

**Safeguarding and Prevent Duty Policy**

# **POLICY STATEMENT**

Aspire Training Solutions (ATS) is fully committed to safeguarding the welfare of our learners. The development and implementation of this policy and procedures are an integral part of ATS’s commitment to ensuring that the highest safeguarding standards are maintained.

All staff, associates and volunteers have a responsibility to take appropriate steps to protect our learners at risk and to understand their responsibility to operate within this policy. Good safeguarding includes arrangements for prevention as well as responding to allegations of harm and abuse. Harm and abuse may include physical, sexual, psychological, financial and institutional abuse, acts of neglect and omission and discrimination.

All allegations concerns or suspicions of abuse or neglect are taken seriously by ATS and responded to in line with our procedures and within the reporting structures of the local authority in which we work.

Allegations made against members of staff will be dealt with. ATS handles all disclosures in accordance with the requirements of a national framework of standards and good practice and outcomes in Adult protection (ADASS 2006). This policy states our approach to preventing and responding to safeguarding issues.

# **INTRODUCTION**



ATS fully recognises its statutory and moral duty to promote the safety and welfare of those learners who are under the age of 18 years and those adult learners who are deemed to be vulnerable; however, ATS has a moral duty and is committed to the safeguarding of all learners regardless of their age and vulnerability.

* [Keeping Children Safe in Education](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf) (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2024)
* [The Care Act (2014)](https://assets.publishing.service.gov.uk/media/5a7dc00a40f0b65d886342e3/Making_Sure_the_Care_Act_Works_EASY_READ.pdf) Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police and other partner organisations.
* [The Prevent Duty](https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible): Departmental advice for schools and childcare providers (Department for Education. December 2023).
* [Working Together to Safeguard Children](https://assets.publishing.service.gov.uk/media/5fd0a8e78fa8f54d5d6555f9/Working_together_to_safeguard_children_inter_agency_guidance.pdf): A guide to inter-agency working to safeguard and promote the welfare of children. (His Majesties Government, February 2024)

All staff should ensure that they have read and understood the associated policies to support the effective implementation of the safeguarding policy and procedures.

# **SCOPE**

This policy and its procedures will apply to:

* The Board
* Employees
* Learners
* Contractors
* Employers providing work placements
* All business activities

# **COMMUNICATION AND DISSEMINATION OF THE POLICY**

ATS recognises that safeguarding and promoting the welfare of its learners is everyone’s responsibility. Everyone who comes into contact with a learner and their families, carers and employers has a role to play in safeguarding. The safeguarding policy is shared with all staff, learners and employers on an annual basis and as and when any in-year updates are made aligned to legislation changes.

The policy, its purpose and reporting procedures will be reinforced via team and employer meetings, staff training, learning resources and literature. Additional support and guidance will be provided to ensure that any learner with a learning difficulty or language barrier can access the policy, its aims and supporting literature.

All staff have read and confirmed their understanding of the Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2024).

# **SAFER RECRUITMENT AND TRAINING STAFF**

When recruiting new members of staff, ATS follows the government statutory guidance set out in Part 3 of KCSIE (2024), which details Safer Recruitment pay due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedom Act 2012.

ATS adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that the relevant staff member uses the DBS checking service to assess applicants’ sustainability for positions of trust. The company also compiles fully with the Code of Practice and aims to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

Newly appointed staff will have a job role induction to include a robust introduction into the safeguarding of children, young people and adults at risk policy and procedures. This includes mandatory reading of internal and external policies and e-learning modules.

# **DEFINITIONS**

Although legislation is specifically related to children and vulnerable adults as defined below, ATS is committed to the safeguarding of all learners and the term learner is used throughout this policy.

* **Child -** In terms of this policy, a child is defined as anyone who has not reached their 18th birthday.
* **Vulnerable Adults -** In terms of this policy, a vulnerable adult is defined as a person aged 18 years or over and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. This may include a person who has a learning difficulty, a physical or sensory disability or a mental illness.
* **Safeguarding -** Safeguarding and promoting the welfare of learners is defined in ‘Working Together to Safeguard Children February 2024
* Protecting children from maltreatment
* Preventing impairment of children’s health or development
* Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
* Taking action to enable all children to have the best outcomes

# **SAFEGUARDING ACTIONS MAY BE NEEDED TO PROTECT LEARNERS FROM:**

* Physical abuse
* Emotional abuse
* Sexual abuse
* Neglect
* Bullying including cyberbullying
* Child missing from education
* Child missing from home or care
* Child sexual exploitation (CSE)
* Domestic violence
* Drugs
* Fabricated or induced illness
* Faith abuse
* Female genital mutilation (FGM)
* Forced marriage
* Gangs and youth violence
* Gender-based violence / violence against women and girls (VAWG)
* Mental health
* Private fostering
* Preventing radicalisation
* Relationship abuse
* Sexting
* Trafficking
* Sexual Violence
* Sexual Harassment

Staff need to have an awareness of the different types of safeguarding issues and explanations and definitions (Appendix c). Staff should also be aware that behaviours linked to, for example, drug taking, alcohol; abuse, truanting and sexting also put learners in danger.

ATS take safeguarding responsibilities very seriously, and as such will not tolerate any forms of abuse, bullying or harassment.

# **LOOKED AFTER CHILDREN**

All staff need to be aware of issues around safeguarding looked after children. The most common reason for young people becoming looked after is as a result of abuse and/or neglect.

# **LEARNERS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES**

All staff need to be aware that additional barriers can exist when recognising abuse and neglect in learners with special educational needs (SEN) and disabilities. This can include:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner’s disability without further exploration.
* Learners with SEN and disabilities can be disproportionally impacted by issues such as bullying without outwardly showing any signs.
* Communication barriers and difficulties in overcoming these barriers.
* Staff should refer to the learner’s education, health care plan (HCP). This will provide additional guidance specific to the learner’s support needs.
* ATS recognises that safeguarding is not just about protecting learners from deliberate harm, neglect and failure to act. It relates to the broader aspects of care and education and the following procedures should be read in conjunction with this policy:
  + Health and Safety Policy
  + Staff Recruitment and selection Policy
* Learner code of conduct and disciplinary policy
  + Guest Speaker Policy

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# **PROCEDURES FOR STAFF**

If ATS staff have concerns about a learner:

* If staff members have any concerns about a learner, this must be referred to the Designated Safeguarding Lead, to agree a course of action. Options can include referral to specialist services or early help services. ATS recognises its role in identifying learners who may benefit from early help and providing support as soon as a problem emerges in a learner’s life.
* Providing early help is more effective in promoting the welfare of young people than reacting later. Staff may be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment. The DSL will be required to report a referral immediately to the local safeguarding authority.
* If early help is appropriate, the Safeguarding Lead will support the staff member to liaise with external agencies. The learner should then be monitored and if the situation does not appear to be improving, a referral will be made by the Designated Safeguarding Lead and to the Local Authority Designated Officer (LADO) or Local Safeguarding Board to ensure the learner’s situation improves.
* Prevent related concerns should also be escalated to the designated safeguarding lead immediately who will refer to the regional Prevent Coordinator for advice and guidance.
* If ATS staff believe a learner is in immediate danger or at risk of harm: This immediate concern must be reported to the Designated Safeguarding Lead and if a learner is in immediate danger or is at risk of harm, a referral will be made to the Local Authority Designated Officer (LADO), Safeguarding Board or to the police immediately.

Staff responsibilities or 5Rs are summarised as:

* **Recognise**
* **Respond**
* **Record**
* **Report**
* **Refer**

## **IF A LEARNER MAKES A DISCLOSURE TO A MEMBER OF STAFF**

* If a learner makes a disclosure to a member of staff, the learner should be acknowledged, taken seriously and listened to.
* As soon as it becomes clear that the learner is talking about a safeguarding issue, you need to gently stop them and inform them that you have a legal obligation to pass this information on to a Designated Safeguarding Lead. You cannot promise confidentiality to the learner. Reassure the learner but tell them that a record of information given will be made.
* It is important not to ask too many questions as you must not under any circumstances investigate any accusations.
* Allow the learner to freely recall significant events, keeping questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said. Record the factual details of what has been told to you using the Safeguarding Disclosure Form. Concern / Disclosure Form. Contact the Designated Safeguarding Lead immediately to explain the situation and pass on the written notes. The Designated Safeguarding Lead will outline the action that he/she has to take so that you can explain this to the learner. It may be appropriate for the Designated Safeguarding Lead to meet the learner. You must not take any further action yourself. This includes contacting parents/carers or outside agencies. The DSL will be required to report a referral immediately to the local safeguarding authority.

## **MEMBER OF STAFF RECEIVES INFORMATION ABOUT A LEARNER FROM ANOTHER PERSON**

If a member of staff receives information about a learner, which suggests that there is a safeguarding issue or that this is likely, this must be recorded on the Safeguarding Concern / Disclosure Form and reported immediately to the Designated Safeguarding Lead. ATS has a duty to refer these concerns to the Local Authority Children’s Social Care Office for the area in which the learner lives or to the police if the learner is in immediate danger.

## **IF A MEMBER OF STAFF SUSPECTS A LEARNER HAS A SAFEGUARDING CONCERN**

If a member of staff suspects that a learner is at risk from a safeguarding issue, they must discuss these concerns with the Designated Safeguarding Lead and not take any independent action. The concerns must be recorded on the Safeguarding Concern / Disclosure form.

All contact with outside agencies over issues of safeguarding must be approved by the Designated Safeguarding Lead. The Designated Safeguarding Lead will decide whether to make a referral to children’s social care, Local Safeguarding Board or Local Authority Designated Officer (LADO).

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

Parents / carers have the right to be informed in respect of any concerns or any action taken to safeguard and promote their welfare, providing this does not compromise the learner’s safety.

[Keeping Children Safe in Education (KCSIE):](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf) Statutory guidance for schools and colleges. (Department for Education, September 2024).

## **ALLEGATIONS OF ABUSE MADE AGAINST OTHER YOUNG PEOPLE**

Staff must recognise that young people are capable of abusing their peers and be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Peer on peer abuse is Inappropriate behaviours between children that are abusive in nature including physical, sexual, or emotional abuse, exploitation, sexual harassment, all forms of bullying, coercive control, hazing/initiation rituals between children and young people, both on and offline (including that which is within intimate personal relationships).

Staff need to be aware that any and all abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’.

ATS will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns, directly to their trainer or to the Safeguarding Team.

Child-on-child abuse can take the form of bullying (including cyber-bullying) sexting and any other form of sexual or physical abuse. Gender based issues can also occur for example girls being sexually touched/ assaulted or boys being subject to initiation/hazing type violence.

# **VISITORS**

All official visitors to ATS premises are required to report to the main reception on arrival and sign in. Visitors are issued with a visitor pass on a ATS lanyard which must always be worn and visible. Visitors are asked to wait in reception until they are collected by a member of staff. Visitors are not permitted to enter access-controlled areas unless accompanied by a member of staff.

Guest speakers will be subject to the guest speaker policy vetting procedure. All centres must carry out appropriate checks on the material that is being presented prior to a guest speaker event.

The relevant checks must be made against all guest speakers before any event is approved. Guest speakers are not permitted to work alone with any learners and will always be accompanied by a trainer. The Guest Speaker approval form must be completed prior to the event and shared with the DSL.

# **WORK SETTING**

ATS, has a responsibility to ensure the health, safety and welfare of all learners undertaking work experience/placements with employers. ATS, will ensure that employers are aware of this policy and their responsibilities for compliance in relation to Safeguarding and the Prevent duty for any learner who is placed with them and that arrangements are in place to ensure that a learner’s wellbeing is safeguarded.

# **LEARNERS WITH CRIMINAL CONVICTIONS**

ATS is committed to the fair treatment of all learners and welcomes applications from a wide range of individuals, including those with criminal convictions.

ATS is committed to the equality of opportunity and selects individuals based on their skills, qualifications, and experience and not on their background or personal circumstances. Having a criminal conviction will not necessarily prevent someone from studying at ATS.

ATS is mindful, however, of the duty of care it owes to its learners, staff and the wider community to act reasonably to protect their health, safety and welfare. As a consequence, ATS requires all applicants to disclose any criminal convictions on application and re-enrolment.

If a criminal conviction is disclosed or otherwise brought to our attention, ATS, will work with that person to determine the level of risk posed by the conviction to both the individual and/or to others.

The individual will be required to complete a safeguarding risk assessment, providing ATS with further information about the offence and contact details for any relevant third party e.g. a Probation Officer.

The information given on the Disclosure Form will then be used to assess whether there is any risk posed should the individual enrol on a course at ATS Training. An interview must take place with one of the nominated Safeguarding Lead to enrolment to approve the application and sign the enrolment form. Where medium/high risk has been identified, this will be referred to the Safeguarding Operational Group and enrolment deferred until a decision is reached.

# **CONCERNS ABOUT ANOTHER STAFF MEMBER**

It is recognised that sometimes allegations may involve a member of ATS staff. In these circumstances the allegation must be reported directly to the Managing Director.

In the absence of the Managing Director, the Contracts Manager must be informed. On receipt of such an allegation, ATS Training’s Disciplinary Procedures relating to allegations of abuse will be followed.

Additionally, the Chair of the Board will be notified if the allegations relate to the Managing Director.

# **CONCERNS ABOUT SAFEGUARDING PRACTICES**

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the ATS Training’s safeguarding practices and that such concerns would be taken seriously by the Management and Leadership Team.

If staff members have any concerns about the safeguarding regime, they should raise this initially with their Line Manager. If no immediate action is taken, then appropriate Whistleblowing Procedures are in place for such concerns to be raised with the Management and Leadership Team.

Where a staff member feels unable to raise an issue with ATS or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: General guidance can be found at - Advice on whistleblowing.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

# **RESPONSIBILITIES OF THE BOARD**

The Board will:

* Ensure that ATS has an effective Safeguarding Policy in place which is updated annually, and that ATS contributes to inter-agency working in line with statutory guidance ‘Working Together to Safeguard Children February 2024 and Keeping Children Safe in Education (KCSIE. (Department for Education, September 2024)
* Ensure that the Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB).
* Ensure that ATS complies with the Prevent Duty as set out in the Counter Terrorism and Security Act December 2023.
* Ensure that the policies and procedures in place enable appropriate action to be taken in a timely manner to safeguard and promote learners’ welfare.
* Appoint a Board Member with responsibility for Safeguarding and Prevent who will liaise with the Managing Director and the Designated Safeguarding Lead.
* Ensure that a Designated Safeguarding Lead is appointed to lead on safeguarding, advise/support staff and liaise with the Local Authority and other agencies. He/she will have status/authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.
* Give scrutiny to regular reports which will provide detail on the numbers and types of safeguarding incidents and concerns which have arisen, along with updates from Human Resources and Workforce Development.
* Ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
* Ensure that a member of the Board Body is nominated to liaise with the designated officer for the relevant local authority and partner agencies in the event of a safeguarding allegation being made against the Managing Director.

# **THE MANAGING DIRECTOR**

The Managing Director has the overall responsibility for Safeguarding at ATS, and he will ensure through the management hierarchy that:

Safeguarding policies and procedures and any linked Safeguarding polices are fully implemented and followed by all staff.

* All staff feel able to raise concerns about poor or unsafe practice regarding learners and that concerns will be addressed sensitively and in a timely and appropriate manner.
* Policy / procedures are available to parents / carers and employers on request.

# **THE DESIGNATED SAFEGUARDING LEAD (DSL)**

The Designated Safeguarding Lead will:

* Ensure that the Safeguarding Policy, including Prevent, is reviewed annually and the procedures and implementation are reviewed regularly by the Personal Development, Welfare and Behaviour Action Group and the Board.
* Ensure that the Safeguarding Policy is made public and that parents/carers and employers are aware of the fact that referrals about suspected abuse or neglect may be made, and the role that ATS will play in this.
* Provide an annual safeguarding report for the Board, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and Board members and number and type of incidents/cases.
* Ensure the quality assurance of the provision of safeguarding information, advice and guidance and procedures.
* Ensure there is liaison with employers providing work placements to ensure proper safeguarding arrangements are in place.
* Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding to make a referral, by liaising with relevant agencies.
* Keep detailed, accurate, confidential and secure written records of concerns, disclosures and referrals. Ensure all such records are kept confidentially and securely.
* Liaise with the Safeguarding Team / any other relevant staff to inform of any issues/ongoing investigations via the Safeguarding Operations Group.
* Ensure the Safeguarding Team acts as a key point of referral for learners/ staff /parents / carers/employers, offer advice, assess information promptly, take action or refer on to the Designated Safeguarding Lead so that ATS respond swiftly and appropriately to all concerns referrals and disclosures.
* Have access to resources and attend any relevant or refresher training courses at least every two years.
* Ensure that a member of the Safeguarding Team attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report.
* Provide staff identification badges that must be worn during all working hours.

# **RESPONSIBILITIES**

Safeguarding Team

Stephanie Donovan – DSL

Micael McMahon – Deputy DSL

Matthew Whittington – Skills Coach DSL Trained

Kady Donahue-Redford – Skills Coach DSL Trained.

# **PREVENT DUTY**

The Prevent Duty, introduced as part of the Counter-Terrorism and Security Act came into effect for key bodies including schools, health bodies and police The duty commenced for higher and further education institutions from the 18 September 2015 and further enhanced in December 2023.

The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to have “due regard to the need to prevent people from being drawn into terrorism”. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Where deemed appropriate, ATS will seek external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities and prevent them becoming further radicalised.

# **WHAT IS TERRORISM/EXTREMISM?**

Terrorism covers all forms of extremism both violent and non-violent and is defined in the national Prevent Strategy as any vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Prevent covers international and domestic terrorist threats, and includes the activities of far-right groups, and animal rights groups.

# **WHAT IS RADICALISATION?**

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Safeguarding from extremism is no different to how staff would share a concern about drugs, physical and sexual abuse or any other safeguarding concern.

# **WHAT IS CHANNEL?**

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and local community to:

* Identify individuals at risk of being drawn into terrorism
* Assess the nature and extent of that risk
* Develop the most appropriate support plan for the individual concerned

The following indicators identify factors that may suggest a young person or their family may be vulnerable to being drawn into extremism:

* Identity crisis - distance from culture religious heritage and uncomfortable with their place in the society around them.
* Personal crisis - family tensions, sense of isolation, adolescence low self-esteem, disassociation from existing friendship groups and becoming involved with a new and different group of friends searching for answers to questions about identity, faith and belonging.

Personal circumstances - migration, local community tensions, events affecting Country and region of origin, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of injustice feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Potential indicators of radicalisation are listed below:

* Use of inappropriate language
* Possession or accessing violent extremist literature
* Behavioural changes
* The expression of extremist views
* Advocating violent actions and means
* Association with known extremists
* Articulating support for violent extremist causes or leaders
* Using extremist views to explain personal disadvantage
* Joining or seeking to join extremist organisations
* Seeking to recruit others to an extremist ideology

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate will be dealt with in line with the Learner Disciplinary Policy and the Code of Conduct for staff.

Staff should use their professional judgement and discuss with a Designated Safeguarding Person if they have any concerns. Once assessed, and if appropriate, this will be referred into the Channel Panel Process as per the flowchart below on the following page.

ATS has an identified single point of contact (SPOC) in relation to Prevent which is the Designated Safeguarding Lead.

To ensure compliance with the Prevent duty, all staff must make sure that they:

* Undertake training in the Prevent duty as identified by ATS, to ensure they have an understanding of the factors that make people vulnerable to being drawn into terrorism and that they are able to recognise this vulnerability and are aware of what action to take.
* Exemplify British/Community Values into their work and practice and that opportunities in the curriculum are used to promote these values to learners.

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# **AIMS OF THE PREVENT POLICY**

This policy has the following aims:

* To promote and reinforce a set of shared values, founded on tolerance and respect for others.
* To create a safe space for free and open debate.
* To promote a sense of community cohesion.
* To ensure that learners are safe and that we create an environment that is free from bullying, harassment, and discrimination.
* To support learners who may be at risk from radicalisation and to be able to signpost them to further external sources of support where appropriate.
* To ensure that staff are aware of their responsibilities under this policy and are able to recognise and respond to vulnerable learners.

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# **BRITISH VALUES**

Defining British Values (For the purposes of this policy British values will be defined as) “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths”

# **MANAGING RISK AND RESPONDING TO EVENTS**

**Embedding values within the provision.** Equality and Diversity, the values of respect and tolerance will be embedded within teaching and learning sessions, learning materials and progress review meetings. Trainers will be empowered to encourage open and safe debate with support from specialist staff where this is deemed necessary.

**Coordination and overall responsibilities.**

The Designated Safeguarding Lead will have overall responsibility for the coordination of Prevent activity.

# The Official Referral Process for Prevent – Training providers

* CPP - Channel Police Practitioner
* Police Practitioner PCM -
* Primary Care Manager

|  |  |
| --- | --- |
| **SAFEGUARDING/PREVENT CONCERN/DISCLOSURE FORM** | |
|  | |
| **Learner Name** |  |
|  | |
| **DOB** |  |
|  | |
| **Course** |  |
|  | |
| **Company/Employer** |  |
|  | |
| **Reported by** |  |
|  | |
| **Reported to** |  |
|  | |
| **Details / Type of Concern / Disclosure / Current external agency involvement (also note are there are any dependents associated with the learner).** | |
|  | |

|  |  |
| --- | --- |
| **Received by** |  |
| **Date:** |  |
| Actions and monitoring will be recorded on ATS Single Central Record | |

# **ADULTS AT RISK**

Physical Abuse can include being assaulted, hit, slapped, pushed, restrained, being denied food or water, not being helped to go to the bathroom and misuse of medication.

Sexual Abuse includes indecent exposure, sexual harassment, inappropriate looking or touching, as well as rape. Sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, and sexual acts that the person does not agree to or were pressured into consenting to.

Psychological Abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion or harassment. It also includes verbal abuse, cyber bullying and isolation or an unreasonable and unjustified withdrawal from services or supportive networks.

Financial Abuse includes theft of money or valuables, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

Neglect and Acts of Omission includes not being provided with enough food or the right kind of food, or not being taken proper care of. Leaving the person without help to wash or change dirty or wet clothes, not getting them to a doctor when one is needed or not making sure that they have the right medicines.

Discriminatory Abuse includes some forms of harassment, slurs or similar unfair treatment relating to race, gender, gender identity, age, disability, sexual orientation or religion.

Self-Neglect is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Self-Harm is defined as self-poisoning or injury, irrespective of the apparent purpose of the act. Self-harm is an expression of personal distress, not an illness, and there are many varied reasons for a person to harm him or herself. Most cases of self-harm do not result in suicide; however, self-harm is known to be a risk factor in suicidal behaviour.

Suicide is the intentional and deliberate act of taking one's own life; youth suicide is a major global public health issue. While suicide rates are higher among 20-24 year olds, suicidal behaviour that may precede suicide is established in the earlier years. Suicide consistently ranks as one of the leading causes of death for adolescents between 15 and 19 years of age. Research suggests that certain situations put children and young people at more risk of suicide, including suffering loss or bereavement, relationship issues, experiencing bullying and/or racism, living in isolated areas and living in unhappy circumstances.

Other Safeguarding Issues. The following list identifies other potential types of safeguarding issues: -

* Young people missing from training, home or care
* Substance misuse
* Faith abuse
* Gangs and youth violence
* Gender-based violence/violence against women and girls
* Hate crime
* Mental health
* Human trafficking and modern slavery

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# **REGIONAL PREVENT COORDINATORS**

**How regional Prevent coordinators can help providers**

The Department for Education (DfE) regional Prevent coordinators act to support and improve Prevent delivery in each region of England. Their remit encompasses the implementation of Prevent Duty responsibilities across schools, further education (FE) and higher education (HE) settings, as well as any other Department for Education interests in the region.

The coordinators are the DfE’s representatives in regional planning, assurance and support for Prevent delivery and other CONTEST related matters.

DfE regional prevent coordinators main responsibilities include:

* supporting to address concerns and improve Prevent delivery in the education sector, including where monitoring bodies have identified concerns
* taking the lead on ensuring support for education providers dealing with complex radicalisation or terrorism cases involving children or learners, or otherwise effecting an education setting
* engaging and liaising with education providers and police following terrorism activity that impacts on education settings
* offering virtual training and good practice events for education providers within the region and sharing relevant updates in a regional newsletter. Further details on these will be made available on this page
* coordinating effectively with other regional partners on the effective delivery of Prevent within the region

The regional Prevent coordinators are not able to assist every setting in day to day Prevent implementation, however if you are facing significant challenges and don’t have direct contact details for your relevant regional Prevent coordinator,

**contact**[**PreventDuty.Support@education.gov.uk**](mailto:PreventDuty.Support@education.gov.uk)**.**

Include your location, setting and nature of inquiry.

# **CONTACT NUMBERS**

The following are useful contact numbers: -

* ATS Designated Safeguarding Lead – Stephanie Donovan
* E-mail: [steph.donovan@aaeg.co.uk](mailto:steph.donovan@aaeg.co.uk)
* ATS Deputy Designated Safeguarding Officers – Michael McMahon
* E-mail: [michael.mcmahon@aaeg.co.uk](mailto:michael.mcmahon@aaeg.co.uk)
* The NSPCC Child Protection 24-hour Helpline - 0808 800 5000

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# **REVIEW**

This policy will be reviewed no later than January 2026

# **APPENDIX A - DEFINITIONS**

**Physical Abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place on-line, and technology can be used to facilitate off-line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Child-on-Child** abuse includes all types of bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, hair pulling or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals; child sexual exploitation; gang activity and youth violence. Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. Sexual violence and sexual harassment can occur between two children of any sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children.

Child-on-child abuse is a particularly sensitive and complex area of safeguarding learners. All staff should recognise that learners are capable of abusing their peers and that inappropriate behaviour should never be tolerated or passed off as ‘banter’ or ‘part of growing up’.

Child-on-child abuse is often gender specific, such as girls being inappropriately touched or sexually abused by boys; boys may be more vulnerable to initiation or hazing type violence and rituals. It is important to deal with a situation of peer abuse immediately and sensitively. As with any safeguarding concern, it is important to gather the information as soon as possible to ascertain the true facts. This should be done objectively, with consideration of intent. Where it is deemed that any party involved in the child-on-child abuse is at risk, then a safeguarding referral should be made. Where there is a potential criminal act, the police should also be informed.

**Bullying** is persistent behaviour directed against an individual, which is intimidating, offensive or malicious and undermines the confidence and self-esteem of the recipient which may cause him or her to suffer stress. Bullying can take place by direct personal contact, or through digital communication such as mobile phones, social networking sites, email or gaming consoles.

**Child Sexual Exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. A significant number of children who are victims of sexual exploitation go missing from home, care or education at some point. Some of the following signs may be indicators of sexual exploitation: -

* Young people who appear with unexplained gifts or new possessions
* Young people who associate with other young people involved in exploitation
* Young people who have older boyfriends or girlfriends
* Young people who suffer from sexually transmitted infections or become pregnant
* Young people who suffer from changes in emotional wellbeing
* Young people who misuse drugs and alcohol
* Young people who go missing for periods of time or regularly come home late
* Children who regularly miss school or education or do not take part in education.

**Sexual Violence and Sexual Harassment** is unwanted conduct of a sexual nature, and this can occur between two or more children of any age and sex. Staff should be aware that this sport of behaviour is not limited to adults.

**Female Genital Mutilation** is a procedure where the female genitals are deliberately cut, injured or changed, but where there is no medical reason for this to be done. FGM is most commonly carried out on girls between infancy and the age of 15, most often before puberty starts. It is illegal in the UK. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

**Neglect** is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve their parent or carer failing to: -

* Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
* Protect a young person from physical and emotional harm or danger
* Ensure adequate supervision (including the use of inadequate caregivers)
* Ensure access to appropriate medical care or treatment
* Neglect may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

**Extremism** goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist. See the ATS Prevent Strategy Policy.

**Psychological Abuse** includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion or harassment. It also includes verbal abuse, cyber bullying and isolation or an unreasonable and unjustified withdrawal from services or supportive networks.

**Financial Abuse** includes theft of money or valuables, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

**Neglect and Acts of Omission** includes not being provided with enough food or the right kind of food, or not being taken proper care of. Leaving the person without help to wash or change dirty or wet clothes, not getting them to a doctor when one is needed or not making sure that they have the right medicines.

**Discriminatory Abuse** includes some forms of harassment, slurs or similar unfair treatment Relating to race, gender, gender identity, age, disability, sexual orientation or religion.

**Self-Neglect** is not a direct form of abuse, but employees need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

**Self-Harm** is defined as self-poisoning or injury, irrespective of the apparent purpose of the act. Self-harm is an expression of personal distress, not an illness, and there are many varied reasons for a person to harm him or herself. Most cases of self-harm do not result in suicide; however, self-harm is known to be a risk factor in suicidal behaviour.

**Suicide** is the intentional and deliberate act of taking one's own life; youth suicide is a major global public health issue. While suicide rates are higher among 20-24 year olds, suicidal behaviour that may precede suicide is established in the earlier years. Suicide consistently ranks as one of the leading causes of death for adolescents between 15 and 19 years of age. Research suggests that certain situations put children and young people at more risk of suicide, including suffering loss or bereavement, relationship issues, experiencing bullying and/or racism, living in isolated areas and living in unhappy circumstances.

The term Looked After Children in the Children Act 1989 refers to all children and young people being looked after by a local authority, namely: - those subject to care orders or interim care orders (under sections 31 and 38 of the 1989 Act); those children who have been placed, or are authorised to be placed, with prospective adopters by a local authority (section 18(3) of the Adoption and Children Act 2002); those who are voluntarily accommodated under section 20 of the 1989 Act, including unaccompanied asylum-seeking children (where children are accommodated under this provision, parental responsibility remains with the parents); and those who are subject to court orders with residence requirements (e.g. secure remand or remand to local authority accommodation), in accordance with section 21 of the 1989 Act.

So-called ‘honour-based’ violence (HBV) and abuse encompasses 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.

**Forced Marriage** is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of adults at risk who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced. The Forced Marriage (Civil Protection) Act was enacted in 2007 and came into force on 25 November 2008. The Act forms part of the Family Law Act 1996 and makes provision for protecting children, young people and adults from being forced into marriage without their free and full consent.

**Domestic abuse** can have both short and long-term detrimental impacts on children’s health, wellbeing and within their own relationships.

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

**Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

**Coercive behaviour** is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

**Eating Disorders** include anorexia nervosa, bulimia nervosa, or other related (or ‘atypical’) eating disorders (mainly binge eating disorder). In general, eating disorders develop over time, sometimes over years, and often at a point when life brings fear and insecurity.

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

**Child Criminal Exploitation** (County Lines) is a geographically widespread form of harm, that is a typical feature of county lines criminal activity: drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas. This also involves enticing or grooming young people into crime or gang activity for illicit gains.

**Prevent** is about safeguarding students to keep them safe from being radicalised and/or exploited by extremists. The Prevent Duty is not about discouraging students from having political views and concerns and should balance its legal duties in terms of both ensuring freedom of speech but also of protecting students and staff welfare. Please refer to the ATS Prevent Strategy Policy.