



Policy and procedures for the safeguarding of children, young people and adults at risk

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Signed	
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Revision History

Version	Type	Date	History
V1.0	New		
V1.2	Revision	October 2022	Update contact details to reflect new DSL and general review of all information in the policy.
V1.3	Revision	September 2023	Check through all information and make necessary amendments. New safeguarding team reflected.

			Amend to reflet September 2023 KCSIE changes
V2.0	Revision	September 2024	Policy reviewed to change DSL details and to reflect KCSIE updates.

This policy applies to HCF CATCH UK in Stallingborough and HCF CATCH UK in West Yorkshire.

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### Important contacts

Role/organisation	Name	Contact details
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Local authority designated officer (LADO)	<b>North East Lincolnshire:</b> <a href="http://www.safernel.co.uk">www.safernel.co.uk</a> or contact MASH  <b>West Yorkshire:</b> <a href="https://www.saferbradford.co.uk/resources/childrens/allegations-management-and-safer-recruitment/">https://www.saferbradford.co.uk/resources/childrens/allegations-management-and-safer-recruitment/</a>	<b>North East Lincolnshire:</b> <a href="mailto:lado@nelincs.gov.uk">lado@nelincs.gov.uk</a> SABenquiries@nelincs.gov.uk 01472 326118  <b>West Yorkshire:</b> <a href="mailto:LADO@bradford.gov.uk">LADO@bradford.gov.uk</a> <a href="tel:01274435600">01274 435600</a>
Chair of the board of directors for CATCH UK	Nick Booth (Uniper)	<a href="mailto:Nick.Booth@uniper.energy">Nick.Booth@uniper.energy</a>
Chair of the board of Education Governance Panel for CATCH apprenticeships	Mike Cargill	<a href="mailto:Mike@ukstem.uk">Mike@ukstem.uk</a> 07507 970 399
Prevent and Channel helpline	<b>North East Lincolnshire:</b> Humberside Police  <b>West Yorkshire:</b> West Yorkshire Police	<b>North East Lincolnshire:</b> Christopher Sybenga <a href="mailto:Chris.sybenga@education.gov.uk">Chris.sybenga@education.gov.uk</a> 07384 456 640 or 101  <b>West Yorkshire:</b> Sam Slack <a href="mailto:Sam.slack@education.gov.uk">Sam.slack@education.gov.uk</a> 07384 452 156 or 101
Children's Social Work Services	<b>North East Lincolnshire:</b> NELC Children's Service  <b>West Yorkshire:</b>	<b>North East Lincolnshire:</b> Front Door, Civic Offices, Knoll Street, Cleethorpes, DN35 8LN <a href="mailto:NELCchildrensfrontdoor@nelincs.gov.uk">NELCchildrensfrontdoor@nelincs.gov.uk</a> 01472 323 145 or 01472 326292 (option 2)  <b>West Yorkshire:</b>

Role/organisation	Name	Contact details
	Bradford Metropolitan District Council	Bradford Metropolitan District Council's Multi-Agency Safeguarding Hub (MASH) 01274 431077 <a href="#">Safer Bradford - Report a Concern</a>
Safeguarding Adults	<p><b>North East Lincolnshire:</b> Focus Independent Adult Social Work C.I.C</p> <p><b>West Yorkshire</b> Bradford Council</p>	<p><b>North East Lincolnshire:</b> Focus, Heritage House, Fisherman's Wharf, Grimsby DN31 1SY 01472 256256 <a href="mailto:Focus@nhs.net">Focus@nhs.net</a></p> <p><b>West Yorkshire:</b> Bradford Metropolitan District Council's Multi-Agency Safeguarding Hub (MASH) 01274 431077 <a href="#">Safer Bradford - Report a Concern</a></p>
Education Safeguarding Team (West Yorkshire)	Michelle Stephenson Maxine Wood	01484 221000 <a href="mailto:schoolsafeguardingofficer@kirklees.gov.uk">schoolsafeguardingofficer@kirklees.gov.uk</a>
Safeguarding Children Multi-Agency Partnership	<p><b>North East Lincolnshire:</b> Multi Agency Safeguarding Hub (MASH)</p> <p><b>West Yorkshire:</b> Bradford Metropolitan District Council's Multi-Agency Safeguarding Hub (MASH)</p>	<p><b>North East Lincolnshire:</b> Civic Offices, Knoll Street, Cleethorpes, North East Lincolnshire, DN35 8LN <a href="https://www.safernel.co.uk/safeguarding-children-partnership/">https://www.safernel.co.uk/safeguarding-children-partnership/</a> <a href="mailto:NEL.SCPEnquiries@nelincs.gov.uk">NEL.SCPEnquiries@nelincs.gov.uk</a></p> <p><b>West Yorkshire:</b> 01274 431077 <a href="#">Safer Bradford - Report a Concern</a></p>
DASM: Designated Adult Safeguarding Manager	<b>North East Lincolnshire:</b> Stewart Watson	<b>North East Lincolnshire:</b> Business Manager Safeguarding Adults Board, N.E.Lincs Council, 3 Town Hall Square, <a href="mailto:Stewart.watson@nelincs.gov.uk">Stewart.watson@nelincs.gov.uk</a> 01472 324711

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## 1. Statement and aims

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

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

HCF CATCH LTD has a zero-tolerance approach to abuse and any other harmful behaviour.

HCF CATCH LTD aims to ensure that:

- All concerns are reported on My Concern as soon as possible which includes as much information as possible, including actions already taken.
- All staff are aware of their statutory responsibilities with respect to and prevent safeguarding.
- Staff are properly trained in recognising and reporting safeguarding and prevent issues.
- Everyone recognises their own responsibility to safeguard and promote the welfare of apprentices amongst the learners.
- All children (defined as those up to the age of 18) and vulnerable adults (defined as those who receive a health, personal or social care service from a professional) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All apprentices and learners have a right to be heard and to have their wishes and feelings considered.
- All our staff understand safe professional practice and adhere to our code of conduct and safeguarding policies.
- We have a responsibility to recognise vulnerability in apprentices and learners and act on any concern in accordance with this guidance.

### Promotion of the Policy

The policy is published on HCF CATCH LTD's website- <https://catchuk.org/>

All apprentices and employees will receive a safeguarding and prevent induction and all will receive ongoing safeguarding and prevent training. Staff will also sign to say that they have read and adhere to the Keeping Children Safe in Education document.

Moodle, learner and employer handbooks also contain a summary of the safeguarding and prevent.

Specific safeguarding meetings will be held on a monthly basis to ensure all staff involved in safeguarding are aware of live/filed cases, any safeguarding or prevent updates and to identify any training requirements.

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2022\)](#). We comply with this guidance and the arrangements agreed and published.

This policy is also based on the following legislation:

- **The Education Act (2011):** The Education Act 2011 makes changes to many areas of educational policies. These include how new staff are supervised, how qualifications are regulated and how vocational apprenticeships are administrated.
- **Equality Act (2010):** The Equality Act legally protects people from experiencing discrimination, specifically in relation to age, gender reassignment, being married or in a civil partnership, being pregnant or on

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maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation.

- **Protection of Freedoms Act (2012): Especially part 5: safeguarding vulnerable groups, criminal records etc.** This act provides for the destruction, retention, use and other regulation of certain evidential material; imposes consent and other requirements in relation to certain processing of biometric information relating to children.
- **Human Rights Act (1998):** This is a UK law which entitles a person to defend their rights in the UK courts. The act also gives a person legal protection, such as the right to a fair trial.
- **GDPR Regulations (2018):** This highlights that everyone that is responsible for using personal data has to follow strict rules called 'data protection principles. They must make sure that information is used; fairly, lawfully and transparently. The guidance was updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government information Sharing. For the purpose of safeguarding, GDPR is not a barrier to justified information sharing. Try to obtain consent to share information where possible, however this is not a necessity.  
For further advice and guidance please refer to [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- **Inspecting Safeguarding in Early Years, Education and Skills Settings (2019):** This guidance provides support to inspecting safeguarding in our setting. It is designed to support inspectors' knowledge and understanding, and to help them to take a proportionate approach to the inspection of safeguarding.
- **Sexual violence and sexual harassment between children in schools and colleges (2018):** This provides advice provided by the Department for Education. Its focus is on child-on-child sexual violence and sexual harassment at the provision. This covers children of all ages (person under 18). This document also outlines what sexual violence and sexual harassment is.
- **Prevent Duty Guidance (2019):** The Prevent strategy, which the government published in 2011. It is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or advocating terrorist ideologies. The three specific strategies for prevent include; respond, prevent and work with sectors.
- **Work-based learning national guidance- DfE- Prevent:** This guidance follows the learner journey from recruitment through to completion from their chosen work-based training programme and makes recommendations for each phase.
- **The Children Act 1989** (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- **Statutory guidance on Female Genital Mutilation:** FGM is against the law in the UK and has been a criminal offense since 1985. It is a serious crime that carries a penalty. It is also an offense to arrange for FGM to be undertaken within the UK or to take, or plan to take a child out of the UK for FGM purposes.
- **The Rehabilitation of Offenders Act 1974:** which outlines when people with criminal convictions can work with children.
- Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006:** which defines what 'regulated activity' is
- **Statutory guidance on the Prevent duty:** which explains duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- **Keeping Children Safe in Education (2022):** This is statutory guidance from the Department for Education. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. Colleges are an important part of the wider safeguarding system for children. **All** staff have the responsibility to provide a safe environment in which children can learn.
- **Working Together to Safeguard Children (2018):** This offers statutory guidance on the roles and responsibilities of different agencies that are working together to safeguard a child/young person. This also includes coordinating early help, when additional needs/support is required.

- **Safeguarding Vulnerable Groups Act (2006):** This act underpins the Vetting and Barring scheme which aims to protect children and vulnerable adults by ensuring that people who are deemed a potential risk are not allowed to work with them.
- **DfE Statutory Guidance (2014):** Provides guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004. This responsibility embeds the responsibility in the provisions that have contact with children and young people.
- **Mental Capacity Act (2005):** This is a law that protects vulnerable people over the age of 16 with their decision making. It states that ‘every adult, whatever their disability, has the right to make their own decisions wherever possible. People should always support a person to make their own decisions where they can.
- **Education for a Connected World (2020):** A framework which provides guidance on how to equip children and young people for digital life

### 3. Definitions

<b>3 Safeguarding Partners</b>	The following 3 <b>safeguarding partners</b> are identified in Keeping Children Safe in Education (2022), (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs: <ul style="list-style-type: none"> <li>• The local authority (LA)</li> <li>• A clinical commissioning group for an area within the LA</li> <li>• The chief officer of police for a police area in the LA area</li> </ul>
<b>Absent from education</b>	All apprentices should provide a minimum of 2 emergency contacts, all numbers provided should be checked as part of their 1-1 meeting. (KCSIE) Apprentices who do not attend (or their parents/carers) should be contacted within the first 3 hours if they have not already made contact to inform you that they are ill or going to be absent. (If an apprentice is a young carer, has an EHCP or has significant mental health issues, the person dealing with the situation will need to use the emergency contact numbers to establish that the n is safe) The following steps must also be taken for apprentices with the above support needs. If attempts to contact a vulnerable apprentice are unsuccessful, where possible a home visit will be conducted. If you have significant concerns for the safety and wellbeing of the apprentice, you will need to contact Children's services to raise concerns and if no action is taken by them you will need to contact the police. You must complete a full log of all action taken and responses received.
<b>Abuse</b>	Child abuse is when a child is intentionally harmed by an adult or another child – it can be over a period but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect (NSPCC 2022). Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.
<b>Abuse of Trust</b>	Under the Sexual Offender Act 2003 it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments
<b>Allegation</b>	This is information which indicates that a person who works with a child, young person or vulnerable adult has: <ul style="list-style-type: none"> <li>• Behaved in a way that has harmed or may have harmed a child or young person</li> <li>• Possible committed a criminal offense against or related to a child or young person</li> <li>• Behaved towards a child or young person in a way that indicates s/he is unsuitable to work with children or young people</li> </ul>
<b>Child</b>	Within the context of this policy a “child” is defined as anyone under the age of 18 (The Children Act 1989, Education Act 2002).
<b>County Lines:</b>	County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or “deal lines”. Children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. This can include: <ul style="list-style-type: none"> <li>• Air BnB and short term private rental properties</li> </ul>

	<ul style="list-style-type: none"> <li>Budget Hotels</li> <li>The home of a drug user, or other vulnerable person, that is taken over by a criminal gang – this may be referred to as cuckooing.</li> </ul>
<b>Child Protection</b>	Part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm
<b>Discriminatory</b>	This may include abuse, bullying and harassment based on the individual’s age, sex, disability, religion, race or sexual orientation (DoH 2000).
<b>Early Help</b>	Professionals should be alert to the need for early help for a child who: <ul style="list-style-type: none"> <li>Frequently missing/goes missing from education, home or care.</li> <li>Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.</li> <li>Has parents or carer in custody or is affected by parental offending.</li> </ul>
<b>Exploitation</b>	Is a form of abuse where someone is forced or coerced into doing things for the benefit of others. Exploitation is often a gradual process. People are groomed and introduced to new ideas, behaviours and activities, making these appear normal and acceptable. These behaviours and activities may seem exciting or give someone something they are looking for – including money, gifts or a sense of belonging. People may not realise that they are being exploited until their situation becomes very serious. Exploitation can take many forms including criminal and sexual.
<b>Gang:</b>	<p>The word ‘gang’ means different things in different contexts, the government in their paper ‘Safeguarding children and young people who may be affected by gang activity’ distinguishes between peer groups, street gangs and organised criminal gangs.<sup>1</sup></p> <p><b>Peer group:</b> A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.</p> <p><b>Street gang:</b> “Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.”</p> <p><b>Organised criminal gangs:</b> “A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crime is their occupation.”</p> <p>It is not illegal for a young person to be in a gang – there are different types of ‘gangs’ and not every ‘gang’ is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organized criminal gangs involved in trafficking, drug dealing and violent crime. (NSPCC 2022)</p>
<b>Homelessness</b>	Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. (KCSIE)
<b>Honour Based Abuse</b>	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.
<b>Information sharing/holding</b>	As well as keeping records of concerns, discussion and decisions, designated safeguarding leads should keep record of the rationales for any decisions made
<b>Mental health</b>	All staff have an important role to play in supporting the mental health and wellbeing of their pupils. 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 (KCSIE). Staff are well placed to observe day to day behaviour which may suggest a child or young person could be experiencing a mental health problem or be at risk of developing one. They are to follow appropriate processes around early help and intervention.
<b>LGBTQ+:</b>	There are lots of types of sexuality and occasionally learners don’t fit into just one. For some people, their sexuality is fluid and can change over time. There are several different genders and sexualities.
<b>Leaner -on -learner abuse (child-on-child)</b>	Children can abuse other children. This is generally referred to as learner-on-learner abuse and can take many forms. This can include (but is not limited to) <ul style="list-style-type: none"> <li>bullying (including cyberbullying)</li> <li>sexual violence and sexual harassment</li> <li>physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm</li> <li>sexting (also known as Youth Produced Sexual Imagery) and initiating/hazing type violence and rituals. (KCSIE)</li> </ul>
<b>Racism</b>	Where someone thinks you’re inferior because of your colour, ethnicity, nationality or race. This can result in them treating you differently or unfairly. This is called racial discrimination.
<b>Radicalisation</b>	The process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy.Gov.uk)



<b>Safeguarding</b>	<p>Safeguarding means:</p> <ul style="list-style-type: none"> <li>• Protecting children from abuse and maltreatment</li> <li>• Preventing harm/impairment to children’s health or development</li> <li>• Ensuring children grow up in circumstances consistent with the provision of safe and effective care</li> <li>• Taking action to enable all children and young people to have the best outcomes.</li> <li>• Providing help and support to meet the needs of children and young people as problems emerge protecting children from maltreatment, inside or outside the home, including online</li> </ul> <p>Safeguarding is not just about protecting learners from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:</p> <ul style="list-style-type: none"> <li>• Health and safety and wellbeing, including their mental health.</li> <li>• Meeting the needs of those with special educational needs and/or disabilities</li> <li>• The use of reasonable force</li> <li>• Meeting the needs of learners with medical conditions</li> <li>• Providing first aid</li> <li>• Educational visits</li> <li>• Intimate care and emotional well-being</li> </ul> <p>Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child. (NSPCC 2022)</p> <p>Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.</p>
<b>Significant harm</b>	The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm.
<b>Serious Violence</b>	All staff should be aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. (KCSIE)
<b>Sexting</b>	(also known as youth produced sexual imagery) is where apprentices share nude or semi-nude images, videos or live streams.
<b>Sexual harassment</b>	<p>Unwanted conduct of a sexual nature that has the same purpose or effect as other types of harassment:</p> <ul style="list-style-type: none"> <li>• The Creating an intimidating, hostile, degrading, humiliating or offensive environment</li> <li>• Violating someone’s dignity</li> </ul> <p>(The Equality Act 2010)</p> <p>CATCH also has a separate Sexual Harassment policy which also refers to apprentices.</p>
<b>Upskirting</b>	Taking a picture under another person’s clothing without their knowledge, with the intention of knowing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm (Keeping Children Safe DfE 2019a).
<b>Young Person</b>	There is no legal definition of a young person, but for HCF CATCH LTD’s purposes we deem this to be any individual up to their 18 <sup>th</sup> birthday.
<b>Vulnerable Adult/Adult at Risk</b>	It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions.

#### 4. Equality statement

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

Some apprentices have an increased risk of abuse, and additional barriers can exist for some with respect to

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recognising or disclosing it. We are committed to anti-discriminatory practice and recognise apprentice's diverse circumstances. We ensure that everyone has the same protection, regardless of any barriers they may face.

We give additional consideration to anyone that is protected by any of the 7 characteristics listed in the Equality Act (2012); age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation:

## 5. Roles and responsibilities

Safeguarding is **everyone's** responsibility. This policy applies to all staff, volunteers, board members, apprentices and governors at HCF CATCH LTD. Our policy and procedures also apply to off-site activities.

### 5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(2022\)](#), sign to confirm that they have read and understood the document and will review this guidance at least annually.

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

- Our systems which support safeguarding, including this safeguarding policy, the staff code of conduct, and the role and identity of the designated safeguarding lead (DSL) and deputy.
- The early help process and the importance of sharing information with other professionals to support early identification and assessment.
- The process for reporting concerns including the role they might be expected to play.
- Awareness and understanding of specific safeguarding issues including if an apprentice tells them they are being abused or neglected, FGM, Child sexual exploitation, radicalisation, bullying, county lines and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- How to provide a safe environment in which apprentices can learn and train.
- Receive regular safeguarding and prevent updates.

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

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

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

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

### 5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. **Our DSL is Paul Robinson**

The DSL takes lead responsibility for child, young people and vulnerable adult protection, wider safeguarding, the prevention of radicalisation and extremism and safer recruitment.

**The DSL will be available during working hours (8.00am- 4.00pm) for staff to discuss any safeguarding concerns and can also be contacted out of hours if necessary, using the same contact details 07535 272 149 email: [paul.robinson@catchuk.org](mailto:paul.robinson@catchuk.org)**

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When the DSL is absent, the DDSL Katy Sidell (07399 296 151) or DSO's Hannah Ardron (07300 858 232) and Jane Winship (01469 552 826) as they will act as cover. The DSL will be given the time, funding, training, resources and support to:

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

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

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

### **5.3 The Board of Directors/Education Governance panel**

The board of directors for CATCH UK will approve this policy at each review, ensure it complies with the law and hold the CEO (David Talbot) accountable for its implementation.

The board will appoint a link member to monitor the effectiveness of this policy in conjunction with the full board.

The chair of the board will act as the 'case manager' in the event that an allegation of abuse is made against the CEO.

The Education Governance Panel (EGP) has been created to support CATCH Apprenticeships and ensure educational standards, monitored by Ofsted remain high. Members of the EGP will oversee the management of the apprenticeship programme so that it runs as effectively as possible. Member of the EGP bring a wide range of skills and expertise in education.

A safeguarding report will be written for the board and the EGP on a termly basis.

### **5.4 The Safeguarding Team**

There is a team of staff with safeguarding responsibilities which cover all CATCH sites. These members of staff include:

DSL: Paul Robinson (07535 272149)

DDSL: Katy Sidell (07399 296151)

DSO: Hannah Ardron (01469 552843)

The main responsibilities of these staff are as follows:

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

### **5.4 Children, young people and vulnerable adults**

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

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

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## 5.5 Parents/carers

### Parents/carers have a responsibility to:

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

Parents can obtain a copy of HCF CATCH LTD's safeguarding policy and other related policies on request or they can view them via the website.

### The four principles that staff should follow when working with parents and carers:

- Effective partnership and the importance of building strong, positive, trusting and cooperative relationships.
- Respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers
- Empowering parents and carers to participate in decision making by equipping them with information, keeping them updates and directing them to further resources
- Involving parents and carers in the design of processes and services that affect them.

## 6. Confidentiality

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

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

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

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

Please read in conjunction with the Confidentiality Policy.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific procedures included in this policy and [appendix 3](#).

### 6.1 Information sharing:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of apprentices.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping apprentices/staff safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if

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to gain consent would place a child at risk.

- Staff should never promise a discloser that they will not tell anyone about a report of abuse, as this may not be in the child, vulnerable adult, apprentice's best interests.
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- Confidentiality is also addressed in this policy with respect to record-keeping in [section 14](#), and allegations of abuse against staff in [appendix 3](#).

## 7. If you have concerns about extremism

### 7.1 The Counter Terrorism & Security Act (2015) & The Prevent Duty

This Prevent Duty requires that all education providers 'have due regard to the need to prevent people from being drawn into terrorism'. We therefore have a duty to safeguard children, young people and adult learners from extremist ideologies and radicalisation.

#### Links to statutory guidance:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/understanding-and-identifying-radicalisation-risk-in-your-education-setting>

<https://www.gov.uk/government/statistics/individuals-referred-to-prevent>

**Prevent** is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The additional 3 strands being pursue, protect and prepare.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Offices uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- funding a specialist police unit which works to remove online content that breaches terrorist legislation
- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel

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

If in exceptional circumstances the DSL or deputy is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social

care or adult care. Make a referral to local authority children’s social care directly. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care or adult care team.

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

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

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

Prevent Coordinators details are as follows:

Regional prevent coordinators: <https://www.gov.uk/guidance/regional-prevent-education-coordinators>

North East Lincolnshire	West Yorkshire	UK
North East <b>Christopher Sybenga</b> <a href="mailto:Chris.sybenga@education.gov.uk">Chris.sybenga@education.gov.uk</a> 07384 456 640	East Midlands <b>Sam Slack</b> <a href="mailto:Sam.slack@education.gov.uk">Sam.slack@education.gov.uk</a> 07384 452 156	Head of Network <b>Chris Rowell</b> <a href="mailto:Chris.rowell@education.gov.uk">Chris.rowell@education.gov.uk</a> 07384 872 518

**7.2 Risk assessment and action plan:** Prevent risk assessment has been completed and will be reviewed on an annual basis or as and when necessary, depending on events happening locally, and nationally. Updates will be received from Prevent Coordinators and will be reflected in the risk assessment if required.

**Due to be reviewed: July 2025**

**7.3 Fundamental British values (FBV):** HCF CATCH LTD fully supports and promotes the ethos of FBV: democracy, rule of law, liberty, respect, tolerance and understanding of different faiths and beliefs, through a range of activities. Apprentices and staff are made aware of the link between the Prevent Duty and British values. The HCF CATCH LTD culture embeds FBV and reflects the country we live in. Themed calendared events throughout the year are used as a medium for focussing on specific events and subjects, for both apprentices and staff.

**7.4 Online:** Daily reports from Sonic Wall will also be generated on suicide, radicalisation, substance abuse, criminal activity which determine how many times these categorised have been searched for. E-mail will be generated to DSL and DDSL if any of the key words have been searched for and which category, they fall in e.g. abuse, suicide, radicalisation, substance abuse, criminal activity etc.

## 8. Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead”.

A member of staff may suspect that an apprentice is being abused or at risk if significant harm. An apprentice may also disclose to a member of staff they are at risk of abuse or significant harm.

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

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

Tell the [DSL](#) as soon as possible if you make a referral directly.

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

NE Lincolnshire	Bradford
<b>NE Lincs Safeguarding Children Multi-Agency Partnership</b> Multi Agency Safeguarding Hub (MASH) Civic Offices, Knoll Street, Cleethorpes, North East Lincolnshire, DN35 8LN NEL.SCPEnquiries@nelincs.gov.uk Telephone: 01472 326292 (option 2)	<b>Bradford Safeguarding Children Multi-Agency Partnership</b> 01274 431077 <a href="#">Safer Bradford - Report a Concern</a>
<b>Children's Social Work Services</b> NELC Children's Service Civic Offices, Knoll St, Cleethorpes, DN35 8LN childrensservicesnel@nelincs.gov.uk 01472 325555	
NE Lincolnshire	Bradford
<b>Concerns about an adult</b> Focus Independent Adult Social Work C.I.C Focus 01472 256256  Heritage House, Fisherman's Wharf, Grimsby DN31 1SY	<b>Concerns about an adult</b> 01274 431077 <a href="#">Safer Bradford - Report a Concern</a>
<b>Call Humberside Police</b> 101 (or 999 if there is an immediate risk of harm)	<b>Call West Yorkshire Police</b> 101 (or 999 if there is an immediate risk of harm)

**For further guidance please visit:**

North East Lincolnshire: [SaferNEL | SaferNEL](#)

West Yorkshire: [Safer Bradford - Home](#)

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

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

**Please inform the DSL or deputy of any referrals made to any of the safeguarding partners and add to [MyConcern \(The Safeguarding Company\)](#).**

### 8.2 If a person makes a disclosure

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the person they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the discloser's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass all records, including originals on to the DSL. Alternatively, if appropriate, make a referral to children or adult social care and/or the police directly ([see section 7 for Prevent guidance](#)), and tell the DSL as soon as possible that you have done so.

### 8.3 Reporting FGM has taken place, or an apprentice is at risk of FGM

The Department for Education's Keeping Children Safe in Education (2022) defines FGM as "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

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

**Any tutor** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on an apprentice **under 18** must immediately report this to the police, personally. This is a statutory duty, and the tutor will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on an apprentice or learner **under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for tutors mentioned above does not apply in cases where an apprentice or learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. **Staff should not examine apprentices.**

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

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

[Figure 1](#) illustrates the procedure to follow if you have any concerns about an apprentice or learner’s welfare.

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

If there are circumstances when the DSL is not available, then speak to **any member of the safeguarding team** or a member of the senior leadership team and/or take advice from local authority children’s social care, adult care or the Local Safeguarding Children Multi-Agency Partnership. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children’s social or adult care directly, if appropriate. Share any action taken with the DSL as soon as possible.

#### **8.5 Procedure for managing allegations of abuse against a member of staff**

**Allegation:** An allegation can be defined as when a member of staff has:

1. Behaved in a way that has harmed a child, or may have harmed a child
2. Possibly committed a criminal offense against or related to a child.
3. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes how someone behaves in their personal life that is considered a transferable risk)

There are only 3 bodies that can investigate an allegation: Police, Children’s Services or the employer. The employer will do this via an internal investigation with the support of employment law. The person that the allegation is about has a **‘right to reply’** to the allegation. It is important that the employer does not go **‘fishing for information’**

**Complaint:** A complaint refers to the process were a person feels aggrieved about an act, omission, decision or how a service has been delivered. The organisation receiving the complaint will investigate the matter fairly considering any learning identified as its outcome.

**Concern:** a concern would be about the quality of care or practice given to a child which should be reported to the agency providing the care or service.

In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them.

The governing body and HCF CATCH UK is required to comply with the detailed Local Safeguarding Children’s Partnership Procedure for Managing Allegations against staff. These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers.

Those dealing with such allegations within HCF CATCH UK will do so with sensitivity and will act in a careful,



measured way. A member of staff who receives an allegation about another member of staff should follow the guidelines for dealing with disclosure. This procedure is to be followed no matter whether the member of staff is permanent, temporary or supply.

1. The allegation should be reported immediately to HR, the DSL and board.
2. Written details of the allegations from the person who received it, that are signed and dated, with the details countersigned by a member of the senior management team.
3. Record information of the times, dates and potential witnesses.
4. Initial assessment to be carried out and LADO to be informed (see below for details)
5. Report/record on MyConcern

HCF CATCH UK will investigate the allegation using its own internal enquiries regardless of any formal police or child protection agency investigations. If there is an investigation by any external agencies, for example the police, the DSL and Child Operating Officer should be made aware and contribute to discussions.

Appropriate confidentiality will be maintained throughout the enquiries, in the interests of the member of staff and about whom the allegation has been made.

Suspension will not be automatic but can be considered at any stage of the investigation. Other considerations include paid leave of absence, agreement to refrain from attending their place of work or withdrawal from specific duties. Examples of where suspension is reasonable includes:

- a. A learner is at risk.
- b. The allegations are potentially sufficiently serious to justify dismissal on the grounds of the gross misconduct.
- c. Where necessary for the good and efficient conduct of the investigation

Where an allegation to a member of staff is made this needs to be reported immediately to the Local Authority Designated Officer (LADO)

North East Lincolnshire	West Yorkshire
LADO <a href="mailto:Lado@nelincs.gov.uk">Lado@nelincs.gov.uk</a> 01472 326 292  Fort further advice see: <a href="https://www.safernel.co.uk/wp-content/uploads/2021/11/Allegations-management-A11Y-Dec-20.pdf">https://www.safernel.co.uk/wp-content/uploads/2021/11/Allegations-management-A11Y-Dec-20.pdf</a>	LADO <a href="mailto:Alison.brooksbank@bradford.gov.uk">Alison.brooksbank@bradford.gov.uk</a> 01274 435 641 or <a href="mailto:Dawn.holt@bradford.gov.uk">Dawn.holt@bradford.gov.uk</a> 01274 434339  For further advice see: <a href="#">Safer Bradford - Allegations Management and Safer Recruitment</a>

#### [LADO Directory – national-lado-network.co.uk](http://national-lado-network.co.uk)

Where a false allegation has been made:

- Inform the member of staff against whom the allegation is made verbally and in writing that no further disciplinary action will be taken. Consideration should be given to offering mental health support to help with rebuilding confidence and self-esteem.
- Inform the parents/carers of those involved of what the allegation was and what the outcome is.
- Sign Consider informing the parents/carers of the learner making the allegation if the allegation was not about themselves.
- Prepare a report outlining the allegation, reasons for the conclusion and the actions that have been taken.
- Considerations of the broader disclosure may be necessary; has the allegation become general gossip? There is a need to provide accurate details for public information.

Please refer to [appendix 3](#) for further guidance

### 8.6 Early help Assessments

If an Early Help Assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up

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an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

**8.7 Referral**

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

If you make a referral directly, you must tell the DSL as soon as possible.

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

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

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

All referrals to the DSL must be made through the safeguarding email [safeguarding@catchuk.org](mailto:safeguarding@catchuk.org) or add directly to My Concern. All staff have a log on created during induction and shown how to use it.

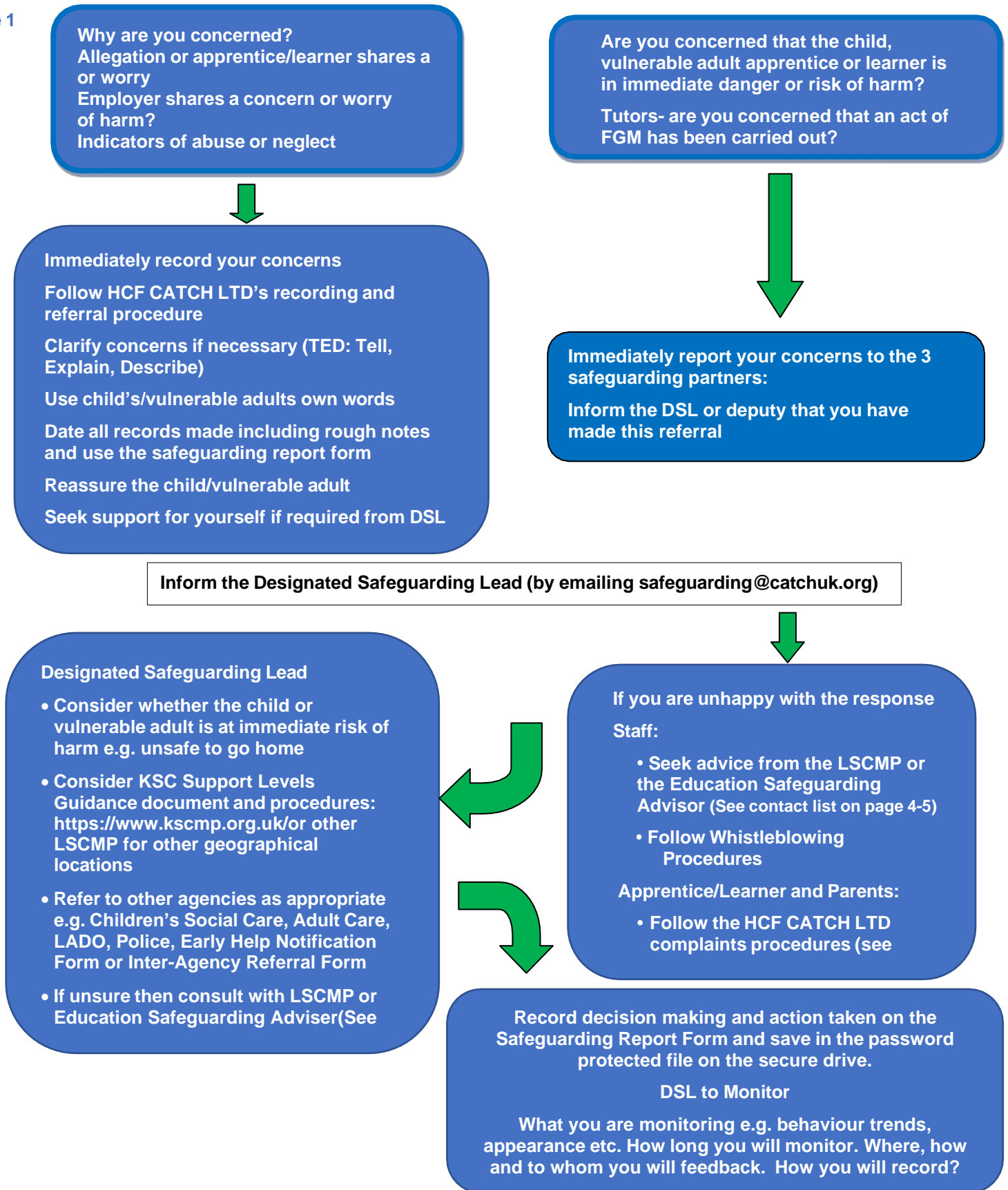
If the safeguarding concern is urgent, you must contact a Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSO) or Designated Safeguarding Officer (DSO) immediately so that action can be taken.

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

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

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

Figure 1



### **8.9 If you have a mental health concern**

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

Staff will be alert to behavioural signs that suggest anyone may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child, vulnerable adult or apprentice that is also a safeguarding concern, take immediate action, which might involve phoning 999.

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

Mental health first aiders that are on site are also available for initial support when necessary.

DSL to signpost to mental health services where deemed necessary.

All staff and apprentices will be given time the needed to access mental health services.

### **8.10 Concerns about a staff member or volunteer**

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

The CEO or Chair of Board Directors will then follow the procedures set out in [appendix 3](#), if appropriate. Please also then refer back to [section 8.5](#).

### **8.11 Allegations of abuse made against other apprentices or learners**

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

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

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

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

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

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

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

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

## 8.12 Sexting

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

### Your responsibilities when responding to an incident:

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

You must **not**:

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

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

### Initial review meeting

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

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

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

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

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

### Further review by the DSL

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

They will hold interviews with all involved (if appropriate).

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

### Informing parents

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

## Referring to the police

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

## Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in [section 15](#) of this policy also apply to recording incidents of sexting.

## Curriculum coverage

Apprentices are taught about the issues surrounding sexting as part of our relationship's education / relationships and sex education and digital awareness programmes. Teaching cover the following in relation to sexting:

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

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

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

This policy on sexting is also shared with apprentices so they are aware of the processes HCF CATCH LTD will follow in the event of an incident.

## 9. Notifying parents

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

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

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

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

## 10. Apprentices and learners with special educational needs and disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the apprentice's disability without further exploration.
- Apprentices being more prone to group isolation than others.
- The potential for apprentices with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

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

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

## 11. Apprentices with a social worker

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

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

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

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

## 12. Looked-after and previously looked-after children and young people

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

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

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

As part of their role, they will:

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

## 13. Mobile phones, cameras and drones

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

Staff will not take pictures or recordings of apprentices or learners on their personal phones or cameras.

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

Learners have all been banned from accessing social media whilst they are on the HCF CATCH UK wi-fi.

The use of drones around the HCF CATCH LTD site is not permitted. This is partially since there is a possibility can be used as a means of terrorist attacks. It is classed as another method which terrorists may adopt as technologies advance and monitoring of human targets continues.

**13.1 PINAC** (Photography is not a crime) is a growing organisation that we all need to be aware of. They focus on the rights of civilians who wish to film and photograph other organisations by accessing publicly accessible areas. These areas may not be public land but land they can access due to the fact of it been an open door such as receptions. Even if you know that they are doing something illegally, threatening them with the police is likely to just aggravate them and give them more motivation to continue. The videos that are filmed are then posted on YouTube. They like to try to pick faults with any organisations e.g. if there are any health and safety risks that have not been addressed, any information that is inaccurate and specifically how people react to their presence.

It is important that staff try to follow the below advise in the event of a PINAC visit.

- Ensure any areas you don't want them to access have access control systems, are locked, or can be locked quickly.
- Do not engage with them, but if you do get caught out, direct them to the CATCH website for any information.
- **Anyone working on the ground floor** please note that they will look through windows, so consider what can be seen through them:
  1. Lock your computer screen immediately (it is important that we all get into the habit of locking our computer screens whenever we are away from our desks anyway whether we are on the ground floor or not).
  2. Turn over or remove any confidential paperwork.
  3. Consider what phone numbers/contact details are on view.
  4. Close any blinds where possible.
  5. Is there any confidential information displayed on the walls, if so this needs to be removed any way.
- Ensure any information and/or signs you have up are correct.

## 14. Complaints and concerns about HCF CATCH LTD safeguarding policies

### 14.1 Complaints against staff

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

### 14.2 Other complaints

HCF CATCH LTD has a Complaints Procedure available to parents, apprentices, learners and members of staff who wish to report concerns. This can be found on HCF CATCH LTD website, <https://catchuk.org/wp-content/uploads/2022/05/CATCH-Compliments-and-Complaints-policy.pdf> in the apprentice and learner handbook and on the virtual learning zone. Please read in conjunction with the Complaints Policy.

### 14.3 Whistleblowing

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

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

- A criminal offence, e.g. fraud
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- The company is breaking the law, e.g. doesn't have the right insurance
- You believe someone is covering up wrongdoing.

Personal Grievances are not counted as whistle blowing.

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

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

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

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

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

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

When a person is whistle blowing the same procedures will be followed as set out in reporting safeguarding concerns of the safeguarding policy, [section 8](#). If you do not feel this is being handled correctly you can use the complaints or grievance policy.

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

### 15.Record-keeping

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

All safeguarding concerns, discussions and decisions made and the reasons for those decisions, must be recorded. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual apprentices or learners will be retained for a reasonable period of time after they have left the training.



In addition

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

In addition:

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

## 16. Training

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

### 16.1 All staff

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

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

- **Recognise** potential safeguarding and child/vulnerable adult protection concerns involving apprentices, learners and adults (colleagues, other professionals and parents/carers)
- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with HCF CATCH LTD policies
- **Refer** concerns to the DSL and be able to seek support external to HCF CATCH LTD if required

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

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

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

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

Staff will also receive regular safeguarding and child, young person and vulnerable adult protection updates (for example, through emails, online training, e-bulletins, the virtual learning zone and staff meetings) as required.

All staff members (including temporary staff) will be made aware of HCF CATCH LTD's expectations regarding safe and professional practice via the code of conduct which is provided and discussed as part of the induction process.

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

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

All staff will complete a safeguarding induction within 2 weeks of them starting. Evidence of this will be recoded by HR. Induction will include the location of the safeguarding policy, where to access safeguarding/prevent updates and training check etc.

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

**Volunteers** will receive appropriate training.

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

### **Online Safety**

Staff are to ensure that learners only have access to the 'Apprentice wi-fi' as this will monitor what sites they are accessing including: suicide, radicalisation, substance abuse, criminal activity. Smooth Wall has been integrated into the apprentice wi-fi so that staff can monitor the appropriateness of the sites that they are accessing. An E-mail will be generated to safeguarding team if any of the key words have been searched for and which category, they fall in forementioned categories. Learners have also been made aware of the [Education for a Connection World guidance](#) and sessions on this will be embedded into the curriculum.

### **Local Threats**

Knowledge of local threats are gained through partnership work and the CTLP and this information will be cascaded to the staff, apprentices, and learners (where appropriate). This information is not to be shared externally.

### **Police Intelligence regarding local threats**

**Lincolnshire and East Yorkshire:** Knife crime, hate crime and county lines

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

## **16.2 The DSL and deputy**

The DSL and deputy will undertake lead child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, online training, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training and be responsible for sharing relevant updates with the rest of the staff as and when they are received.

## **16.3 Education Governance Panel**

All members of the EGP and the board of directors will receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of the board of directors may be required to act as the 'case manager' if an allegation of abuse is made against the CEO, they receive training in managing allegations for this purpose.

## **16.4 Safer Recruitment**

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

HCF CATCH UK will always follow the below principles to adhere to safer recruitment guidelines:

- The post or role will be clearly defined
- The key selection criteria for the post or role will be identified.
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants.
- Requirement of documentary evidence of academic and vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history including the explanation of any gap

Staff caught by the 'by association' rule may be able to apply to OFSTED for a waiver of disqualification by such staff may not be used unless and until such waiver.

- Enhanced DBS/List 99 checks
- Use of variety of selection techniques e.g. qualification, previous experience, interview, reference checks

Please visit this link for further guidance: [Applying to waive disqualification: early years and childcare providers - GOV.UK \(www.gov.uk\)](#)

## **16.5 Training and Education for Apprentices and Learners**

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

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

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

### **Curriculum and Staying Safe**

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

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

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

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

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

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

### **Relationship, Health and Sex Education**

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

### **Online Safety**

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

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

However, the DSL is acknowledged as having overall responsibility for online safeguarding within HCF CATCH LTD.

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

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

The DSL and Senior Management team have read Annex C regarding Online Safety within 'Keeping Children Safe in Education' 2022.

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

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

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

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

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

**3D Printing** in the UK is legal, however it is illegal to construct a viable, homemade firearm, including 3D printed designs. However, the threat posed 3D printed firearms is increasing due to improved printing techniques and accessibility of products.

## 16.6 Employer Induction

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

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

They visit the place of work for assessment purposes.

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

## 17. Monitoring arrangements

This policy will be reviewed **every 12 months** by the DSL and the Chair of Education Governance Panel - Mike Cargill. At every review, it will be approved by the governing board.

## 18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour and Sanctions Policy
- Staff Code of Conduct
- Complaints
- Health and Safety
- Online Safety
- Equality and Diversity
- Teaching, Learning and Assessment Strategy
- Privacy Notices
- Data Protection and GDPR

- External Speakers and Visitors
- Missing Persons Policy
- Prevention of Extremism and Radicalisation Policy
- Safer Recruitment Policy
- IT Acceptable Use
- Bullying and Harassment
- Whistleblowing

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

## Appendix 1: types of abuse

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

Within the context of this policy, abuse and harmful behaviours are defined through the following main categories, please see appendix 1.

**Bullying and cyberbullying:** Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at school, at home or online. It’s usually repeated over a long period of time and can hurt a child both physically and emotionally

Cyberbullying is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone.

CATCHUK commit to a zero-tolerance approach to bullying/cyberbullying. In the first instance these incidents will be reported to the employer so that the necessary action is determined together. If it is considered that there is a lack of support from the employer, then internal disciplinary action will be taken. Preventative measures, such as posters, mental health workshops, implementation and embedding of **Education for a Connected World (2020)** are in place to try to such incidents occurring. Learners are also made aware of acceptable and expected behaviour via the induction process and the learner handbook. The safeguarding team are also introduced to the learners as part of the induction process so that they are fully aware of who to seek out if they are experiencing bullying.

**Criminal exploitation and gangs:** Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.

**Domestic abuse:** Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people and witnessing domestic abuse is child abuse. It’s important to remember domestic abuse:

- can happen inside and outside the home
- can happen over the phone, on the internet and on social networking sites
- can happen in any relationship and can continue even after the relationship has ended
- both men and women can be abused or abusers.

**Emotional abuse:** Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It’s sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.

Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

**Female Genital Mutilation (FGM):** FGM is a form of child abuse. It's dangerous and a criminal offence in the UK. We know:

- there are no medical reasons to carry out FGM
- it's often performed by someone with no medical training, using instruments such as knives, scalpels, scissors, glass or razor blades
- children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained
- it's used to control female sexuality and can cause long-lasting damage to physical and emotional health. (NSPCC 2022)

**Grooming:** Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.

Children and young people who are groomed can be sexually abused, exploited or trafficked.

Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

**Neglect:** Neglect can be a lot of different things, which can make it hard to spot. But broadly speaking, there are 4 types of neglect.

- **Physical neglect:** A child's basic needs, such as food, clothing or shelter, are not met or they aren't properly supervised or kept safe.
- **Educational neglect:** A parent doesn't ensure their child is given an education.
- **Emotional neglect:** A child doesn't get the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them.
- **Medical neglect:** A child isn't given proper health care. This includes dental care and refusing or ignoring medical recommendations.

**Non-recent abuse:** Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18. Sometimes adults who were abused in childhood blame themselves or are made to feel it's their fault. But this is never the case: there's no excuse for abuse.

You might have known you were abused for a very long or only recently learnt or understood what happened to you. Whether the abuse happened once or hundreds of times, a year or 70 years ago, whatever the circumstances, there's support to help you. It's never too late.

**Online abuse:** Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:

- social media
- text messages and messaging apps
- emails
- online chats
- online gaming
- live-streaming sites.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

**Physical abuse:** Physical abuse is when someone hurts or harms a child or young person on purpose. It includes:

- hitting with hands or objects
- slapping and punching
- kicking
- shaking
- throwing
- poisoning
- burning and scalding
- biting and scratching

- breaking bones
- drowning.

It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

**Sexual abuse:** When a child or young person is sexually abused, they're forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere – and it can happen in person or online.

**Sexual exploitation:** Child sexual exploitation (CSE) is a type of sexual abuse. When a child or young person is exploited they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they're in a loving and consensual relationship. This is called grooming. They may trust their abuser and not understand that they're being abused. For more information visit [CEOP website](#).

Children and young people can be trafficked into or within the UK to be sexually exploited. They're moved around the country and abused by being forced to take part in sexual activities, often with more than one person. Young people in gangs can also be sexually exploited.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse to control them.

Anybody can be a perpetrator of CSE, no matter their age, gender or race. The relationship could be framed as friendship, someone to look up to or romantic. Children and young people who are exploited may also be used to 'find' or coerce others to join groups.

**Trafficking:** Child trafficking and modern slavery are child abuse. Many children and young people are trafficked into the UK from other countries like Vietnam, Albania and Romania. Children are also trafficked around the UK.

It can be difficult to know what you can do if you're worried about a child. We have information and advice to help you feel confident in taking the next steps to keep children and young people safe.

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

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

### New staff

When appointing new staff, we will:

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

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

**Regulated activity** means a person who will be:

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

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

### **Existing staff**

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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

### **Contractors**

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

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

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

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

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

We will check the identity of all contractors and their staff on arrival at HCF CATCH LTD.

### **Volunteers**

We will:

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

### **Education Governance Panel (EGP)**

All members of the EGP will provide a copy of their current DBS or apply for a basic DBS check.

To be a member they will have a basic DBS check as they will not be partaking in regulated activity.

Check will include:

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



## Appendix 3: allegations of abuse made against staff

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

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

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

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

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

### Suspension of the accused until the case is resolved

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

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

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

### Definitions for outcomes of allegation investigations

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the DSL and/or the CEO (David Talbot) (or Chair of the board of directors where the CEO or DSL is the subject of the allegation) will take the following steps:

- Immediately discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The DSL may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children, young people and vulnerable adults or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children, young people, vulnerable adults, apprentice at HCF CATCH LTD is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

**If immediate suspension is considered necessary,** agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at HCF CATCH LTD and their contact details.

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

**If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action at HCF CATCH LTD and/or liaise with the police and/or children's social care services as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The DSL will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against tutors (where this applies) while investigations are ongoing.

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, young person or vulnerable adult.

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

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

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

#### **Conclusion of a case where the allegation is substantiated**

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

#### **Individuals returning to work after suspension**

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

#### **Unsubstantiated or malicious allegations**

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

### **Confidentiality**

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

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

- Who needs to know about the allegation and what information can be shared.

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

### Record-keeping

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

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

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

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### References

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

### Learning lessons

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

This will include consideration of (as applicable):

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

## Appendix 4: specific safeguarding issues

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

### Children and young people missing from education, training or work

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

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

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

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

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

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

### **Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

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

### **Child sexual exploitation**

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

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

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

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

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

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

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

### **Domestic abuse/and or violence**

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

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

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

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

### **Homelessness**

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

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

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

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

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

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

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

### **FGM**

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

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

Indicators that FGM has already occurred include:

- An apprentice or learner confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/apprentice or learner already being known to social services in relation to other safeguarding issues
- 

An apprentice or learner:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise
- Being repeatedly absent from training, education or work, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the apprentice or learner's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- 

An apprentice or learner:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the apprentice or learner out of the country for a prolonged period

- Requesting help from a tutor or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation
- Being unexpectedly absent from training or work

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

### **Forced marriage**

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

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

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

The DSL will:

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

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

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

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

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

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

We will ensure that suitable internet filtering is in place, and equip apprentices and learners to stay safe online.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

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

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

- Refusal to engage with, or becoming abusive to, apprentices who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter and other social media
- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations
- Apprentices or learners who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

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

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

Further information on HCF CATCH LTD’s measures to prevent radicalisation are set out in The Prevention of Extremism and Radicalisation Policy and the Teaching, learning and assessment strategy.

### Checking the identity and suitability of visitors

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

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

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

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

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

<b>Receive</b>	<ul style="list-style-type: none"> <li>• Keep calm</li> <li>• Listen to what is being said without displaying shock or disbelief</li> <li>• Take what is being said to you seriously</li> <li>• Note down what has been said</li> </ul>
<b>Respond</b>	<ul style="list-style-type: none"> <li>• Reassure the apprentice or learner that they have done the right thing in talking to you</li> <li>• Be honest and do not make promises you cannot keep e.g. “It will be alright now”</li> <li>• Do not promise confidentiality; you have a duty to refer</li> <li>• Reassure and alleviate guilt, if the apprentice or learner refers to it e.g. “you’re not to blame”</li> <li>• Reassure the apprentice or learner that information will only be shared with those who need to know</li> </ul>
<b>React</b>	<ul style="list-style-type: none"> <li>• React to the apprentice or learner only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details</li> <li>• Do not ask leading questions; “Did he/she....?” Such questions can invalidate evidence.</li> <li>• Do ask open “TED” questions; Tell, explain, describe</li> <li>• Do not criticise the perpetrator; the learner may have affection for him/her</li> <li>• Do not ask the apprentice or learner to repeat it all for another member of staff</li> <li>• Explain what you have to do next and who you have to talk to</li> </ul>
<b>Record</b>	<ul style="list-style-type: none"> <li>• Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible</li> <li>• Do not destroy your original notes before passing them on to the DSL.</li> <li>• Record the date, time, place, any non-verbal behaviour and the words used by the learner. Always ensure that as far as possible you have recorded the actual words used by the apprentice or learner</li> <li>• Record statements and observable things rather than your interpretations or assumptions</li> </ul>
<b>Remember</b>	<ul style="list-style-type: none"> <li>• Contact the DSL: Email the safeguarding incident form to</li> </ul>

	<a href="mailto:safeguarding@catchapprenticeships.ac.uk">safeguarding@catchapprenticeships.ac.uk</a> <ul style="list-style-type: none"> <li>The DSL may be required to make appropriate records available to other agencies.</li> </ul>
<b>Relax</b>	<ul style="list-style-type: none"> <li>Get some support for yourself, dealing with disclosures can be traumatic for professionals</li> </ul>

## Appendix 6: Safeguarding and Prevent Regional Risks in Areas other than Humberside and West Yorkshire

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

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

### Violence:

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

### Sexual offences:

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

### Violence and Sexual Offences:

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

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

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

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

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

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

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



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

**South Yorkshire** The highest priority in this area is antisocial behaviour.

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

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