

<b>Policy title:</b>	Safeguarding Policy		
<b>Scope:</b>	Achieve Training		
<b>Policy owner &amp; job title:</b>	Hannah Warburton Head of Learner Wellbeing and Development		
<b>Signed:</b>		<b>Date:</b>	3/11/21
<b>Approver:</b>	Daniel Canavan		
<b>Signed:</b>		<b>Date:</b>	3/11/21
<b>Date:</b>	3/11/21	<b>Review Due Date:</b>	1/11/22

## POLICY SUMMARY

- Achieve Training acknowledges our statutory Duty to safeguard and promote the welfare of all our learners and to maintain a professional attitude of ***it could happen here*** where safeguarding is concerned.
- We expect all staff, board members, associated employers and visitors to share this commitment and maintain a vigilant and safe environment.
- We are committed to training our staff and providing them with CPD through various mediums to ensure that they are aware of their responsibilities in the execution of our statutory duty and to provide them with confidence to report concerns without delay.
- This policy is published on our website and awareness of this is embedded within learner and company inductions.
- We provide opportunities for our learners to gain knowledge, skills and attitudes that promote their safety and wellbeing.

## 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:

- Prevent Policy 2021
- Acceptable Behaviour Policy 2021
- Whistleblowing Policy & Procedure 2018
- Online Safety & Social Media Policy 2021
- Peer on Peer Abuse and Sexual Harassment/ Violence Policy 2021

### 1. POLICY STATEMENT AND ETHOS

The purpose of this Safeguarding policy is to ensure Achieve Training:

- **Are committed** – to develop a robust culture of vigilance and challenge.
- **Build resilience** – by raising awareness of safeguarding and child protection issues, and equipping learners with the language and skills to keep themselves safe.
- **Establish a safe environment** – in which learners can learn, train and develop and where they are encouraged to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- **Support vulnerable learners**—who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- **Prevent unsuitable people** – from working with children by ensuring we practice safe recruitment in checking the suitability of **all** school staff, supply staff and volunteers to work with our children. And to maintain an active vigilance thereafter in line with the safeguarding culture.

**Our aim** is to follow the procedures set out by Staffordshire Safeguarding Children’s Board, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021 by **knowing** and **understanding** that:

- Safeguarding and promoting the welfare of young people is **everyone’s** responsibility, and the **voice of the young person** is evident.
- **Everyone** who comes into contact with young people and their families has a role to play.
- **Everyone** should ensure that their approach is **young person** considering, at all times, what is in the **best interests of the young person**.
- **No single practitioner** can have the full picture of a young persons needs and circumstances

- **Everyone** who comes into contact with young people and their families has a role to play in identifying concerns, sharing information and taking prompt action
- The importance of providing Personal and Social Development learning opportunities that raise awareness of **key themes** such as healthy relationship education, online safety and mental health awareness.
- Undertaking the role to enable learners on our programmes to have **best outcomes**.
- Ensuring that we have awareness of our staff's knowledge and understanding as well as embedding safeguarding, through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a **robust element** of our organisations practice.

## 2. KEY PRINCIPLES

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

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 and guidelines.

This policy will be reviewed on an annual basis or sooner should legislation or guidance change.

We aim to promote this policy through various mediums such as Achieve Training website, learner induction processes, company inductions and through our internal staff intranet policies page.

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.

We maintain a professional attitude of '**it could happen here**' where safeguarding is concerned. When there are concerns about the welfare of a learner, staff members will always act in the best interests of that individual.

Achieve Training have a robust safeguarding training and CPD plan in place that ensures that staff are trained to a level commensurate to their role and that there are regular opportunities throughout the academic year to refresh awareness through CPD briefings and staff meeting updates led by the DSL.

### 3. ROLES AND RESPONSIBILITIES

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 Safeguarding Lead** is:
  - Sharon Francis, Safeguarding Manager. Telephone 01782 279121/07436158676 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.
- The designated Senior Manager and **Deputy Designated Lead** 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, 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 member of Leadership responsible 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.

Other safeguarding staff champions include:

Lisa Skerratt	lskerratt@achievetraining.org.uk	07796 991028
Anne Jones	anne2@achievetraining.org.uk	07775 701498
Cheryl Tunnicliffe	ctunnicliffe@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 role of the champion is to contribute ideas to strategic developments and review of action plans and procedures and champion the importance of safeguarding within their respective teams.

- 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 in relation to any safeguarding concerns raised about Achieve Training's senior leaders.

**The Designated and Deputy Safeguarding Leads (DSL and DDSL) will carry out their roles in accordance with Keeping Children Safe in Education 2021**

Keeping Children Safe in Education 2021

The DSL/DDSL will undergo the appropriate Safeguarding Training to provide them with the knowledge and skills to carry out their role. This training should be updated at least every 2 years, in line with the Stoke on Trent Safeguarding Children's Partnership requirements.

The DSL/Deputy DSL continually develop an understanding of the community the school serves, the risks and resilience through partnership with specialist agencies such as Local Prevent education teams, local policing units and specialist support agencies.

DSL/Deputy DSL will refer cases of suspected abuse to the local authority children's social care as required. They will represent Achieve Training at relevant safeguarding conferences and core group meetings. The DSL will be the expert within our setting to support staff in liaising with other agencies, making assessments and referrals. Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of individuals.

The DSL will be the primary individual who makes referrals to Childrens Advice & Duty service (ChAD) on 01782 235100 or on occasions where this is not the case, support the staff member doing so.

The DSL will refer cases to the Channel programme where there is a radicalisation concern as required, and support staff making Prevent referrals to the Channel programme.

#### **4. RECRUITMENT AND INDUCTION PROCESSES**

All recruitment materials will include reference to Achieve Trainings commitment to safeguarding and promoting the wellbeing of Learners. Managers involved in the recruitment process undergo Safer Recruitment Training.

At Achieve Training we pay full regard to 'Keeping Children Safe in Education 2021'. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking relevant academic or vocational qualifications, obtaining references, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking appropriate checks including criminal record checks (DBS checks). Evidence of these checks is recorded on our Single Central Record.

All staff are planned a clear induction process which involves the reading of key policies and undergoing of relevant training commensurate to their role.

#### **5. WORKING WITH PARENTS AND CARERS**

A copy of this policy will be provided to parents on request and is available on the Achieve Training website. We also aim to provide updates via parental newsletters and have information displayed within our training centres.

We are committed to working with parents in a positive, open and transparent way. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a learner from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the organisation has about a child will not prevent the Designated Safeguarding Lead making a referral to the relevant local authority in those circumstances where it is appropriate to do so.

On enrolment with Achieve Training study programmes, we require accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above).

## 6. PROTECTING OUR LEARNERS-KEY SAFEGUARDING THEMES: KCSIE 2021

In line with our duty, all staff are required to read Part One of Keeping Children Safe in Education Guidance on an annual basis to ensure that they are aware of their own responsibilities in relation to the safeguarding of our learners. This guidance is also consolidated and embedded through Safeguarding CPD Briefings, Team meeting drop ins by the DSL and other training opportunities offered to staff throughout the year. All staff should have an awareness of safeguarding issues that can put children at risk of harm such as:

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.

- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late.
- children who regularly miss school or education or do not take part in education.

### **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious



violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Domestic Abuse**

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/ young people.

**Operation Encompass** -Operation Encompass is an information sharing partnership between Staffordshire Police and Staffordshire and Stoke on Trent educational settings (from Reception through to Higher Education) which allows schools to offer immediate support for children and young people experiencing domestic abuse. Achieve Training are fully committed to this project and work closely with the Local Authority and partners.

### **Drugs**

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation. At Achieve we work closely with specialist partnership agencies to ensure relevant staff have CPD opportunities to refresh knowledge in this area.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority, so they can raise/progress concerns at the earliest opportunity.

It is recognised that in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and they will require a different level of intervention and support.

Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the individuals circumstances.

### **Honour-based Abuse**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

## Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM is known by several names including “cutting”, “female circumcision” or “initiation”. The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to “honour-based abuse”.

Achieve Training recognises that FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

## Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, **without** the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived culture practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person’s parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage will be taken seriously by staff at Achieve Training who should also realise that this could be ‘one chance to save a life’. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

## Mental Health

All staff have an incredibly important role to play in supporting the mental health and wellbeing of our learners and **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.

We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Achieve Training's Wellbeing Lead Is Julie Chapman whose responsibilities include the planning and co-ordination of support provision for learners' mental health. This provision includes:

- Provision of private counselling services for all learners.
- Support and awareness raising sessions delivered by NHS Mental Health Support Teams.
- Peer mentor service.
- Awareness raising through focused awareness weeks and planned activities.

## Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

At Achieve Training we realise that it is essential for our learners to be safeguarded from potentially harmful and inappropriate online material. We take a whole organisation approach to online safety which empowers us to protect and educate learners/apprentices, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters systems in place, and these are regulated, and risk assessed as part of the prevent duty in our action plan.

We have an online safety policy **Online Safety and social media** which identifies the usage and expected behaviour of learners/apprentices, this is also emphasised in our **Internet and Technical Devices Use Agreement** which we require parents/carers and learners to sign. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

Education at home/Remote learning: - Where children are being asked to learn online at home, Achieve Training will ensure that appropriate expectations and systems are in place to reduce risks to learners.

Review of online safety provision forms part of Achieve Training's safeguarding and Prevent Action plans which are reviewed by a safeguarding action group which meets every quarter.

We embed online safety into the curriculum through internally led Personal and Social Development sessions as well as through provision of specialist external agency sessions such as Fake News delivered by SOT Prevent Education Team, MHST cyberbullying Awareness sessions.

Safeguarding updates including our organisational approach to online safety are communicated through parental newsletters, social media and website.

### **Peer on peer abuse (including Child on Child Sexual Violence and Sexual Harassment)**

At Achieve Training it is acknowledged that children can and sometimes do abuse other children (often referred to as peer-on-peer abuse).

We have a specific Peer on Peer Abuse & Sexual Violence and Sexual Harassment Policy which recognises the potential of peer-on-peer abuse, as well as an Acceptable Behaviour Policy with Student Code of Conduct, to inform and support learners, staff and parents/carers.

Achieve Training, through training, CPD opportunities and policies/procedures ensure that staff understand the importance of the **timely** challenge of inappropriate

behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of: -

- Making clear that peer on peer abuse including sexual violence and sexual harassment is not acceptable and that we have a zero-tolerance approach.
- Not dismissing peer on peer abuse (incl sexual violence or sexual harassment) as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

**All** staff know that if we do not challenge and support our learners that this will lead to a **culture** of unacceptable behaviours, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

If staff have a concern about a learner or a learner makes a report to them, they will follow Achieve’s safeguarding referral procedure. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

## 7. PREVENT AND CHANNEL

### Prevent

Achieve Training recognises our duty to have “due regard to the need to prevent people being drawn into terrorism” (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our organisations wider safeguarding obligations.

Achieve Training’s designated safeguarding lead is also our Prevent Single Point of Contact. Along with members of senior management, the DSL will assess the level of risk through regular review of our Prevent risk assessment, liaison with specialist external colleagues and put actions in place to reduce these through implementation of our safeguarding/prevent action plans.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

At Achieve Training we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. We have a culture that advocates British Values, and these themes are embedded within our pre-apprenticeship and apprenticeship curriculum.

There is no single way of identifying whether an individual is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Achieve Training is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting learners from the risk of radicalisation is part of our safeguarding duty.

The designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral.

Achieve Training expects that its sub-contractors and associated employers acknowledge the risks posed to learners/apprentices and work collaboratively with Achieve Training in line with our safeguarding referral procedures to report any prevent related concerns.

Achieve Training currently uses filtering systems to ensure that inappropriate sites are not accessed by students or staff.

## **Channel**

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

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for education providers to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Achieve Training has a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).



## 8. WORKING WITH THIRD PARTIES

### Subcontracted Provision

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
- Achieve Training will provide training updates related to safeguarding and prevent to staff from all subcontracting partners.

### Employers

In this section we are referring to 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, our DSL will share this information with the relevant local Safeguarding Children Board.

Learners who are placed with employers will be given clear advice about whom to contact if they have any concerns regarding their safety.

Employers will be expected to read and acknowledge advice, guidance and responsibilities detailed in this policy and commit to sharing concerns regarding a learners welfare.

Achieve Training will support employers/workplace organisations in their understanding of their safeguarding responsibilities through clear induction processes, guidance documents including safeguarding clear points of contact and details and additionally the offer of further support/training from our DSL should the company wish to increase their safeguarding knowledge.

## **9. VISITORS TO CENTRES**

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.

We will use professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.
- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2021

## 10. REPORTING, MONITORING PROCEDURES

Staff will follow the procedure as set out in the accompanying procedures document.

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.

Safeguarding concerns are recorded on a confidential centralised database- MyConcern, which records decisions and actions taken against reported concerns. Full access to our reporting and monitoring system is strictly restricted to designated staff.

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.

- The Head of Learner Wellbeing and Development will update the Achieve Training Leadership Team and Board champion 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)

## 11. INFORMATION SHARING

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children (2018). Our setting works closely with Stoke and Staffordshire Children's Social Care and, where appropriate from a placing local authority.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. We have clear powers to share, hold and use information for these purposes.

As part of meeting a learners needs, our **Board** recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with the three safeguarding partners, other organisations, agencies, and practitioners as required.

We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our organisation is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. We ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Where learners leave our provision, the DSL will ensure that any relevant safeguarding file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the safeguarding file, our DSL will also consider if it would be appropriate to share any information with the new setting in advance of the learner leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the child arrives.

**The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

## **12. EQUALITY, DIVERSITY AND INCLUSION**

This policy and accompanying procedures has been considered against our Equality, Diversity AND Inclusion 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.

## **13. REVIEW OF THIS POLICY**

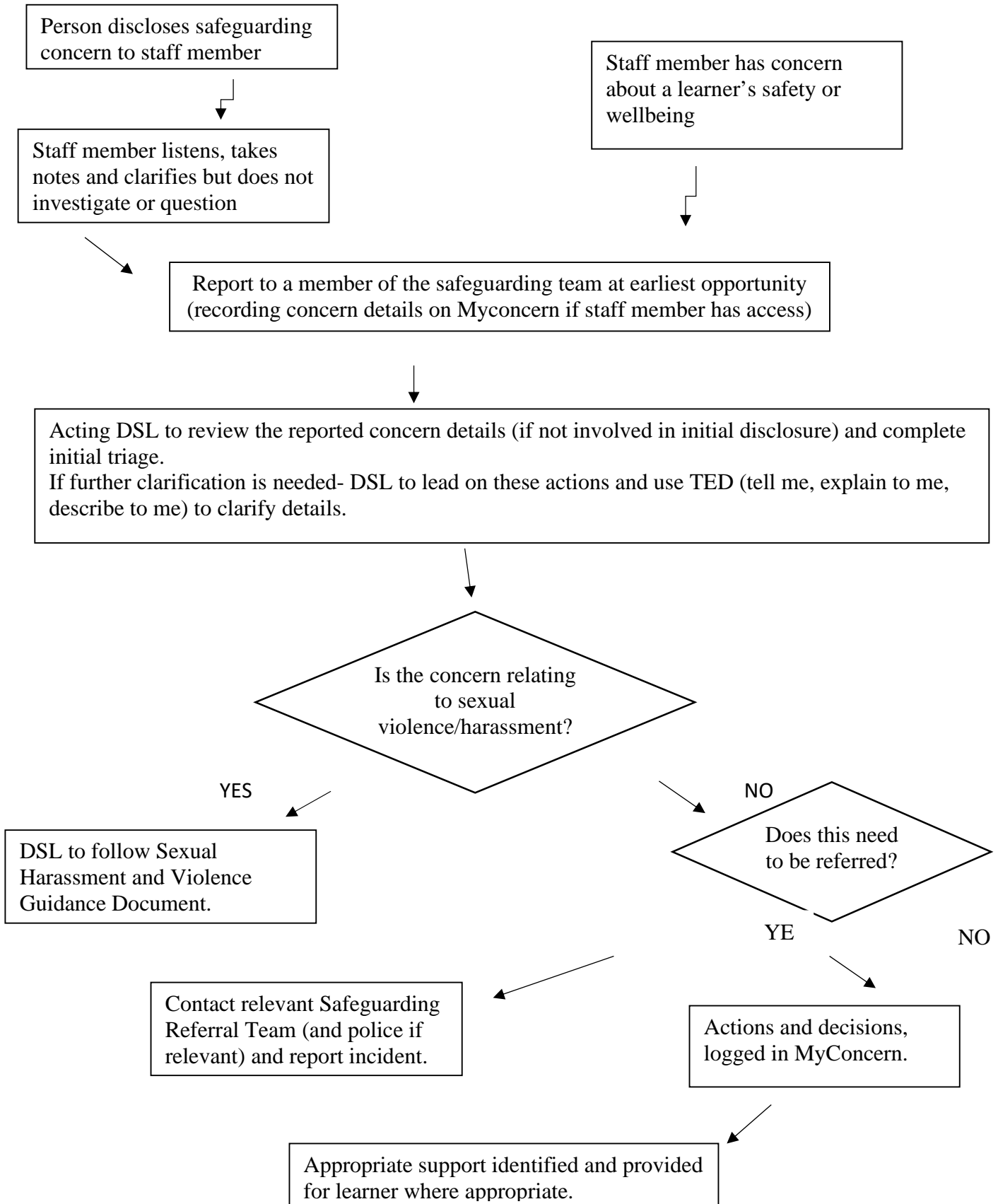
Implementation of this policy and relevant procedure will be subject of an annual audit.

The Board and the Leadership Team will keep this policy under review and the policy will be updated as and when necessary, through changes in legislation or lessons learnt by the company, a full review will take place as a minimum on a 12-month basis.

The formal review of the policy is the responsibility of the owner and approver (named above) and will be monitored and managed by the Business Intelligence Team as part of the Corporate Policy Framework.

**APPENDIX A**

**Achieve Training Safeguarding Procedure**



The procedure below should be followed in all circumstances for referrals to appropriate external agencies, apart from life threatening incidents including the threat of immediate suicide where staff should call 999 and inform a member of the Leadership Team.

Individual staff should never deal with or investigate a disclosure of abuse or concerns around potential radicalisation alone and should always refer to a Safeguarding Officer. In all cases, safeguarding concerns must be referred to a Safeguarding Officer at the earliest possible opportunity.

If you think a child, young person or vulnerable adult is in immediate danger, contact the Police straight away on 999.

#### Stoke on Trent

- Children's Advice and Duty Service: 01782 235100, [SRT.Referrals@stoke.gov.uk](mailto:SRT.Referrals@stoke.gov.uk)
- Emergency Duty Team: 01782 234234 (After 5pm)

#### Staffordshire County Council

- First Response: 0800 13 13 126, [frist@staffordshire.gov.uk](mailto:frist@staffordshire.gov.uk)
- Out of Hours: 0345 604 2886, mobile: 07815 492613

#### Police MASH

- Tel: 101

To contact a Safeguarding Team:

- T: 01782 358655
- E: [safeguarding@achievetraining.org.uk](mailto:safeguarding@achievetraining.org.uk)

Designated Safeguarding Lead:

- Sharon Francis (**Safeguarding Manager/ DSL**)
- Hannah Warburton (**Head of Wellbeing & Development /DDSL**)

Safeguarding Champions:

- Lisa Skerratt
- Anne Jones
- Cheryl Tunnicliffe

Designated Senior Staff:

- Dan Canavan

Safeguarding Referral Teams  
Contact Nos:

Stoke 01782 235100  
Staffs 01785 277151  
Cheshire: 0300 123 5012  
Shrops: 0345 678 9044

## APPENDIX B

### Dealing with a Disclosure of Abuse

**When a learner tells me about abuse, they have suffered, what should I remember?**

- Stay calm
- Do not communicate shock, anger, or embarrassment
- Reassure the learner and tell them that you are pleased that they are speaking to you
- Never agree or promise to keep it a secret. Assure them that you will try to help but let the learner know that you will have to tell other people to do this and state who this will be and why.
- Tell them that you believe them.
- Tell the individual that it is not their fault
- Encourage the learner to talk but do not ask "leading questions" or press for information
- Use the acronym **T.E.D**: Tell me. Explain. Describe
- Listen and remember to check that you have understood correctly what the learner is trying to tell you
- Communicate that they have a right to be safe and protected
- It is inappropriate to make any comments about the alleged offender
- Be aware that the individual may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of the disclosure.
- At the end of the conversation, tell the learner again who you are going to tell and why it is that person or people who need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the learners own language. Include any questions that you may have asked. Do not add any opinions or interpretations. (dates, times, names

mentioned and to whom the information was passed need to be clearly recorded).

- Use Achieve' Trainings MyConcern system if you have access.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing in as much detail as possible.

The information should then be passed, in a timely way, to the DSL/DDSL and immediately if the child discloses any abuse they have suffered or may be at risk of suffering.

If DSL/DDSL not available, it is the staff member's **responsibility** to make a referral to Staffordshire Children's Advice and Support and inform the DSL at the earliest opportunity.



