

Safeguarding and Prevent Policy

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IMPORTANT CONTACTS

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Hayley Norgrove	hayley@dulsontraining.co.uk 07970 889245
Deputy DSL	Stephen Dulson	steve@dulsontraining.co.uk 07983 636990
Local authority designated officer (LADO)		03000 410888
Channel helpline		020 7340 7264
Concerns about an adult		Concerned about an adult? A guide to adult safeguarding in Shropshire Shropshire Council
Education Safeguarding Team	Rebecca Avery Peter Lewer,	Education Safeguarding Adviser e-Safety Development Officer 03000 415797 https://www.theeducationpeople.org/
For all other national Local Safeguarding Children Multi-Agency Partnerships		https://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links

1. STATEMENT AND AIMS

Dulson Training is dedicated to and recognises our moral and statutory responsibility to safeguard and promote the welfare of all apprentices and learners. All those involved in training must adhere to the ethos that **'it could happen here'** to reinforce the protection of individuals and the identification/reporting of concerns.

Dulson Training recognises the importance of providing an ethos and environment that will help apprentices and learners to be safe and feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children, young people and vulnerable adults receive effective support, protection and justice.

Dulson Training aims to ensure that:

- › Appropriate action is taken in a timely manner to safeguard and promote apprentice and learner's welfare.
- › All staff are aware of their statutory responsibilities with respect to safeguarding.
- › Staff are properly trained in recognising and reporting safeguarding issues.
- › We are an important part of the wider safeguarding systems for apprentices and learners.
- › It is everyone's responsibility to safeguard and promote the welfare of apprentices and learners.
- › All children (defined as those up to the age of 18) and vulnerable adults (defined as those who receive a health, personal or social care service from a professional) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- › All apprentices and learners have a right to be heard and to have their wishes and feelings taken into account.
- › All our staff understand safe professional practice and adhere to our code of conduct and safeguarding policies.
- › We have a responsibility to recognise vulnerability in apprentices and learners and act on any concern in accordance with this guidance.
- › Review this policy annually – Next Review date March 2023

Promotion of the Policy

The policy is published on Dulson Training's intranet website-

All staff, apprentices, learners, and employers will receive a safeguarding induction and all staff, apprentices and learners will receive ongoing safeguarding training (see section 15) when the safeguarding and protection of children and vulnerable adults' policy will be promoted, and the content disseminated.

The virtual learning zone, learner and employer handbooks also contain a summary of the safeguarding and protection of children and vulnerable adult policy.

Safeguarding and the protection of children and vulnerable adults will be an agenda item at each monthly team meeting.

2. LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2018\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- › Education Act 2011
- › Equality Act 2010
- › Protection of Freedoms Act 2012

- › Vetting and Barring Scheme Guidance
- › Human Rights Act 2010
- › GDPR Regulations 2018
- › The Care Act 2014
- › Modern Slavery Act 2014
- › Inspecting Safeguarding in Early Years, Education and Skills Settings 2019
- › Sexual violence and sexual harassment between children in schools and colleges 2018
- › Prevent Duty Guidance 2019
- › Work-based learning national guidance- DfE- Prevent
- › CONTEST strategy (Prevent)
- › The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- › Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is
- › Statutory guidance on the Prevent duty, which explains duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

3. DEFINITIONS

Safeguarding and promoting the welfare of apprentices and learners means:

- › Protecting apprentices and learners from maltreatment
- › Preventing impairment of apprentice’s and learner’s mental and physical health or development
- › Ensuring that apprentices and learners are training in circumstances consistent with the provision of safe and effective care
- › Taking action to enable all apprentices and learners to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is where apprentices or learners share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Young Person- there is no legal definition of a young person, but for Dulson Training's purposes we deem this to be any individual up to their 25th birthday.

Vulnerable Adult includes a person who is aged 18 or over that is or may need community care services because of a disability (mental or other), age or illness and is someone who could be unable to look after themselves or protect themselves from harm or exploitation.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The local authority (LA)
- › A clinical commissioning group for an area within the LA
- › The chief officer of police for a police area in the LA area

4. EQUALITY STATEMENT

Dulson Training actively promotes Safeguarding and Equality, Diversity and Inclusion which are intrinsically linked by separate Equality and Safeguarding Legislation and subsequent Dulson Training Policies, creating an environment that eliminates discrimination, bullying and harassment and reinforces the Safeguarding Agenda. Together they work to provide a safe environment in which to deliver training. Training on Equality, Diversity and Inclusion and Safeguarding are mandatory, and attendance is monitored through the Dulson Training Probationary and Performance Review Processes ensuring all staff are fully aware of the importance of Safeguarding and how to keep apprentices and learners safe from harm.

Some apprentices and learners have an increased risk of abuse, and additional barriers can exist for some with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise apprentice's and learner's diverse circumstances. We ensure that all apprentices and learners have the same protection, regardless of any barriers they may face.

We give special consideration to apprentices and learners who:

- › Have special educational needs (SEN) or disabilities (see section 9)
- › Are young carers.
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- › Have English as an additional language.
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalization.
- › Are asylum seekers.
- › Are at risk due to either their own or a family member's mental health needs.
- › Are looked after or previously looked after (see section 11)

5. ROLES AND RESPONSIBILITIES

Safeguarding and child and vulnerable adult protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors at Dulson Training and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

Through staff induction, monthly meetings (where safeguarding is a mandatory agenda item) annual staff training, our website and virtual learning zone, all staff will be aware of:

- › Our systems which support safeguarding, including this safeguarding policy and protection of children and vulnerable adults' policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, and the safeguarding response to apprentices or learners who go missing from training.
- › The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- › What to do if they identify a safeguarding issue or a child, young person, vulnerable adult, apprentice or learner tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- › How to provide a safe environment in which apprentices and learners can learn and train.

All members of staff know what to do if a child/vulnerable adult tells them he/she is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child. See Appendix 3 for advice for staff on responding to safeguarding concerns.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Hayley Norgrove Operations Manager. The DSL takes lead responsibility for child, young person and vulnerable adult protection, wider safeguarding, the prevention of radicalisation and extremism and safer recruitment.

The DSL will be available during working hours (8.30am- 5.30pm) for staff to discuss any safeguarding concerns and can also be contacted out of hours if necessary, using the same contact details – 07970 889245.

When the DSL is absent, the deputy – Stephen Dulson Managing Director 07983 636990 – will act as cover and can be contacted via details listed above

The DSL will be given the time, funding, training, resources and support to:

- › Provide advice and support to other staff on apprentice and learner welfare and child, young person and vulnerable adult protection matters.
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- › Contribute to the assessment of learners and apprentices.
- › Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also keep the Managing Director informed of any issues and liaise with local authority case managers and designated officers for child, young person and vulnerable adult protection concerns as appropriate.

The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The Designated Safeguarding Lead

Is responsible for the implementation of this policy, including:

- › Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- › Communicating this policy to parents for apprentices and learners who are up to 18 years old, via the website and virtual learning zone.
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- › Ensuring that all staff undertake appropriate safeguarding and child, young person and vulnerable adult protection training and update this regularly.
- › Ensure that safeguarding is included as an agenda item each month.
- › Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

Contextualised Safeguarding

Managers, Assessors, Tutors and Designated Safeguarding Lead/Deputy must consider external factors when reviewing and dealing with safeguarding incidents and apprentice or learner behaviours. A knowledge of individual situations such as home life, social contacts and living environments can place the behaviour or incident into context, informing next steps to protect and prevent situations developing further.

Being proactive in understanding the wider context in which the apprentice or learner lives can help put safeguarding measures in place prior to incidents occurring, thus reducing threats and harm to the individual.

Contextual background will also help inform the referral process when working with external organisations. This could include child protection, abuse, preventing radicalisation, peer on peer abuse including sexual violence, sexual harassment and sexting, any number of safeguarding categories such as online abuse and bullying, drugs, gangs, child sexual exploitation, female genital mutilation (FGM) etc.

Children, young people and vulnerable adults have a right to:

- Contribute to the development of safeguarding policies
- Receive help from a trusted adult
- Learn how to keep themselves safe, including online

Parents/carers have a responsibility to:

- Understand and adhere to the relevant policies and procedures, encouraging their children to adhere to them.
- Talk to their children about safeguarding issues, support Dulson Training in their safeguarding approaches, and reinforce appropriate safe behaviours at home
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from Dulson Training, or other agencies.
- Contribute to the development of Dulson Training's safeguarding policies

Parents can obtain a copy of Dulson Training's Child and Vulnerable Adult Protection Policy and other related policies on request and can view them via our intranet site and within our learner handbooks that provides links, in the learner/apprentice handbook and on the virtual learning zone.

6. CONFIDENTIALITY

Dulson Training recognises that all matters relating to child, young person and adult protection are confidential. The DSL will only disclose information about an apprentice or learner to other members of staff on a need-to-know basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children, young people and vulnerable adults, this includes the 3 safeguarding partners as outlined above.

All staff must be aware that they cannot promise a child, young person or vulnerable adult to keep secrets which might compromise the child, young person or adult's safety or wellbeing. Further advice on responding to disclosures can be found in Appendix 5.

DfE Guidance on Information Sharing (July 2018) provides further detail. If Dulson Training is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local schools/colleges) then advice will be sought from the Education Safeguarding team to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.

Please read in conjunction with the Confidentiality Policy.

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 or volunteer will be dealt with under the specific procedures included in this policy and appendix 3.

Dulson Training recognises that:

- › Timely information sharing is essential to effective safeguarding.
- › Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of apprentices and learners.
- › The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping apprentices and learners safe.

- › If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- › Staff should never promise a discloser that they will not tell anyone about a report of abuse, as this may not be in the child, vulnerable adult, apprentice or learner’s best interests.
- › The government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information.
- › If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- › Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

7. RECOGNISING ABUSE AND TAKING ACTION

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

7.1 If a child or vulnerable adult is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care or adult care and/or the police **immediately** if you believe a child or vulnerable adult is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Contact the relevant partner immediately to report a concern that a child or vulnerable adult is in immediate danger:

Concerns about an adult

Call 03000 41 61 61 (text relay 18001 03000 41 61 61)

Call Shropshire Police

101 (or 999 if there is an immediate risk of harm)

For all other Local Councils following the link to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

Please inform the DSL or deputy of any referrals made to the 3 safeguarding partners.

7.2 If a person makes a disclosure to you

If a person discloses a safeguarding issue to you, you should:

- › Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- › Stay calm and do not show that you are shocked or upset.
- › Tell the person they have done the right thing in telling you. Do not tell them they should have told you sooner.
- › Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- › Write up your conversation as soon as possible in the discloser's own words. Stick to the facts, and do not put your own judgement on it.
- › Sign and date the write-up and pass all records, including originals on to the DSL. Alternatively, if appropriate, make a referral to children or adult social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

7.3 If you discover that FGM has taken place or an apprentice or learner is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that an individual has already been subjected to FGM, and factors that suggest an individual may be at risk, are set out in appendix 4.

Any tutor who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on an apprentice or learner **under 18** must immediately report this to the police, personally. This is a statutory duty, and the tutor will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on an apprentice or learner **under 18** must speak to the DSL and follow our local safeguarding procedures. The duty for tutors mentioned above does not apply in cases where an apprentice or learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine apprentices or learners.

Any member of staff who suspects an apprentice or learner is *at risk* of FGM or suspects that FGM has been carried out or discovers that an apprentice or learner **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures. Please see flowchart on page 13).

7.4 If you have concerns about an apprentice or learner (as opposed to believing a child, young person or vulnerable adult is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 13 illustrates the procedure to follow if you have any concerns about an apprentice or learner's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or deputy is not available, this should not delay appropriate action being taken. or a member of the senior leadership team. And/or take advice from local authority children's social care, adult care or the Local Safeguarding Children Multi-Agency Partnership. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social or adult care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and Dulson Training will consider a referral to local authority children's social or adult care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care, adult care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child or vulnerable adult's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the situation improves.

Safeguarding Referrals to Designated Safeguarding Lead (DSL) (Guidance for staff)

All referrals to the DSL must be made through the safeguarding email- safeguarding@dulsontraining.co.uk using the safeguarding report form which can be found within our handbooks and links provided

If the safeguarding concern is urgent, you must contact a Designated Safeguarding Lead (DSL) or Designated Safeguarding Officer (DSO) immediately so that action can be taken. Please remember to return to the safeguarding report form once you have spoken to a DSL and complete the relevant details.

The Safeguarding Form can be found on the Dulson Training intranet site and handbook. Complete all sections fully before submitting the referral, then please email the form to safeguarding@hughesdriving.co.uk

and this will either be picked up by the designated safeguarding lead or the deputy.

The relevant the DSL or deputy responsible will update you on action taken and progress, though it will not always be appropriate to share full details.

Emailed forms to safeguarding will help us to track and monitor our safeguarding practice and report on areas of concern and our responses.

For what do to if you have a concern- please see over page.

At all stages, the child, young person, vulnerable adult, apprentice, or learner's circumstances will be kept under review. The Designated Safeguarding Lead (DSL), deputy and staff will re-refer if required to ensure the **child's, young people, vulnerable adult, apprentice or learner's safety is paramount:**

Figure 1

Why are you concerned?

- Allegation or apprentice/learner shares a concern or worry
- Employer shares a concern or worry
- Indicators of abuse or neglect

Are you concerned that the child, vulnerable adult , apprentice or learner is in immediate danger or risk of harm?
Tutors- are you concerned that an act of FGM has been carried out?

Immediately record your concerns
Follow Dulson Training's recording and referral procedure
Clarify concerns if necessary (TED: Tell, Explain, Describe)
Use child's/vulnerable adults own words
Date all records made including rough notes and use the safeguarding report form
Reassure the child/vulnerable adult
Seek support for yourself if required from DSL

Immediately report your concerns to the 3 safeguarding partners:
See contact details of page 10 Of this policy
Inform the DSL or deputy that you have made this referral

Inform the Designated Safeguarding Lead (by emailing safeguarding@dulsontraining.co.uk or see contact list of DSLs or the deputy on page 4

Designated Safeguarding Lead

- Consider whether the child or vulnerable adult is at immediate risk of harm e.g. unsafe to go home
- Consider Support Levels Guidance document and procedures: or other LSCMP for other geographical locations
- Refer to other agencies as appropriate e.g. Children's Social Care, Adult Care, LADO, Police, Early Help Notification Form or Inter-Agency Referral Form
- If unsure then consult with LSCMP or Education Safeguarding Adviser(See contact

If you are unhappy with the response

- Staff:**
- Seek advice from the LSCMP or the Education Safeguarding Advisor (See contact list on page 4-5)
 - Follow Whistleblowing Procedures
- Apprentice/Learner and Parents:**
- Follow the Dulson Training complaints procedures (see website)

Record decision making and action taken on the Safeguarding Report Form and save in the password protected file on the secure drive.

DSL to Monitor

What you are monitoring e.g. behaviour trends, appearance etc
How long you will monitor.
Where, how and to whom you will feedback

Review and Re-refer (if necessary) (Central Duty team 03000 41 91 91) or the LSCMP or <https://www.safecic.co.uk/your-scb-accp/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links>

7.5 If you have concerns about extremism

Please read in conjunction with the prevention of radicalisation and extremism policy.

If a child, vulnerable adult, apprentice, or learner is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or deputy is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care or adult care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care or adult care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff and governors can call to raise concerns about extremism with respect to an apprentice or learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- › Think someone is in immediate danger.
- › Think someone may be planning to travel to join an extremist group.
- › See or hear something that may be terrorist-related.

Fundamental British values

Dulson Training fully supports and promotes the ethos of Fundamental British values: Democracy, rule of law, liberty, respect, tolerance and understanding of different faiths and beliefs, through a range of activities. Learners and staff are made aware of the link between the Prevent Duty and British values. The Dulson Training culture embeds British values and reflects the country we live in. See Dulson Training's Prevention of extremism and radicalisation policy.

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child, vulnerable adult, apprentice or learner has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child, vulnerable adult, apprentice, or learner may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child, vulnerable adult, apprentice, or learner that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff (including a volunteer), or an allegation is made about a member of staff (including a volunteer) posing a risk of harm to apprentices or learners, speak to the DSL. If the concerns/allegations are about the DSL, speak to the Managing Director.

The Managing Director will then follow the procedures set out in appendix 3, if appropriate.

7.8 Allegations of abuse made against other apprentices or learners

We recognise that apprentices and learners are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of apprentices or learners hurting other apprentices or learners will be dealt with under our Apprentice and Learner Behaviour Policy, but this Safeguarding and Protection of Children and Vulnerable Adults policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- › Is serious, and potentially a criminal offence
- › Could put apprentices or learners at risk
- › Is violent
- › Involves apprentices and learners being forced to use drugs or alcohol
- › Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

If an apprentice or learner makes an allegation of abuse against another apprentice or learner:

- › You must record the allegation and tell the DSL, but do not investigate it
- › The DSL will contact the local authority children’s social care or adult care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL will put a risk assessment and support plan into place for all involved (including the victim(s), the individual against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- › Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- › Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards females, and initiation or hazing type violence
- › Ensuring our curriculum helps to educate apprentices and learners about appropriate behaviour and consent
- › Ensuring apprentices and learners know how to report concerns and worries, this can be done by talking to their designated tutor, the DSL or deputy and the apprentice and learner will be informed of this at induction, contact information is on the virtual learning zone and on the website.
- › Ensuring staff are trained to understand that a child, young person or vulnerable adult harming a peer could be a sign that the child, young person or vulnerable adult is being abused themselves, and that this would fall under the scope of this policy.

7.9 Sexting

This is an approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask an apprentice or learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- › Delete the imagery or ask the apprentice or learner to delete it
- › Ask the apprentice or learners who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- › Share information about the incident with other members of staff, the apprentice or learner(s) it involves or their, or other, parents and/or carers
- › Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the apprentice or learner(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to apprentices and learners
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- › What further information is required to decide on the best response
- › Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to delete or remove images or videos from devices or online services
- › Any relevant facts about the apprentices and learners involved which would influence risk assessment
- › If there is a need to contact another training provider, school, college, setting or individual
- › Contact parents or carers of the apprentices and learners involved if 18 and under.

The DSL will make an immediate referral to police and/or children's social care if:

- › The incident involves an adult
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The DSL has reason to believe an apprentice or learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Managing Director and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the apprentices and learners involved (if appropriate).

If at any point in the process there is a concern that an apprentice or learner has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents of any apprentice or learner who is under 18 years at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the apprentice or learner at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the DSL and dialing 101.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

apprentices and learners are taught about the issues surrounding sexting as part of our relationships education / relationships and sex education and digital awareness programmes. Teaching covers the following in relation to sexting:

- › What it is
- › How it is most likely to be encountered
- › The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- › Issues of legality
- › The risk of damage to people's feelings and reputation

Apprentices and learners also learn the strategies and skills needed to manage:

- › Specific requests or pressure to provide (or forward) such images
- › The receipt of such images

This policy on sexting is also shared with apprentices and learners so they are aware of the processes Dulson Training will follow in the event of an incident.

8. NOTIFYING PARENTS

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

9. APPRENTICES AND LEARNERS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

We recognise that apprentices and learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the apprentice's or learner's disability without further exploration.

- › Apprentices and learners being more prone to peer group isolation than others.
- › The potential for apprentices and learners with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in overcoming these barriers

We offer extra support for apprentices and learners with SEN and disabilities. This includes:

- Additional tutor contact time
- Additional progress reviews
- Referrals to external agencies for additional support or equipment

10. APPRENTICES OR LEARNERS WITH A SOCIAL WORKER

Apprentices or learners may need a social worker due to safeguarding or welfare needs. We recognise that an individual's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children, young people and adults.

Where we are aware that an apprentice or learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the apprentice or learner's safety, welfare and educational outcomes. For example, it will inform decisions about:

- › Responding to unauthorised absence or missing education where there are known safeguarding risks
- › The provision of pastoral and/or academic support

11. LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN AND YOUNG PEOPLE

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and young people and previously looked-after children and young people safe. We will ensure that:

- › Appropriate staff have relevant information about children and young people's looked after legal status and care arrangements.
- › The DSL has details of children's social workers.

The Head of Quality and Curriculum will take the lead on promoting the achievement of looked-after and previously looked-after children and young people.

As part of their role, they will:

- › Work closely with the designated Tutor to ensure that any safeguarding concerns regarding looked-after and previously looked-after children and young people are quickly and effectively responded to.
- › Work with the Tutor to promote the educational achievement of looked-after and previously looked-after children and young people.

12. MOBILE PHONES AND CAMERAS

Staff are allowed to bring their personal phones to work for their own use but will limit such use to non-contact time when apprentices and learners are not present. Staff members' personal phones will remain in their bags or cupboards during contact time.

Staff will not take pictures or recordings of apprentices or learners on their personal phones or cameras. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in training. Tutors may use equipment issued by Dulson Training to digitally record assessment evidence. They may also use the mobile phone provided by Dulson Training to tether to the internet for use of the virtual learning zone when in the apprentice or learner's workplace. Any assessment evidence or records relating to apprentices or learners, must only be obtained and stored on Dulson Training equipment. Any apprentice or learner data should be stored on a Dulson Training laptop which is password protected and should be saved on the secure drive and not on a desktop. Please read in conjunction with the Data Protection policy with regards to the processing, use and retention of data.

13. COMPLAINTS AND CONCERNS ABOUT DULSON TRAINING SAFEGUARDING POLICIES

13.1 Complaints against staff

Complaints against staff that are likely to require a child, young person or vulnerable adult protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

Complaints

Dulson Training has a Complaints Procedure available to parents, apprentices, learners and members of staff who wish to report concerns. This can be found on Dulson Training website, www.hughesdrivertraining.co.uk in the apprentice and learner handbook and on the virtual learning zone. Please read in conjunction with the Complaints Policy.

13.3 Whistle-blowing

A whistle blower is a worker who is concerned about a wrongdoing and reports this. This will usually be something they have seen at work - though not always. The wrongdoing that is disclosed must be in the public interest. This means it must affect others, e.g. the general public.

Whistle blowers are protected by law.

The following are examples of when it may be appropriate to whistle blow:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice

- the company is breaking the law, e.g. doesn't have the right insurance
- you believe someone is covering up wrongdoing.

Personal Grievances are not counted as whistle blowing

Staff who suspect malpractice within their workplace or a workplace that they visit must report their concerns to either the Designated Safeguarding Lead (DSL) or Managing Director (MD). This is called "whistleblowing". The Public Interest Disclosure Act came into force in 1999 and gives statutory protection to staff who legitimately make a disclosure in the public interest which relates to:

- Crime
- Failure to comply with legal obligations
- Miscarriages of justice
- Health & safety threat
- Damage to the environment

Not reporting malpractice is considered misconduct and may lead to disciplinary action.

It is the responsibility of Dulson Training to ensure that any reports are thoroughly investigated, and findings recorded. If the report relates to their manager, then a SMT member or the MD should be approached. If the concern is regarding an apprentice, learner or their workplace, it should be discussed with Dulson Training in the first instance, which could be the Tutor and/or DSL or deputy and not the workplace manager. If the staff member/apprentice/learner who has made the report feels victimised or does not believe that their concerns have been taken seriously, they are encouraged to raise the issue with the MD. Any malicious reports that are made by a staff member will lead to disciplinary action. We will also look to refer whistleblowing to the local safeguarding children multi-agency partnership.

Staff should be able to report their concerns to the designated safeguarding lead or deputy without fear of repercussions. Each member of staff should know and understand the whistle blowing procedures. All disclosures will be treated in confidence and the whistle blower will be protected by law.

A whistle blower is someone employed by the company who has seen wrongdoing and feels unsafe practices are being followed, putting them or others at risk.

When a person is whistle blowing the same procedures will be followed as set out in reporting safeguarding concerns of the safeguarding policy, section 7.4. If you do not feel this is being handled correctly you can use the complaints or grievance policy.

For advice and guidance on whistle blowing you can use this helpline from the NSPCC Contact the Whistleblowing Advice Line Call [0800 028 0285](tel:08000280285) or Email help@nspcc.org.uk .

14. RECORD-KEEPING

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions and decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual apprentices or learners will be retained for a reasonable period of time after they have left the training.

In addition

- › All records will be stored electronically.
- › All records are stored on a secure drive and password protected.
- › Any original paper-based notes must be scanned and emailed to the DSL or handed to the DSL to be scanned and stored in the secure drive and then destroyed.
- › Records will be retained in accordance with the Data Protection Policy and not kept for longer than necessary.
- › All records must remain confidential and only be shared on a need-to-know basis and with safeguarding partners if necessary to protect the child, young person or vulnerable adult.
- › Information will only be shared with safeguarding partners to official telephone numbers and email addresses included in this policy or checked with the relevant safeguarding partner. When making a referral to the Local Safeguarding Children Multi-Agency Partnership or Children's Social Care or Adults Care, wherever possible utilise the official website and complete the report form embedded in the official sites, such as 'worried about a child' or 'worried about an adult'.

In addition:

- › Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- › Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

15. TRAINING

The DSL will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.

15.1 All staff

The DSL will ensure that all new staff and volunteers are appropriately inducted on Dulson Training's safeguarding policies, procedures, referral and reporting systems and that they know how to implement them.

All staff members (including temporary staff) will receive appropriate safeguarding and child/vulnerable adult protection training (organised by the DSL) which will enable them to:

- **Recognise** potential safeguarding and child/vulnerable adult protection concerns involving apprentices, learners and adults (colleagues, other professionals and parents/carers)

- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with Dulson Training policies
- **Refer** concerns to the DSL and be able to seek support external to Dulson Training if required

All staff members (including temporary staff) will undertake safeguarding and child, young person and vulnerable adult protection training at induction, including on whistle-blowing procedures, to ensure they understand Dulson Training's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated (at least annually) and will be in line with advice from the 3 safeguarding partners.

All staff members (including temporary staff) will receive appropriate ongoing training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to the likes of drug taking, alcohol abuse, and peer on peer abuse such as bullying and sexting can put children/vulnerable adults in danger. The staff training will also include Dulson Training responsibilities, protection procedures, online safety, safe working practice and external reporting mechanisms.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify those at risk of being drawn into terrorism and to challenge extremist ideas.

All staff members (including temporary staff) will receive regular safeguarding and child/vulnerable adult protection updates through e-Bulletins, monthly staff meetings, briefings or online training (as required, but at least annually), to provide them with relevant skills and knowledge to safeguard children/young people/vulnerable adults effectively.

Staff will also receive regular safeguarding and child, young person and vulnerable adult protection updates (for example, through emails, online training, e-bulletins, the virtual learning zone and staff meetings) as required. All staff members (including temporary staff) will be made aware of Dulson Training's expectations regarding safe and professional practice via the code of conduct which is provided and discussed as part of the induction process.

Dulson Training recognises the expertise which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis.

Opportunity is therefore provided for all staff to contribute to and shape safeguarding arrangements and the safeguarding policies and procedures as part of the Safeguarding board review.

Contractors who are providing services relevant to apprenticeship or training will also receive safeguarding training.

Volunteers will receive appropriate training.

All delivery staff will be trained to promote and provide health, sexual health, and relationship education as part of the curriculum.

Local Threats

- › Knowledge of local threats are gained through partnership work and cascaded to the staff, apprentices, and learners.

Police Intelligence regarding local threats

- › **Shropshire:** Main threat is drugs. Drug of choice in young people is cannabis. Some gang activity but no serious threat. There are some issues with criminals exploiting cross county lines, related to drug offences to avoid detection, particularly from Birmingham and Liverpool.

- › **All Other National Areas:** Please see appendix 6

15.2 The DSL and deputy

The DSL and deputy will undertake lead child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, online training, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Recruitment – interview panels

At least one person conducting any interview for a post at Dulson Training will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

15.4 Training and Education for Apprentices and Learners

All learners must have Safeguarding included in their Induction Programme and be made aware of:

- Dulson Training policies related to safeguarding, the prevention of extremism and radicalisation, complaints, bullying and harassment, equality and diversity and acceptable use of IT
- Their responsibility for their own and others’ safety
- Online-Safety (Internet, text, websites, safe from cyber bullying, grooming and radicalisation)
- How to maintain own wellbeing and who to talk to if they have concerns
- How to report any instances related to Safeguarding, Child Protection, sexual violence and sexual harassment, FGM, radicalisation or contact with extremist groups
- How to report instances of bullying and harassment and that reporting procedures are clear

Dulson Training raises awareness of the government **Run, Hide, Tell** campaign to further promote how to keep learners and apprentices safe within and outside training and work environments.

CURRICULUM AND STAYING SAFE

We recognise that Dulson Training plays an essential role in helping apprentices and learners to understand and identify the parameters of what is appropriate child, young person and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Dulson Training will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that apprentices and learners have the resilience, a range of contacts and strategies to ensure their own protection and understand the importance of protecting others. This will include online safety.

Apprentices and learners will be educated about a range of safeguarding concerns through planned curriculum and tutorials, yet with flexibility to include emerging risks and threats to apprentice and learner safety. This will include, but is not limited to, bullying (including cyber bullying), radicalisation, child sexual exploitation (CSE), Child criminal exploitation (CCE), sexual abuse, FGM, neglect, online safety, gender-based violence/sexual assaults, peer on peer abuse and sexting.

Systems have been established to support the empowerment of apprentices and learners to talk to a range of staff. Apprentices and learners at Dulson Training will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

Specific systems outside of expected day to day learning activity and support will include:

- Safeguarding email address
- Apprentice/Learner Voice
- Health and Wellbeing advice and guidance
- Referral to counselling service

Relationship, Health and Sex Education

Dulson Training acknowledges the importance of relationship, health and sex education, particularly for young adults and will embed this as part of the curriculum, including providing links to suitable and supportive referral agencies. The virtual learning zone will include relevant resources to promote healthy relationships, health and sex education. Staff are trained to embed discussions into teaching and learning sessions and during tutorial sessions. Learners/apprentices will be offered suitable pastoral support by trained staff where required.

ONLINE SAFETY

It is recognised by Dulson Training that the use of technology presents particular challenges and risks to children and adults both inside and outside of training.

Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSL, and the DSO as appropriate, for example when developing curriculum approaches or making technical decisions.

However, the DSL is acknowledged as having overall responsibility for online safeguarding

within Dulson Training.

Dulson Training identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm

The DSL and Senior Management team have read Annex C regarding Online Safety within 'Keeping Children Safe in Education' 2020.

Dulson Training will ensure that appropriate filtering and monitoring systems are in place when apprentices, learners and staff access Dulson Training IT equipment and internet provision.

Dulson Training will be careful to ensure that these systems do not place unreasonable restrictions on internet access or limit what children/young people can be taught with regards to online teaching and safeguarding.

Dulson Training acknowledges that whilst filtering and monitoring is an important part of Dulson Training's online safety responsibilities, it is only one part of our role. Children and adults may have access to systems external to Dulson Training control such as mobile phones and other internet enabled devices and technology. This is covered in more depth within Dulson Training's Online Safety Policy.

Dulson Training will ensure a comprehensive curriculum response is in place to enable all apprentices and learners to learn about and manage online risks effectively and will support parents and the wider community (including all members of staff) to become aware and alert to the need to keep children/young people safe online.

Detailed information about Dulson Training's response to online safety can be found in Dulson Training's Online Safety Policy and Acceptable Use Policy.

15.6 Employer Induction

Dulson Training will work closely with employers to ensure the protection and safeguarding of apprentices and learners. All employers will receive an induction including the safeguarding and protection of children, young people and vulnerable adults and will know how to recognise the signs and symptoms of abuse and neglect. This induction includes who to contact if they have any concerns about an apprentice or learner, this information can be found in the employer handbook, on the Dulson Training website and on the virtual learning zone.

Dulson Training Employer Engagement Contact/Tutor will be in regular contact with the employer this includes but is not restricted to when:

- They visit the place of work for assessment purposes.
- Conducting Learner Progress Reviews and Welfare Checks

- Liaising with the employer for feedback on apprentice and learner progression
- Obtaining employer satisfaction feedback
- Conducting employer inductions
- Conducting health and safety and safeguarding reviews of the workplace

16. MONITORING ARRANGEMENTS

This policy will be reviewed **every 6 months** by Andrew Case the DSL and MD – Carl Hughes. At every review, it will be approved by tSMT

17. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

- › Behaviour
- › Staff Code of Conduct
- › Complaints
- › Health and Safety
- › Online Safety
- › Equality and Diversity
- › Teaching, Learning and Assessment Strategy
- › Privacy Notices
- › Data Protection and GDPR
- › External Speakers and Visitors
- › Missing Persons Policy
- › Prevention of Extremism and Radicalisation Policy
- › Safer Recruitment Policy
- › IT Acceptable Use
- › Bullying and Harassment
- › Whistleblowing

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child, young person or vulnerable adult.

Emotional abuse is the persistent emotional maltreatment of an individual such as to cause severe and adverse effects on the emotional development. Some level of emotional abuse is involved in all types of maltreatment of a children, young people or vulnerable adults, although it may occur alone.

Emotional abuse may involve:

- › Conveying to a child, young person or vulnerable adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- › Not giving the child, young person or vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- › Age or developmentally inappropriate expectations being imposed on children, young people or vulnerable adults. These may include interactions that are beyond an individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the individual from participating in normal social interaction.
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyberbullying), causing the individual to frequently to feel frightened or in danger, or the exploitation or corruption of children, young people or vulnerable adults.

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child, young person or vulnerable adult 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
- › Non-contact activities, such as involving child, young person or vulnerable adult in looking at, or in the production of, sexual images, watching sexual activities, encouraging a child, young person or vulnerable adult to behave in sexually inappropriate ways, or grooming a child, young person or vulnerable adult in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children, young people or vulnerable adults.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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 child from physical and emotional harm or danger
- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out on the single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate including barred list information for those working in regulated activity. We will not keep a copy of this for longer than 6 months.
- › Verify their mental and physical fitness to carry out their work responsibilities.
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- › Verify their professional qualifications, as appropriate.
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions: criminal records checks for overseas applicants
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete, including checking gaps in employment.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- › Responsible, on a regular basis for teaching, training, instructing children; or

- › Carrying out paid, or unsupervised unpaid, work regularly where that work provides an opportunity for contact with children;

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, young people, vulnerable adults, apprentices or learners we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- › We believe the individual has engaged in relevant conduct; or
- › The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- › The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work with apprentices or learners has had the appropriate level of DBS checks. This will be:

- › An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- › An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at Dulson Training.

Volunteers

We will:

- › Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- › Obtain an enhanced DBS check with barred list check for all volunteers who are new to working in regulated activity
- › Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list check for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Non Exec

All Non Exec members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

Check will include:

- › Identity

- › Right to work in the UK
- › Other checks deemed necessary if they have lived or worked outside the UK

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including any volunteers has behaved in a way that has harmed, or may have harmed a child, young person, vulnerable adult, apprentice or learner, or

- › Possibly committed a criminal offence against or related to a child, young person, vulnerable adult, apprentice or learner, or
- › Behaved towards a child, young person, vulnerable adult, apprentice or learner in a way that indicates he or she may pose a risk of harm to children, young people, vulnerable adults, apprentices or learners, or
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children, young people, vulnerable adults, apprentices or learners.

It applies regardless of whether the alleged abuse took place at Dulson Training. Allegations against staff who no longer work at Dulson Training and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child, young person or vulnerable adult protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension will be considered in cases where there is reason to suspect that a child, young person, vulnerable adult, apprentice, or learner is at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- › Redeployment within Dulson Training so that the individual does not have direct contact with children until the case is resolved and an outcome has been decided.

Definitions for outcomes of allegation investigations

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- › **False:** there is sufficient evidence to disprove the allegation
- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the DSL or Managing Director (or Chair of Governors where the Managing Director or DSL is the subject of the allegation) will take the following steps:

- › Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The DSL may, on occasion, consider it necessary to involve the police *before*

consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children, young people and vulnerable adults or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- › Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- › Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children, young people, vulnerable adults, apprentice, or learners at Dulson Training is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate.
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at Dulson Training and their contact details.
- › **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- › **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action at Dulson Training and/or liaise with the police and/or children’s social care services as appropriate.
- › Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- › Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The DSL will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against tutors (where this applies) while investigations are ongoing.
- › Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, young person or vulnerable adult.

Where the police are involved, wherever possible the Managing Director will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the disciplinary process, should this be required at a later point.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution

The DSL will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed, or the individual resigns or otherwise ceases to provide their services, the DSL and Managing Director will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child or young person, or if they think the person otherwise poses a risk of harm to a child or young person, they must make a referral to the DBS.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the Managing Director will consider how best to facilitate this.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Managing Director, or other appropriate person in the case of an allegation against the MD, will consider whether any disciplinary action is appropriate against the apprentice or learner who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not an apprentice or learner.

Confidentiality

Dulson Training will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The DSL will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The DSL will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, Dulson Training will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to Dulson Training's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 4: specific safeguarding issues

This appendix is based on the advice in annex A of Keeping Children Safe in Education

Children and young people missing from education, training or work

A child or young person going missing from education, training or work, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child or young person may become missing from education or training, but some children or young people are particularly at risk. These include children or young people who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a education
- › Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children, young people, vulnerable adults, apprentices or learners who go missing from education, training or work particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. Please read in conjunction with the Missing Person Policy.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child or young person is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation
- › Suffering from changes in emotional wellbeing
- › Misusing drugs and alcohol
- › Going missing for periods of time or regularly coming home late
- › Regularly missing training, education or work
- › Not taking part in education, training or work

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child or young person:

- › Having an older boyfriend or girlfriend
- › Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse/and or violence

Children and young people can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Apprentices and learners may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children, young people, vulnerable adults, apprentices and learners.

The DSL will provide support according to the child, young person, vulnerable adult, apprentice or learner's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child, young people, vulnerable adults, apprentices or learners' welfare.

The DSL deputy will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child or young person has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child, young person, vulnerable adult, apprentice or learner being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children and young people affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that an apprentice or learner is at risk of FGM.

Indicators that FGM has already occurred include:

- › An apprentice or learner confiding in a professional that FGM has taken place
- › A mother/family member disclosing that FGM has been carried out
- › A family/apprentice or learner already being known to social services in relation to other safeguarding issues
- › An apprentice or learner:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise
 - Being repeatedly absent from training, education or work, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that an apprentice or learner may be at risk of FGM include:

- › The family having a history of practising FGM (this is the biggest risk factor to consider)
- › FGM being known to be practised in the apprentice or learner’s community or country of origin
- › A parent or family member expressing concern that FGM may be carried out
- › A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- › An apprentice or learner:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the apprentice or learner out of the country for a prolonged period
 - Requesting help from a tutor or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation
 - Being unexpectedly absent from training or work

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that an apprentice or learner is being forced into marriage, they will speak to the apprentice or learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- › Speak to the apprentice or learner about the concerns in a secure and private place
- › Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- › Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fcdo.gov.uk

Preventing radicalisation (Please read in conjunction with the Prevention of Extremism and Radicalisation Policy)

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

- › **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- › **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Dulson Training has a duty to prevent apprentices and learners from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify those at risk.

We will assess the risk of apprentices and learners being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip apprentices and learners to stay safe online. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in apprentices or learners' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that an apprentice or learner is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance
- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or Twitter and other social media
- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations
- › Apprentices or learners who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about an apprentice or learner, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on Dulson Training's measures to prevent radicalisation are set out in The Prevention of Extremism and Radicalisation Policy and the Teaching, learning and assessment strategy.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into Dulson Training any speaker who is known to disseminate extremist views and will carry out appropriate checks and risk assessments to ensure that any individual or organisation using Dulson Training facilities is not seeking to disseminate extremist views or radicalise apprentices, learners or staff.

Appendix 5: Keeping yourself safe when responding to disclosures (the 6 R's – what to do if...)

Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said

Respond

- Reassure the apprentice or learner that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt, if the apprentice or learner refers to it e.g. "you're not to blame"
- Reassure the apprentice or learner that information will only be shared with those who need to know

React

- React to the apprentice or learner only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- Do not ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell, explain, describe

- Do not criticise the perpetrator; the learner may have affection for him/her
- Do not ask the apprentice or learner to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes before passing them on to the DSL.
- Record the date, time, place, any non-verbal behaviour and the words used by the learner. Always ensure that as far as possible you have recorded the actual words used by the apprentice or learner
- Record statements and observable things rather than your interpretations or assumptions

Remember

Contact the DSL: Email the safeguarding incident form to safeguarding@maybirdtraining.com
The DSL may be required to make appropriate records available to other agencies.

Relax

Get some support for yourself, dealing with disclosures can be traumatic for professionals

Appendix 6: Safeguarding and Prevent Regional Risks in Areas Other than Shropshire

- West Midlands
- Devon & Cornwall
- Avon & Somerset
- Gloucestershire
- Staffordshire
- Cheshire
- Lancashire
- Derbyshire
- Greater Manchester
- Leicester
- Liverpool
- Nottinghamshire
- South Yorkshire
- West Yorkshire
- Warwickshire
- Wiltshire

We have identified safeguarding risks and threats for all of these areas using the local police commissioner's priorities and local police projects, alongside information from the local safeguarding children boards and local crime statistics. Crime statistics show a high risk of **Violence and Sexual Offences**. This is closely followed in all areas by **Anti-Social Behaviour**.

Looking into **Violence and Sexual Offences**, the Police identify the following under this category:

Violence:

- Minor assaults (such as pushing and shoving)
- Harassment and abuse (that result in no physical harm) through to wounding and homicide

Sexual offences:

- Rape
- Sexual assault and unlawful sexual activity against adults and children
- Sexual grooming
- Indecent exposure.

Violence and Sexual Offences:

Learners are made aware of all risks in their demographic region. They are reminded at every progress review by their assessor and a discussion takes place each time as a standard part of the review. Learners are actively involved in research surrounding safeguarding themselves, colleagues and children and are routinely asked how they are keeping themselves and others safe. They undertake extensive training on safeguarding adults and children so that they have a complex understanding of what violence and sexual offences are and how to stay safe and ensure that others are also kept safe. They are reminded of different situations which can make them vulnerable such as walking alone at night, joining large public crowds, using public transport late at night all the way through to meeting with people met through the internet, being aware of who they are conversing with online and using privacy settings on social media accounts.

Looking into **Anti-Social Behaviour**, the Police identify the following under this category:

- Nuisance, rowdy or inconsiderate neighbours
- Vandalism, graffiti and fly-posting
- Street drinking
- Environmental damage including littering, dumping of rubbish and abandonment of cars
- Prostitution related activity
- Begging and vagrancy
- Fireworks misuse
- Inconsiderate or inappropriate use of vehicles

Learners are made aware of all risks in their demographic region.

They are championed as being role models to children and parents and therefore, as part of their employability training, are actively encouraged to continue this behaviour outside of their working hours. Each learner/apprentice is taught about British Values, in depth, and this contributes to them being aware of citizenship and how to make a difference in the community. This informs them of what is and what isn't acceptable behaviour. Again, progress reviews are the optimal time for them to be reminded by their assessor as they talk about how they have improved their own employability skills as well as discussing their own personal development and welfare.

Prevent Risks

Learners and staff are aware of the Run, Hide and Tell government agenda through the critical incident training. Staff, learners and have received training on the Prevent agenda.

County Priorities

These are used to educate staff and learners and help to inform programme delivery and provide localised knowledge and understanding to support the learner.

West Midlands

80% of the risk is from Islamic Extremism and 20% from Far-Right extremism such as banned Far Right Groups. Other priorities include gang related crime, cybercrime, child sexual exploitation and domestic abuse.

Devon & Cornwall

Far Right Extremism is the largest risk to the Prevent agenda in this area. Other priorities that may impact upon learners, include domestic abuse, modern slavery and hate crime.

Avon & Somerset

Antisocial behaviour and drug related crime remain top risks in this area.

Gloucestershire

Knife crime, gang crime and sexual exploitation are priorities in this area.

Staffordshire

Both far right and Islamic extremism are priorities. Problems with Hate Crime are an issue.

Cheshire

In this area there is work to reduce domestic violence.

Lancashire

Anti-social behaviour is a significant issue, with young adults being drawn into it.

Derbyshire

Drug related crime is a high priority, there are some major operations to eradicate the supply of synthetic cannabinoids- Operation Halifax.

Greater Manchester

There are concerns over links to far-right extremism and football. Project Kraken aims to raise awareness of maritime threats -looking out for suspicious activity that could be terrorist related. Project Pegasus focuses on- smuggling of people, drugs, firearms, or terrorist related smuggling. Hate crime is an issue and so is county lines crime. Grooming of children for sexual exploitation has been a concern in the area.

Leicester

Islamic extremism is a priority on the Prevent Agenda. Hate crime is also a risk. The Young Adults project aims to reduce the number of 16–24-year-olds drawn into criminal activity and who re-offend, by looking at ways to profile and try to prevent it in the first instance.

Liverpool

Knife crime prevention and gang related crime is a high priority. Domestic violence remains a priority.

Nottinghamshire

Modern slavery and human trafficking has been an issue in Nottinghamshire. Knife crime particularly for young adults is a high priority.

South Yorkshire

The highest priority in this area is antisocial behaviour.

Warwickshire

Priorities include domestic abuse, cybercrime (including grooming and bullying) and alcohol and drug related crime.

Wiltshire

Priorities include The Troubled Families programme which aims to tackle absenteeism from education, involvement in crime and antisocial behaviour.

West Yorkshire

Grooming children for sexual exploitation has been a focus in West Yorkshire.

The Central East cover the following areas:

- Suffolk
- Berkshire, Buckinghamshire and Oxfordshire
- Northamptonshire
- Hertfordshire
- Norfolk

We have identified safeguarding risks and threats for all of these areas using the local police

commissioner's priorities and local police projects, alongside information from the local safeguarding children partnership and local crime statistics.

Suffolk

Radicalised or extreme Animal Rights Activist groups are a concern in Suffolk, as is drug and substance misuse.

Berkshire, Buckinghamshire and Oxfordshire

Hate Crime is a priority. Middle Eastern terrorist groups are on the local Prevent Agenda. FGM, domestic and sexual abuse are priorities. Grooming children for sexual exploitation has been on the agenda in Oxfordshire.

Northamptonshire

Areas of priority include- antisocial behaviour, drug and alcohol related crime, cybercrime (such as grooming), modern slavery and human trafficking and knife crime.

Hertfordshire

Modern slavery and human trafficking is a priority in this area, as is hate crime. Alcohol and drug misuse, missing children and domestic abuse are also concerns.

Norfolk

Antisocial behaviour is the main concern in Norfolk, with additional issues surrounding drug and alcohol related crime.

Cambridgeshire

The Troubled Families Project is a main focus, concentrating on families that are involved in crime, absenteeism from education and antisocial behaviour.

London and Surrounding Area

The London and Surrounding Areas Team cover the following areas:

- London- All Boroughs
- Essex
- Surrey
- Hertfordshire
- Middlesex

We have identified safeguarding risks and threats for all of these areas using the local police commissioner's priorities and local police projects, alongside information from the local safeguarding children partnerships and local crime statistics.

The City of London and Metropolitan Police cover these boroughs:

Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Camden, Croydon, Ealing, Enfield, Greenwich, Hackney, Hammersmith and Fulham, Haringey, Harrow, Havering, Hillingdon, Hounslow, Islington, Royal Borough of Kensington and Chelsea, Kingston upon Thames, Lambeth, Lewisham, Merton, Newham, Redbridge, Richmond upon Thames, Southwark, Sutton, Tower Hamlets, Waltham Forest, Wandsworth, City of Westminster, Central London (City of London Police)

The main areas for concern and issues that are high priority include:

Violence to women and girls
Sexual violence to women and girls
Sexual exploitation
Online grooming
Knife crime
Gang related crime
Hate crime
Human trafficking and modern slavery
Islamic extremism
Far right extremism
Domestic abuse
Antisocial behaviour
Drug misuse and related crime

Essex

Areas of priority include antisocial behaviour, domestic violence, gang related crime, organised crime (including cross county borders issues) sexual violence, drug and alcohol related crime and online grooming.

Surrey, Hertfordshire and Middlesex

Areas of priority include antisocial behaviour, drug and alcohol misuse, knife crime, gang related crime, online grooming and missing children.

Signed:



Position:
Stephen Dulson
Managing Director

Review Date: March 2022

Next Planned Review date: March 2023