



Safeguarding Policy

SECTION A

We all have a statutory duty to safeguard and promote the welfare of our learners and to maintain a professional attitude of *it could happen here* where safeguarding is concerned.

Acacia Training is committed to safeguarding learners and promoting children’s welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to **act without delay** to protect learners by reporting anything that might suggest a child (or adult) is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. Acacia Training seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

'Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.' (Keeping Children Safe in Education 2020)

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| Current version: V2 | Previous version: V1 |
| Reviewed by: A Fowles | Changes made: Changes to reporting processes due in introduction of My Concern Changes to roles and leads for safeguarding |
| Issued: 3.4.22 | Next review date: 3.10.22 |
| Signed by: (Name & role) Amy Fowles (DSL) | Signature: A Fowles |

All staff are encouraged to report any concerns that they have and **not see these as insignificant**. On occasions, a referral is justified by a **single incident** such as an injury or disclosure of abuse. More often however, **concerns accumulate over a period of time** and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, **it is crucial that staff record and pass on concerns** in accordance with this policy to allow the Designated Safeguarding Lead to build up a picture and access support for the child at the earliest opportunity.

We maintain a professional attitude of 'it could happen here' where safeguarding is concerned. When there are concerns about the welfare of a learner, staff members will always act in the best interests of the learner. This policy has been developed in-conjunction with our culture of prevention, protection and support and will be linked with all our policies e.g. anti-bullying, online safety, health and safety, anti-radicalisation. We will continue to maintain an ethos where learners feel secure, are encouraged to talk, are listened to and feel safe. Learners at Acacia Training are encouraged to talk freely with any staff member at Acacia Training if they are worried or concerned about something. This includes any learners we are responsible for under sub-contracting arrangements.

Sub-contractors undergo annual due diligence to ensure they have the necessary policies in place and contractually are obliged to meet all the necessary requirements including staff training.

Introduction

The aim of this policy is to clarify Acacia Training role in the safeguarding and protection of children and young people and adults at risk and to promote their welfare. The purpose is to bring about better outcomes for all learners by facilitating open communication channels and clear accountability in interagency working arrangements. By implementing the policy it will help all learners achieve the below outcomes:

- Are committed – developing a robust culture of vigilance
- Build resilience – raising awareness of safeguarding and child protection issues, and equipping children & young people (and adults) with the language and skills to keep themselves safe

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- Establish a safe environment – in which children & young people (and adults) can work and learn and develop within an ethos of openness and are taught to treat each other with respect, to feel safe, to have a voice and are listened to
- Support vulnerable learners – supporting learners who have been abused, have witnessed violence towards others or may be vulnerable to abuse
- Prevent unsuitable people – from working with children & young people by ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with our children. And to maintain an active vigilance thereafter
- Make a positive contribution – know and understand how to ensure those around our learners and in their care are safeguarded and how to report if there are concerns

This policy applies to the entire ACACIA TRAINING caseload including all young people aged 13-18 and vulnerable adults, who form part of our statutory responsibilities, specifically those young people who have a physical, sensory or learning disability. Throughout this document the generic phrase learners will be used where possible. Where the phrase “Child” or “Child Protection Procedure” applies these will also apply to Adults at risk. We recognise that any learner could potentially be a victim of abuse. The aim is to follow the procedures set out by Staffordshire Safeguarding Children’s Board, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2018 by:

- Knowing that safeguarding and promoting the welfare of learners is everyone’s responsibility, and the voice of the learner is evident
- Protecting our learners from maltreatment
- Establishing a safe environment in which our learners can learn and develop within an ethos of openness
- Preventing impairment of our learner’s health or development
- Ensuring young people at Acacia Training grow up in circumstances consistent with the provisions of safe and effective care.

| | |
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- Offering learners a balanced curriculum including PHSE, healthy relationship education, online safety, sexting, peer on peer abuse, sexual harrassment
- Offering learners a balanced curriculum through online activities, enabling them to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Understanding that no single professional can have the full picture of a learner’s needs and circumstances. Everyone who comes into contact with children and their family has a role to play in identifying concerns, sharing information and taking prompt action.
- Undertaking the role so as to enable learners at Acacia Training to have best outcomes.
- Ensuring as a provider we have a clear understanding of our staff’s knowledge and understanding, and embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our provision.

This policy provides guidance to all adults working within the business, whether paid or voluntary or directly employed by Acacia Training or a third party.

- This policy is available on our website & within the resources section on our eportfolio and is available on request from Amy Fowles amyf@acaciatraining.co.uk
- We also inform learners about this policy when they enroll in learning.
- This policy will be reviewed in full by the Board on an annual basis or sooner should legislation/guidance change.
- This policy sets out how Acacia Training discharges its statutory responsibilities relating to safeguarding and promoting the welfare of learners. Our policy applies to all staff; paid and unpaid
- The policy is provided to all staff (including freelance, temporary staff and volunteers) at induction, alongside our Staff code of conduct. In addition, all staff are provided with Part One & Annex A of Keeping Children Safe in Education 2018.
- All new staff receive a safeguarding induction with the Safeguarding Lead and all staff have to complete the necessary mandatory training

The revised interagency guidance is based on:

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The Education and Training (Welfare of Children) Act 2021 – passed 29/01/2021
<https://bills.parliament.uk/bills/2633>

Keeping Children Safe in Education – updated 01/09/2021
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Inspecting Safeguarding in Early Years Education and Skills Settings – updated 02/09/2019
<https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>

Sexual violence and sexual harassment between children in schools and colleges – updated 01/09/2021
<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Review of sexual abuse in schools and colleges – published 10/06/2021
<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>

Prevent Duty Guidance – updated 12/05/2021
<https://www.gov.uk/government/publications/work-based-learners-and-the-prevent-statutory-duty/guidance-for-providers-on-work-based-learners-and-the-prevent-statutory-duty>

Work-based learning National Guidance – DfE – Prevent



WBL-National-Guidance-DfE-Final.docx

CONTEST Strategy (Prevent)
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

Counter-Terrorism and Security Act 2015
<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill#related-documents>

Equality Act 2010
<https://www.gov.uk/guidance/equality-act-2010-guidance>

Protection of Freedoms Act 2012
<http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

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Vetting and Barring Scheme Guidance

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Education Act 2011

<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>

Every Child Matters 2004 updated 2007

<https://www.gov.uk/government/publications/every-child-matters>

Children Act 2004

<https://www.legislation.gov.uk/ukpga/2004/31/contents>

Working Together to Safeguard Children 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Human Rights Act 2010

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

GDPR Regulations 2018

<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

The Care Act 2014

<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

Modern Slavery Act 2015

<https://www.gov.uk/government/collections/modern-slavery>

Female Genital Mutilation (FGM)

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Sharing nudes and semi-nudes: advice for education settings working with children and young people

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

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All staff working with learners must be able to identify when someone may be likely to suffer significant harm through abuse or neglect and how to act upon concerns by referring them to Children’s or adults Social Care. In addition all staff must ensure that learners are supported with e- safety and are aware of threats surrounding this.

For children or young people only:

We will work closely with Staffordshire local safeguarding children’s board who will help and support us in instances relating to abuse. For anyone wanting to contact the local safeguarding children’s board, the contact details are: 01782 235100, this is the Stoke on Trent Safeguarding board, it is worth noting that all regions will have their own local numbers.

<https://www.staffsscb.org.uk/Aboutus/What-is-the-SSCB.aspx>

All agencies and their staff should be aware of internal arrangements consistent with the child and vulnerable adult’s protection procedures (Section B), and the roles of key staff within the organisation.

Roles, Responsibilities and Structure

All staff delivering services in children and young people have a responsibility under the Keeping Children Safe in Education – updated 17/06/2020

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

to safeguard and promote the welfare of children.

We also have an ethical and moral duty to protect those adults that could become vulnerable or who are vulnerable to abuse due to the nature of the sectors we deliver education within.

Tutor Coach, Enrolment Officers, Careers Advisors

| | |
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ACACIA TRAINING's staff have a legal responsibility for the identification and reporting of individual abuse and for safeguarding the welfare of children, young people and adults at risk.

Advice and support should be sought from the Designated Safeguarding Lead, especially with regard to consent and referral issues. If the DSL is not available staff should contact the Designated Safeguarding Deputy or Designated Safeguarding Officer.

There are clear procedures for the reporting and recording of information which need to be followed.

All Staff

Where a safeguarding concern is held all staff should report through the MyConcern application. Here the complaint should be logged with sufficient detail including name of individual, times and locations of incidents and full details of the concern and any action taken.

The reporting staff member should then take no further action until contacted by the safeguarding team or if tasks are assigned through the MyConcern app.

If an URGENT concern is held (where learners, staff or service users are at immediate risk) the DSL should be contacted by phone immediately.

Line Manager

Line Managers have the responsibility to ensure that staff are familiar with all safeguarding procedures and keep all training up to date.

Line Managers should offer the external counseling service to staff that have had a particularly disturbing disclosure (for information contact HR Department).

The Designated Safeguarding Lead is responsible for keeping MyConcern up to date and triaging all cases to the appropriate individuals through the system. The DSL is responsible for ensuring that only those who require access to each case hold it.

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All cases will be held in MyConcern as the central record and will be used to evaluate practices by the safeguarding committee to improve processes and procedures.

Safeguarding Designated Team

Victoria Sylvester (CEO)– Governing Board Representative

Victoria is the board safeguarding lead with responsibility for Acacia’s Safeguarding Strategy. Through governance and oversight, she ensures that this is central to Acacia’s vision and is evident in all practices. She ensures that all board members are kept up to date with all safeguarding and ensure training and development of the board takes place. Victoria provides advice and guidance to the safeguarding team and is referred to for challenging cases and referrals to external sources. Victoria Chairs the Safeguarding Committee and leads on Prevent.

Responsible for referrals to outside agencies.

Amy Fowles (Director of Education) – Designated Safeguarding Lead

Amy is the first contact for all safeguarding concerns and is responsible for MyConcern including triaging concerns and assigning case owners, team members and tasks. Amy will provide monthly updates to board and SMT with regards to cases and lessons learned. Amy will chair the safeguarding committee in Victoria’s absence.

Overall responsibility for Individual Protection issues in ACACIA TRAINING, making sure they are maintained, monitored and evaluated.

Responsible for keeping central confidential files

Contactable out of hours in exceptional circumstances

Responsible for ensuring Safeguarding and Individual Protection procedures and policies are kept up to date

Responsible for contributing to Serious Case Reviews and implementing any resulting action plans

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Fallon Southwell (Quality Manager) – Designated Safeguarding Deputy

Fallon is second point of contact and will lead on safeguarding in the absence of Amy Fowles.

Designated Safeguarding Officers - Safeguarding Champions

Designated Safeguarding Officers sit on the safeguarding committee and input into safeguarding evaluation and lessons learned providing additional perspectives throughout the business. DSOs champion safeguarding and ensure practices are being maintained across the business,

Designated Safeguarding Lead (Amy Fowles)

amyf@acaciatraining.co.uk

07958 725 348

Should you have concerns in relation to radicalization they should immediately be referred to the Prevent Lead. The Prevent Lead is responsible for making any further referrals thereon (i.e. Channel).

Key Definitions

Safeguarding and Promoting Welfare is defined as:

- Protecting children, young people and adults at risk from maltreatment
- Preventing impairment of children's/adults at risk health or development
- Ensuring that children/adults at risk are growing up in circumstances consistent with
- The provision of safe and effective care
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully

| | |
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- Be vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our learners are safe from harm.

All staff in Acacia Training have an awareness of safeguarding issues through regular training and briefings, some of which are listed below. We enable our staff to be aware that these behaviours put learners in danger. All staff are aware of the Designated Safeguarding Lead, who is the expert within our School and is there to support staff, sub-contractors, volunteers and the Board further.

- Abuse
- Bullying, including cyberbullying
- Children and the courts
- Children with family members in prison
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gambling Addiction
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Grooming for crime
- Sexual Harassment *Settings are to assume sexual harassment is taking place as per Ofsted review and KCSIE put appropriate measures in place*
- Homelessness
- Mental health
- Missing children and adults strategy
- Modern slavery *
- Online safety
- Peer on peer abuse
- Private fostering

| | |
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- Preventing radicalisation
- Sexual violence and sexual harassment
- Sexting/sharing nudes or semi-nude images or video
- Sexual or criminal exploitation
- Trafficking

**Modern Slavery – whilst not in scope to be subject to the Modern Slavery Act, as organisation that delivers in a sector with high recruitment needs, the risk of learners being subject to potential slavery conditions is high and therefore staff are provided with training and information to understand how to recognise the possible signs a learner may be subject to this and that it is delivered to learners as part of safeguarding training.*

Specific Definitions

E-safety is electronic safety which can be associated with websites such as Facebook, Twitter, msn and any other social networking site. E-safety also applies to mobile phones also where learners should be aware of what to do should they be subject to Sexting. Learners should understand GDPR and how to protect their personal data.

Child Protection is part of safeguarding and promoting welfare. The term is used to refer to the activity that is undertaken to protect specific children who are suffering or are at risk of suffering significant harm.

Physical Abuse – may involve hitting, shaking, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an individual. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as factitious illness by proxy or Munchausen’s by proxy.

Indicators:

Torn Fraenum.

| | |
|--|---|
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Blood in whites of eyes, small bruises on head, bruising on rib cage, maybe associated with shaking.

Burns and scolds on hands, feet, buttocks, groin.

Cigarette burns.

Linear marks, weal marks.

Bruised eyes or ears.

Multiple bruising.

Grip/slap marks.

Bite Marks.

Injuries found to be at different stages.

Unconscious Individual.

Injuries/fractures in individuals who are not mobile.

NB This is not an exhaustive list

Emotional Abuse/ Psychological abuse

Emotional and psychological abuse is the persistent emotional ill treatment of an individual which causes severe and persistent side effects on the individual's emotional development. Most forms of abuse will generally include psychological or emotional signs and symptoms. It may involve conveying to the individual that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on individual. These may include interactions that are beyond the individual's development capability as well as overprotection and limitation of exploration and learning or preventing the individual participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing individuals to feel frightened or in danger, or the exploitation or corruption of

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individual. Some level of emotional abuse is present in all types of ill treatment of a individual, though it can still occur alone.

Indicators:

Lack of self-esteem.

Withdrawn, aggressive behavior, self harm, mutilation, substance abuse and suicide attempts.

Eating disorders.

Degrading or humiliating punishments.

Children who appear unused to praise or encouragement.

Children who are rejected by parent/carer/sibling.

Bullying.

Neglect and acts of omission

Neglect can also be a form of emotional abuse, many of the signs and symptoms will be the same as outlined above, Acts of omission are when knowingly someone could be putting a child, young person or vulnerable adults at risk or they are aware of the abuse but it is not reported. Such instances include, ignoring medical or physical care needs, failure to provide access to appropriate health and social care and with holding the necessities in life.

Indicators

See all indicators of abuse

Sexual Abuse – involves forcing or enticing a child or young person or adults at risk to take part in sexual activities including prostitution, whether or not the individual is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may involve non-

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contact activities such as involving individuals in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging individuals to act in sexually inappropriate ways.

Indicators:

Inappropriate sexual knowledge or behavior.

Excessive sexual play and masturbation.

Sexually transmitted diseases.

Pregnancy – especially concealed.

Children who witness intimate sex acts.

Self-harm/suicide attempts/substance abuse.

Eating disorders.

Nightmares/disturbed sleep patterns.

Wetting, soiling/smearing excreta.

Significant changes in behavior/personality.

Persistent offending, non-school attendance.

Financial or material Abuse

This may include theft, fraud, exploitation, pressure when dealing with wills or inheritance, financial transactions and claiming benefits that they are not entitled to.

Indicators:

Loss of money from wallet or purse

Lack of money to buy basic items

Bills not been paid when money has been entrusted to a third party

| | |
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Inadequate clothing
Unexplained withdrawal of cash

Discriminatory abuse

This could include bullying and harassment based on the age, sex, disability, race, religion, ethnicity and sexual orientation. The indicators are same as those identified in emotional abuse.

Protection of Children in Specific Circumstances

Children have a right to be protected including in the following circumstances -

Sexual activity of young people under the age of 18.

Female genital mutilation.

Protecting children from forced marriages.

Protection from radicalisation

Radicalisation

There are a number of behaviours that might indicate that an individual is at risk of being radicalised or exposed to extreme views. Such behaviours may include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause;
- Loss of interest in others and activities not associated with the extremist ideology, group or cause;
- Possession of materials or symbols associated with an extremist cause;

| | |
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- Attempts to introduce others to the group/cause;
- Communications with others that suggests identification with a group, cause or ideology;
- Using names/language ranging from insulting to derogatory for members of another group;
- Increase in prejudice-related incidents committed by that person – these may include:
 - physical or verbal assault;
 - provocative behaviour;
 - damage to property;
 - derogatory name calling;
 - possession of prejudice-related materials;
 - prejudice related ridicule or name calling;
 - inappropriate forms of address;
 - refusal to co-operate;
 - attempts to recruit to prejudice-related organisations;
 - condoning or supporting violence towards others.

This list is in no sense intended either to be exhaustive or any more than a description of possible consistent behaviours – rather than proofs – of radicalisation.

Peer on Peer Abuse

There are four key definitions of peer-on-peer abuse:

Domestic abuse – young people who experience physical, emotional, sexual and/or financial abuse, and coercive control, in their intimate relationships, as well as family relationships.

| | |
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Child sexual exploitation – those under the age of 18 who are sexually abused in the context of exploitative relationships, contexts and situations, by a person of any age, including another young person. This includes Sexting/sharing nudes or semi-nude images or video

Serious youth violence – any offence of most serious violence or weapon-enabled crime, where the victim is aged 19 or younger, e.g. wounding with intent, rape, murder and grievous bodily harm.

Harmful sexual behaviour – young people displaying sexual behaviours that are outside of developmentally 'normative' parameters.

For the purpose of this guidance, the term 'child' refers to any young person under 18 years old.

Sexual Harassment

Sexual harassment is unwanted behaviour of a sexual nature which:

- violates your dignity
- makes you feel intimidated, degraded or humiliated
- creates a hostile or offensive environment

Modern Slavery

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

The Home Office estimates there are 13,000 victims and survivors of modern slavery in the UK; 55% of these are female and 35% of all victims are trafficked for sexual exploitation.

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
| Reviewed by: A Fowles | Changes made: Changes to reporting processes due in introduction of My Concern Changes to roles and leads for safeguarding |
| Issued: 3.4.22 | Next review date: 3.10.22 |
| Signed by: (Name & role) Amy Fowles (DSL) | Signature: <i>A Fowles</i> |

Recognising Abuse – General Considerations

All staff should be alert to signs that an individual may be at risk of significant harm, regardless of age, sex, culture, religion, and social class, as individual abuse occurs regardless of these factors.

All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Identification of individual abuse may be difficult; it normally requires both medical and social assessment.

Different types of individual abuse could be present at the same time, e.g. an individual who is being sexually abused may be physically abused. Staff need to be alert to signs of other types of abuse.

Always listen carefully to the individual – pay particular attention to any spontaneous statement. In the case of an individual with limited language, pay attention to their signing or behavior or play. Be aware of body language and scribbling/doodling.

Any delay in seeking medical assistance, or none being sought at all for an ill individual could be an indicator of abuse.

Beware if the explanation of an accident is vague, lacking in details, is inconsistent to the injury or varies with each telling.

Take note of the appropriateness of the response of parents/carers.

Observe a child's interaction with parent particularly wariness or fear or watchfulness.

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
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Any history or unexplained illness/injuries requires the most careful scrutiny.

Beware if there are indicators of a history of domestic violence. Violence towards adults may also indicate violence towards children, and can itself be emotionally abusive.

Individuals who are being abused often do not disclose, for a variety of reasons, so in our professional capacity we have to be vigilant to possible signals.

Be aware at all time that ACACIA TRAINING is responsible for reporting incidents of suspected abuse and not investigating them.

Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

Significant Harm

The term 'significant harm' is important as it is the point at which Children's Social Care have a statutory duty to put in motion Section 47 enquiries under the 1989 Children Act. **It is the duty of CHILDREN'S SOCIAL CARE to determine whether the child is at risk of significant harm, not ACACIA TRAINING.** However we need to have an understanding of what it means to inform our referral procedures.

There are no absolute criteria for deciding what constitutes significant harm. It requires judgment based on the nature of the abuse, and the effects of that abuse on the individual.

In order to help us decide how severe the harm is the following factors should be considered:

- The degree and extent of the abuse and neglect.

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
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- The duration and frequency of the abuse and neglect
- The extent of pre-meditation
- The degree of threat or coercion

Recording, Sharing of Information and Consent Issues

Recording Information

In the climate of 'working together' with other agencies, young people, adults and families, information will have to be shared, so it is important that our records are kept up to date at all times.

It is important that the safeguarding log is updated as and when information is received, and with any action taken in following these procedures. As with other information recorded on the safeguarding log, we need to bear in mind that a young person or adult can request their records, so until official 'consent' has been sought we need to be sensitive as to what we record. It is the Designated Persons responsibility to maintain the log and keep all records.

Any written records you make for yourself must be submitted to the Designated Person who will hold them centrally with all records in a secure place in case they are needed at a later date.

The Designated Person should keep a 'confidential' file containing all Individual Protection matters for the organisation.

Sharing Information

Important statutory duties in relation to adults at risk and children in need cannot be met without **effective** and **appropriate** sharing of information. For agencies to work together to the benefit of individuals, they must be able to share relevant information.

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
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| Issued: 3.4.22 | Next review date: 3.10.22 |
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This includes a referral to Children’s Social Care or CQC, but could simply be sharing information between supporting agencies regarding a young person or adult at risk, for example, before a referral is made.

However, sharing of information should take place according to the principles of good practice and on a need to know basis. When a request for information is made we need to be clear about **why** the information is needed and the **way** it is going to be used.

The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a provider we **adhere to data protection** yet we **do not allow this to stand in our way** in the need to promote the welfare and protect the safety of our learners.

Seeking Consent for Making a Referral or Sharing Information

Prior to information being shared with other agencies, or a referral being made, consent should normally be sought from the young person and/or from one parent/carer with agreed parental responsibility.

However, there are certain important circumstances where consent should not be sought. These are:

- If this would put the child or young person at greater risk of significant harm.
- Interfere with criminal enquiries.
- Raise concern about the safety of staff.
- Reasons not to seek consent have to be recorded on the records and written on the referral form.

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
| Reviewed by: A Fowles | Changes made: Changes to reporting processes due in introduction of My Concern Changes to roles and leads for safeguarding |
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As a 16-19 service we will come across the situation where a young person is sufficiently mature enough to understand choices and their consequences, and will not give consent for referral, especially if they believe it will make their situation worse. This is a particularly difficult situation. You will have to use your judgment as to whether it is appropriate and lawful to refer without consent. Advice must be sought from your team manager and Children’s Social Care. You must inform the young person if you decide to refer.

A parent’s or young person’s lack of agreement should not prevent you from making a referral. If they do not agree, and you decide you need to refer, then you must inform them accordingly.

The Designated Person is responsible for making any referrals.

Support for Staff

Although staff should be aware of their responsibilities and procedures for individual protection issues, appropriate support should be sought to help throughout that process.

The senior designated person will help in more complex or serious cases.

Children’s Social Care, or other designated ‘contacts’ can be contacted for advice as appropriate (see contact name and addresses)

Training

Effective training is the key to carrying out our responsibilities of promoting and safeguarding children, young people and vulnerable adults. Staff need to be trained on how to identify an individual in need, and what subsequent action to take.

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
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| Issued: 3.4.22 | Next review date: 3.10.22 |
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Training takes place on a variety of levels, and will depend upon the needs of the staff concerned.

All staff will receive a safeguarding induction on entry to the business.

Front line staff/Line managers that have direct access to learners will hold at least Level 2 in safeguarding, prevent and equality & diversity.

The Designated Person(s) and HR Manager will hold a Level 2 qualification in safeguarding, prevent and equality and diversity.

All staff have a duty to update their CPD in relation to safeguarding on an annual basis. This is monitored through electronic staff training records.

Safeguarding will be addressed and updated at each delivery team and staff meeting, which will inform and update staff CPD.

All board members will undertake safeguarding governance training.

Monitoring and Evaluation

The designated persons will conduct a monthly review of our Safeguarding and Child Protection systems and policies at the Safeguarding Committee. This will include consideration of specific cases dealt with by staff in the last month. The resulting information – including feedback from staff, will be used by the designated person to inform any improvements. Feedback will also be obtained from the learners in relation to the policy and their understanding of safeguarding that we cover at induction. Feedback on the safeguarding policy and its implementation will be provided at management meetings where decisions can be made if specific items need to be addressed or policies amended.

| | |
|--|---|
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Dealing with a Disclosure of Abuse

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

- Stay calm
- Do not communicate shock, anger or embarrassment
- Reassure the learner. Tell her/him you are pleased that s/he is speaking to you
- Never agree or promise to keep it a secret. Assure her/him that you will try to help but let the learner know that you will have to tell other people in order to do this. State who this will be and why
- Tell her/him that you believe them.
- Tell the learner that it is not her/his fault
- Encourage the learner to talk but do not ask "leading questions" or press for information
- Use the acronym **T.E.D**: **T**ell me. **E**xplain. **D**escribe
- Listen and remember
- Check that you have understood correctly what the learner is trying to tell you
- Communicate that s/he has a right to be safe and protected
- It is inappropriate to make any comments about the alleged offender
- Be aware that the learner may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the learner again who you are going to tell and why that person or those people need to know
- As soon as you can afterwards, make a detailed record of the conversation using the learner's own language. Include any questions you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded)
- Login to MyConcern and detail all of the information written down into the 'Report a Concern' section. This should include all relevant details including names of any individual concerned.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible

SECTION B

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
| Reviewed by: A Fowles | Changes made: Changes to reporting processes due in introduction of My Concern Changes to roles and leads for safeguarding |
| Issued: 3.4.22 | Next review date: 3.10.22 |
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PROCEDURE FOR DISCLOSURE OF ABUSE BY CLIENT

ALL SITUATIONS

(1) The guidance process should normally be kept confidential, and the privacy of our clients respected. However, there are limitations to this confidentiality and clients need to be made aware of this. If a client reveals something which leads you to believe they were at risk of, or have already suffered significant harm, then you cannot keep this confidential, and the client needs to be aware of this.

(2) If during any contact with a client it appears they may be about to disclose an issue in relation to Individual Protection, ensure you remind clients of the limits of confidentiality.

(3) If the client continues to disclose to you, use your training/experience to listen and note all significant detail of the discussion. Login to MyConcern and detail all of the information written down into the 'Report a Concern' section. This should include all relevant details.

(4) If it is a child, enquire, sensitively, if there are other siblings in the household, as the living situation needs to be included when referring to Children's/adults Social Care.

(5) Confirm with the client that you will have to record this information, manually and on the safeguarding log and that you may have to share this with other colleagues and agencies, and will involve a referral to Children's/adults Social Care.

| | |
|--|---|
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TRAINING PROVIDERS/CONSORTIA MEMBERS/SUB CONTRACTORS

(i.e. where the agency concerned will have their own procedures)

(1) Acacia Training’s DSL will discuss with the Designated Person for that agency. Sub-contracts are expected to have their own safeguarding processes in place, however they have to mirror those of Acacia Training when dealing with any learners under their contracts/care. ATL should be informed immediately of any safeguarding issues. This is a contractual requirement.

(2) The designated person should then take this forward adding to MyConcern, and use their own procedures as regards referral and consent. Obtain copies of referral forms as for education.

| | |
|--|---|
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PROCEDURE WHERE YOU HAVE CONCERNS ABOUT A CLIENT

(1) Take an informal approach initially and seek an explanation for concerns with the client without raising questions of abuse.

(2) Gather as much information as possible from the individual, other colleagues who may have had some involvement with client and other agencies. Investigate whether there are others that maybe at risk.

(3) Login to MyConcern and detail all of the information written down into the 'Report a Concern' section. This should include all relevant details including names of any individual concerned.

(4) In an emergency situation contact Amy Fowles in the first instance on 01782 646346 or 07958 725348. If there is no answer and it is urgent email or contacting the DSD or member of the wider safeguarding team.

| | |
|--|---|
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PROCEDURE FOR CONCERNS RAISED BY SOMEONE OTHER THAN INDIVIDUAL THEMSELVES AND YOU

- (1) If the person concerned is a colleague within ACACIA TRAINING refer them to these procedures and MyConcern.
- (2) If the person concerned is a colleague within another institution refer them to their own line manager and their Protection procedures.
- (3) If the person concerned is a parent/carer or member of the public refer them to CHILDREN’S SOCIAL CARE for advice.

| | |
|--|---|
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| | |
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PROCEDURE TO BE FOLLOWED IF YOU RECEIVE AN ALLEGATION AGAINST A MEMBER OF ACACIA TRAINING STAFF

- (1) From time-to-time children/adults at risk may make an allegation that they have been abused by a member of staff.
- (2) The procedure for dealing with such allegations is contained in the Company's disciplinary procedures. Such an allegation will be treated as a potential case of gross misconduct.
- (3) If you receive an allegation either by the young person or another person you must refer the matter to the DSL or the HR Manager.
- (4) The member of staff may not be automatically suspended, but we have a duty to make preliminary enquiries before a referral to CHILDREN'S SOCIAL CARE (Children only). These must not interfere with possible investigations and a referral should be made if there is any doubt.
- (5) If another agency receives an allegation against a member of ACACIA TRAINING staff, they should contact the DSL or HR Manager direct.
- (6) If a member of ACACIA TRAINING's staff receives an allegation against a member of another agency, staff should in the first instance discuss this with your Line Manager.
- (7) If an allegation is made against the Line Manager, then refer direct to either the HR Manager or the appropriate Designated Person.
- (8) Follow guidelines in personal safety policy on lone working and good professional practice when working in a one-to-one situation. Apply your experience and judgment when dealing with interactions with clients, in order to minimise the possibility of allegations occurring.

| | |
|--|---|
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Section C

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Remote education, virtual lessons and live streaming guidance

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

<https://www.ncsc.gov.uk/guidance/video-conferencing-services-security-guidance-organisations>

<https://www.ncsc.gov.uk/guidance/video-conferencing-services-using-them-securely>

| | |
|--|---|
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Safeguarding policy Covid-19 annex

There have been significant changes within our business in response to the Coronavirus outbreak. Many of our learners are now continuing their learning at home and staffing is likely to be significantly affected through illness and self-isolation. Despite these changes Acacia Training Limited continues to be wholly committed to safeguarding and promoting the welfare of all staff and learners.

During this period the principles and practices of Acacia Training Limited's safeguarding policy will continue to apply. In order to ensure the safety and welfare of all staff and learners the company will adhere to the DfE coronavirus guidance <https://www.gov.uk/coronavirus/education-and-childcare> in practice, the following procedures will apply:

Designated Safeguarding Lead

There will always be a nominated DSL or deputy DSL available, either on site or contactable by telephone, email or video calling. The name and contact details of the DSL and DSD are clearly identified within this policy.

Learners or parents of learners (age dependant) should contact the DSL or DSD.

Learners and staff on-site.

Acacia Training Limited will continue to be a safe place for learners to attend.

All staff or learners attending any of our sites will be expected to adhere to the outlined Health & Safety procedures as identified via associated risk assessments which will be fully explained upon entry. All visitors entering on site will be recorded as part of track and trace protocol.

Working in partnership

We continue to work closely with our local safeguarding partners and local agencies.

Useful Documents

| | |
|--|---|
| Current version: V2 | Previous version: V1 |
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- <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>
- <https://www.gov.uk/coronavirus/education-and-childcare>

Linked Policies

Anti-Radicalisation

Freedom of Information

Complaints

Equality & Diversity

Health & Safety

Prevent Action Plan

E&D Action Plan

Non-Attendance

Sharing Information

ICT Acceptable Use

Lone Worker

Recruitment & Retention

Disclosure and Barring

Domestic Abuse Pledge

Health & Wellbeing

Learner Behaviour Policy

Anti-Slavery (Modern Slavery)

| | |
|--|---|
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