

## **Alt Valley Community Trust Safeguarding Policy**

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### **Introduction**

Alt Valley Community Trust is committed to equality of opportunity, fairness, safety, and to promoting diversity in all its practices for our apprenticeships.

### **Background and Definitions**

Safeguarding regulations have been around for a while, across a wide range of legislation, but were brought together by the Safeguarding Vulnerable Groups Act 2006 and most recently Keeping Children Safe in Education (KCSiE) September 2023.

This legislation provides definitions of children and vulnerable adults, and sets out the legislative framework of measures to protect them from harm.

The term 'safeguarding' embraces both child and vulnerable adult protection and preventative approaches to keep our apprentices, staff and employers safe. Safeguarding encompasses apprentices' health and safety, welfare and well-being.

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of
- Safe and effective care
- Taking action to enable all children to have the best outcomes

AVCT is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and employers to share this commitment. AVCT strives towards providing a preventative curriculum and ethos which ensures children, young people and vulnerable adults develop a healthy awareness about keeping themselves safe, whilst working with a range of agencies in order to carry this out effectively.

We have developed a Safeguarding Policy and Procedure that aims to meet this commitment.

<b>Protecting</b>	Children and vulnerable people from maltreatment
<b>Preventing</b>	Preventing impairment of children's mental and physical health
<b>Ensuring</b>	Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
<b>Taking Action</b>	Taking action to enable all children to have the best outcomes

### **What is 'risk'?**

'Risk' is the future possibility that someone may be harmed due to a range of unwanted or neglectful behaviours. We work to reduce the likelihood of harm to our learners/apprentices and mitigate the impact of that harm in terms of the severity.

'Harm' is sometimes 'significant' to a child or young person (Children Act 2004). The definitions of emotional, physical and sexual abuse and neglect describe categories of 'harm' and can be found in the document Working Together to Safeguard Children (2018). And more recently keeping Children Safe in Education (2023). 'Harm' is described as the "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse, domestic abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another". This is useful when considering harm arising from domestic abuse.

### **Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

## **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Domestic abuse continues to be a prevalent risk factor identified through children social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others such as the non-abusive parent.

## **Mental Health and Wellbeing**

It is important that staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, however, well trained staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that all staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

## **Early Intervention for Vulnerable Children**

Any child may benefit from early help, all, staff should be particularly alert to the potential need for early help for a child who is disabled and has specific additional needs; has special educational needs (whether or not they have a statutory Education, Health and Care Plan, is a young carer is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups is frequently missing/goes missing from care or from home is at risk of modern slavery, trafficking or exploitation is at risk of being radicalised or exploited is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.

## **Who is this policy for?**

All AVCT staff, associates, third-party providers, employers and volunteers have a duty of care to safeguard and promote the welfare of learners/apprentices. This includes employers safeguarding apprentices within their place of work. Everyone working with children, vulnerable adults and

their families should be familiar with this document and with their role in reporting any safeguarding concern to the relevant local authority and also within our internal recording procedure. This policy is also available to learners/apprentices and employers at the initial point of their engagement with AVCT.

## **Responsibilities**

The designated Safeguard Lead has overall responsibility for the implementation, monitoring and reviewing of the safeguarding, child protection and prevent policies and procedures at AVCT, ensuring the effective coordination and responses are adhered to by all staff, including regular updates on training and changes in legislation are communicated throughout the organisation all to senior managers, tutors/assessors and support staff employed by AVCT, that come into contact with learners/apprentices, ensuring they are fully aware of safeguarding' duties and our associated policies, and how to implement the reporting progress if they have concerns.

## **Employer responsibilities**

To understand what is meant by safeguarding, prevent and promotion of the welfare of learners/apprentices, to be aware of our statutory duties towards the welfare of children and vulnerable adults and to ask for support if needed. To be familiar with current legislation and guidance, in particular, the reporting arrangement and due diligence processes to ensure employees/employers working alongside learners/apprentices are free from convictions and of sound character and judgement and will not pose as any threat or danger to apprentices.

Legislative guidance on work based learners and prevent is provided to all employers who work with us. [Guidance for further education providers on work-based learners and the Prevent statutory duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/guidance-for-further-education-providers-on-work-based-learners-and-the-prevent-statutory-duty) Employers will also be asked for a single point of contact (SPoC), usually someone who has the skills and knowledge to support the learner/apprentice through their training as well as implementing safeguarding (particularly for 16-18 year olds) British values, prevent, and equality and diversity matters. Employers will be guided to familiarise themselves with these policies and procedures. An additional young persons' risk assessment and a policy and procedures that requires enhanced protection for young learners will be implemented for apprentice aged 16-18 years.

All staff are aware of systems within AVCT which support safeguarding and are explained to new staff as part of staff induction.

This includes the:

- Child protection policy
- Prevent policy
- Staff behaviour policy (and apprentice code of conduct)

- safeguarding response to children who go missing from education
- Role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). Copies of policies and a copy of Part one of KCSiE 2023 document is provided to all new staff at induction.

## Contacts

<b>Name and contact details of Designated Safeguarding and Prevent Lead</b>	<b>Lesley Baugh:</b> Landline: <b>0151-546-5514</b> Mobile: <b>07775423629</b>
<b>Name and contact details of Deputy Designated Safeguarding and Prevent Lead</b>	<b>Carol Lea:</b> Mobile: <b>07393522170</b>
<b>Local and Regional Authority contact information:</b>  <b>For under 18 s (and those up to the age of 24 with an EHCP- education and health care plan)</b>  <b>For over 18 s without an EHCP, identified as vulnerable – Social Care</b>  <b>In emergencies</b>  <b>Merseyside Police Prevent Team</b>  <b>Regional Prevent Coordinator</b>	Telephone number: Care-line Children’s Services– <b>0151-233-3700</b> (Available 24/7)  Telephone number: Care-line Adult Service Services- <b>0151-233-3800</b> (Available 24/7)  Telephone number: Out of hours emergencies: <b>0151-934-3555</b>  Telephone number: 0151 777 4878  Nigel Lund nigel.lund@education.gov.uk 07384 452146

## Approach to Safeguarding

Our organisational approach to safeguarding and child protection not only ensures that safeguarding is measurable and effective throughout our organisation. AVCT ensures that safeguarding policies and procedures are fully embedded into and using information from a range of local intelligence such as; multi-agency services, schools, local councils and local community hubs.

AVCT ensures reflection on, and learning from best practice in safeguarding through the Local Children’s Safeguarding Board’s performance framework. All AVCT Safeguarding policies, which is

in accordance with LSCB arrangements and procedures, links to other relevant policies within the setting to ensure awareness of specific safeguarding issues and how to respond across the education setting's community: staff, parents and learners/apprentices. These details are outlined and described in Keeping Children Safe in Education September 2023 (KCSiE) and Working Together to Safeguard Children 2018.

These policies must be read and signed by all safeguarding staff members and evidence of this kept on staff files and made available to apprentices / apprentices parents/ employers (if requested or appropriate).

AVCT approach to safeguarding all of our apprentices is founded on the nature of our relationships. We prioritise assessing and managing the needs of our learners/apprentices and have a dynamic approach to the identification, assessment and response to risk. We have a commitment to ensuring that all of our learner/apprentice recruitment processes contain reference to health and safety, safeguarding, prevent and child protection procedures. We also ensure that initial assessment, induction, curriculum, training and exit/progression processes have all the above procedures embedded to ensure the early detection or continued support for any additional needs or specific interventions required to support our learners/apprentices, particularly 16-18 year olds.

AVCT ensure that staff involved in the recruitment of learners/apprentices have bi-annual refresher training on Safeguarding and Prevent. We also ensure the DSL has additional training on mental health first aid, adverse childhood experiences (ACE's), domestic violence, suicide awareness, FGM & harmful practices, child criminal and sexual exploitation, including coercive behaviours and online safety training, as well as necessary updates on working together to safeguard children with the local safeguarding board. In order to promote our commitment to keeping apprentices safe we ensure that training is both face to face with our local safeguarding board, through external training organisations and online learning.

Our organisational structure and approach places emphasis on collaborative relationships with the learner/apprentice, employers and our partners in delivery. This means our response to need and risk is timely and effective. We ensure that we work together to learn the lessons from our practice and use them to inform our safeguarding procedures.

Our staff are informed of the indicators of possible harm and vulnerabilities, in line with the local safeguard board recommendations. Staff know what to do when possible abuse or neglect is suspected or disclosed and are skilled in a range of interventions to prevent further or future risk to the learner/apprentice. Our goal is to protect and enable our learners/apprentices. This means that we focus on supporting them in finding their own solutions to challenges that pose a risk to their well-being, empowering them to make positive sustainable changes to their lives.

This policy outlines our organisational standards in safeguarding children and young people. AVCT use these standards to measure our performance and achievements in safeguarding across our delivery. We also outline a range of behaviours that we encourage staff to embed in their

approach to safeguarding that in turn, we believe, supports effective safeguarding practice and the prevention of harm. This policy references key legislation and statutory guidance and outlines how we approach safeguarding at local delivery level. It addresses the need to safeguard in all of our practice contexts.

### **Safer Recruitment**

There are detailed requirements for safer recruitment outlined in KCSiE 2023. Working Together to Safeguard Children (2018). These include specific requirements for education settings including; advertising the post ensuring that anyone applying for the role understands that AVCT has robust child protection and safeguarding procedures in place and these procedures will be implemented to ensure we are recruiting suitable staff to the post. This includes people already in a position of trust, as they may have behaved in a way that indicates they may not be suitable to work with children, for example where a person who works with children is involved in a domestic abuse incident at home and this may have implications for their suitability to work with children.

We have implemented a Single Central Record (single check register) for the staff recruited and evidence of the required checks, including; identity checks, DBS Enhanced checks, barred list checks, further checks for anyone who has lived or worked outside the UK (checks for overseas applicants) and relevant references covering at least five years consistent employment and any explanations and evidence for gaps in employment.

AVCT have a clear commitment to ensure our Central Record is up to date in order to evidence gaps in vetting; references and DBS check with automatic annual renewal on the updating service. We communicate with all staff to make clear that learners/apprentices are protected from unsupervised contact with people who have not been subject to the required checks.

We provide bespoke, specialist training to our staff from our DSL who has received recognised training on safer recruitment, information advice and guidance and good practice in recruitment and induction processes. This is to ensure staff are able to flag up any issues prior to offering a candidate employment.

### **Staff Induction, Training and Development**

The expectations of staff training as outlined in detail throughout Keeping Children Safe in Education (October 2023) have been summarised and shared within the policy and procedures, and made applicable to our delivery standards. This will be updated if and when further updates are made. There is a mandatory safeguarding training offer for all staff within the AVCT organisation.

All AVCT staff must complete appropriate safeguarding and Prevent training courses at foundation level one and DSL and deputy must complete the appropriate DSL qualifications and updates from the Local Safeguarding Children Boards (LSCBs) as an absolute minimum.

AVCT is committed to training all staff to work within the local safeguarding procedures and operational safeguarding arrangements where possible, as set out by Local Safeguarding Children Boards (LSCBs) and Working Together to Safeguard Children (2018) Our DSL works closely with Children and Young People's Services and the Youth Justice Board as a volunteer community panel member. This is invaluable to our organisation in the form of local intelligence and of areas of risk for child criminal and sexual exploitation issues. The DSL has completed inter-agency training to ensure good practice and compliance to 'Working Together to safeguard Children' 2018. And Keeping Children Safe in Education (2023). This information is disseminated to all staff to ensure timely reporting, early intervention procedures, and consistent and effective support for our learners/apprentices. We deliver in-house safeguard training and updates twice yearly to ensure contractual compliance and good practice within our organisation.

**It is important that AVCT staff, including the Board of Directors:**

- Take up the mandatory training and development opportunities that AVCT offer
- Familiarise themselves with local opportunities for multi-agency safeguarding training and other opportunities in developing safeguarding practice (mentoring, shadowing)
- Through their supervision and appraisals process with line managers and other opportunities, we consider and examine what knowledge and skills and behaviours are needed to carry out their role in safeguarding during the delivery of induction, work-based, face to face and online delivery, and assessment of risk outside an apprentices home
- Seek out and reflect upon any feedback from colleagues, peers and apprentices about what how their practice can be improved
- Identify if there are new and different ways that AVCT could improve their offer to staff in their safeguarding role

We have developed a '*what to do approach*' for staff across AVCT, the implementation and embedding in practice of the content of this document form part of a learning outcome for our basic mandatory safeguarding training

All delivery staff at AVCT, will complete the Home Office Prevent awareness training. As well as receiving updates from our DSL after any CPD training. We also recommend this training to employers who are working with us as a matter of good practice [Prevent Awareness Online Training](#)

AVCT staff are fully trained in the internal reporting system used in making a referral and/or raising concerns in line with our local multi-agency early help directory and level of needs assessment. Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2018) this is implemented during staff induction and overseen by the DSL on-going.

## **How does AVCT safeguard their learners/apprentices?**

Lesley Baugh (DSL) has responsibility for oversight and management of this policy alongside reviewing and monitoring safeguarding procedure and any incidents through our safeguarding performance framework and organisational lessons learned. This is supported by the AVCT Board of Directors and the formal mechanism which disseminates safeguarding roles and responsibilities to staff as well as setting the strategic direction for safeguarding within its services. This procedure ensures effective communication between the managers, staff and other stakeholders including employers who promote safeguarding by:

- providing up to date knowledge on safeguarding matters
- ensuring that staff have access to appropriate safeguarding training
- reviewing how the safeguarding policies are working in practice

## **An overview of organisational safeguarding structure**

The Board of Trustees and DSL hold ultimate accountability for ensuring safeguarding arrangements for both learners/apprentices, staff and associates. The Deputy Safeguard Officer will deputise in the absence of the DSL.

The nominated Designated Safeguarding Lead ensures that safeguarding matters are central to the strategic management of AVCT, the DSL is an experienced and qualified practitioner.

The role of the DSL is key in ensuring that operational safeguarding in the service-specific contexts is effective. The DSL will also ensure that local delivery staff develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the children and young people that AVCT staff works with.

Every member of staff or volunteers has the responsibility for ensuring that apprentices are safeguarded while they are using our services. Our organisational safeguarding standards recognise that we safeguard in a wide range of contexts with a diverse group of apprentices. Therefore, managing the risk to apprentices in these contexts can require different sets of knowledge and skills, and different responses, some of which are driven by statute and legislation. Our safeguarding standards and behaviours seek to underpin safeguarding in all of our practice and are derived from section 11 of the Children Act (2004) and the Care Act (2014) as well as best practice guidance such as Guidance for Further Education Providers on 'Work based Learners and the prevent Strategy' (2019). 'Working Together to Safeguarding Children' (2018) and of course most recently 'Keeping Children Safe in Education' (2023)

## **What to do in the event of a disclosure?**

### **Responsibility to report concerns**

It is not the responsibility of the Designated Safeguard Lead to decide whether or not abuse has taken place against an adult. It is the responsibility of staff / employers in partnership with to act if there is cause for concern in order that the appropriate local authorities can investigate and take necessary action to protect the adult at risk.

AVCT staff do not investigate but do make the judgement “if this incident or situation were true, is this cause for concern”.

### **Responding to concerns**

Staff may need to make immediate contact with emergency health services, the Police or Local Authority Designated Officer (LADO). AVCT reporting procedures will subsequently apply to any immediate action taken to safeguard a child or vulnerable adult and the incident should be reported through the AVCT safeguarding procedures as soon as possible after the event.

Telling somebody about abuse can be frightening and difficult for anyone. In doing so the person disclosing has put AVCT staff in a position of trust, however, they must not keep this disclosure confidential. Staff need to be clear to the learner/apprentice that they can't keep a secret that they will write down what they say and that they have done the right thing in telling them.

Staff must inform the learner/apprentice that they will need to record it. AVCT staff must not ask any questions that may be regarded as leading or closed.

Any person making a disclosure must trust AVCT staff to help them but staff must make it clear that they cannot keep the disclosure 'a secret' if the disclosure is seen as harmful or endangers the person making the disclosure, staff should:

- Speak to the learner/apprentice in a private and safe place to inform them of the concerns
- Obtain the apprentice and parents views, if necessary on what has happened and what they want to be done about it
- Provide information about the safeguarding process and how it could help to make them safer
- Ensure that they understand the parameters of confidentiality
- Explain how they will be kept informed, particularly if they have communication needs
- Consider how the abusive experience might impact on the ongoing delivery of services, particularly personal care arrangements and access arrangements
- Assess their immediate protection needs
- React calmly and in an encouraging manner

- Advise them that they are right to tell
- Emphasise that they are not to blame
- Take what is being said seriously and communicate this to them
- Keep questions to the minimum necessary for ensuring a clear and accurate picture of what is being said to you. Remember you are not to investigate
- Be clear that there are certain people that you will have to tell in order to make sure that necessary action is taken. Stress it is part of your job to keep children and adults safe.
- Make a full record of what is communicated as soon as possible using our internal paperwork. This should include exact words used, body charts of injury, behaviour and other forms of communication
- Do not delay in passing the information on to the DSL

### **Recording of concerns**

Employees working closely with children or vulnerable adults should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice.

If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact the Designated Safeguarding Team.

Any concern must be documented and emailed securely to the Designated Safeguarding Lead. Unless in immediate harm, where the relevant authorities will be contacted immediately.

In this situation ensure that the apprentices accompanied and kept safe until the relevant authorities arrive.

If staff have any concerns about an apprentice, then they must not hesitate to contact the designated safeguarding team, even if this is in an advisory capacity. If in doubt, check.

It is crucial that all concerns are properly recorded. The following information, if available, should be recorded:

- Name and address
- Age and date of birth
- Ethnic origin
- Religion, if any
- Disability, if any
- Preferred communication method and language
- Name and address of adults involved in the incident/concern/allegation

- Date and time of the alleged incident
- Nature of injury, behaviour or concern
- When the behaviour or injury was first noticed
- The explanation in his/her own words as verbatim as possible
- Date and time of the recording
- Any questions that were asked
- Signature of the person recording the concern

Some of this information may not be available to staff. It is important that the person/s who discloses does this freely and volunteers whatever information they have.

When recording, staff must separate fact from opinion by setting out the facts first

- Having an opinion is entirely valid and may be crucial but it must not be confused with factual information

All written records must be retained securely and confidentially and marked as sensitive and confidential, with relevant password codes within the relevant service recording system

### **Escalating concerns**

Line Management: In consultation with the staff member, the DSL will decide as to whether a referral is necessary/ will take place.

**All reported disclosures regardless of outcome must also be reported internally through the completion of the 'Safeguarding Incident form'** in conjunction with the written referral to the appropriate local authority safeguarding team.

The form has 3 parts:

- Part 1 outlines the basic details of the referral and
- Part 2 the details of the incident being reported.

Both part 1 and 2 must be completed at the same time following the disclosure.

The form must then be anonymised by removing the person's personal details and password protected and sent by email to the DSL

**Part 3 of the form must be completed within 7 days subsequent to the submission of Parts 1 and 2 once the outcome of the referral is known and resubmitted as detailed above. Data Protection (please also see Data Protection policy)**

All details and actions taken are recorded on the personal file of the apprentice. There may be different recording requirements dependent on the context of their work, however, as a reminder here are the key principles:

- Be clear
- Ensure you include the key details of the learner/apprentice and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

### **What happens to the recording of the disclosure and other information gathered?**

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally and through the local safeguard board reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure

### **Whistleblowing and Complaints (please also see related policies)**

“What do I do if I am worried that another member of staff is acting in a way that may be unsuitable in practice, or may be causing harm to another person or even committing a criminal offence against another person?”

Where an allegation is made against a staff member, either employed or associate, the matter immediately to The DSL. If there is a risk arising to operational delivery, then key partners should then be informed. The DSL will then decide whether the incident is a potential safeguarding matter or should be dealt with under our complaints policy and disciplinary procedures.

If the allegation is of a safeguarding nature and constitutes:

- A concern which may mean the employee is not suitable to practice with children, young people

- A concern which has led to the possible harm to an learner/apprentice
- A safeguarding concern which may be criminal in its nature or intent

Then this should be reported as per local procedures, to the (Local Authority) and Designated Lead

### **Responding to allegations against staff for misconduct or inappropriate behaviour**

Responding to a suspicion or allegation of inappropriate behaviour or misconduct In the course of your role within AVCT a child, young person or vulnerable adult may disclose information to you about an employee or a non-member of AVCT that leads to a suspicion or allegation of inappropriate behaviour or misconduct. You must:

- Listen to the child as detailed
- Acknowledge the information received.
- Pass to the Safeguarding Officer, who will, contact the Board of Directors in the first instance. And, if appropriate the parents/guardians/carers of the child, young person or vulnerable adult (Separate section - Sharing Concerns with Parents, Guardians or Carers).
- Make a full written record of the disclosure on the day you receive the disclosure.
- Sign and date the record. Establishing the basic facts. The Safeguarding Officer must clarify the basic facts to establish whether there is reasonable cause to suspect or believe that misconduct has occurred

If the basic facts support a suspicion or allegation of misconduct by a member of staff, the matter will be dealt with in accordance with AVCT Disciplinary Procedure and referred to Social Services.

### **Managing the Member of staff against whom the Allegation has been made**

Following advice from Care line, if the decision is made that the member of staff against whom the allegation has been made is to be informed, the member should be told an allegation has been made which suggests abuse. It is essential to preserve evidence for any criminal proceedings while at the same time safeguarding the rights of the member. Suspension.

- Suspension is not a form of disciplinary action. The member may be suspended whilst an investigation is carried out.

- Suspension will be carried out by the Head of Education in accordance with AVCT's Disciplinary Procedures.
- At the suspension interview the member will be informed of the reason suspension is taking place and given the opportunity to give a statement should he/she wish. Notification of the suspension and the reasons will be conveyed in writing to the member in accordance with AVCT's Disciplinary Procedures.

### **Managing False or Malicious Allegations**

- Where after investigation, the allegation is found to be false or malicious the member will receive an account of the circumstances and/or investigation and a letter confirming the conclusion of the matter. The member of staff involved may wish to seek legal advice.
- All records pertaining to the circumstances and investigation will be destroyed.
- Where this involves a member staff of AVCT, they will be advised of the appropriate counselling services available.

### **Managing Allegations of Historical Abuse**

- Allegations of abuse may be made some time after the event e.g. an adult who was abused as a child by a member who is still currently working with children, young people or vulnerable adults. Where such an allegation is made the procedures for managing allegations of abuse must be followed.

## **Safeguarding-Radicalisation**

Those vulnerable to radicalisation must be safeguarded.

Whilst a single factor could be enough to cause someone to become radicalised or to support terrorism, being subjected to a combination of the recognised risk factors can often create the perfect conditions for radicalisation to occur. There is no single profile of what an extremist might look like or what it is that might cause someone to become radicalised.

Those involved in extremist activity can come from a range of backgrounds with different life experiences - the reasons for becoming radicalised will be unique to them and may take place over an extended period or happen within a very short time frame.

## Prevent-Channel Programme

Click this link for referral form [Prevent - Liverpool City Council](#)

Prevent radicalisation-reporting procedure-

### **Are you concerned about someone who is at risk of radicalisation?**

If so, get in touch with the council's Prevent Safeguarding Team to discuss your concerns. We can support vulnerable people and prevent them from being drawn into extremism or terrorism as part of the [UK Government Counter Terrorism Strategy](#).

**Contact the Prevent Safeguarding Team in confidence**

You can also call the Merseyside Police Prevent Team on 0151 777 4878.

**If you believe your situation is an emergency, call 999.**

What happens next?

We will contact you to discuss your concerns within three days.

This might involve us completing a referral to enable us to share information with our partners and start the safeguarding process. This will ensure we provide the most appropriate help and support.

**No support can be provided to anyone without first obtaining their informed consent.**

Any support that we do provide is done so through the [Channel programme](#), an early intervention and multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

### **We may offer support in the following areas:**

- support from a specialist mentor
- social care support
- specialist mental health support
- help with accessing appropriate education support
- housing support

### **Causes and signs of radicalisation**

Many of the factors that put people at risk of radicalisation are the same as those that put people at risk of becoming involved in drug and alcohol misuse, child sexual exploitation and gangs.

You may notice changes in a person's behaviour, appearance or speech - however, remember there may be other reasons for these changes.

### **Exploiting vulnerability**

The following factors might contribute to a vulnerable person becoming radicalised:

- The need for belonging
- Bereavement
- Looking for a cause or reward
- Mental health
- Isolation
- A sense of injustice or grievance
- Access to extremist material online
- A desire for power, respect or status
- Bullying
- Drug or alcohol misuse

### **Changes in behaviour or appearance**

Radicalisation may be accompanied by sudden or gradual changes to a person's behaviour or appearance. This may include some of the following:

- Changes in mood, patterns of behaviour or being secretive
- Possession of violent extremist literature or use of inappropriate language or speech
- Expression of extremist views or sympathy with extremist causes
- Seeking to engage or recruit others to support extremist ideologies, extreme groups, social media groups or marches
- Preaching or attempting to impose their views on others
- Isolating themselves from family and friends
- Outbursts of anger
- Change in language or use of words
- Fixation on a new subject or person

### **Modern slavery and human trafficking statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to improving our practices to combat slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 we are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. If this is identified we will follow the procedure for safeguarding. The Safeguarding Officer may then be required to produce a formal written report detailing:

- Name of child, young person or vulnerable adult.
- Age, date of birth of child, young person or vulnerable adult.
- Home address and telephone number of the child, young person or vulnerable adult.
- The nature of the allegation in the child, young person or vulnerable adult's own words.
- Whether the person making the report is expressing their own concern or the concerns of another person.
- The child, young person or vulnerable adult's account, if it can be given, of what has happened and how any injuries occurred.
- The nature of the allegation (include all of the information obtained during the initial account e.g. time, date, location of alleged incident).
- A description of any visible (when normally dressed) injuries or bruising, behavioural signs, indirect signs (do not examine the child, young person or vulnerable adult).
- Details of any witnesses to the incident.

- Whether the child, young person or vulnerable adult's parents / guardians /carers have been contacted.
- Details of anyone else who has been consulted and the information obtained from them.
- If it is not the child, young person or vulnerable adult making the report, whether the child, young person or vulnerable adult has been spoken to, if so what was said.
- Record, sign and date on the day what you have seen, heard or been told.
- If making an electronic copy do not save to the hard drive or external port. Print off the record, sign and date, then delete the electronic copy, that day.
- Pass the record to Care line. Remember: Listen; Respond; Report and Record

## **FGM**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

Are informed by a girl under 18 that an act of FGM has been carried out on her  
Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under (18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate

safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information - explain that you are making a report under the FGM mandatory reporting duty:

Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work

Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work

The girl's details: name, age/date of birth, address.

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organization's designated safeguarding lead is kept updated as appropriate.

Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

*FGM is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.*

### **What does the term grooming mean?**

- Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- Grooming can be used to
- You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

## **What is sexual online grooming?**

Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so, this has become much more prevalent during 2020/21. The person carrying out the online grooming will try to establish the likelihood of the child, or vulnerable adult telling someone. They will also find out as much as they can on family and social networks.

Online groomers will tend to use chatrooms, which are focused on young people. There are countless teen chat rooms on the internet, those carrying out the grooming will pretend to be a similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming. Grooming online is anonymous and children and vulnerable people find it easier to trust an online 'friend' than someone they have met 'face to face'

## **How do you know if a child is being groomed online?**

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

## **Grooming – In Person**

Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust. They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult

## **Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues**

### **To gain trust, groomers will:**

- Pretend to be someone they are not
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention

- Use their professional position or reputation
- Take them on trips, outings or holidays, or offer them money or drugs

Children or vulnerable adults may not speak out about their situation because they:

- Feel ashamed of feel guilty
- Are being coerced and threatened by the assailant
- Are unaware that they are being abused or exploited
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

### **Assessment of risk outside the home, including teenage relationship abuse as a factor.**

All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This has been previously known as contextual safeguarding which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Assessment of risk outside of the home helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools, colleges and online can feature violence and abuse, including teenage abuse and gang affiliation. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

AROH, therefore, expands the objectives of child protection systems, beyond focusing on families in recognition that young people are vulnerable to abuse in a range of social contexts." (KCSiE 2018 extract)

### **I.T. and Internet Safety**

The internet is used in AVCT to promote our service and to support the professional work of staff and to enhance the management functions. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our staff with all the necessary I.T skills that they will need in order to enable them to deliver an effective, efficient and safe service, both on site and away from the centres as has been necessary over the current challenging times.

Communication between AVCT and our learners/apprentices, and employers may be through e-mail, WhatsApp messaging, online Zoom and Teams meetings and telephone messages. Also, online platforms such as, OneFile and BKSb. This form of contact can often be considered to be

more effective, reliable and economic in current times. Will may also inform apprentices of details relating to changes in delivery and deadlines for completion of work via letter.

**The Safeguarding Lead has the following responsibilities:**

- has day-to-day responsibility for e-safety issues and has a leading role in establishing and reviewing AVCT e-safety policies and documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an e-safety incident taking place
- provides advice for staff, as required and advises apprentices on e-safety and how to stay safe
- liaises with the Local Authority through the LADO for incidents that are defined as Safeguarding concerns and appropriate referrals made
- receives reports of e-Safety incidents and creates a log of incidents to inform future developments following our Safeguarding reporting procedures)

Parents/Carers play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. AVCT service will take every opportunity to help parents/carers understand these issues and encourage the promotion of good e-safety practice and to follow guidelines such as, [Information, Advice and Support to Keep Children Safe Online \(internetmatters.org\)](https://www.internetmatters.org)

**Cyberbullying?**

Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications.

***Who is most at risk?***

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

**Photographing, videoing and filming of children, young people and vulnerable adults**

The following is required for AVCT activities or events where children or vulnerable adults are participating:

- Where appropriate consent from the parent/guardian for photographing, videoing and/or filming of a child, young person or vulnerable adult must be obtained prior to the event or activity.

- Where possible anyone wishing to use photographic/film/video equipment at a venue must obtain the approval of the Safeguarding Officer this includes the use of mobile phones and any other similar equipment.
- An activity or event specific identification badge/sticker must be provided to and clearly displayed at all times by accredited photographers, film and video operators on the day of the activity or event.
- No unsupervised access or one-to-one sessions are to be permitted unless this has been approved in advance by the organisation, and appropriate vetting has occurred.
- AVCT reserves the right at all times to prohibit the use of photography, film or video at any event or activity with which it is associated.
- The requirements above are publicly promoted to ensure all people present at the event or activity understand the procedure and are aware of whom to contact if concerned.

Concerns about Photographers, Video or Film Operators Any concerns with photographers or video or film operators are to be reported to AVCT's Safeguarding Officer and where relevant Care line and Local Authority Designated Officer.

### **Children or Vulnerable Adults in Publications and on the Internet**

The internet and internal publications provide excellent opportunities to broadcast achievements of individuals to the world and to provide a showcase for the activities of AVCT. In some cases, however, displaying certain information about children, young people and vulnerable adults could place them at risk. The following procedure must be followed to ensure AVCT publications and AVCT information on the Internet do not place children, young people and vulnerable adults at risk. AVCT publications and AVCT information on the Internet must adhere to the following:

- Publications or information on an Internet must never include personal information that could identify a child or vulnerable adult e.g. home address, e-mail address, telephone number of a child or vulnerable adult. Any contact information must be directed to either the Safeguarding Officer.
- Before publishing any information about a child, young person or vulnerable adult, written consent must be obtained from the child, young person or vulnerable adult's parent/guardian if appropriate. If the material is changed from the time of consent, the parents/guardians must be informed and consent provided for the changes.
- The content of photographs or videos must not depict a child or vulnerable adult in a provocative pose or in a state of partial undress. Children, young people and vulnerable adults must never be portrayed in a demeaning or tasteless manner.
- For photographs or videos of groups or teams of children or vulnerable adults ensure that only the group or team is referred to, not individual members. Credit for achievements by a child or vulnerable adult are to be restricted to first names e.g. Tracey was Player of the Year 2002.

- All published events involving children or vulnerable adults must be reviewed to ensure the information will not put children or vulnerable adults at risk. Any publications of specific meetings or child, young person or vulnerable adult events e.g. team coaching sessions, must not be distributed to any individuals other than to those directly concerned.
- Particular care must be taken in publishing photographs, film or videos of children or vulnerable adults who are considered particularly vulnerable e.g. the subject of a child or vulnerable adult protection issue or a custody dispute.
- Particular care is to be taken in publishing photographs, films or videos of children, young person or vulnerable adults with physical, learning and/or communication or language disabilities, as they could be particularly vulnerable to abuse. Important Note: Any concerns or enquiries about publications or Internet information should be reported to the Safeguarding Officer.

### **Supporting the threat of Homelessness**

Housing authorities have a duty to provide or secure the provision of advice and information about homelessness and the prevention of homelessness, free of charge. These services will form part of the offer to applicants who are also owed other duties under Part 7, for example the prevention and relief duties. **They must also be available to any other person in their district**, including people who are not eligible for further homelessness services as a result of their immigration status. The provision of up to date, comprehensive, tailored advice and information will play an important part in delivering the housing authority's strategy for preventing homelessness.

Housing authorities may wish to consider providing information for those who are ineligible for further homelessness services on how to access any other assistance available in the area, for example through charitable or faith groups.

Under [section 179\(1\) of the 1996 Act](#), authorities must provide information and advice on:

1. (a) preventing homelessness;
2. (b) securing accommodation when homeless;
3. (c) the rights of people who are homeless or threatened with homelessness, and the duties of the authority;
4. (d) any help that is available from the authority or anyone else for people in the authority's district who are homeless or may become homeless (whether or not they are threatened with homelessness); and,
5. (e) How to access that help.

Early applications for homelessness assistance maximise the time and opportunities available to prevent homelessness. Information provided through authorities' websites and other channels should therefore:

1. (a) help enable people to take action themselves where possible; and,
2. (b) Actively encourage them to seek assistance from the authority in good time if they need it.

[Section 179\(2\)](#) states that housing authorities must design advice and information services to meet the needs of people within their district including, in particular, the needs of the following groups

1. (a) people released from prison or youth detention accommodation;
2. (b) care leavers;
3. (c) former members of the regular armed forces;
4. (d) victims of domestic abuse;
5. (e) people leaving hospital;
6. (f) people suffering from a mental illness or impairment; and,
7. (g) Any other group that the authority identify as being at particular risk of homelessness in their district.

Housing authorities will need to work with other relevant statutory and non-statutory service providers to identify groups who are at particular risk and to develop appropriate provision that is accessible to those who are likely to need it. In some circumstances tailored advice and information will be best delivered in a targeted and planned way when it is most likely to be needed – for example, in preparation for leaving care, being discharged from hospital or being released from custody, but it should also be widely accessible as a universal service. Appropriate provision will need to be made to ensure accessibility for people with particular needs, including those with mobility difficulties, sight or hearing loss and learning difficulties, as well as those for whom English is not their first language.

Many people concerned about a risk of homelessness will be seeking practical advice and assistance to help them remain in their accommodation or secure alternative accommodation. Advice on the following issues may help to prevent people from becoming threatened with homelessness:

1. (a) tenants' rights and rights of occupation;

2. (b) what to do about harassment and threats of illegal eviction;
3. (c) rights to benefits including assistance with making claims as required;
4. (d) how to protect and retrieve rent deposits;
5. (e) rent and mortgage arrears;
6. (f) how to manage debt;
7. (g) help available to people at risk of violence and abuse;
8. (h) grants available for housing repair and/or adaptation;
9. (I) how to obtain accommodation in the private rented sector – e.g. details of landlords and letting agents within the district, any accreditation schemes, and information on rent guarantee and deposit schemes;

### **Keeping Yourself Safe**

To maintain yours and the learner/apprentice safety, the following are strictly prohibited:

- Befriending apprentices on personal social media sites
- Distributing personal telephone numbers
- Visit apprentices at home
- Do not use sarcasm, insults or belittling comments towards apprentices
- Personal relationships with apprentices

You will naturally build a rapport with apprentices and they may see you as a confident and support, but be sure to maintain professional boundaries whenever carrying out work on behalf. Be respectful and appreciate you are in a position of trust.

- Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so
- Avoid spending time alone with apprentices in a closed environment. If this is unavoidable for example during a formal assessment/ examination ensure a member of the site staff is aware where you are and monitors this. Always keep the door to the room open at all times.
- Be careful when giving apprentice advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting)

If at any point, you feel unsafe in an apprentices company inform your line manager and the DSL immediately.

**It is a requirement of Contract to report all Safeguarding concerns- please ensure contract compliance at all times**

### **Related policies**

There are other specific AVCT policies that have our approach to safeguarding embedded within them. These include:

- Prevent Policy
- Whistle Blowing Policy
- Complaints Policy.
- Disciplinary and Code of Conduct
- Safer Recruitment

### **Key National guidance and legislation**

There are numerous publications and evidence around best practice in safeguarding in education. The following guidance has been used and applied to ensure our compliance and legal obligation to protect children and vulnerable adults accessing our services for harm and abuse:

- The Data Protection Act 2018 [Data protection for education providers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/data-protection-for-education-providers)
- Working Together to Safeguard Children <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners [Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671111/Stat-guidance-template.pdf)
- Departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges Unless otherwise specified [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671111/Sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges.pdf)
- Keeping Children Safe in Education [Keeping children safe in education \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671111/Keeping-children-safe-in-education.pdf)
- Care Act 2014-Safeguarding Adults <https://www.scie.org.uk/care-act-2014/safeguarding->

[adults/](#)

- The Children's Act 2004 [Children Act 2004 \(legislation.gov.uk\)](#)
- Prevent Duty Guidance <https://www.gov.uk/government/publications/prevent-duty-guidance>
- Work based Guidance [Guidance for further education providers on work-based learners and the Prevent statutory duty - GOV.UK \(www.gov.uk\)](#)
- Level of Needs [Liverpool Safeguarding Children Partnership \(LSCP\) - \(liverpoolscp.org.uk\)](#)
- Liverpool Safeguarding online Procedures [Contents \(proceduresonline.com\)](#)
- Online Referral Form [Prevent - Liverpool City Council](#)
- Information and Sharing Advice-for Practitioners-  
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- Supporting Homelessness' [Overview of the homelessness legislation - Homelessness code of guidance for local authorities - Guidance - GOV.UK \(www.gov.uk\)](#)