

Safeguarding Policy and Procedures

Contents

The Purpose of the Policy and Procedures	2
Policy Statement	2
Scope.....	3
Categories of abuse	4
Prevent.....	6
British Values Statement.....	7
Positive Disclosures.....	9
Responsibilities of Staff.....	10
Safeguarding Officers Contact Details	11
Dealing with Disclosure of Abuse and Procedure for Reporting Concerns	13
Allegations or concern about a staff member, carer, volunteer or a learner	19
Implementation, Review and Evaluation of the Policy and Procedures.....	20
Other Relevant Policies and Procedures.....	20
Distribution and Communication.....	21
Approval.....	21
Safeguarding Incident/Concern Recording Sheet.....	22
Impact Assessment Form.....	24

The Purpose of the Policy and Procedures

The purposes of this policy and the related procedures are:

1. To confirm the organisation's commitment and obligations in respect of Safeguarding and promoting the welfare of young people.
2. To ensure the organisation complies with relevant Government guidance.
3. To provide clear guidance to staff about how to respond when a case of possible harm, abuse or neglect is identified or suspected.
4. To ensure staff are aware of their responsibilities in dealing with learners.
5. To ensure a prompt and effective response is taken when it appears a learner may be at risk of abuse or neglect.
6. To ensure staff are adequately briefed and trained in the implementation of the organisations Safeguarding Policy and Procedures.
7. To ensure the roles and responsibilities of the designated Lead Safeguarding Officer and other key staff for young people protection are known and understood by staff.

Policy Statement

At Ashley Hunter Training Academy, the safety and welfare of our learners is of the utmost importance.

The organisation has a duty of care to all its learners and a legal obligation to safeguard and promote the welfare of all its learners and to respond immediately if there is a suspicion a vulnerable adult may be a victim of bullying, harassment, abuse (including physical, sexual, emotional) or neglect.

All adults working in the organisation must protect young learners from abuse and be aware that any young learner or vulnerable adult may be the victim of harm of abuse or at risk of harm or abuse.

The organisation recognises that all staff who work with learners need to have basic training that equips them to recognise and respond to welfare concerns. All staff will receive adequate training to familiarise them with protection issues and responsibilities in addition to the organisation's procedures and policies, undertaking refresher training at least every 3 years.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 2 of 24

Scope

This policy and these procedures apply to dealing with vulnerable adults and young people.

- a) When a learner reports abuse or harm, the organisation should consider whether the following procedures should be applied with the appropriate adaptations, to afford protection of vulnerable adults. It may be more appropriate that formal action is pursued by the learner under criminal or civil law. However, consideration must be given as to whether these issues would have implications for vulnerable adults within the organisation. In this instance, the Local Authority Adult Safeguarding Team for the learner's home address should be contacted when there could be implications for learners within that household, or associated networks.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 3 of 24

Categories of abuse

The duties placed on providers relating to safeguarding and promoting the welfare of learners refer to any person who has suffered from, or may be at risk of physical abuse, neglect, emotional abuse or sexual abuse. Staff should also be aware these also relate to vulnerable adults. What is meant by each of these terms is set out as follows.

1. What is abuse or neglect?

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Learners may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults.

2. Physical Abuse

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

3. Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving learners in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging learners to behave in sexually inappropriate ways.

4. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed upon them. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the person participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying, causing the person to frequently to feel frightened or in danger, or the exploitation or corruption of a person. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

5. Neglect

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 4 of 24

- Protect a child from physical harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness of, a young person’s basic emotional needs. The notion of ‘abuse’ includes bullying and other intimidating behaviour and racial abuse or harassment. Such behaviour can also be an element of any of the above categories of abuse. Separate policies exist for dealing with allegations of intimidation, harassment, violence and racial abuse against students.

6. Child Protection

This is a **statement of intent** that demonstrates a commitment to safeguard those involved in learning from harm. The essential inclusions for a child protection policy are outlined below:

- The welfare of the child is paramount
- All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs
- Who the policy applies to (i.e. all trustees, staff and volunteers)
- Children and parents are informed of the policy and procedures as appropriate
- All concerns, and allegations of abuse will be taken seriously by trustees, staff and volunteers and responded to appropriately - this may require a referral to children’s services and in emergencies, the Police
- A commitment to safe recruitment, selection and vetting
- Reference to principles, legislation and guidance that underpin the policy
- Arrangements for policy and procedures review
- Reference to all associated policies and procedures which promote safety and welfare e.g. with regards to: health and safety, anti-bullying, protection of children online, and photography.

7. Vulnerable Groups

A number of groups within our societies face higher risk of poverty and social exclusion compared to the general population. These vulnerable and marginalised groups include but are not limited to: people with disabilities, migrants and ethnic minorities, homeless people, ex-prisoners, drug addicts, people with alcohol problems, isolated older people and children.

The problems these groups experience are translated into homelessness, unemployment, low education, and subsequently, their further exclusion from society.

Safeguarding and inclusion of vulnerable groups is one of the priorities of AHTA. In this context, AHTA has committed to develop strategies to integrate and include this cohort in all provision

- respond to the multiple disadvantages and the need of particular groups.
- help to ensure that those who have regular contact with vulnerable groups through paid and unpaid work do not have a known history of harmful behaviour
- complete a detailed application form every time a disclosure check is required
- strike a balance between proportionate protection and robust regulation to protect the client group

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 5 of 24

Prevent

In February 2008, the Government published guidance to local partners including colleges on preventing violent extremism. While the guidance was prompted following examples of Al Qaida terrorist activities, it was also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups. Children, learners and vulnerable adults are particularly targeted by extremist groups who may promote violent extremist narrative and activity.

Since 2010, when the Government published its Prevent Strategy, there has been increased awareness of the specific need to safeguard children, young people and vulnerable adults from radicalisation and violent extremism. Ashley Hunter Training Academy (AHTA) seeks to protect children, young people, and vulnerable adults against all messages of violent extremism including, but not restricted to, those linked to Islamist ideology, far right/Neo Nazi/White Supremacist ideology, and extremist animal rights movements.

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, including schools and colleges, listed in Schedule 3 to the Act, to have **“due regard to the need to prevent people from being drawn into terrorism”**.

The Designated Safeguarding Officers will liaise with Deputy Chief Executive and the relevant Prevent engagement officer from the local police force over matters related to students and combating radicalisation and violent extremism, including referrals through the Channel process.

Any safeguarding concerns concerning radicalisation and extremist views must be recorded in writing and reported to the Lead Safeguarding Officer who will liaise as appropriate with the local Prevent Engagement Officer, following the agreed referral and Channel process.

The organisation will provide appropriate and timely support including referral via the Channel process to any student at risk of radicalisation and violent extremism.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 6 of 24

British Values Statement

The Department for Education introduced a statutory duty for schools to promote British Values more actively from September 2014, and to ensure they are taught in schools. Ashley Hunter Training Academy is committed to serving its community. It recognises the multi-cultural, multi-faith and ever-changing nature of the United Kingdom. It also understands the vital role it has in ensuring that groups or individuals within Ashley Hunter Training Academy are not subjected to intimidation or radicalisation by those wishing to unduly, or illegally, influence them.

It follows equal opportunities guidance which guarantees that there will be no discrimination against any individual or group, regardless of faith, ethnicity, gender, sexuality, political or financial status, or similar. Ashley Hunter Training Academy is dedicated to preparing students for their life beyond the formal, examined curriculum and ensuring that it promotes and reinforces British values to all its students.

The government set out its definition of British values in the 2011 Prevent Strategy.

The five key British Values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those of different faiths and beliefs

Ashley Hunter Training Academy uses strategies within its curriculum and beyond to secure such outcomes for students. The examples that follow show some of the ways Ashley Hunter Training Academy seeks to instil British Values.

Democracy

Ashley Hunter Training Academy is committed to collecting and acting on the views of its learners and stakeholders through:

- Questionnaires
- Consultations
- Learner Meetings/feedback
- Employer Meetings/feedback

The Rule of Law

Ashley Hunter Training Academy is committed to develop law abiding citizens by:

- Teaching the value and reasons behind the law within induction and IAG sessions
- Publishing the Learner handbook that every learner will sign and adhere to
- Enforce consequences of breaking the code of conduct and reward learners who keep it
- Inviting authorities to engage with learners and re-enforce the message

Individual Liberty

Ashley Hunter Training Academy promotes the individual's liberty by:

- Encouraging learners to make individual choices within their personal pathway
- Actively promoting and helping learners to express their ideas and views in an open and safe environment
- Enforcing the Academy's anti-bullying policy.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 7 of 24

Mutual Respect

It is important that learners know their behaviour has an effect on their own rights and the rights of others. Treating each other with respect is actively promoted through the code of conduct and the aims of AHTA. It is further underpinned within the programme of learning.

Curriculum design includes projects that encourage working in groups and understanding each other's needs/strengths and weaknesses thus promoting a culture of mutual respect and helpfulness.

Tolerance of Those of Different Faiths and Beliefs

Ashley Hunter Training Academy is not a faith Academy and does not actively promote one faith or belief system over another, learners are actively encouraged to share their beliefs in an honest and open environment.

Examples of how Ashley Hunter Training Academy promotes tolerance to different faiths and beliefs:

- AHTA encourages informal learner led discussion and promotes tolerance
- Single equality policy enforced within AHTA
- Celebration of different faiths on key calendar days.

The organisation will

Conform to security standards during recruitment of staff, include statements of intention toward DBS clearance within all internal and external recruitment advertisements and regularly train staff on Safeguarding issues within the post 16 contexts. No staff members will have unaccompanied visits with candidates until DBS clearance has been received by AHTA.

Actively promote the use of the www.excellencegateway.org.uk website during induction and throughout the course duration. The Safeguarding Officer will be introduced to the learners during induction, providing a summary of what support can be accessed, online resources, bespoke sessions and links to websites and resources. The use of the Local Safeguarding Team will also be promoted along with Social Services and other learner specific support agencies as required. Although there is a Lead Safeguarding Officer for AHTA, there are also Safeguarding Officers in place, one male one female. Details of these are displayed throughout the documentation on the USB provided to learners and the Learner Handbook, which learners' attention will be drawn to during induction.

All learners will be given links or directions to Safer Practice / Safer Learning leaflets with the details of the specific Safeguarding Officers named. Links are available on the AHTA website to the Safe Learner documents and leaflets. AHTA will also complete a monthly Health & Safety Accident Form as part of our commitment to safeguarding. Relevant contact details for children's services, police, health, support and NSPCC help lines will be made available.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 8 of 24

Positive Disclosures

- a. The term 'positive disclosure' refers to a disclosure containing information relating to convictions, cautions, reprimands, etc. plus 'soft information' relating to non-convictions, but which police forces deem relevant.
- b. If a positive disclosure (self-disclosure or DBS information or from another source) is received for:
 - an employee already working with vulnerable groups, a risk assessment should be undertaken and dependent on the circumstances and conviction they may be removed from that area of work immediately, pending further enquiries and action;
 - an applicant who has been made an offer of employment but failed to disclose the information at application stage, the offer of employment will usually be withdrawn,
 - an applicant (self-disclosure on an application form) this will be taken into account when making the recruitment decision as part of the recruitment and selection process.
- c. Most final decisions regarding employees or applicants following disclosure will be made after an interview with the individual concerned. The interview will take place with the relevant Manager as appropriate and a member of the Safeguarding team will be present.
- d. The interview is necessary to verify that the disclosure does relate to the individual (errors do occur in the DBS system occasionally) and to gain their views on the matter. The discussion at the interview will depend on each individual case.
- e. Following the interview a decision will be made as to whether the individual can start (or continue) in employment at AHTA and, if so, in what capacity. The Manager will be accountable for the decision but will be expected to discuss with the Safeguarding Officer and usually with their manager as well. In the event of a disagreement about the decision, the matter will be referred to the relevant Director and their decision will be final.
- f. If the decision is to:
 - Withdraw an offer of employment, the individual may make representations in writing within 5 days of receipt of decision to the relevant Director and their decision will be final;
 - Dismiss an employee; the individual may appeal the decision using standard AHTA appeal procedure (submit an appeal in writing to a manager more senior than the one who made the decision, within 5 working days of receipt of the decision)

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 9 of 24

Responsibilities of Staff

The Role of the organisation

The Safeguarding Officer is committed to ensuring that the organisation:

- Raises awareness of issues relating to safeguarding and promoting the welfare of learners in the organisation.
- Provides a safe environment in which learners learn.
- Identifies learners who are suffering, or at risk of suffering, significant harm and takes appropriate action to see that such learners are kept safe in the organisation.
- Have procedures for reporting and dealing with allegations of abuse against members of staff and volunteers.
- Operates safe recruitment procedures.
- Designates a member of staff with sufficient authority to take lead responsibility for the protection of young people.
- Remedies any deficiencies in or weaknesses in regard to the protection of learners arrangements that are brought to the Safeguarding Officer's attention.
- The Compliance Manager will approve and annually review organisation policies and procedures.

The Safeguarding Officer

The organisation has nominated Mohammed Islam, as the Lead Safeguarding officer.

The Safeguarding Officer is responsible for liaising with the Board and Designated Manager over matters regarding the protection of learners including:

- Ensuring that the organisation has procedures and policies which are consistent with the Local Safeguarding Young People's Procedures.
- Ensuring that the organisation considers the policy on the protection of learners each year
- Ensuring that each year the organisation is informed of how the organisation and its staff have complied with the policy including, but not limited to, a report on the training that staff have undertaken and that such training is recorded on staff's individual records of training.

The Safeguarding Officer is responsible for:

- Reporting on matters relating to safeguarding
- Providing first-line advice to staff and students on protection of learners matters.
- Knowing how to make an appropriate referral and then to liaising with protection officers in local authorities to see advice on how best to deal with a specific case.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate.
- Agreeing and implementing actions relating to individual learners protection cases.
- Advising on any improvements that should be introduced to improve the procedures relating to Learners protection.
- Supporting the processes of briefing and training of staff on matters relating to learner protection.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 10 of 24

Safeguarding Officers Contact Details

Name	Contact No	Email Address	
Andrea Kay	07711 371171	andrea@ashleyhunter.co.uk	safeguarding@ashleyhunter.co.uk
Mohammed Islam	0161 628 8563	mohammed@ashleyhunter.co.uk	

The Managing Director is responsible for overseeing the liaison with the external agencies such as the police and/or social services in connection with allegations against the Safeguarding Officer or Senior Designated Manager. This will not involve undertaking any form of, but will ensure good communication between the parties and provide information to assist enquiries.

To assist in the duties, the Safeguarding Officer shall receive appropriate training in line with Local Authority Safeguarding procedures.

The Safeguarding Officer

The Safeguarding Officer has been designated with the overall responsibility for the protection of learners.

The Safeguarding Officer is responsible for the management of the organisation's overall policy and procedures that relate to the protection of young people. The Safeguarding Officer will have received training in young/vulnerable person protection issues and inter-agency working and will receive refresher training at least every 2 years. The Safeguarding Officer will keep up to date with developments in young and vulnerable person protection issues.

More specifically has the responsibility for:

- Liaising with the Managing Director, Adult Services, Social Services and other agencies to refer individual cases of suspected or identified abuse, neglect or such allegations.
- Acting as the key contact person within the organisation.
- Being responsible for co-ordinating action with the organisation on the protection of young and vulnerable people issues.
- Where appropriate liaising with staff to share information, but only on a 'need to know basis', to protect rights of learners to confidentiality.
- Representing the organisation at meetings and being a member of a core group is required.
- Raising awareness about the protection of learners and ensuring all staff are familiar with this Policy and Procedure and receive basic training in young and vulnerable people protection issues.
- Providing advice and support to other staff on issues relating to young and vulnerable people protection.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 11 of 24

- Maintaining a proper record of any young and vulnerable person referral, complaint or concern (even where that concern does not lead to a referral).
- Ensuring that carers of young and vulnerable people within the organisation are aware of the organisation's protection policy.
- Liaising with organisations which send learners to the organisation to ensure that appropriate arrangements are made for the learners.
- Where an inter-agency protection plan is in place, ensuring the organisation is involved, if necessary, in the preparation of the plan and ensuring the organisation's role is clearly defined. This will include any involvement with the Multi-Agency Public Protection Arrangement (MAPPA).
- Ensuring that there are effective arrangements for liaising with employers and training organisations that receive learners from the organisation on placements to ensure that appropriate safeguards are put in place.
- Ensuring that staff receive basic training in learners protection issues and are aware of the organisation's protection procedures.
- Reporting annually to the board of the organisation on how the organisation has discharged its duties. The designated staff member is responsible for reporting deficiencies in procedure identified internally or by outside agencies to the board at the earliest opportunity.

3.4 The Safeguarding Officer

The Safeguarding Officer is responsible for:

- Reporting on matters relating to safeguarding
- Providing first-line advice to staff and students on protection of learner's matters.
- Knowing how to make an appropriate referral and then to liaising with protection officers in local authorities to see advice on how best to deal with a specific case.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate.
- Agreeing and implementing actions relating to individual learner's protection cases.
- Advising on any improvements that should be introduced to improve the procedures relating to learners protection.
- Supporting the processes of briefing and training of staff on matters relating to learners protection.
- Undertaking training in protection issues and inter-agency working

3.5 The roles and responsibilities of all staff

Everyone in the organisation must be aware that any young person or vulnerable adult may be the victim of abuse or may be at risk of physical abuse, neglect, emotional abuse or sexual abuse.

Key management and all staff working with learners will receive training adequate to familiarise them with young person protection issues and responsibilities and the organisation policy and procedures, with refresher training at least every three years.

Consequently, all staff members must be familiar with these procedures. It is the responsibility of all members of staff to act immediately if they become aware of an actual case of abuse/neglect or become suspicious that there may be a risk of abuse/neglect.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 12 of 24

Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

These procedures must be followed by all members of staff

4.1 Confidentiality

4.1.1 Confidentiality is an issue which requires discussion and understanding by all those working with learners particularly in the context of protection. Normally, personal information should only be disclosed to third parties with the consent of the subject of that information.

4.1.2 Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, consent may not be possible or desirable but the safety and welfare of the young or vulnerable person dictates that the information should be shared.

4.1.3 Clear boundaries of confidentiality will be communicated. Staff have a professional responsibility to share relevant information about the protection of learners with other professionals.

4.1.4 If a young person confides in a member of staff and requests the information is kept secret, it is important the member of staff tells the young person in an appropriately sensitive way that he or she has a responsibility to refer cases of alleged abuse to the appropriate people in the organisation and the young person should be assured the matter will be disclosed only to people who need to know.

4.1.5 All personal information regarding a young person will be kept confidential except when:

- a) It is suspected that a young person is the victim of abuse;
- b) It is suspected that an adult with learning difficulties is at risk from abuse (this would include any student whose limited understanding of relationships meant they could not protect themselves from abuse).

4.1.6 The Safeguarding Officer will liaise with the learner, if appropriate, in respect of disclosure to Agencies.

The need to safeguard the interests of all young persons will be an overriding consideration

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 13 of 24

4.2 Disclosure of Abuse

4.2.1 If a young person discloses abuse, or if abuse is suspected, staff should:

- Listen carefully and stay calm;
- Question normally and without pressure, in order to be sure that what the young person is saying is fully understood by the member of staff;
- Reassure the young person throughout that by telling a member of staff they have done the right thing;
- Inform the young person that the information must be passed on but that only those who need to know about it will be told. Inform the young person to whom the matter will be reported (having regard to Section 4.3).
- Note the main points carefully, be factual using the young person's own words.
- Make a detailed note of the date, time, place where the alleged abuse took place, what the young person said, did and the questions asked by the member of staff. Include a description of any injuries observed, the member of staff's name and those of any other present.

4.2.2 For learners in the organisation who have disabilities and difficulties in communicating, extra care should be taken to enable the young person to express themselves to a member of staff with appropriate communication skills.

4.2.3 Staff should not:

- Put words into the young person's mouth or ask leading questions.
- Investigate concerns or allegations, the organisation has no investigative role, but should report them immediately to the Safeguarding Officer.
- Promise confidentiality (refer to section 4.1);
- Forget to record what you have been told;
- Fail to pass on the information to the correct person;
- Assume someone else will take the necessary action.

4.3 Act Immediately!

4.3.1 Any member of staff who has any concern about a young person or vulnerable adult must discuss the case with the Safeguarding Officer (see above for details) immediately (at least within the same working day), so that, if necessary, a referral can be made to the relevant agency/local authority without delay.

4.3.2 If the Safeguarding Officer cannot be contacted the staff member should contact one of the other Directors. The Safeguarding Officer must notify the Managing Director as soon as practicable and in any event within 24 hours of the disclosure or suspicion being raised.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 14 of 24

4.4 Action by the Safeguarding Officer

4.4.1 The Safeguarding Officer will collate relevant information about the case and at the earliest opportunity (normally within the same day), will take a decision about whether the case should be referred to the relevant external agency/Local Authority. The Safeguarding Officer may discuss the case with relevant people/officers in the relevant agency/Local Authority to seek advice as to the appropriate action to be taken.

4.4.2 The Safeguarding Officer will collate the relevant information and discuss the case with one of the Directors who will take responsibility for referring the case to the Local Authority.

4.5 Investigation of a Case

4.5.1 Individual members of staff must not investigate abuse concerns. This will be carried out if necessary by the appropriate agency and usually by an external agency.

4.6 Making Written Notes

4.6.1 A member of staff must make a written record of their concerns at the earliest opportunity – recording relevant facts accurately and clearly. Do not make any assumptions or confuse fact with opinion.

4.6.2 When recording discussions that took place regarding the case, members of staff should try to record accurately what was said. Where possible, the actual words that were said should be recorded.

Any notes must be given to the Safeguarding Officer as soon as possible and will help to ensure accuracy in recalling events later. Such notes should be stored safely.

4.7 Written Records

The Safeguarding Officer shall retain a copy of:-

The report

Any notes or correspondence dealing with the matter

Any other relevant material

Copies of reports, notes and all documents should be kept securely locked at all times and access to records will be confined to designated staff.

4.8 Record Keeping

a) All records relating to the welfare and protection concerns for any learner will be kept in locked filing cabinets which are maintained at Head Office by the Safeguarding Officer.

b) The organisation will adopt the standard documentation that is prescribed under the procedures for 'The Common Assessment Framework' which has been developed for use within all local authorities and relevant partners.

c) For any learner who has been the subject of a welfare or young person protection matter, a note will be placed on their record. The note will state that 'this student has been the subject of a welfare or young person protection concern. For further information refer to the Safeguarding Officer at Head Office'.

d) Records will be kept for any learner who is listed on the Child Protection Register (CPR) for

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 15 of 24

any local authority and these records will be maintained within the Safeguarding Files. The Safeguarding Officer will ensure that relevant assessors or tutors are advised about the Child Protection record for any such learner.

e) The Safeguarding Officer will ensure that where there is a record within the Safeguarding Files, a note is placed on the main file for the learner to make reference to the record within the Safeguarding Files.

f) Where a course tutor has a learner in their group who has been placed on the Child Protection Register, they will advise the Safeguarding Officer of any significant changes in behaviour or of any other concerns.

g) Records relating to the welfare of a learner will remain on the 'Safeguarding Files' for a period of one year from the date that the learner leaves the organisation.

h) When the learner leaves the organisation, any educational institution to which the learner progresses will be advised in writing that the learner records within the organisation contain information about child protection concerns even where these are no longer current.

4.9 Contact with the Family

4.9.1 Contact with the family should first be discussed with the organisation's Safeguarding Officer, who will consult relevant staff within the appropriate external agency or local authority.

4.9.2 In cases where a minor physical injury causes concern, it is usual to discuss this with the parent or carer. If the explanation suggests a non-accidental cause the injury (or failure to protect the young person from harm), the parent or carer should be advised that the matter may be referred to an agency and most likely to the Social Services of the relevant local authority.

4.9.3 In cases of possible neglect or emotional abuse, the concern is likely to have built up over a period of time. There may have been discussion between staff of the organisation and the family about sources of help but if concerns persist, the Safeguarding Officer will need to refer to the Children and Family Service and will normally advise the family of this.

4.9.4 In cases where there are suspicions of sexual abuse, where there is fabricated or induced illness or where to do so would place the young person in greater risk, the Safeguarding Officer will seek immediate advice from the Children and Family Service staff before discussing this matter with the family, to determine whether it is appropriate for the Safeguarding Officer to speak with the family or whether instead an external agency may liaise with the family.

4.10 The Child Protection Register

a) The organisation will normally be told by the relevant Children's Social Services when a learner's name is on the Child Protection Register (CPR) whether within Greater Manchester or within another local authority.

b) The Safeguarding Officer will write to the relevant department of all local authorities in Greater Manchester to request that they inform us if any young person on their Child Protection Register is currently attending the organisation.

c) The name and contact details of the key social worker must be obtained and clearly recorded on the relevant learner's record within the 'Safeguarding Files'.

d) The organisation will participate fully in the work of relevant professionals who are responsible for these learners and will assist with the objectives of the Young Person Protection

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 16 of 24

Plan for the learner.

e) When a learner's name is on the CPR, the Safeguarding Officer for the organisation will report all absences, behavioural changes or any other concerns to the key social worker.

f) When a learner whose name is on the CPR leaves the organisation, the Safeguarding Officer will send the information and records relating to child protection to the designated Child/Young Person Protection Office at any educational institution to which the student progresses.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 17 of 24

4.11 Sharing Information and requests for assistance by other agencies

- a) The organisation has a legal duty to assist other agencies including the appropriate department within the local authority or the Police, when they are making enquiries about the welfare of a young person or vulnerable adult.
- b) It is therefore appropriate that information about a young person or vulnerable adult is shared with other agencies but such information must only be shared on a 'need to know' basis with other agencies.
- c) When telephone requests for information are received, the relevant member of staff should always contact the Safeguarding Officer who will deal with the request in a manner consistent with (d) below.
- d) Where a written request for information is received by a member of staff, the member of staff should always advise the Safeguarding Officer and they should handle the information request or expressly authorise that member of staff to deal with the enquiry. If the staff member does not receive this authorisation they should not engage in detailed dialogue.
- e) Requests for attendance at meetings about individual learners should be notified to the Safeguarding Officer who will arrange the preparation of a report and attendance at the meeting.
- f) Reports on learners should contain information about the learner's:
- Progress
 - Attendance
 - Behaviour
 - Relationships with young people and adults
 - Family
 - Any other relevant matter
- g) Reports should be objective and distinguish between fact, observation, allegation and opinion.
- h) Any Report shall remain confidential for the purposes of any young person protection investigation.

4.12 Contact Details for External Agencies

The Safeguarding Officer will ensure that a directory of external contacts is maintained.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 18 of 24

Allegations or concern about a staff member, carer, volunteer or a learner

5.1 The organisation recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. The organisation recognises that the Children Act 1989 states that the welfare of the young or vulnerable person is the paramount concern. It also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, allegations of abuse by a member of staff shall be handled with sensitivity.

5.2 It is essential that any allegation of abuse made against a member of staff is dealt with fairly, quickly and consistently. The organisation has a procedure that applies to all staff, whether teaching, administrative, management or support and volunteers. This procedure is called 'Safeguarding Young/Vulnerable People – Dealing with Allegations of Abuse against Staff'.

5.3 In the event that there is an allegation of abuse made against a learner, then the matter should be discussed immediately with Safeguarding Officer who will discuss the matter with the Managing Director and determine what action to take. The following will inform the decisions:

- Taking such steps s/he considers necessary to ensure the safety of the learner in question and any other learner who may be at risk;
- Reporting the matter to the local relevant services in accordance with the organisation procedure.
- Ensuring that the person who reported the concern completes a written report.

Recruitment and Selection Procedures

6.1 The organisation has in place recruitment procedures which will ensure that every care is taken to ensure that young people and vulnerable adults are protected from unsuitable people.

6.2 The recruitment procedures will apply to all staff and volunteers within the organisation who may work with young people or vulnerable adults. The recruitment procedures will include the following:

- Registration/checks with the Independent Safeguarding Authority (ISA)
- Identity check
- The post or role will be clearly defined
- The key selection criteria for the post or role will be identified
- The requirement to produce documentary evidence of academic/vocational qualifications
- Obtaining professional and character references
- Verification of previous employment history
- Criminal Records Bureau disclosure whilst maintaining sensitive and confidential use of the applicant's disclosure.
- Enhanced DBS check where necessary
- Use of a variety of selection techniques (e.g. Qualifications, previous experience, interview, reference checks).

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 19 of 24

Implementation, Review and Evaluation of the Policy and Procedures

All organisation staff should be aware of and must observe the above policy and procedure at all times.

7.1 How the policy and the procedures are implemented and monitored?

- A) The Compliance Manager is responsible for implementing the policy and procedures.
- B) The Safeguarding Officer is responsible for advising, updating and informing Directors, managers and members of staff on young people protection matters.
- C) All staff will have access to this policy and procedures. All new staff will be given information about this and all key cross organisation policies at their staff induction session.
- D) The Safeguarding Officer will ensure that all staff are trained and regularly updated (with refresher training at least every 3 years) on matters relating to Young Person Protection and ensure that they are familiar with this policy and procedures.
- E) The Safeguarding Officer will form and chair a Young Person Protection Group (see below) which will have membership of appropriate managers and staff to ensure that the operation of the policy and procedures is effectively implemented and monitored.

7.2 The Safeguarding Young/Vulnerable People Protection Group

The role of the group is to:

- Make recommendation to the Safeguarding Officer on the implementation of the policy and procedures.
- Help to plan training activities for staff across the organisation.
- Review the handling of Young/Vulnerable Person protection cases to identify whether improvements in procedures and/or guidance should be made.
- Support the process of reviewing and evaluating of the policies and procedures.

7.3 How the policy and procedures will be reviewed and evaluated

The Compliance Manager will ensure that the policy and the procedures are reviewed and evaluated on an annual basis.

The Young/Vulnerable Person Protection Group will support the Safeguarding Officer in reviewing the policy and procedures, particular attention will be paid to ensuring that:

- The requirements of relevant legal frameworks and guidance are being met.
- The processes and procedures are clearly described and are still relevant.
- The arrangements for briefing and training staff are being implemented and are effective.
- The cases relating to young/vulnerable person protection have been effectively managed or that lessons have been learnt where they have not been effectively managed and any necessary changes have been implemented.
- The Safeguarding Officer will keep the Managing Director updated in terms of the above.

Other Relevant Policies and Procedures

[Safer Recruitment Policy 2018.doc](#)

[Equality Diversity and Inclusion Policy 2018.docx](#)

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 20 of 24

Distribution and Communication

A copy of the policy is to be held at Head Office. A hard copy is also distributed to the Compliance Manager for inclusion in the Policies and Procedures File.

Separate information, '<https://www.skillsforcare.org.uk/Documents/Topics/Safeguarding/A-guide-to-adult-safeguarding-for-social-care-providers.pdf>' which provides more detailed guidance regarding Adult Safeguarding to members of staff will be posted at the Head Office.

Approval

[Signature of MD]

Mostafa Hussain

[Date]

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 21 of 24

Safeguarding Incident/Concern Recording Sheet

Safeguarding Incident/Concern Recording Sheet

In the event of a disclosure or incident, all staff and learners should behave in the following way:

- Stay calm;
- Do not press for information by questioning the individual. Encourage the person to talk, listen and remember what they say;
- Do not express disbelief, anger, embarrassment, shock or fear;
- Reassure the individual and tell them you are glad they are speaking to you and that you know it is not their fault;
- Never promise to keep a secret;
- When appropriate write down what has happened on the safeguarding incident form and where possible, recount any conversations verbatim;
- Inform the Safeguarding officer at the earliest opportunity and hand in this form to them.

PLEASE NOTE – THE DETAILS RECORDED IN THIS FORM WILL BE STORED IN A CONFIDENTIAL FILE. DETAILS INCLUDED IN THIS RECORDING SHEET WILL ONLY BE SHARED WHEN NECESSARY FOR THE PROTECTION OF THE INDIVIDUAL.

Date of recording	Name of Staff / Learner Reporting:
Date of incident (if applicable):	Location:

Nature of concern

PLEASE PROVIDE AS MUCH DETAIL AS POSSIBLE.

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 22 of 24

Actions taken	
Outcome (to be completed by the lead safeguarding officer)	
Review of procedures <ul style="list-style-type: none"> • Review safeguarding assessment. • Review Risk assessment. • Check DBS for each member of staff and volunteer. • Share any learning or improvements with Directors 	

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 23 of 24

Impact Assessment Form

1. Name of policy,, function or service development being assessed:	Policy and Procedures for Safeguarding
2. Please describe the purpose of the policy, function or service development:	<ol style="list-style-type: none"> 1. To confirm the organisation’s commitment and obligations in respect of Safeguarding and promoting the welfare of young people. 2. To ensure the organisation complies with relevant Government guidance. 3. To provide clear guidance to staff about how to respond when a case of possible harm, abuse or neglect is identified or suspected. 4. To ensure staff are aware of their responsibilities in dealing with learners. 5. To ensure a prompt and effective response is taken when it appears a learner may be at risk of abuse or neglect. 6. To ensure staff are adequately briefed and trained in the implementation of the organisations Safeguarding Policy and Procedures. 7. To ensure the roles and responsibilities of the designated Lead Safeguarding Officer and other key staff for young people protection are known and understood by staff.
3. Does this policy, function or service development impact on learners, staff and/or the public?	YES – Staff (directly) and learners and the public (indirectly)
4. Is there reason to believe that the policy, function or service development could have an adverse impact on a particular group or groups?	NO
5. Based on the initial screening process, now rate the level of impact on equality groups of the policy, function or service development:	<p>Negative/Adverse impact LOW</p> <p>Positive impact HIGH</p>

Date Completed: November 2018

Signed: Andrea Kay – Pastoral Care and Policies Co-ordinator

Document Title	AHTA Doc. Ref.	Version	Created on	Last Revised	Page
Safeguarding Policy January 2019	AK- Safeguarding 02	AK 2.0	18 Oct 2017	30 January 2019	Page 24 of 24