouraging staff to share concerns using the confidential safeguarding@sr-apprenticeships.co.uk email address or by contacting the Designated Safeguarding Officer.

SR Apprenticeships Board

- 🌱 An appropriate Safeguarding and Prevent Duty policy is in place
- 🌱 Sufficient resources including time, funding, training supervision and support, are allocated to ensure that the policy can be implemented effectively
- 🌱 The policy is subject to annual monitoring and review
- 🌱 One board member has responsibility for overseeing Safeguarding and Prevent Duty issues demonstrating a clear line of accountability at the most senior level
- 🌱 SR Apprenticeships recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse.

Management Team

- 🌱 Implementing the Safeguarding and Prevent Policy
- 🌱 Monitoring, reviewing, and updating the Safeguarding and Prevent Policy
- 🌱 Monitoring the work of and supporting the Designated Lead Safeguarding Officer.
- 🌱 To deter potential, unsuitable individuals from applying to SR Apprenticeships by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- 🌱 To reject at interview stage anyone where we have doubts about suitability

Designated Lead Safeguarding Officer, Deputy Safeguarding Officer, Lead Liaison Officer, and Prevent Lead

The responsibilities of the Lead Safeguarding Officers, Lead Liaison Officer and Prevent Lead include:

- 🌿 Promoting good practice in relation to Safeguarding and Prevent
- 🌿 To promote awareness to staff of the need to safeguard children and to recognise that safeguarding is everyone's responsibility
- 🌿 Developing and maintaining effective links with relevant external agencies, including the sharing of information.
- 🌿 Providing support and advice to staff who share a concern or disclosure about a learner and maintaining appropriate records of concerns, incidents, or disclosures on a secure central risk register
- 🌿 Immediately investigating significant concerns and referring to the local Safeguarding Children's Board or Adult Safeguarding Board when necessary
- 🌿 SR Apprenticeships will monitor all those that fall into the under 18 or vulnerable category through a regular welfare call and this is logged on a learner welfare tracker spreadsheet
- 🌿 Oversight of the creation and maintenance of a secure, confidential, single central file to record staff DBS certificate details, safe recruitment details, emergency contact information and learner data for apprenticeship programmes
- 🌿 Oversight of the delivery and review of SR Apprenticeships staff training in safeguarding and Prevent
- 🌿 Oversight and delivery of the Prevent management procedure and risk self-assessment
- 🌿 Ensuring that all non-confidential documentation relating to the Apprenticeship Safeguarding Policy and procedures is made available to all staff, learners and employers and the safeguarding referral procedure is made available to every learner-facing member of staff.
- 🌿 To provide guidelines for staff in handling matters relating to actual or suspected child abuse
- 🌿 To ensure staff act professionally

Staff responsibility

All staff have a duty to safeguard and promote the welfare of our applicants and apprentices. We all have a statutory and moral duty to protect children and young people. If anyone hears, or becomes aware of anything that leads them to believe that the safety or welfare of any child or young person is at risk due to neglect, physical, emotional or sexual abuse, they MUST pass on the information to the DSM. Additionally, staff have a duty to:

- 🌿 Understand and fulfil their safeguarding responsibilities as outlined in this policy statement, the Safeguarding Framework and Reporting Procedure, and any supporting documents
- 🌿 SR Apprenticeships will advise all employers of the existence of the SR Apprenticeships Safeguarding Policy and Procedures, and the fact that this may require cases to be referred to the investigative agencies in the interests of the child
- 🌿 Ensure that all learner data is kept confidential in line with Data Protection Policy (GDPR)
- 🌿 Report any safeguarding concerns or disclosures immediately to the Designated Lead Safeguarding Officer, using the email: safeguarding@sr-apprenticeships.co.uk in line with the reporting concerns procedure and supporting guidance
- 🌿 Maintain strict confidentiality with learners in line with this policy and guidance from the Designated Lead Safeguarding Officer
- 🌿 Engage in safeguarding and Prevent training and complete safeguarding assessments and qualifications as required

- 🌱 Act on the basis that the welfare of the learner is of paramount concern and, if in doubt, to immediately seek advice from the Designated Lead Safeguarding Officer
- 🌱 Be alert to signs of abuse as well as other children in need issues
- 🌱 Be prepared to contribute to whatever actions are needed to safeguard the applicant or apprentice
- 🌱 Read at least Part 1 of KCSIE and any updates communicated – confirming understanding in writing (September 2022 updated).
- 🌱 Abide by the Sexual Offences Act 2003
- 🌱 Refrain from physical contact – children and young people should only be touched in ways that are appropriate to our professional or agreed role and responsibilities
- 🌱 Treat children and young people with dignity and respect even in those circumstances where difficult or challenging behaviour is observed
- 🌱 Advise a colleague if 1:1 working is required
- 🌱 Discuss and raise awareness of issues, supported by a monthly welfare newsletter
- 🌱 Signpost learners to the ETF side-by-side course to develop their own understanding and value

The 5 Rs

Everyone has a responsibility to actively make the learning environment safe and secure for all by following the 5 R's:

Recognise - One of the most important roles for any employee is to be able to recognise abuse or neglect in the course of their everyday work. Sometimes, the signs are obvious such as broken bones or cuts and bruises. However, sometimes the signs are a lot less easy to identify.

Respond - All employees working with young and vulnerable people need to be alert to signs of abuse or neglect and know how to respond appropriately (including knowing who in their organisation to share their concerns with and where appropriate, knowing how to ask relevant non-leading questions to see if there is a reasonable and consistent explanation for the signs observed)

Recording - When recording an incident, a Safeguarding Report Form must be completed (available in Forms). The document must be sent to safeguarding@sr-apprenticeships.co.uk Whilst you can record observations, do not interpret, or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation.

Report - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to a Safeguarding Designated Lead.

Refer - Where required, the Safeguarding Representative will refer or support you with guidance on next steps and / or signposting the relevant external agency.

We abide by the DBS regulatory requirements in respect of requesting references and DBS checks for staff and volunteers. We will meet the DBS reporting requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of learner protection concern.

The Designated Lead Safeguarding Officer is: Jane Roberts. Any concerns should be reported to her at safeguarding@sr-apprenticeships.co.uk.

The Designated Safeguarding Support, should Jane Roberts be unavailable, is: Nadine Hughes

The Board Director responsible for Safeguarding for SR Apprenticeships is: Nadine Hughes, Operations Director.

All three persons named above receive communications sent to safeguarding@sr-apprenticeships.co.uk.

Welfare Call

A further welfare call is conducted monthly by a trained member of staff with safeguarding lead approved questions, this forms another means of checking on welfare and safety of any learner deemed as at risk or under the age of 18.

Recruitment

Safe recruitment practices are followed as follows

- 🌱 Job or role descriptions for all roles involving contact with young people and/or adult at risks contain reference to their safeguarding responsibilities
- 🌱 There are person specifications for roles, which contain a statement on core competency regarding young person/ adult at risk protection/ safeguarding
- 🌱 Shortlisting is based on formal application processes/forms, including the submission of CVs.
- 🌱 Interviews are conducted according to equality of opportunity principles and interview questions are based on the relevant job description and person specification
- 🌱 DBS checks are conducted for specific roles for all staff working with young people and adult at risks.
- 🌱 No formal job offers are made until after checks for suitability are completed (including DBS checks, two references, verification of identify and checking of qualifications). However, in exceptional and justifiable circumstances employment could begin prior to DBS clearance. In such cases, an appropriate risk assessment would be undertaken.

Disclosure and Barring Service checks

SR Apprenticeships maintains a central list of staff, with dates of when their DBS checks were made and certificate numbers. DBS re-checks are carried out every three years. Existing staff who transfer from a role which does not require a DBS check to one which involves contact with apprentices will come into scope for DBS checks. All staff who are involved in direct or remote contact with apprentices will be subject to basic DBS checks.

Support for staff

Induction for new staff

SR Apprenticeship provides an induction for all new staff, which includes a comprehensive coverage of safeguarding and Prevent issues. This includes an introduction to the Safeguarding and Prevent

Duty policy and related procedures, roles and responsibilities, and how to identify and report safeguarding and Prevent Duty issues. This also applies to Board members

On-going training

All staff who are in contact with learners undertake safeguarding and Prevent Duty training at an appropriate level. Teaching staff will be equipped fully with the knowledge and confidence to discuss these topics with apprentices. An appropriate level training qualification will be refreshed at least every 2 years for everyone; however, knowledge and skills will be refreshed at regular intervals, at least annually.

Regular updates

Safeguarding and Prevent is a regular agenda item at team meetings, senior management meetings, board meetings and one-to-ones.

The Designated Safeguarding Lead will update colleagues with new information as it becomes available.




Monitoring and Review

This policy will be monitored through update reports presented to the Apprenticeship Senior Management Team and will be formally reviewed annually.

In addition, these policies will be reviewed by a working group of apprentices at least on an annual basis. The purpose of this review will be to provide opportunity for feedback and recommendations to support SR Apprenticeships in providing a safe and open environment for all. This review will also ensure that all apprentices are familiar with the safeguarding policies and establish if that good communication and safeguarding information is in place across the programme.

Subcontracting

Where SR Apprenticeships works with any subcontract provider the following arrangements will be maintained

-  regular checking of safeguarding arrangements in partner organisations
-  safeguarding is a fixed agenda item on any subcontract reporting meetings
-  service level agreements include clear minimum expectations, arrangements for reporting safeguarding and Prevent issues, and non-compliance procedures.

Confidentiality

SR Apprenticeships recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge SR Apprenticeships responsibilities and duty of care.

All staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a learner's safety or welfare. All staff will be fully supported by the Designated Safeguarding Lead.

Staff must always endeavour to share our intention to report a concern or refer to the safeguarding referral procedure, with parents/carers of young learners and the learner themselves in all cases unless to do so would put the learner at greater risk of harm

Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the Designated Safeguarding Lead.

Welfare and Pastoral Support

All learners have a named tutor/coach/assessor who provides first line support with any learning-related or personal difficulties. In most instances, these can be resolved through liaison with the apprentice and their workplace manager. In some instances, the Tutor Team Leader may provide additional support and guidance to the learner and tutor. Where welfare or personal concerns develop into Safeguarding or Prevent Duty Concerns, the usual reporting procedure should be followed and the matter raised with the Designated Safeguarding Lead.

Employers

Employers of apprentices are required to comply with SR Apprenticeships Safeguarding and Prevent Duty Policy and related procedures, as stated within employer agreements.

This policy serves to make employers aware and acknowledge that SR Apprenticeships has a statutory duty to safeguard and promote the welfare of individuals under the age of 18 years old and adults at risk over the age of eighteen (18) years old pursuant to the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006.

All employers of apprentices have an obligation to ensure that their employees, contractors, and agents comply with the requirements of the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006 to the extent that they apply to the employer; and to confidentially report to the Designated Safeguarding Lead, any concerns relating to an apprentice or other learner enrolled with SR Apprenticeships, or an employee or associate of SR Apprenticeships.

Appendices

Key Principles – Statutory Framework

- 🌱 The Children Act 1989 provides the legal framework for the protection of children in the UK. Under the Children Act a child is defined as any person under 18 years of age. Under Sections 27 and 47 of the Children Act 1989, SR Apprenticeships have a statutory requirement to assist the Local Authority Social Services Department acting on behalf of children in need
- 🌱 The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children and Adult at risks. SR Apprenticeships is required under this legislation to apply for an enhanced disclosure from the Criminal Records Bureau for staff working with such learners.
- 🌱 Working Together to Safeguard Children (2015), alongside DfES guidance Keeping Children Safe in Education (2015) is a Government Guidance document which sets out how all agencies and professionals should work together to promote children and Adult at risks

welfare and protect them from abuse and neglect and requires all educational staff to follow the procedures for protecting children from abuse which are established by the Area Child Protection Committee. The guidance makes clear that educational staff are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or is at risk of abuse – these procedures should cover circumstances in which a member of staff is accused or suspected of abuse.

- 🌿 DfES Safeguarding Children and Safer Recruitment in Education (2007) derives from the Education Act 2002 and places the following responsibilities on all educational Organisations:
- 🌿 Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
- 🌿 A Designated Senior Person (DSP) should have responsibility for co-coordinating action within the QA and for liaising with other agencies.
- 🌿 Staff with designated responsibility for child and Adult at risk protection should receive appropriate training.
- 🌿 Educational Organisations should be aware of and follow the procedures established by the LSCBs and, where appropriate, by the Local Education Authority or Children’s Social Care (England) /Social Services Department (Scotland).
- 🌿 Educational Organisations should have procedures, of which all staff are aware, for handling suspected cases of abuse of children, including procedures to be followed if a member of staff is accused of abuse. Circular 10/95 also states that “parents should be made aware of the (educational Organisations) safeguarding policy and the fact that this may require cases to be referred to the investigative agencies in the interests of the child.” SR Apprenticeships follows the detailed guidelines set out in Circular 10/95 in dealing with all cases of abuse or suspected abuse against children. Section 175 of the Education Act 2002 This section of the Act requires providers to safeguard and promote the welfare of child and Adult at risks. SR Apprenticeships will follow any guidance issued on this section of the Act. The SR Apprenticeships Lead Safeguarding Officer will keep its policy and procedures on safeguarding under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children and Adult at risks.
- 🌿 Section 26 of the Counterterrorism and Security Act 2015 the Act places a duty on certain bodies, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism” – the Prevent Duty, alongside associated guidance social media for Online Radicalisation (July 2015).
- 🌿 The Prevent strategy, published by the Government in 2011, is part of the overall counterterrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

The 2011 Prevent strategy has three specific strategic objectives:

- 🌿 Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- 🌿 Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.

- 🌱 Work with sectors and institutions where there are risks of radicalisation that we need to address.

Local Safeguarding Children Boards bring together all services for children and young people in a local area to focus on improving outcomes for all children and young people. The outcomes that are most important to children and young people are:

- 🌱 Being Healthy
- 🌱 Staying safe
- 🌱 Enjoying and achieving
- 🌱 Economic wellbeing
- 🌱 Making a positive contribution

Learning outcomes: Radicalisation and Extremism

Section / main objective	Learning points
Introduction	<ul style="list-style-type: none"> • Understand what extremism means and how it differs from legitimate protests and campaigns
Targeting by extremists Understand the vulnerabilities that extremist recruiters take advantage of.	<ul style="list-style-type: none"> • Know that there is not a problem with disagreeing with the government policy or actions or trying to achieve change through peaceful and democratic means. • Know that extremists do not respect democratic methods and <u>may</u> try to achieve change using criminal methods • Know that extremists will target people who are still forming their views • Know that extremists will target people with a range of vulnerabilities and/or political views • Know the importance of individuals knowing their own emotional vulnerabilities
A radical solution Understand that a key tipping point is when an individual decides that a given cause justifies illegal action.	<ul style="list-style-type: none"> • Know that even extremism can feel 'just' when individuals engage with groomers. There is an emotional reward when surrounded by people agreeing with you • Know that when engaging with some religious and political beliefs there might be a more radical group of people rejecting democratic means and advocating criminal (extremist) acts • Know that many extremist groups sustain their identity by focussing on an exaggerated threat from other groups.
On the brink Understand the mind-set of an individual that has been radicalised and what could tip them into an	<ul style="list-style-type: none"> • Know that some people decide to pursue change through anti-democratic, extremist means

<p>extremist act or tip them away from extremism.</p>	<ul style="list-style-type: none"> • Know that whilst legitimate protest may involve civil disobedience, extremist behaviour goes way beyond this and generally involves significant harm to others • Know that breaking the law and taking part in extremist behaviour has negative outcomes for the individual, their family and friends • Know that learners should report concerns to the safeguarding team if they are worried that someone known to them may be involved in extremism.
<p>Summary Learners will recall key actions that lead to radicalisation and extremist views</p>	<ul style="list-style-type: none"> • Seeing injustice and wanting change is normal/legitimate and part of the role of an engaged citizen in a democratic society • Democratic engagement is admirable and effective, extremism is criminal, dangerous and ineffective

Learning outcomes: Staying safe online

Section / main objective	Learning points
<p>Encountering extremism <i>Learners will be aware of where they might be targeted, how they can avoid being targeted, and how they can reject targeting when subject to it</i></p>	<ul style="list-style-type: none"> • Know that extremists use websites (and social media) to draw people to their cause. • Know that extremists target can target anyone - particularly if they seem to be seeking answers to their concerns about the world or their lives • Know that extremists cast their net widely to find those open to extremist grooming • Know that extremists may target anyone
<p>Your online friend <i>Learners will be aware of the methods that an extremist might use to influence them.</i></p>	<ul style="list-style-type: none"> • Know that extremists will seek to develop relationships with individuals (appear to be their friend) • Know that groomers have a plan for people they groom that will not be clear to the person being groomed in the early stages of grooming. • Know that extremists will target people's vulnerabilities • Know that extremists will manipulate people so that the grooming will feel like a positive relationship • Know that extremists collect incriminating material to coerce those they are grooming • Know that extremists use the same/similar grooming methods as sexual abusers and blackmailers • Know that grooming process is incremental
<p>Do as I say <i>Learners will be aware of how extremists may get them to become extremists themselves using online communications.</i></p>	<ul style="list-style-type: none"> • Know that extremists choose private channels because: <ul style="list-style-type: none"> ○ they want to remove the person being groomed from a wider range of views ○ they want to encourage or organise criminal activity

	<ul style="list-style-type: none"> • Know that extremists will test commitment, breaking current emotions anchors e.g. with family and friends and establish new ones within their extremist network • Know that extremists will promote misleading and false “information” • Know that extremists will play on the emotions of the individual being groomed
<p>Summary</p> <p><i>Learners will recall key actions which will help themselves and others to stay safe.</i></p>	<p><i>Learners should:</i></p> <ul style="list-style-type: none"> • Should use maximum privacy settings • Be very cautious when talking to strangers (those they do not have real-world links to). • Be extremely cautious if people learners meet online want to have private discussions. • Not reveal personal details to strangers • Not meet strangers met only online

Learning outcomes: What can you trust?

Section / main objective	Learning points
<p>Exploring interests</p> <p><i>Understand that all sources of information are written with an agenda. Be able to evaluate sources as to how strongly they might be presenting an extremist agenda.</i></p>	<ul style="list-style-type: none"> • Know that everything learners read and hear is, to some extent, reflecting someone else’s point of view • Understand that mainstream media in the UK have a variety of viewpoints • Understand that some media outlets provide platforms for a variety of viewpoints including more extreme views • Know that many specialist news sites are likely to have a strongly held agenda and not offer alternative viewpoints • Recognise emotional manipulation within factual material • Know that some sources will put up information that is completely false
<p>Entering the debate</p> <p><i>Be aware of common gaps in the logic of those justifying extremism</i></p>	<ul style="list-style-type: none"> • Know some tricks used by extremists to ‘win’ arguments – e.g. strawman, false cause • Recognise how emotional manipulation is used in discussion. • Be aware of the impact on others (family and friends) of extremist beliefs and actions
<p>Who’s in control?</p>	<ul style="list-style-type: none"> • Know that extremists use private discussions to avoid the scrutiny of a public forum • Know that extremists are not friends, they are aiming to radicalise through grooming

<i>Know of specific strategies that extremist might adopt to justify radical action.</i>	<ul style="list-style-type: none"> Recognise emotional manipulation
Summary	<ul style="list-style-type: none"> Look for whole picture not just one point of view Check information/evidence which is given Be aware of manipulation techniques which are used

Learning outcomes: British values

Section / main objective	Learning points
<p>Introduction</p> <p><i>Understand that the British values are values common to all in Britain that underpin our society.</i></p>	<ul style="list-style-type: none"> British Values underpin British society enabling those with different views/beliefs live and work together successfully and peacefully There are four British Values and these are widely accepted due to their enabling nature We can share British values even though we may enact them differently - through different political or religious commitments How this impacts on learners' everyday life
<p>Democracy</p> <p><i>Understand that people who make decisions for us are democratically accountable - and that this accountability brings legitimacy.</i></p>	<ul style="list-style-type: none"> The UK has a representative democracy - we elect MPs to pass laws on our behalf. Even the government has to abide by these laws - if they want to change them they have to win a vote in parliament. We also have democracy at other levels - regional parliaments and assemblies, elected mayors and councils. This ensures that the people making decisions on behalf of everyone are regularly held accountable. Part of the democratic process in the UK includes campaigning for change e.g. through pressure groups, trade unions Democratic accountability provides legitimacy to the decisions being made. British Values are enabling – if people want to change things then they can engage with democratic process How does this impact on learners' everyday lives?
<p>Rule of Law</p> <p><i>Understand that the rule of law enables society to function better. For the most part, the rule of law is working, invisibly,</i></p>	<ul style="list-style-type: none"> Society works better when everyone lives by the same rules. The rules are made by Parliament but an independent body - the judiciary - is responsible for seeing that they are upheld. British Values are enabling - it is the rule of law, protecting our safety and giving us certainty about how others can act, that enables us to succeed. How this impacts on learners' everyday life

<p><i>to provide you with a better life.</i></p>	
<p>Individual liberty</p> <p><i>Understand that we have a lot of - but not absolute - freedom. This includes freedom to question how the country is run.</i></p>	<ul style="list-style-type: none"> • In the UK we enjoy a relatively high level of liberty (historically / internationally) • Although we take freedoms for granted, UK liberty has been achieved through years of democracy (from a start-point of very little liberty for ordinary citizens and a total lack of democracy) • There are limits on liberty - these remain because one person's liberty can adversely impact others. • British Values are enabling - consider the things that learners are at liberty to do and some things that they are not at liberty to do. • How this impacts on learners' everyday life
<p>Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.</p> <p><i>Understand that Britain - as a diverse nation - needs citizens to share mutual respect and tolerance for those with different faiths and beliefs and for those without faith. Be clear that people all faiths adhere to Fundamental British Values.</i></p>	<ul style="list-style-type: none"> • <i>British society contains a wide mix of people of different faiths and beliefs (including those who have no faith).</i> • <i>Having a different faith (or none) does not stop British people sharing values (particularly fundamental ones)</i> • <i>Mutual respect and tolerance goes beyond the minimum standards (legal protections)</i> • <i>British Values are enabling - Consider how a position of mutual respect and tolerance allows people to live full and happy lives</i> • <i>How this impacts on learners' everyday life</i>
<p>Equality Duty</p>	<ul style="list-style-type: none"> • What does the Equality duty cover? • Public bodies are bound by the Equality duty • How this impacts on learners' everyday lives

Safeguarding Procedures

These procedures should be read in conjunction with the Department for Education and Skills document 'What to do if you're worried a child is being abused' March 2015.

- Purpose

The purpose of these guidelines is to ensure that the rights of children and adult at risks are protected through staff awareness of the issues and the following of the statutory and local guidelines in the reporting of concerns. It is the responsibility of all staff working within SR Apprenticeships to record and report Child Protection concerns, i.e. where they believe a child has been or is at risk of abuse, neglect or significant harm. This responsibility extends to all staff and not just those specifically working with under 18s.

- Definition of terms

The Safeguarding Policy describes the support and protection procedures for all learners under the age of 18, or vulnerable learners over this age, who may be “at risk” of abuse.

- The definition of a “child” “Child” is defined as all young people under the age of 18, in accordance with the 1989 Children Act.
- The definition of a “Adult at risk” “Adult at risk” is defined as, “a person 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 or herself, or unable to protect him or herself against significant harm or exploitation”.

Categories of Abuse

Children can be potentially abused within the family, community, and in work by employees (including those employed to promote their welfare and protect them from abuse), volunteers, visitors, and fellow students. Expert and professional organisations are best placed to provide up-to date guidance and practical support on specific safeguarding issues and the Designated Safeguarding Lead will liaise with appropriate external agencies. Issues that may arise that staff should be aware of and look out for are:

- Physical Abuse: may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child and adult at risk. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child and adult at risk who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen’s syndrome by proxy'.
- Emotional Abuse: is the persistent emotional ill-treatment of a child or adult at risk such as to cause severe and persistent effects on the child and adult at risk’s emotional development. It may involve conveying to children or adult at risks that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in children and adult at risks. It may involve causing children or adult at risks frequently to feel frightened or in danger, or the exploitation or corruption of children and adult at risks. Some level of emotional abuse is involved in all types of ill treatment of a child or adult at risk, though it may occur alone.
- Sexual Abuse: involves forcing or enticing a child or adult at risk to take part in sexual activities, whether or not the child or adult at risk is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving children or adult at risks in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children or adult at risks to behave in sexually inappropriate ways. This also includes sexual consent where an assessment is made to ascertain that the child or adult are not being unduly influenced, coerced or intimidated and is aware of all their options.
- Neglect: is the persistent failure to meet the child’s or adult at risk’s basic physical and/ or psychological needs, likely to result in the serious impairment of the child or adult at risks health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child or adult at risks from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or adult at risk’s basic emotional needs.
- Significant Harm: Some children or adult at risks may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept

of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

- Financial Abuse Some children and adult at risks may be abused or exploited financially including fraud and extortion.
- Peer on peer abuse (Child on Child) - Peer on peer abuse is behaviour by an individual 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 either physically or emotionally. It is more likely that females will be victims and males' perpetrators, but all peer-on-peer abuse is unacceptable and will be taken seriously. Peer on peer abuse can take many forms including serious bullying (including cyberbullying), up-skirting, relationship abuse, domestic violence, 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's race, religion, gender, sexual orientation, special educational needs or disabilities; or where a young/ vulnerable person is adopted or in care, has caring responsibilities, is suffering from a health problem, is frequently on the move (e.g. those from military families or the travelling community), is experiencing a personal or family crisis, has actual or perceived differences, (e.g. physical or cultural differences). Peer on Peer abuse can also be related to gang culture and linked knife crime which can lead to subsequent involvement in county lines.
- Risks/ abuse related to family/cultural belief/ faith - It is important to remember that many young/ vulnerable learners are a part of a family. Some families have certain values and beliefs that can cause harm to a young/ vulnerable learner. An example of this can include strong beliefs or a sense of honour or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women - to get the help they need. Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem. In extreme cases the young/ vulnerable person who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The young/ vulnerable person can be physically and emotionally abused to exorcise the spirit.
- Bullying and Harassment - Bullying can include a variety of behaviours 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. Please refer to SR Apprenticeships' Anti-Bullying Policy for further detail.
- Cyber Bullying and E-Safety - The safe and responsible use of technology, is sometimes presented as primarily a young/ vulnerable learner protection issue. While young/ 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.
- Risk to self and/or others - This may include but is not exclusive to self- harm, suicidal tendencies, or potential risk of harming others, which may or may not include young/ vulnerable learners. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

- Domestic Violence - can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence. Some young/ vulnerable learners may experience issues with drugs or alcohol to self-medicate or via dependence.
- Female Genital Mutilation (FGM) - Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that females at risk of FGM may not yet be aware of the practice or that it may be conducted on 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 female 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 female under 18 and they have no reason to believe that the act was necessary for the female's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the female'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 had FGM when she was under 18).
- Forced Marriage - One or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young/ vulnerable person.
- Modern slavery - Encompasses slavery, human trafficking, forced labour 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.
- Sexting - 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 any 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/ vulnerable people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003. Any direct disclosure by a learner (male or female) will be taken very seriously. A learner who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, we will follow the guidance as set out in the UKCCIS publication Sexting in Schools and Colleges: Responding to incidents and Safeguarding young/ vulnerable people.
- Initiation/Hazing - Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation 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 in common with older or established members of the organisation or 'gang', because they have all experienced this as part of a 'rite of passage'. Many rituals involve humiliation, embarrassment, abuse, and harassment.

These types of abuse rarely take place in isolation and often indicate wider Safeguarding concerns. Abusive behaviour can happen to a young/ vulnerable learner in a learning environment and it is necessary to consider what abuse is and looks like, how it can be managed and what support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.











There may be reports where the alleged incident is between two learners from the same or different training establishments but is alleged to have taken place away from the premises. The Safeguarding principles, and our duty to safeguard and promote the welfare of the learner remain the same regardless of where the incident took place and regardless of whether the incident was online or offline.



Abuse is abuse and will never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Equally, abuse issues can sometimes be gender specific e.g. females being sexually touched/assaulted and boys being subject to initiation/hazing type violence. We will not dismiss abusive behaviour between young/ vulnerable learners as 'normal' and our thresholds for investigating claims and allegations are the same as for any other type of abuse. Preventing violence and ensuring immediate physical safety is SR Apprenticeships' priority but we also acknowledge that emotional abuse can be just as damaging if not more so than physical violence. We recognise that abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of abuse having control over the relationship which makes it difficult for the victim to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

We also acknowledge that low level disruption and the use of offensive language can have a significant impact on its target. If left unchallenged or dismissed as 'banter' or 'horseplay', it can also lead to reluctance to report other behaviour, this also applies to the Incels (involuntarily celibate) terminology that has now entered into communities with regards. An Incel is a member of an online subculture of people who define themselves as unable to get a romantic or sexual partner despite desiring one, predominantly seen as a male supremacy movement, de-humanising 'Stacey's' and encouraging the male to 'take what he wants'. Training and updates provided on these topics through the Newsletter and staff weekly updates by email.

Additional forms of abuse:

In addition, Keeping safe in Education identifies that there are wider safeguarding issues that should be considered and acted upon. The statutory guidance lists sixteen specific issues and provides further links to information on all these areas. The specific areas are:

-  Child Sexual Exploitation
-  Domestic Violence
-  Fabricated or induced illness
-  Gangs and Youth Violence, county lines
-  Mental Health
-  Radicalisation
-  Teenage Relationship Abuse
-  Drugs
-  Faith Abuse
-  Gender-based violence






-  Private Fostering
-  Trafficking

Safeguarding Designated Senior Person (DSP)

All training organisations and providers are required to have a designated member of staff, who is assigned to act upon child and adult at risk protection concerns.

At SR Apprenticeships this person is called the Designated Lead Safeguarding Officer and they are responsible for co-ordinating action within SR Apprenticeships and liaising with other agencies. The SR Apprenticeships Designated Safeguarding Senior Person is Jane Roberts.

The Designated Lead Safeguarding Officer and Deputy Lead Safeguarding Officer for safeguarding are required to know:

-  how to identify the signs and symptoms of abuse and when to make a referral
-  the local Child and Adult at risk protection procedures and the DSPs role within them
-  the role and responsibilities of the investigating agencies and how to liaise with them
-  the requirements of record keeping
-  the conduct of a child protection conference and how the DSM or other members of staff can make an appropriate contribution to it.

If a safeguarding concern relates to an apprentice employed by SR Apprenticeships, the agreed approach is for Designated Safeguarding Lead to manage these cases specifically.

Designated Safeguarding Lead

The Managing Director of SR Apprenticeships is responsible for safeguarding. The nominated Designated Safeguarding Lead is Jane Roberts, and Nadine Hughes is the Deputy Designated Safeguarding Lead. In their absence, Nadine Hughes, Operations Director, assumes responsibility. Both the Designated Safeguarding Lead and Deputy Designated Safeguarding Officer and Operations Director have been fully trained for the demands of the role in child protection, inter-agency working, participation in any case conferences, supporting children in need, record keeping and promoting a culture of listening to children and young people. SR Apprenticeships will ensure all staff that routinely has contact with children and young people are trained and receive refresher training regularly in line with advice from the LSCB. Contact details for Designated Safeguarding Lead and Deputy Designated Safeguarding Lead as follows:

Jane Roberts, Designated Safeguarding Lead, safeguarding@sr-apprenticeships.co.uk 07745601940

Nadine Hughes, Deputy Designated Safeguarding Lead, safeguarding@sr-apprenticeships.co.uk 07745601940

Nadine Hughes, Operations Director, Nadine.hughes@sr-apprenticeships.co.uk , 07833 583 163

SR Apprenticeships Head Office, 32 Mile End Road, Colwick, Nottingham, NG4 2DW, enquiries@sr-apprenticeships.co.uk telephone 01949 20976

When to Take Action & How

Once you suspect or know of any abuse of any child or adult at risk, you should immediately inform the Designated Lead Safeguarding Officer in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the Designated Lead Safeguarding Officer to discuss your concerns.

It is important to understand that your responsibilities extend to suspicion of abuse in any area of the child or adult at risk's life, not just in the SR Apprenticeships learning environment.

You must also contact Designated Lead Safeguarding Officer if you know or suspect that a member of staff or student has a previous history of abuse of children and/or adult at risks.

If you become aware of any allegations against a member of staff this must always be escalated to the Designated Lead Safeguarding Officer. If the Designated Lead Safeguarding Officer is not immediately available, you should then contact the Deputy Lead Safeguarding Officer or the Operations Director. You must not try to investigate the matter on your own. Staff are not equipped or qualified to do so. Contact details for the Designated Lead Safeguarding Officer can be found on the emails and flow chart referral forms sent to staff and on the SR Apprenticeships website.

If, following your initial contact with the Designated Lead Safeguarding Officer, it is decided that the matter should be taken further; a written report must be prepared. A written report is essential to prevent any misrepresentation of your findings, and should be sent to the Designated Lead Safeguarding Officer within 24 hours of the suspicion arising. The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the child or adult at risk concerned, as accurately as you are able to record it. The report should be signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the Designated Lead Safeguarding Officer and a template is available.

SAFEGUARDING REFERRAL FORM

Learner name:		Date of birth:	
Company and Location:		Line Manager name:	
Name and position of person completing form (please print)			
Date of Incident /concern: (DD MM YY)			
Incident / concern (who what where when)* Please be factual			
Any other relevant information (witnesses, immediate action taken)* Please be factual			
Signature: <small>If not sending by email</small>		Date form completed (DD MM YY):	
Action taken (including reasons for decisions) and Outcomes* (NB – this section is only to be completed by DSL)			
Signature of DSL		Date (DD MM YY)	
Signature of Lead DSL (if appropriate)		Date (DD MM YY)	

*Continue on a separate sheet if necessary

If a child or adult at risk comes to you with a report of apparent abuse, you should listen carefully to the child or adult at risk, using the following guidelines. When listening to a child or adult at risk staff must:

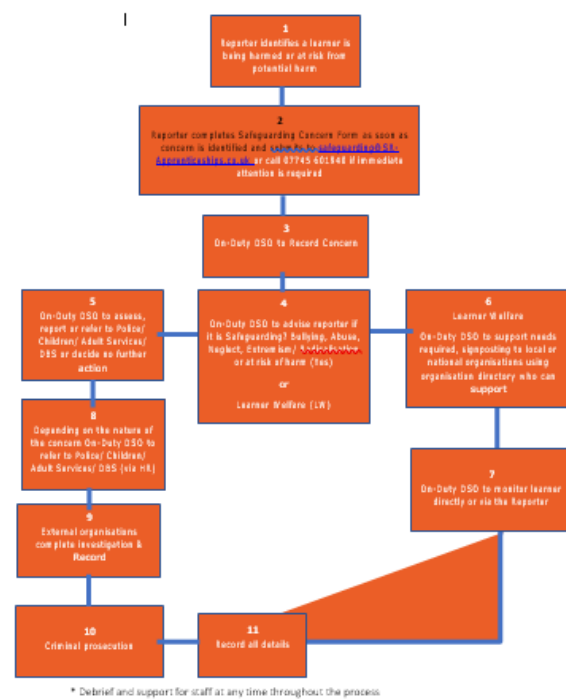
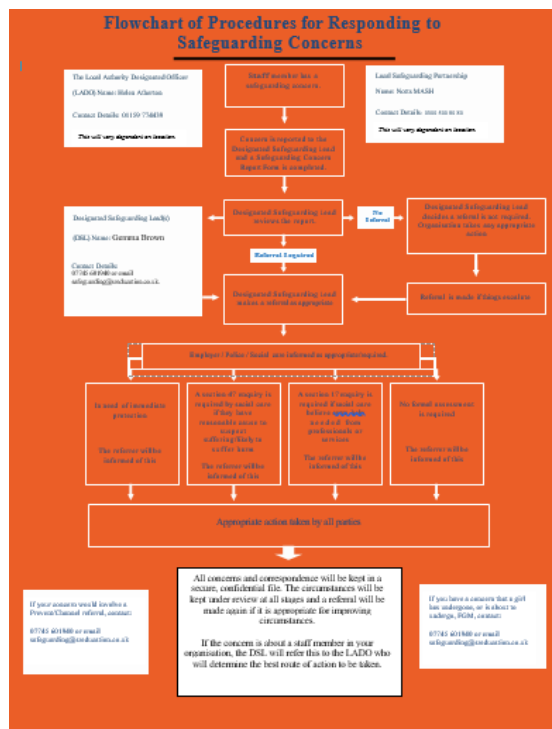
- 🍃 Allow the child or adult at risk to speak without interruption
- 🍃 Remember the TED principles (Tell me, Explain to me, Describe to me)
- 🍃 Make accurate notes including age, time, date, place and people who are present as well as what was said/disclosed – the nature of any injuries, if applicable, should also be included
- 🍃 Never trivialise or exaggerate the issue
- 🍃 Never make suggestions
- 🍃 Never coach or lead the child or adult at risk in any way
- 🍃 Reassure the child or adult at risk, let them know you are glad they have spoken up and that they are right to do so
- 🍃 Always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the child or adult at risk – spare them having to repeat themselves over and over.
- 🍃 Be honest – let the child or adult at risk know that you cannot keep this a secret; you will need to tell someone else.
- 🍃 Try to remain calm – remember this is not an easy thing for them to do.

- Do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- Let the child or adult at risk know that you are taking the matter very seriously
- Make the child or adult at risk feel secure and safe without causing them any further anxiety.

At the earliest opportunity involve the Designated Lead Safeguarding Officer.

The Designated Lead Safeguarding Officer will be responsible for liaising with external agencies and recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be confined to the Designated Lead Safeguarding Officer, (if not involved in the allegations) and the Apprenticeship Director and any external agencies the Designated Lead Safeguarding Officer determines to engage. The Manager(s) and staff reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis.



What Happens Next?

Taking into account all the information available, the Designated Lead Safeguarding Officer will decide on the next steps, which may include taking no further action. In most cases the Designated Lead Safeguarding Officer will seek advice from the Local Authority Designated Officer (LADO) and agree what further action is necessary, which may include:

- Seek further advice from The LSCB
- Undertake further investigation under the direction of the LADO or support an investigation by the LSCB

- 🌿 Make a referral to the appropriate agency, as signposted.
- 🌿 Report the incident to a designated Social Worker, as signposted.
- 🌿 Report the matter to the police if a crime is suspected.

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours. The Designated Lead Safeguarding Officer may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the child, other students, staff, parents or carers involved) the Designated Lead Safeguarding Officer will make the necessary arrangements.

Allegations against Staff

The primary concern of the organisation is to ensure the safety of the child and adult at risk. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally whatever the validity. There are occasions where a child or adult at risk will accuse a member of staff of physically or sexually abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

Any instance of a child or adult at risk being abused by a member of staff is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career. If any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the Designated Lead Safeguarding Officer. On being notified of any such matter the Designated Lead Safeguarding Officer shall:

- 🌿 Seek and follow advice from the LADO
- 🌿 Take such steps as they consider necessary to ensure the safety of the child or adult at risk in question and any other child or adult at risk who might be at risk
- 🌿 Ensure that a report of the matter is completed by the person who reported the original concern
- 🌿 Put in place the steps necessary to follow the advice of the LADO

If the allegation concerns the Designated Lead Safeguarding Officer, the matter should be discussed with the Managing Director of SR Apprenticeships, in addition to following the normal safeguarding procedures highlighted in this document.

Signposting

Advice for Young People by Young People

www.coap.org.uk (coping with drug or alcohol or other difficult situations at home or with a parent)

Alternative to Samaritans (for Young People)

Get Connected is a confidential 24 hour free telephone helpline that might be a suitable alternative to the Samaritans – www.getconnected.org.uk or 0808 808 4994

Bullying (including Cyber)

Workplace http://www.supportline.org.uk/problems/bullying_at_work.php

Cyber <http://www.nhs.uk/Livewell/Bullying/Pages/Cyberbullying.aspx> or

<http://www.saferinternet.org.uk/about/helpline>

Child Sex Exploitation <http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child->

sexual <http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/what-is-child-sexual-exploitation/exploitation/what-is-child-sexual-exploitation/> or <http://www.stopitnow.org.uk/> or 0808 1000 900

Domestic Violence

For women: <http://www.nationaldomesticviolencehelpline.org.uk/> or 0808 2000 247

For men: http://www.mensadvice.org.uk/mens_advice.php.html or 0808 801 0327

Drug or Alcohol Abuse

Drugs - <http://www.talktofrank.com/> or call: 0300 123 6600 text: 82111

Alcohol - <https://www.drinkaware.co.uk/understand-your-drinking/is-your-drinking-a-problem/alcohol-support-services> or call: 0300 123 1110

Both - <http://www.addaction.org.uk/>

Eating Disorders

B-Eat - <https://www.b-eat.co.uk/support-services/helpline> or Adults 0345 634 1414 email help@b-eat.co.uk. Under 25's 0345 634 7650 email fyp@b-eat.co.uk

<http://www.eatingdisorderssupport.co.uk/help/links-resources>

E-Safety - <http://www.saferinternet.org.uk/about/helpline> or 0844 381 4772

Extremism, Radicalisation and Terrorism <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty> <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty> or 020 7340 7264 email: counter.extremism@education.gsi.gov.uk

Faith Abuse <http://www.equalityadvisoryservice.com/app/home> or 0808 800 0082

FGM <http://www.nhs.uk/NHSEngland/AboutNHSservices/sexual-health-services/Pages/fgm> <http://www.nhs.uk/NHSEngland/AboutNHSservices/sexual-health-services/Pages/fgm-resources.aspx> or 0800 028 3550 [resources.aspx](http://www.nhs.uk/NHSEngland/AboutNHSservices/sexual-health-services/Pages/fgm-resources.aspx) or 0800 028 3550

Forced Marriage Karma Nirvana Victim Support 0800 5999 247

<https://www.gov.uk/guidance/forced-marriage> <https://www.gov.uk/guidance/forced-marriage>

Forced Marriage Unit email fmu@fco.gov.uk or 020 7008 015;

Outreach email fmuoutreach@fco.gov.uk ; Facebook: Forced Marriage page; Twitter: @FMUnit

Gangs and Youth Violence

For concerned adults - <http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/staying-safe-away-from-home/gangs-young-people/>

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/staying-safe-away-from-home/gangs-young-people/> or 0808 800 5000

For young people - <http://www.childline.org.uk/Pages/Home.aspx> or 0800 1111

Gender Based Violence

Solace Advice Hub email advice@solacewomensaid.org.uk or 0808 802 5565

Women and Girls Network Advice Hub email advice@wgn.org.uk or 0808 801 0660

24 Hour Domestic Violence Helpline 0808 2000 247

Living with a Family Member's Addiction to Alcohol or Drugs

<http://www.nhs.uk/Livewell/drugs/Pages/caring-for-a-drug-user.aspx> or 0300 123 6600

<http://www.adfam.org.uk>

Long Term Absence <http://fitforwork.org/employee/> or 0800 032 6235

Mental Health Problems <http://www.nhs.uk/conditions/stress-anxiety-depression/pages/mental-health-helplines.aspx>

Self-Harm or Suicidal Thoughts

Suicide <http://www.nhs.uk/conditions/Suicide/Pages/Introduction.aspx>

Self-Harm <http://www.nhs.uk/conditions/Self-injury/Pages/Introduction.aspx>

Sexting <http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/> or call: 0808

800 5000 (18 and over) 0800 1111 (under 18)

Teenage Pregnancy <http://www.nhs.uk/conditions/pregnancy-and-baby/pages/teenager-pregnant.aspx#close> or 0300 123 2930

Trafficking, Exploitation and Modern Slavery <http://www.salvationarmy.org.uk/human-trafficking> or 0300 303 8151

Safeguarding:

- <https://www.gov.uk/government/publications/covid-19-safeguarding-in-workplaces-colleges-and-other-providers>

Vulnerable Children and Young People:

- <https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people>

Mental Health Guidance for Parents and Carers:

- <https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>
- <https://www.nytimes.com/2020/03/21/opinion/scott-kelly-coronavirus-isolation.html>
- <https://www.nytimes.com/2020/03/11/well/family/coronavirus-teenagers-anxiety.html> Supporting student mental health:
- <https://www.nytimes.com/2020/03/11/well/family/coronavirus-teenagers-anxiety.html>
- <https://www.nhs.uk/apps-library/filter/?categories=Mental%20health> - a list of apps which can support good mental health
- <https://www.childline.org.uk/>
- <https://kooth.com> (an online counselling and wellbeing platform for young people offering advice and support.)
- www.youngminds.org.uk
- <https://www.mind.org.uk/information-support/> (Mind provides a lot of helpful detailed information on mental health issues and how to deal with them.)
- <https://www.studentsagainstdepression.org/>
- <https://papyrus-uk.org/> (support if you are feeling suicidal.)

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