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| <b>Policy title:</b>                 | Safeguarding Policy                                                           |                         |          |
| <b>Scope:</b>                        | Aspire Housing and Achieve Training                                           |                         |          |
| <b>Policy owner &amp; job title:</b> | Exec Director of Achieve Training<br>Director of Communities (Aspire Housing) |                         |          |
| <b>Approver:</b>                     | Exec Director of Achieve Training<br>Director of Communities (Aspire Housing) |                         |          |
| <b>Date:</b>                         | 01/04/22                                                                      | <b>Review Due Date:</b> | 31/03/23 |

## POLICY SUMMARY

- Aspire includes Aspire Housing, Achieve Training and Realise. (Achieve Training also have a separate, more detailed policy to cover the complexities of working with young people in a training setting).
- Aspire believes that children, young people and vulnerable adults must be protected from harm at all times
- To ensure children, young people and vulnerable adults are protected
- Aspire will have up to date safeguarding policies, procedures and processes which all appropriate staff members have read and received training on
- All members of staff have a duty to ensure that they follow procedures to help ensure that children, young people and vulnerable adults are protected from harm

## Relevant Legislation and Guidance:

- Keeping Children Safe in Education 2021
- Education and Training (Welfare of Children) Act 2021
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges 2021
- Working Together to Safeguard Children 2018
- The Children Act 2004 as amended by the Children and Social Work Act 2017
- The Care Act, 2014
- The Children Act of 1989

## Associated Policies and Procedures:

- Children, Young People and Vulnerable Adults Safeguarding Procedure 2020
- Prevent Policy 2021
- Acceptable Behaviour Policy 2021 (Achieve Training only)
- Whistleblowing Policy & Procedure 2018
- E-Safety & Social Media Policy 2020

- Prevent Policy 2021

**Please Note:** All relevant staff should read the Children, Young People and Vulnerable Adults Safeguarding Procedure

## 1. POLICY STATEMENT

### 1. Scope of Policy

Aspire is committed to safeguarding the welfare of children, young people and vulnerable adults. This policy and the corresponding procedure aims to meet our responsibilities to protect the safeguarding and welfare of children, young people and vulnerable adults.

This policy applies to all staff (including temporary staff), volunteers, contractors and agents who work for Aspire. It also acts as a framework for any organisations offering training as a subcontractor to learners and/or apprentices on behalf of Achieve Training, although a separate policy is available specifically for Achieve Training.

### Policy Definitions

#### 2.1 Safeguarding

Safeguarding and promoting the welfare of children, young people and vulnerable adults is defined as:

- Protecting children, young people and vulnerable adults from abuse or neglect
- Preventing impairment of the health or development of children, young people and vulnerable adults.

#### 2.2 Abuse and neglect

- Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child, young person or a vulnerable adult by inflicting harm or by failing to act to prevent harm.
- Children, young people and vulnerable adults may be abused in a family, in an organisation or community setting by those known to them or, more rarely, by others (e.g. via the internet).
- They may be abused by an adult or adults, or by another child/young person or children/young people.

- The source of risk may be intentionally abusing the child, young person or adult with care & support needs or may be causing risk to the person by their inability to cope with a given situation or level of support & care needs.

2.3 Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

#### 2.3 A child or young person

A child or young person is any person under the age of 18.

#### 2.4 Vulnerable Adult

Any person aged 18 and over who may be considered vulnerable to abuse, for example those with learning difficulties or disabilities

2.5 Types of abuse can include the following. Please note that this list is not exhaustive.

- Physical: being hurt or harmed either deliberately or through rough, careless or thoughtless behaviour, including assault, hitting, slapping, pushing, misuse of medication or inappropriate physical sanctions.
- Psychological or Emotional abuse or bullying: being humiliated or put down or made to feel anxious, frightened or intimidated, including threats of harm or abandonment, deprivation of contact, controlling, coercion, verbal abuse and cyber-bullying.
- Neglect and acts of omission: not being given the things you need to feel safe and comfortable or not making sure you get the care or treatment you need.
- Sexual abuse (including sexual Harassment and violence), Child Sexual Exploitation or grooming: being made to do something that you don't want to, didn't or couldn't agree to, including rape, indecent exposure, sexual harassment, looking, touching or innuendo and exposure to sexual photography or pornography.
- Financial or Material Abuse: someone using your money or possessions in a way that you don't want or isn't in your best interest, includes theft, fraud, internet scamming and coercion in relation to an adult's financial affairs or matters.
- Discriminatory abuse: includes forms of harassment, slurs or similar treatment, because of race, gender, age, disability, sexual orientation or religion.

- Domestic Violence and Abuse: includes physical abuse while in a relationship, this can cover sexual relationships, sibling groups, children abusing parents and any other close or family relationship.
- Self-neglect: includes vulnerable adults who for one reason (mental ill-health/physical disability/choice) or another are putting themselves in a highly risky and dangerous situation by not looking after their own overall physical and/or mental wellbeing.
- Modern Slavery: includes children, young people and vulnerable adults who are either trafficked and/or imprisoned against their will by people exploiting their vulnerability.
- Criminal Exploitation and Gangs: including manipulation or coercion to commit criminal acts and membership of street organised criminal gangs which may include County Lines activities.
- Female Genital Mutilation (FGM): the deliberate altering or cutting of a female's genitals over for non-medical reasons. Also known as 'female circumcision' or 'cutting'.
- Organisational: included any business giving care & support to children, young people and vulnerable adults. These can be accommodation based including care homes and supported living accommodation and can also include community services including nursing and domiciliary care in the individual's own home.
- Radicalisation and extremism: encouragement or grooming to take part in activities in pursuit of terrorist or extreme ideologies. See the Prevent Policy for further information.
- The above types of abuse conducted through the use of computers, computing devices and the internet. See the E-Safety & Social Media Policy.
- This policy applies to all learners and apprentices at Achieve Training and at the subcontracting providers it works with.

#### Peer on Peer Abuse

Achieve Training recognises that children can abuse their peers through many of the methods described above such as bullying, physical abuse and sexual violence.

Allegations of peer-on-peer abuse will be recorded, investigated and dealt with at Achieve Training, with the same urgency and seriousness as all other safeguarding concerns through the procedure detailed.

## **2. Policy**

3.1 Aspire believes that children, young people and vulnerable adults must be protected from harm at all times.

3.2 To ensure children, young people and vulnerable adults are protected, Aspire will have up to date safeguarding policies, procedures and processes which all appropriate staff members have read and received training on.

The Director of Communities will act as safeguarding lead for Aspire Housing; there will be four trained designated persons (two for children and two for vulnerable adults) to take responsibility for child and adult safeguarding enquiries. These officers will also form a panel that will meet regularly to review cases and safeguarding matters and will ensure continuous development and improvement within Aspire Housing.

Achieve Training has single point of contact for safeguarding:

E: [safeguarding@achievetraining.org.uk](mailto:safeguarding@achievetraining.org.uk) and T: 01782 358655. For Achieve Training, designated staff for safeguarding are as follows:

- The designated senior staff member for safeguarding is:
  - Dan Canavan, Executive Director Achieve Training. Telephone 01782 275953, email: [daniel@achievetraining.org.uk](mailto:daniel@achievetraining.org.uk)
  - The designated senior staff member for safeguarding will ensure that the awareness of issues related to the welfare of children and young people of all employees is raised and that safeguarding is appropriately managed and reported.
- The designated manager for safeguarding is:
  - Hannah Warburton, Head of Learner Wellbeing and Development. Telephone: 01782 279121/07920477217, email: [hannahw@achievetraining.org.uk](mailto:hannahw@achievetraining.org.uk).
  - The designated manager will ensure: the appropriate reporting of alleged harm or abuse to the relevant investigating agencies; reports on safeguarding cases are shared with leaders as set out in this policy; the organisation has current and up to date information on safeguarding, e safety and related issues; that proper records are maintained of safeguarding disclosures; that Achieve Training liaises closely with external agencies, organisations and companies (including partners and customers) as appropriate, including to share information; that, through the Head of Contracts, subcontracting organisations comply with this policy; that a safeguarding action plan is developed, implemented and reviewed annually to continually improve our safeguarding and related arrangements.
- The designated Safeguarding Lead is:
  - Sharon Francis, Safeguarding Manager. Telephone 01782 279121, email: [sharon@achievetraining.org.uk](mailto:sharon@achievetraining.org.uk)
  - The designated safeguarding lead will manage the day-to-day recording, investigating and dealing related to reported safeguarding concerns. The Safeguarding Manager will be the primary point of contact for staff and make necessary referrals to outside agencies where appropriate. Additionally, they will support in the delivery of safeguarding related cpd training, advice and guidance to staff.

Other safeguarding staff champions include:

|                   |                                    |              |
|-------------------|------------------------------------|--------------|
| Lisa Skerratt     | lskerratt@achievetraining.org.uk   | 07796 991028 |
| Anne Jones        | anne2@achievetraining.org.uk       | 07775 701498 |
| Cheryl Tunncliffe | ctunncliffe@achievetraining.org.uk | 07513 047871 |
| Brian Pepper      | bpepper@achievetraining.org.uk     | 07826 899471 |

This team will always include at least one member of the apprenticeship delivery team and one member of the Homeworks team.

- The designated Safeguarding Champion on the Board is Elizabeth Shenton

The designated Board Safeguarding Champion will: ensure Achieve Training has appropriate safeguarding policies and arrangements in place; champion safeguarding issues within the company; to contribute to ensuring any opportunities to further strengthen safeguarding arrangements are acted upon; to ensure the Board receives an annual report on safeguarding; to liaise with the Chair to in relation to any safeguarding concerns raised about Achieve Training's senior leaders.

3.3 All members of staff have a duty to ensure that they follow policy and procedures to help ensure that children, young people and vulnerable adults are protected from harm.

3.2 We are committed to working in partnership with agencies that have a statutory responsibility towards children, young people and vulnerable adults. We recognise our duty to co-operate as defined in the relevant legislation above.

3.3 We aim to ensure that our employees are knowledgeable and appropriately skilled for the client groups with which they routinely work.

3.4 Where needed we will co-operate fully with section 44 SAR instigated by our partners in statutory services. Where we have reason to believe that a member of our staff may present a risk to children, young people and vulnerable adults, we will take appropriate HR action to ensure that children, young people and vulnerable adults are no longer at risk from this person. This may include rapid, preventative action such as suspension from duties pending subsequent investigation. Any such cases will be investigated in accordance with the Disciplinary Rules & Procedures 2018. We recognise our duty to inform the LADO or DASM for children or adults respectively where we've identified that a professional from any service is a risk to others.

3.5: Aspire recognise the direction to 'make safeguarding personal' and adhere to it and the ethos of 'no decision about me without me' as set out in the relevant legislation above.

### **3. Responsibilities**

#### 4.1 Responsibilities of Aspire:

- Aspire will have in place trained Designated People to help and support colleagues in respect of safeguarding children and adults.
- Aspire will provide appropriate training, updates and support to enable front-line employees, volunteers and involved customers to be able to recognise abuse and understand the processes they are required to take. Training will be provided to all staff:
  - For Achieve Training, at least every 2 years with an annual update briefing
  - For Aspire, at least every 3 years with an annual update briefing.
- All visitors to Achieve Training sites will receive information about our arrangements for safeguarding that set out the guidance they should follow and how to report any concerns about the welfare of students or apprentices.
- Achieve Training: Where learners are not attending Achieve Training's premises regularly, such as for apprentices or learners undertaking supported home learning (eg. As a result of Covid 19), Achieve Training will maintain regular contact with reasonable checks on learners' welfare (apprentices: at least every month; study programme learners: at least weekly). Where learners are considered to be more vulnerable due to personal or home circumstances (which may fall short of being considered a safeguarding case), more frequent contact will be maintained as appropriate.
- Aspire recognises that witnessing and/or reporting abuse can be difficult and stressful for the staff member involved and therefore support will always be offered at the time of reporting the abuse and through the 1-to-1 process. The manager will support the member of staff to access the relevant support either internally via the Designated Lead or through professional organisations.
- Aspire has a duty of care to ensure that all staff who have specific and regular contact with children, young people and vulnerable adults or access to their personal information are appropriately checked following the DBS guidelines. This will be stated at the advertisement stage of the recruitment process.
- Staff will receive training and guidance on how to approach potentially abusive situations. Members of staff exposed to such situations will be managed in line with the lone working policy and a risk assessment will be completed.
- Staff will receive training, support and guidance on how to deal with abuse which may be targeted at them or a colleague.
- Achieve Training will ensure learners and apprentices are briefed about: how to report safeguarding concerns; potential signs of abuse or neglect for themselves or their peers; how safeguarding issues will be dealt with; and how to keep themselves safe online.
- Achieve Training will ensure that all subcontractors delivering provision on its behalf will abide by this policy and report on safeguarding cases as set out in section 6 below. Liaison with subcontractors will initially be through the

Head of Contracts. Records will be maintained on the same system as for Achieve Training's directly delivered programmes. Subcontractors must notify Achieve Training immediately upon identification of a safeguarding concern about a learner or apprentice. Subcontractors must identify a nominated safeguarding lead to liaise with Achieve Training about safeguarding arrangements and concerns.

- Achieve Training's safeguarding team will oversee the arrangements in place to ensure the safeguarding of the wellbeing of our learners whose training is delivered by subcontracting partners. This will be carried out according to the following principles:
  - Achieve Training will monitor data and information related to safeguarding across the whole provision to ensure proper reporting of concerns.
  - For specific cases, it is expected that subcontracting partners will coordinate the operational management of the case.
  - Achieve Training will support by:
    - Maintain comprehensive records of the case throughout its journey
    - Oversee the management of the case by the subcontracting partner
    - Provide guidance, advice and support to the subcontracting partner to ensure proper management of the case
    - Become fully involved in the case alongside the subcontracting partner in the event it is deemed appropriate to report it to an external agency
    - In the event that Achieve Training considers the subcontracting partner not to be managing the case sufficiently well, Achieve Training will take over management of the case
  - In addition, Achieve Training will provide training updates related to safeguarding and prevent to staff from all subcontracting partners.

#### 4.2 Responsibility of employees:

- Aspire: When visiting homes Aspire staff and contractors will show their I.D before entering a home, they should never enter unless a responsible adult is present and should avoid being left alone in a room with a child or adult with care & support needs at any time during the visit.
- Aspire: Where the tenant or licensee is under the age of 18, an assessment will be completed to ascertain whether there is a requirement to visit in twos or if there needs to be an appropriate adult present
- Aspire employees have a responsibility to recognise and address suspected, disclosed or known abuse of children, young people and adults with support & care needs. If any member of staff has reason to suspect that abuse is occurring, including where involvement of an Aspire employee is suspected,



- they must speak to their Line Manager or Designated Person immediately and take steps as set out in the Safeguarding Children and Adults procedure.
- All Managers are responsible for any alerts that come to their attention in their service area. They must never ignore, underplay or pass on overall responsibility to another member of staff or peer. Managers also have a key role in helping develop understanding, knowledge and confidence to ensure protection procedures are followed effectively, professionally and safely. Arrangements are in place to ensure no member of staff making an alert or indeed, any manager has to shoulder this burden on their own.
  - Referrals to investigating agencies should be made by the person who identified the abuse whilst carrying out their job role, supported by the staff member's line manager WITHIN 24 HOURS of an incident being reported. If there are immediate protection issues the referral should be made by telephone, to the appropriate Duty Officer (Staffordshire and /Stoke on Trent Adult Safeguarding Partnership) or (Staffordshire and Stoke on Trent Children's Safeguarding Partnership).
  - Information will be shared with other agencies in accordance with statutory procedures. If the child or adult is deemed to be at risk or any other person is considered to be at risk, referrals may still be made despite not having consent of the person involved. Where an adult has capacity, they can refuse consent to; share information with non-professionals, a medical examination and to make a complaint to the Police. Each decision whether or not to share and/or breach a person's right to confidentiality will be made by balancing the risk to the individual and others and right to confidentiality of the individual (Article 8 Human Rights Act 1998 / Mental Capacity Act 2005).
  - Any criminal offences must be reported immediately to the Police.
  - Any incident involving a registered care provider must be reported to the National Care Standards Commission/CQC.
  - Any incident which involves an alleged perpetrator who is in a position of trust working with vulnerable people shall also trigger a 'whistle blower' response from Aspire to reduce the likelihood of other children or adults being abused in accordance with the Whistle Blowing Policy 2018. Any incident which involves an alleged perpetrator from our own organisation will also trigger an urgent investigation into their conduct by the HR department.
    - Discussions will take place within 24 hours and if a strategy meeting is to be held it should take place within 3 working days of referral.
  - Where group activities are taking place such as diversionary activities or youth projects, parental carer consent forms must be obtained for every child or young person taking part in the activity without the parent or carer present. These activities will respect local authority guideline ratios for safe supervision and will be risk assessed.
  - Aspire Housing staff should never take photographs or recordings of children or young people for any purpose. The Aspire Group's Marketing team will follow their own procedures regarding obtaining parental consent which should include specific permission for use. Achieve Training staff must only

take photographs of students or apprentices where required for their learning and assessment programmes. Such photographs must only be taken on Aspire devices, with the student/apprentices' specific permission and must be deleted from these devices as soon as possible.

- Work placements, workplace learning (including apprenticeships):
  - Staff who arrange, vet and monitor work placements and work-based or workplace learning must undertake appropriate safeguarding training.
  - Organisations who offer work placements or workplace learning for Achieve Training learners will be vetted for their suitability to do so. This will include both a formal health and safety assessment and safeguarding risk assessment completed by staff.
  - When the assessment suggests that an employer does not have safeguarding and child protection policies, or awareness of safeguarding and child protection issues, or where there is any evidence of risks to a student's safety, Achieve Training will ensure that no learners are placed with that employer until a Safeguarding Officer has made an appropriate assessment. If an employer is deemed unsuitable for work experience placements or work-based / workplace learning, the College will share this information with the relevant local Safeguarding Children Board.
  - Children, young people and vulnerable adults who are placed with employers will be given clear advice about whom to contact if they are worried or uncomfortable about the surroundings, or if they suffer abuse.
  
- Trips:
  - If a disclosure is made on a trip, residential or by a learner on work placement/ work based learning a member of the safeguarding team should be contacted during the day and the relevant emergency number provided in the procedure should be used out of hours.
  - Managers and staff responsible for placements and work based learning learners/apprentices need to obtain a copy of the relevant company's safeguarding policy to check that it follows similar principles and guidelines to Achieve Training.

## **5. Reporting**

Staff will follow the procedure as set out in the accompanying procedures document. Through these procedures we aim to ensure;

5.1 For Aspire related Safeguarding concerns should be recorded on the Safeguarding Referral Form AS1. Reports of safeguarding concerns about children,

young people and vulnerable adults will be kept, even where there is no need to refer the matter immediately.

5.2 Staff must report any concerns or allegations about safeguarding to a designated Safeguarding Officer and must not investigate these themselves. Staff must not promise confidentiality to children, young people or vulnerable adults making a disclosure.

5.3 All safeguarding concerns are recorded on a confidential centralised database, which will include as a minimum, name and address of the person at risk, name of reporter, name of manager or designated person, what the concern was, what actions were taken and the reasons for the decision. Referrals to external agencies and local partners will be recorded on the database. Additional information will be stored confidentially and electronically where required. Access to the database and records will be strictly restricted to designated staff.

5.4 Where appropriate, and using a safety-first approach, relevant information relating to safeguarding concerns will be shared with the relevant local Safeguarding Children Board. Where reports of abuse are raised there should be a co-ordinated multi-agency approach to tackling the abuse or neglect. All agencies and departments involved, including social and health services and support agencies should be informed of the report and an immediate course of action should be agreed and taken to resolve the issues. This should where appropriate, include a review of the whole service including those provided by other agencies.

5.5 Where reports of abuse are made, there should be a planned approach to victim support. Victims should be advised of and supported to contact appropriate support networks and agencies.

5.6 Perpetrators of abuse should be dealt with in a planned way in accordance with Aspire policies and procedures including Anti-Social Behaviour, Complaints, Nuisance and Harassment.

## **6. Disclosure of Information**

Confidential information will only be passed to external organisations with the individual's consent except in the case of exceptional circumstances as detailed in the Data Protection Act 1998. These circumstances would include:

- where there is clear evidence of fraud
- to comply with the law
- in connection with legal proceedings

- to protect the health and safety of the individual, where the health and safety of the individual would be at risk if the information were not disclosed, or there is a legal requirement to do so.

Assurances of absolute confidentiality should not be given in reports of abuse. The Data Protection Act should not be a barrier to sharing information that needs to be shared (on a need to know basis).

## **7. Monitoring and Review**

**Achieve:** An overview of current and closed safeguarding cases will be reported as below to enable managers and leaders to ensure appropriate management of cases and to identify trends and opportunities to improve out identification and management of safeguarding cases. Reports will include summary statistics and relevant commentary.

- To the Head of Learner Wellbeing and Development on a weekly basis.
- To the Training Operations SMT on a monthly basis.
- The Head of Learner Wellbeing and Development will update the Achieve Training Leadership Team as appropriate and at least monthly.
- To the Achieve Training Board on a quarterly basis.
- To the Achieve Training Board on an annual basis (annual summary report)

Implementation of this policy and relevant procedure will be subject of an annual audit. The policy will be reviewed every year.

- Safeguarding Procedure Aspire Housing
- Safeguarding Procedure Achieve Training

## **Equality & Diversity:**

This policy and accompanying procedures has been considered against our Equality and Diversity Policy and is applicable to all children, young people and vulnerable adults no matter what their ethnic group, religion, gender, ability/disability or sexual orientation.

## **Further Reading and Guidance Points**

- Keeping Children Safe in Education 2021
- The Children Act 2004 ( with consideration for legislative changes)
- Safer Working Practice for Adults who Work with Children and Young People 2015
- Safeguarding Children and Safer Recruitment in Education 2010
- Working Together to Safeguard Children 2018
- Information Sharing Guidance for Practitioners 2015

Staffordshire and Stoke on Trent Adult Safeguarding partnership:

<https://www.ssaspb.org.uk/Home.aspx>

Staffordshire Safeguarding Children Board:

<http://www.staffsscb.org.uk/Home.aspx>

Stoke on Trent Safeguarding Children Board

<http://www.safeguardingchildren.stoke.gov.uk/ccm/portal/>

Working Together to Safeguard Children 2018:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

No Secrets, Department of Health 2000:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/194272/No\\_secrets\\_\\_guidance\\_on\\_developing\\_and\\_implementing\\_multi-agency\\_policies\\_and\\_procedures\\_to\\_protect\\_vulnerable\\_adults\\_from\\_abuse.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/194272/No_secrets__guidance_on_developing_and_implementing_multi-agency_policies_and_procedures_to_protect_vulnerable_adults_from_abuse.pdf)

Care & support Statutory Guidance, Issued under the Care Act 2014, Department of Health (Section 14 Adult Safeguarding

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/366104/43380\\_23902777\\_Care\\_Act\\_Book.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366104/43380_23902777_Care_Act_Book.pdf)