

Child Protection & Safeguarding Policy

Haddon Training Ltd

'Developing Potential for Future Success'



This policy will be reviewed annually in line with Policy Review timetables in May each year.

It will be updated as required to reflect any changes that affect its contents.

NEXT REVIEW DATE: May 2023

CHILD PROTECTION AND SAFEGUARDING POLICY

1. Introduction

- 1.1. Haddon Training is committed to providing a secure environment for all learners and staff. All the members of staff recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not. Haddon Training Ltd aims to create a culture of vigilance.
- 1.2. In adhering to this policy, and the procedures therein, staff and visitors will contribute to Haddon Training's delivery of the outcomes to all learners, as set out in s10 (2) of the Children's Act 2004.
- 1.3. This Policy is one element within our overall organisational arrangements to safeguard and promote the welfare of all learners and staff in line with our statutory duties set out at s175 of the Education Act 2002.
- 1.4. This Policy also draws upon the guidance contained in DfE Guidance 'Keeping Learners Safe in Education, 2021', Education and Training (Welfare of Children) Act 2021; Relationships and Sex Education (RSE) and health education June 2019' Working Together to Safeguard Children 2018; and specifically DCSF Resources 'Learning Together to be Safe', 'Prevent: Resources Guide', 'Tackling Extremism in the UK', DfE's 'Teaching Approaches that help Build Resilience to Extremism along Young People' and Peter Clarke's Report of July 2014. Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE July 2018). Ofsted's Review of sexual abuse in schools and colleges, June 2021.

2. Information Sharing and Confidentiality

- 2.1. Our Safeguarding Policy takes into account the GDPR and Data Protection Act 2018. Please refer to the Flowchart of when and how to share information in Appendix 3.

3. Policy Statement

- 3.1. It is this company's Policy to treat all learners and staff members fairly and equally, regardless of their sex, gender reassignment status, sexual orientation, religion or belief, marital status, civil partnership status, age or perceived age, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, it is the company's responsibility to ensure the safety of all staff and learners from physical, sexual, psychological or emotional, financial, neglect or discriminatory abuse.
- 3.2. Through this policy and procedure and the training and development of managers and staff, the company will do all it can to promote good practice in this area in order to reduce the likelihood of abuse occurring.
 - 3.2.1. *Abuse: is a violation of an individual's human and civil rights by any other person or persons. It may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.*
- 3.3. This document covers safeguarding our learners (children, young people and vulnerable adults) and staff members from abuse.
- 3.4. Haddon Training believes that:
 - 3.4.1. Children, young people and adults should never experience abuse of any kind

- 3.4.2. We have a responsibility to promote the welfare of all children, young people and adults, to keep them safe and to practise in a way that protects them.
- 3.5. Haddon Training recognises that:
 - 3.5.1. The welfare of its learners and staff is paramount
 - 3.5.2. Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
 - 3.5.3. Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting welfare.
- 3.6. It is Haddon Training's intention to:
 - 3.6.1. Ensure staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk
 - 3.6.2. Ensure that appropriate supervision is given, where required
 - 3.6.3. Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
 - 3.6.4. Regularly review and monitor Haddon Training's policies and procedures to ensure our legal, moral and social responsibilities are met
 - 3.6.5. Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration
 - 3.6.6. Have a Designated Safeguarding Lead (DSL) and a Deputy Safeguarding Officer (DSO) in place to advise on and manage any concerns and referrals made
 - 3.6.7. Ensure that relevant employment and security checks are undertaken, as required
 - 3.6.8. Ensure that personal information is confidential and should only be shared with the permission of the individual concerns (and/or those with parental responsibility), unless the disclosure of confidential information is necessary in order to protect a child or adult at risk from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict "need to know" basis

4. Physical Abuse

- 4.1. This may include, but is not limited to, hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, slapping, pushing, kicking, and misuse of medication, restraint or inappropriate sanctions.
- 4.2. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates, illness in a child, young person or vulnerable adult.
- 4.3. Some of the signs of abuse may include:
 - 4.3.1. Unexplained burns, bruises, marks or injuries on any part of the body;
 - 4.3.2. Scratches;
 - 4.3.3. Drowsiness from misuse of medication;

- 4.3.4. Anxiety in the presence of an abuser;
- 4.3.5. Frequent visits to the GP or A&E;
- 4.3.6. An injury inconsistent with the explanation offered;
- 4.3.7. Reluctance to get changed, or wearing long sleeves in hot weather;
- 4.3.8. Flinching when approached; and
- 4.3.9. Running away from home/residential care

5. Sexual Abuse

- 5.1. This may include, but is not limited to, rape and sexual assault or sexual acts to which the child or vulnerable adult has not consented, or could not consent or was pressured into consenting including so called Honour Based Violence (HBV). HBV encompasses crimes which have been committed to protect or defend the honour of the family and/or community. Where staff are concerned that a child may be at risk of HBV they must contact the Designated Safeguarding Lead as a matter of urgency.
- 5.2. HBV includes Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing.
- 5.3. FGM refers to procedures that intentionally alter, or cause injury to, the female genital organs for non-medical reasons. FGM risk factors can include:
 - 5.3.1. Low level of integration into UK society
 - 5.3.2. Mother or sister who has undergone FGM
 - 5.3.3. Girls who are withdrawn from PSHE
 - 5.3.4. Visiting female elder from the country of origin
 - 5.3.5. Being taken on a long holiday to the country of origin
 - 5.3.6. Talk about a 'special procedure' to become a woman
- 5.4. Symptoms that FGM may have already taken place:
 - 5.4.1. Difficulty walking, sitting or standing
 - 5.4.2. Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - 5.4.3. Spending long periods of time away from learning with bladder or menstrual problems
 - 5.4.4. Talking about pain or discomfort between her legs
- 5.5. If you discover that an act of FGM appears to have been carried out on a girl under the age of 18, you **must report this to the police immediately**.

THERE IS A MANDATORY DUTY (THE SERIOUS CRIME ACT 2015) FOR EDUCATION PROFESSIONALS TO NOTIFY POLICE WHEN THEY DISCOVER THAT FGM APPEARS TO HAVE BEEN CARRIED OUT ON A GIRL UNDER 18 AND TRAINER COACHES MUST PERSONALLY REPORT THIS.

- 5.6. Sexual abuse also includes forcing a person to look at pornographic materials.
- 5.7. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual

abuse, as can other children.

5.8. Some of the recognised signs of sexual abuse are:

5.7.1. Changes in behaviour;

5.7.2. Sexually transmitted diseases;

5.7.3. Difficulties in walking or sitting; and

5.7.4. Sexualised behaviour.

6. Child Sexual Exploitation

6.1. 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 in exchange for something the victim needs or wants, and/or 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.

6.2. Like all forms of child sexual abuse, child sexual exploitation can:

6.2.1. Affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;

6.2.2. Still be abuse even if the sexual activity appears consensual;

6.2.3. Include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;

6.2.4. Take place in person or via technology, or a combination of both;

6.2.5. Involve force and/or enticement-based methods of compliance and may or may not, be accompanied by violence or threats of violence;

6.2.6. Occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);

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

6.2.8. Be typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

6.3. Some of the recognised signs of sexual exploitation are:

6.3.1. Appearing with unexplained gifts or new possessions;

6.3.2. Older boyfriends or girlfriends;

6.3.3. Sexually transmitted infections;

6.3.4. Drug and alcohol misuse; and

6.3.5. Missing education or missing from home.

- 6.4. Further information is available in the DfE 2017 Definition and Guide for Practitioners www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners
- 6.5. The statutory definition of Child Sexual Exploitation can be found in 'Working Together to Safeguard Children (2018)

7. Sexual Consent, harassment and assault

- 7.1. Ofsted's Review of sexual abuse in schools and colleges, June 2021 identified high levels of sexual abuse within schools and colleges. From November 2021, Ofsted will inspect work-based learning providers' arrangements to ensure that apprentices and learners are safeguarded are robust and implemented.
- 7.2. The review of legal definition of consent is defined by Section 74 of the Sexual Offences Act 2003. This also covers the legal definitions of Sexual Assault, sexual assault by penetration (rape) and harassment.

8. Physiological/Emotional Abuse

- 8.1. This may include, but is not limited to, emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- 8.2. Some of the recognised signs of psychological or emotional abuse are:
 - 8.2.1. Fear;
 - 8.2.2. Passivity;
 - 8.2.3. Confusion;
 - 8.2.4. Apathy;
 - 8.2.5. Lack of eye contact;
 - 8.2.6. Low self-esteem;
 - 8.2.7. Disturbed sleep patterns; and
 - 8.2.8. Reluctance to talk openly.

9. Financial or Material Abuse

- 9.1. This may include, but is not limited to, theft, fraud, exploitation, pressure in connection with financial transactions, or the misuse or misappropriation of property or possessions.
- 9.2. Some of the recognised signs of financial or material abuse are:
 - 9.2.1 Loss of jewellery and personal property;
 - 9.2.2 Lack of money to purchase basic items;
 - 9.2.3 A bill not being paid when money is entrusted to a third party;
 - 9.2.4 Inadequate clothing;
 - 9.2.5 Unexplained withdrawal of cash; and

9.2.6 Loss of money from a wallet or purse.

10. Neglect and Acts of Omission

- 10.1. This may include, but is not limited to, ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life such as medication, adequate heating and nutrition.
- 10.2. Some of the recognised signs of neglect and acts of omission are:
 - 10.2.1 Dehydration;
 - 10.2.2 Infections;
 - 10.2.3 Malnutrition;
 - 10.2.4 Hypothermia; and
 - 10.2.5 Lack of suitable clothing

11. Discriminatory Abuse

- 11.1. This may include, but is not limited to, abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation.
- 11.2. Some of the recognised signs of discriminatory abuse might be very similar to psychological and emotional abuse.

12. Children Missing from Education

- 12.1. All children under 18 are required by law to remain in education or training until they reach the age of 18. We monitor attendance carefully and address poor or irregular attendance without delay. Work Placements (for Traineeships) and employers (for Apprenticeships) are asked to notify Haddon Training if a learner has any unauthorised absence exceeding 10 days.
- 12.2. If a learner aged under 18 has a continuing unexplained absence Haddon Training's procedure is to:
 - 12.2.1. Report the absence to the relevant Local Authority in writing
 - 12.2.2. Report the absence to the child's parent or care-giver in writing
 - 12.2.3. Emergency contact details are held securely on Tracker system

13. Private Fostering

- 13.1. Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'. A connected person is defined as a 'relative, friend or other person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child.
- 13.2. Haddon Training Ltd understands that it has a mandatory duty to inform the local authority of children in such arrangements.
- 13.3. The local authority will be notified by the DSL if a child is living with someone who is not their parent or a 'connected person' for longer than 28 days. The local authority need to be satisfied that the placement is suitable and the child is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but

can include occasional short breaks.

14. Online Safety

- 14.1. All Learners, at Induction, will have access to information about safe use of devices and how to stay safe online. This will be ongoing throughout their time on programme.

15. Criminal Exploitation of Children (County Lines)

- 15.1 County Lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.
- 15.2 County Lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults.
- 15.3 'County Lines' operates by gangs from urban areas, in particular London but also other cities, introducing a telephone number in a new area to sell drugs directly at street level. Potential buyers telephone the number and local runners are dispatched to make deliveries via a telephone 'relay or exchange' system. The 'runners' are almost invariably children, often boys aged 14 – 17 years, who are groomed with the promise of money and gifts and deployed or forced to carry out day to day dealing. Runaway and missing children are also used by gangs to expand inner city drugs operations into county towns. Children as young as 11 years of age have been reported as being recruited by these highly organised networks.
- 15.4 Gang members also enter into relationships with young, often vulnerable, women in order to secure a location for drugs to be stored in the new area. In addition, violence is used against drug users to coerce them to become runners, enforce debts, and use their accommodation as an operating base.
- 15.5 All staff at Haddon Training Ltd. Will be vigilant and report to the DSL any potential issues with learners.

16. Safeguarding Learners

- 16.1. The Company has a responsibility to report to the proper authority, any abuse as described above, from which it is perceived a learner is suffering. All learners are given a Haddon Training Safeguarding Contacts Key Fob. This gives them the name, email address and telephone number of Haddon Training's Designated Safeguarding Lead.
- 16.2. All learners are taught about safeguarding, including on-line, through various teaching and learning opportunities which commences at Induction and continues throughout their programme of learning with Haddon. This is logged in progress reviews.
- 16.3. Employees of Haddon Training share the responsibility described above and do not have an option to keep 'secrets' with learners. If a learner asks to share with a Haddon Training an incidence of abuse, whether described above or not, and asks for it to be kept secret, the employee must advise the learner before they impart the information that they cannot keep it a secret. If the learner decided to go ahead and tell.
- 16.4. The employee, they must then pass the information onto Haddon Training's Designated Safeguarding Lead or Deputy Safeguarding Officer. The DSL or DSO will contact the learner and then investigate. If necessary, they will advise the learners' employer (and/or suitable government agency) and take any necessary steps to protect the learner from that perceived abuse.
- 16.5. Learners with Special Educational Needs and disabilities can face additional safeguarding challenges because:
 - 16.5.1 There may be assumptions that indicators of possible abuse such as behaviour, abuse

and injury relate to the learner's disability without further exploration

16.5.2 These learners may be disproportionately impacted by bullying without outwardly showing any signs

16.5.3 Communication barriers may be more of an obstacle

16.6. Haddon Training seeks to keep learners and staff members safe by:

16.6.1 Valuing, listening to and respecting them

16.6.2 Appointing a Designated Safeguarding Lead and a Deputy Safeguarding Officer

16.6.3 Developing Safeguarding policies and procedures which reflect best practice

16.6.4 Using our Safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately

16.6.5 Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise

16.6.6 Developing and implementing an effective online safety policy and related procedures

16.6.7 Sharing information about child protection and safeguarding best practice with children, their families, staff and volunteers via leaflets, posters, group work and one- to-one discussions

16.6.8 Recruiting staff and volunteers safely, ensuring all necessary checks are made

16.6.9 Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures

16.6.10 Implementing a Code of Conduct for staff and volunteers

16.6.11 Using our procedures to manage any allegations against staff and volunteers appropriately

16.6.11 Ensuring we have effective complaints and whistleblowing measures in place

16.6.11 Ensuring we provide a safe physical environment for our learners and staff by applying health and safety measures in accordance with the law and regulatory guidance

16.6.12 Recording and storing information professionally and securely

17. Learners with Special Educational Needs or Disabilities

17.1. At Haddon Training we identify learners who might need more support to be kept safe or to keep themselves safe by:

17.1.1 Identifying Special Educational Needs (SEN)/Additional Learning Needs (ALN) at Induction or at any time during their programme

17.1.2 Completing an ALN notification form

17.1.3 Undertaking additional ALN visits

17.1.4 Monthly discussion with Team leaders on all ALN learners

17.1.5 Identifying ALN learners on the weekly In-learning Report

17.1.6 Regular discussion and teaching on Safeguarding by Trainer Coaches to identify and provide appropriate strategies and support with employer communication

17.2. Haddon Training safeguards vulnerable adults as defined in the Care and support statutory guidance issued under the Care Act 2014 by:

17.2.1 Protecting the rights of adults to live safely, free from abuse and neglect

17.2.2 Working with people and organisations to prevent and stop both the risks and experience of abuse or neglect

17.2.3 Making sure the adult's wellbeing is promoted, including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action

17.2.4 Recognising that adults sometimes have complex interpersonal relations and may be ambivalent, unclear or unrealistic about their personal circumstance and therefore potential risks to their safety or wellbeing.

18. Peer on Peer Abuse (Refer to section 7)

18.1.1 This includes, but is not limited to:

18.1.2 Bullying (including cyberbullying)

18.1.3 Gender based violence

18.1.4 Sexual violence, such as rape, assault by penetration and sexual assault

18.1.5 Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

18.1.6 Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

18.1.7 Sexting (also known as youth produced sexual imagery)

18.1.8 Initiation/hazing type violence and rituals.

18.1.9 In cases of 'sexting' we follow guidance by the UK Council for Child Internet Safety (UKCCIS) published in August 2016.

18.1.10 Haddon Training supports victims of peer on peer abuse by reporting to the Designated Safeguarding Lead for investigation and appropriate action.

19. Role of Designated Safeguarding Lead (DSL)/Deputy Safeguarding Officer (DSO)

19.1. Haddon Training has two Designated Safeguarding Leads and a number of Deputy Safeguarding Officers.

19.2. The DSL is responsible for safeguarding and child protection at Haddon Training by:

19.2.1 Managing referrals from staff or any others outside the company

19.2.2 Working with external agencies and professional on matters of safety and safeguarding

19.2.3 Undertaking training at least every two years and updates annually

- 19.2.4 Raising awareness of safeguarding and child protection amongst staff, learners, employers and parents.
- 19.3. Alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a child or vulnerable adult.
- 19.4. Alert the police when a crime may have been committed.
- 19.5. Refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority's adult's social care.
- 19.6. Refer to the ESFA should Haddon Training be subject to an investigation regarding its safeguarding practices.
- 19.7. Maintain a proper record of any safeguarding referral, complaint or concern, even when that concern does not lead to a referral.
- 19.8. Act as a source of advice, support and expertise to staff members on matters of safety and safeguarding.
- 19.9. Liaise with relevant agencies following a referral to ensure it has been dealt with effectively, and identify whether or not a resolution has been achieved. The DSL/DSO will ensure that Haddon Training works employers and other training organisations that provide apprenticeships and/or work placements for learners or adult at risk, to ensure that appropriate safeguards are in place.
- 19.10. If the DSL is absent from the business, the DSO will be responsible for undertaking DSL duties.
- 19.11. The DSL and DSO are prohibited from being absent from the business at the same time.

20. Role of the Chief Operating Officer

- 20.1. The Chief Operating Officer is responsible for the following:
- 20.1.1 Overall responsibility for Safeguarding and Prevent at Board level
 - 20.1.2 Ensuring that resources, support and all relevant training is available and in place for all staff
 - 20.1.3 Supporting the DSL and DSO in meeting their responsibilities
 - 20.1.4 Ensuring Haddon Training meets its commitments and takes them seriously

21. Role of All Staff at Haddon Training

- 21.1. No one working for Haddon Training should investigate concerns about individuals who are or may be being abused or who are at risk.
- 21.2. All staff should following the reporting process as described in Clause 21.
- 21.3. When an allegation of abuse is made to a member of staff, the member of staff who receives it should:
- 21.3.1. Reassure the individual making the allegation that they have done the right thing
 - 21.3.2. Listen and not interrupt
 - 21.3.3. Not promise that the matter will be kept confidential. Explain to him/her that the matter must be reported to a member of Haddon Training's Designated Safeguarding Team as part of the legal duty. If there is any doubt as to whether the matter is a safeguarding

issue, check with the DSL or DSO

Let the individual finish speaking and then only ask questions if still unsure whether this is a safeguarding issue

21.3.5 Note that it is not an investigation and simply establish the key facts

21.3.6 Only ask simple, open, non-leading questions

21.3.7 Accept what the individual is saying and do not offer an alternative interpretation of the alleged events

21.3.8 Raise the concern with the DSO/DSL and not ask any more questions

21.3.9 Write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual, ensuring that you make clear what is fact and what is opinion or hearsay in any given piece of information.

21.3.10

Remember that if an individual recites abuse that happened a long time ago or some time has lapsed since it last occurred, it does not make it any less real and distressing for the individual. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred to the DSO/DSL.

21.4. If an individual choose to disclose, **staff should never:**

21.4.1 Take photographs of the injuries

21.4.2

Examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate First Aid)

21.4.3 Investigate or probe, aiming to prove or disprove probably abuse

21.4.4 Make promises to the individual about confidentiality or keeping secrets

21.4.5 Assume that someone else will take the necessary action

21.4.6 Confront another person allegedly involved

21.4.7 Fail to pass the information on to the DSL/DSO

21.4.8 Ask the individual to sign a written copy of the disclosure or statement

22. **Keeping Yourself Safe**

22.1.1 To maintain yours and the learner's safety, the following are strictly prohibited:

22.1.2 Befriending learners on personal social media sites

22.1.3 Distributing personal telephone numbers

22.1.4 Visit learners at home or transporting learners to and from locations

- 22.1.5 Do not use sarcasm, insults or belittling comments towards learners
- 22.1.6 Personal relationships with learners
- 22.1.7 It also important to be mindful of the following when conducting yourself:
- 22.1.8 Locations of one to one meetings with colleagues. These should take place at a neutral location
- 22.1.9 You will naturally build a rapport with learners through the apprenticeship contact, and the learners may see you as a confidante and support but be sure to maintain professional boundaries whenever carrying out work on Haddon Training's behalf.
- 22.1.10 Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We have the opportunity to listen to their concerns and support them.
- 22.1.11 Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- 22.1.12 Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination ensure a member of the site staff is aware where you are and monitors this.
- 22.1.13 Be careful when giving learner advice – as this is based on your opinion, focus support on information (facts) and guidance (signposting).
- 22.1.14 Be mindful of any learners you acquire that by default creates a conflict of interest. i.e. a partner or friend becomes a learner. Discuss appropriateness/ alternative assessor arrangements with your line manager.
- 22.1.15 If a learner offers you gifts of any sort as a result of the support through their programme, please refer to the bribery policy for the process to follow. If at any point you feel unsafe in a learner's company inform the site manager, your line manager, the Designated Safeguarding Officer and leave the premises.

23. Reporting Safeguarding, Prevent and Child Protection Concerns

23.1. When Haddon staff have a concern about a child or young person they should:

23.1.1 Notify the DSL (or DSO) by phone within 10 minutes where there is an immediate danger or risk of harm. If the member of staff is unable to contact the DSL or DSO within this time frame and where there is an immediate danger or risk of harm they should escalate the report immediately to the police or relevant local authority social services department, and then complete the Safeguarding Report Form to the DSL within 4 hours.

23.1.2 For all other Safeguarding Concerns, notify the DSL/DSO by phone initially as soon as practically possible, ensuring they speak to the DSL/DSO and do not leave voice messages. Complete the Safeguarding Report Form (on google documents) and submit to the DSL within 24 hours.

23.1.3 All verbal conversations should be promptly recorded in writing

23.1.4 At Haddon Training we recognise the possibility that adults working alongside learners may harm them. Any concerns about the conduct of other adults in a Traineeship/Apprenticeship location should be taken to the DSL/DSO without delay

24. Staff Safeguarding Training

- 24.1. All Haddon staff will undertake the following Safeguarding training:
 - 24.1.2 Induction training on our Safeguarding Policy, Procedures, Personnel and Toolkit
 - 24.1.3 Annual training to provide them with relevant skills and knowledge to safeguard learners effectively
 - 24.1.4 Regular safeguarding and child protection updates as required
 - 24.1.5 Learning resources / materials circulated for use with learners
 - 24.1.6 DSL and DSO attend training every two years and in addition to formal training their knowledge and skills is refreshed at regular intervals at least annually.

25. Whistleblowing

- 25.1. Where there are concerns about the way that safeguarding is carried out at Haddon Training staff should refer to the NSPCC Whistleblowing helpline on 0808 800 5000

26. Relevant Documents All Staff Must Read

- 26.1 Keeping Children Safe in Education 2021
- 26.2 Haddon Staff Code of Conduct
- 26.3 Haddon Safeguarding Policy
- 26.4 Haddon Safeguarding Toolkit

27. Related Policies and Procedures

- 27.1. This policy should be read alongside our organisational policies and procedures, including:
 - 27.1.2 Procedures for responding to concerns about a learner or member of staff's wellbeing
 - 27.1.3 Dealing with allegations of abuse against a learner or member of staff
 - 27.1.4 Role of the Designated Safeguarding Lead
 - 27.1.5 Managing allegations against staff and volunteers
 - 27.1.6 Adult to child supervision ratios
 - 27.1.7 Code of Conduct for staff and volunteers
 - 27.1.8 Anti-bullying policy and procedures
 - 27.1.9 Online safety policy and procedures for responding to concerns about online abuse
 - 27.1.10 Photography and image sharing guidance
 - 25.1.10 Whistleblowing Policy

28. Links to key documents:

- 28.1. KCSiE Part one and Annex A Updated 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828587/Keeping_children_safe_in_education_part_one.pdf
 - 28.2. Working Together to Safeguard Children (update July 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf
 - 28.3. Child Sexual Exploitation Update Feb 2017
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf
- Criminal Exploitation of Children (including County lines) Sept 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626770/6_3505_HO_Child_exploitation_FINAL_web_2_.pdf

29. Legislation and Guidance

- 29.1. The Children's Act 2004
- 29.2. UN Convention on the Rights of the Child 1991
- 29.3. Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- 29.4. Sexual Offences Act 2003
- 29.5. Protection of Freedoms Act 2012
- 29.6. Education Act 2005
- 29.7. Human Rights Act 1998
- 29.8. Health and Social Care Act 2008
- 29.9. Domestic Violence, Crime and Victims Act 2012
- 29.10. Statutory guidance Working Together to Safeguard Children 2018 (previous version: 2014, 2015 and the Safeguarding Children and Safer Recruitment in Education 2006)
- 29.11. Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2015
- 29.12. The Care Standards Act 2014
- 29.13. The Mental Capacity Act 2005
- 29.14. The "No Secrets" guidance, which sets out a code of practice for the protection of vulnerable adults
- 29.15. Equality Act 2010
- 29.16. Prevent Duty Act 2015

PREVENT DUTY

1. Introduction

- 1.1. As part of The Counter-Terrorism and Security Act 2015, Haddon Training has a duty to 'PREVENT' people being drawn into terrorism. This has become known as the 'Prevent Duty'.

2. Aim

- 2.1. The aim of this part of policy is to outline our approach to supporting the national 'Prevent' Agenda linked to the safeguarding of our learners and staff. This policy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Training Providers, in the exercise of their functions, must have "due regard to the need to prevent people from being drawn into terrorism".

3. Awareness of the Prevent Agenda

- 3.1. Prevent is one of the four elements of 'CONTEST', the government's counter-terrorism strategy. The four elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people becoming terrorists or supporting terrorism.
- 3.2. The Prevent strategy responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- 3.3. It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- 3.4. It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.
- 3.5. The Prevent Duty incorporates the responsibility to promote Fundamental British Values through our practices and the formal and informal curriculum. These values are defined as; democracy, the rule of law, individual liberty and mutual respect and tolerance of those of different faiths and beliefs.
- 3.6. The Prevent Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism.
- 3.7. Source: <https://www.gov.uk/government/publications/prevent-duty-guidance>

4. Current Practice Which Contributes to Prevent

- 4.1. Haddon Training's Safeguarding, Child Protection and Prevent Policy features reference to the Prevent agenda to safeguard our apprentices, learners and members of staff.
- 4.2. The Designated Safeguarding Lead arranges regular training sessions on Prevent to maximize the opportunities for expert input to develop staff awareness.
- 4.3. Our work to promote Equality and Diversity within Haddon Training Ltd incorporates British Values, contributes to good community relations and reduces the risk of radicalisation.
- 4.4. All Haddon Trainer Coaches regularly include education on Prevent in their delivery of teaching and learning making a positive contribution to the development of a fair, just and civil society.

5. Terms and Definitions

- 5.1. Radicalisation and/or Extremism may involve:
 - 5.1.1. An ideology is a set of beliefs
 - 5.1.2. Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism
 - 5.1.3. Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
 - 5.1.4. Terrorism is an action that endangers or causes serious violence, damage or disruption, is intended to influence the government or intimidate the public, and is made with the intention of advancing a political, religious or ideological cause
 - 5.1.5. Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
 - 5.1.6. Extremism is 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. Calls for the death of the British Armed Forces is also included.
- 5.2. Signs of Radicalisation and/or Extremism may include:
 - 5.2.1. Isolation and identity crisis
 - 5.2.2. Personal crisis and/or circumstances
 - 5.2.3. A misconception and/or rejection of UK foreign policy
 - 5.2.4. A distrust of Western media reporting
 - 5.2.5. Perceptions that UK government policy is discriminatory
 - 5.2.6. Perception that their aspirations for career and lifestyle are undermined by limited employment prospects
 - 5.2.7. Thinks that the 'world owes them a favour'

6. Prevent Risk Assessment

- 6.1. The Prevent Duty Guidance requires all relevant institutions to conduct a regularly reviewed Prevent Risk Assessment and associated Action Plan.
- 6.2. Haddon Training's Risk Assessment will be constructed and reviewed by the Managing Director drawing in commentary and responsibility for actions from other members of staff as appropriate.
- 6.3. The Risk Assessment and Action Plan will be additionally overseen by the Designated Safeguarding Lead and a summary will be reported annually to the Senior Management Team.

7. Channel Referrals

- 7.1. A Channel referral is a supportive activity which initially involves identification of any learner or member of staff at risk of radicalisation.
- 7.2. A referral should be made via a member of the Safeguarding Team, typically the Designated Safeguarding Lead.

7.3. Appendix 1 shows the referral flow chart.

Contact Numbers

Penny Bird 07377 096749

Tracey O'Neil 07795 842 017

Social Services – Use this web address to find the department you need: www.gov.uk/find-local-council

Police – 101 (this number replaces all local station numbers)

Channel - Contact ***the relevant local authority*** Prevent Coordinator

This policy has been approved and authorised by:

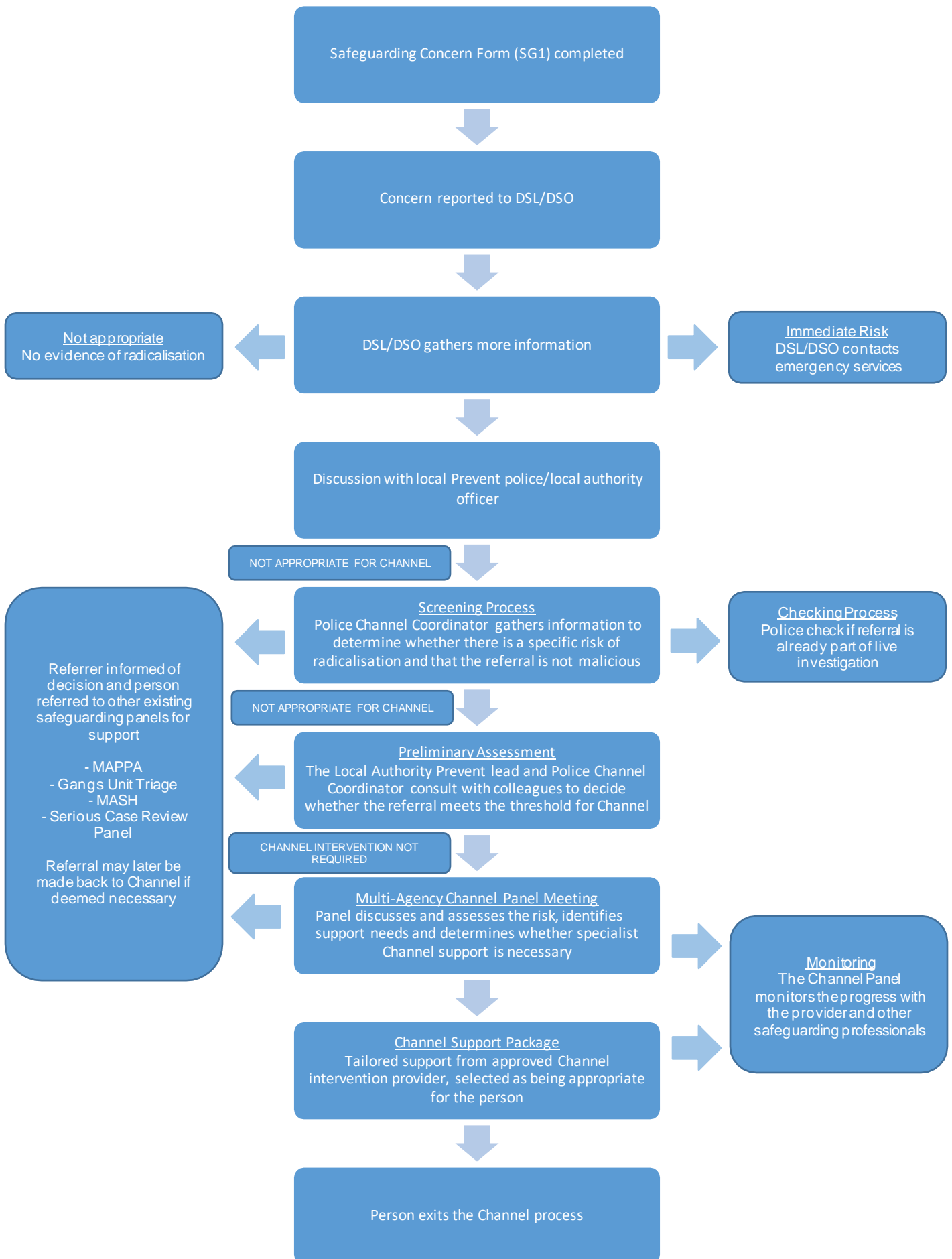
Name: Jude Holloway

Position: Educ8 Group Operations Director

Date: 1.06.2022

Signature: *Jude Holloway*

THE CHANNEL REFERRALS FLOWCHART



Appendix 2

SAFEGUARDING REPORT FORM - SG1

This form should be used to record concerns about a young person. It should be completed as accurately as possible & passed directly to the Designated Safeguarding Lead who should action & then file securely. If emailed it must be password protected. The Company's child protection & safeguarding procedures should always be followed.

Learner Details

Name:	
ULN:	
DoB:	
Address:	
SEN Status:	

Staff Details

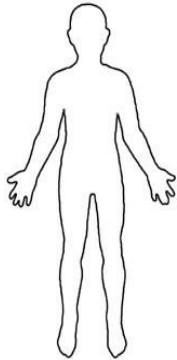
Name:	
Date of incident:	
Location of Incident:	
Time of Incident:	
Time / date report disclosed:	

Concern Details

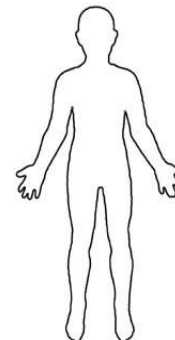
Immediate Risk of Danger: No General Safeguarding concern: Yes

NATURE OF CONCERN

Provide details of the concerns or incident including times, dates and places. Descriptions of any injuries (use body diagram for location of injuries). Include witness details, observations, anything you have heard or been told. Is the information first hand, fact or opinion? Ensure you clearly record the voice of the child (use capitals so it can be easily recognised). Act in a timely manner. Clearly sign and date everything.



FRONT



BACK

NATURE OF CONCERN cont ../

Appendix 3

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A LEARNER

