

Estu Academy

Safeguarding and Prevent Policy

Know Practice Do

1. Purpose

The aim of this policy is to outline the practice and procedures for paid and voluntary staff in Estu Academy to contribute to the prevention of abuse to apprentices that we work with through raising awareness and providing a clear framework for action when abuse is suspected. It is aimed at protecting the apprentice and the worker, recognising the risks involved in lone working. The policy covers all staff and areas of work with specific guidance for projects regularly in contact with our apprentices.

The policy is available externally via the website and internally through the shared drive. All staff will be introduced to the policy via the induction process and on an ongoing basis through review, as part of their annual training programme and as part of their personal development opportunities with their line manager. Estu Academy are committed to the application and continued development of this policy and require all staff to remain vigilant to the issues identified and implement the processes to ensure the protection of our apprentices at all times.

Any member of staff or apprentice at Estu Academy who have any concerns regarding the issues identified within this guidance policy should report those concerns immediately and no later than the end of the working day to the Designated Prevent and Safeguarding Officer (DPSO).

Paul Conroy – Safeguarding Lead – 07855 868353 or by email on paulc@vsstraininganddevelopment.co.uk

Philippa Plumpton – Safeguarding Officer – 07803824524 or by email on philippap@vsstraininganddevelopment.co.uk

You can also contact anonymously if you have concerns on confidential@vsstraininganddevelopment.co.uk

2. Scope

This policy applies to all permanent, temporary or contracted staff employed by Estu Academy.

3. Introduction and relevant legislation

The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children and young people. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process (see below).

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

Equality, Diversity and Community Cohesion

Estu Academy aim to guide our apprentices to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our young people for life in modern Britain.

We also aim to encourage working towards a society in with a common vision and sense of belonging by all. Communities; a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in schools and in the wider community.

National Guidance and Strategies

PREVENT is a key part of the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

The PREVENT strategy objectives are:

- **Ideology:** respond to the ideological challenge of terrorism and the threat we face from those who promote it
- **Individuals:** prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- **Institutions:** work with institutions where there are risks of radicalisation which we need to address

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately.

Vulnerability/Risk Indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern, nor does it mean that vulnerable young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences.

The following indicators may help to identify factors that suggest a young person, or their family may be vulnerable or involved with extremism:

Vulnerability

- Identity crisis: Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
- Personal crisis: Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging. Personal circumstances: Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet aspirations: Perceptions of injustice; feeling of failure; rejection of civic life. Criminality: Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to extremist influences

- Reason to believe that the apprentice associates with those known to be involved in extremism
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence
- Use of closed network groups via electronic media for the purpose of extremist activity

Experiences, behaviours and influences

- Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity/use of documents to support this
- Experience of disadvantage, discrimination or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status

More critical risk factors include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance/behaviour

Channel referral process

Some concerns which are identified may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. The Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the young person.

THE MAIN LEGISLATION for Safeguarding requirements:

The Rehabilitation of Offenders Act (1974) This act made any convictions 'spent' after a certain period and the convicted person would not normally have to reveal or admit the existence of a spent conviction. In most circumstances, an employer cannot refuse to employ someone, or dismiss them, on the basis of a 'spent' conviction. However under this act all applicants for positions which give them "substantial, unsupervised access on a sustained or regular basis" to children, must declare all previous convictions whether spent or unspent, and all pending cases against them.

The Children Act 1989 This act provided legislation to ensure that the welfare and developmental needs of children are met, including their need to be protected from harm.

The Police Act 1997 This act contained the provision to set up the Criminal Records Bureau for England and Wales. Under this act it is a criminal offence for an employer to:

- not check an employee working with children or vulnerable adults
- give a job to someone who is inappropriate to work with children or vulnerable adults when they know this to be case.

The Protection of Children Act 1999 Under this act, childcare organisations (defined as those that are 'concerned with the provision of accommodation, social services or health care services to children or the supervision of children') must make use of the Disclosure Service in their recruitment and reporting processes and urges other organisations working with children to also do so. Criminal Justice and Court Services Act 2000 This act covers Disclosures and child protection issues. It contains the list of convictions that bar offenders

from working with children in 'regulated positions'. These types of 'regulated positions' are defined in this act and include:

- any employment in schools, children's homes, day care premises where children are present caring for, training, supervising, or being in sole charge of children
- unsupervised contact with children
- other positions which give the kind of access or influence which could put children at risk if held by a disqualified person (e.g. management committee members).

Education and Training (Welfare of Children) Act 2021

Which has now been amended to extend safeguarding provision to include post 16 education

Care Standards Act 2000

A DBS disclosure is required for most roles in organisations providing care or health services regulated under this act. This act also sets out the Protection of Vulnerable Adults scheme.

The POVA or Protection of Vulnerable Adults scheme was launched in 2004 by the Department of Health and the National Assembly for Wales.

Every Child Matters and the Children Act 2004

Under the previous government, 'Every Child Matters: Change for Children' was issued and the Children Act 2004 was passed. It set out the Government's approach to the well-being of children and young people from birth to age 19. Its aim is for every child, whatever their background or circumstances, is to have the support they need to:

- be healthy
- stay safe
- enjoy and achieve
- make a positive contribution
- achieve economic well-being.

Every local authority leads on an integrated delivery of services for children and young people through multi-agency children's trusts. Each local authority is responsible for establishing a Local Safeguarding Children Board (LSCB) in their area and ensuring it is run effectively. Current ministers are expected to set out the Coalition Government's priorities for children, young people and families in the coming months. Further details from www.education.gov.uk/childrenandyoungpeople

Safeguarding Vulnerable Groups Act 2006

In response to recommendation 19 of the Bichard Inquiry Report into child protection procedures following the Soham murders, new arrangements for people whose jobs and voluntary work bring them into contact with children and vulnerable adults (previously Safeguarding and Prevent Policy v2 Oct 2021

referred to as the vetting and barring scheme) was initially phased in from October 2009 under the Safeguarding Vulnerable Groups Act, but was halted whilst the vetting and barring scheme (VBS) was reviewed by the Coalition Government.

The aim of the scheme was to provide a more effective and streamlined vetting service for potential employees and volunteers. This means that the previous vetting systems using List 99 and POVA was integrated to create a single list of people barred from working with children.

In addition a separate, but aligned, list of people barred from working with vulnerable adults was also established, replacing POVA. In effect, there are just two lists: the children's barred list and the adult's barred list.

The scheme also aims to ensure that unsuitable individuals are barred from working or seeking to work with children and vulnerable adults and the earliest opportunity. The decision on who should be placed on the barred lists will lie with the new Independent Safeguarding Authority which is an independent statutory body. The Coalition Government's review report has now been published. Key recommendations included:

- The merging of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) Continuing a barring and criminal records disclosure service for workers and volunteers but only covering only those who may have regular or close contact with children or vulnerable adults (under a new narrowed definition of regulated activity) Now referred to as a DBS
- Scrapping the notion of controlled activity altogether
- Scrapping the requirement for individuals to register with the ISA along with the ongoing monitoring of individuals
- Making criminal record disclosures portable and enabling disclosures to be updated
- Continuing the duty on employers to make referrals to the state barring body (currently the ISA) Introducing two offences under the new system: for a barred person to work with children or vulnerable adults in regulated activity roles, and for an employer to knowingly employ a barred person in a regulated activity role.

Working together to Safeguard Children 2018

This guidance covers:

- the legislative requirements placed on individual services
- a framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of police for a police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs
- the framework for the two child death review partners (the local authority and any clinical commissioning group for an area, any part of which falls within the local authority) to make arrangements to review all deaths of children normally resident in the local area, and if they consider it appropriate, for those not normally resident in the area

The Protection of Freedoms Act 2012

The Act was introduced on 10 September 2012 following the above and the points relevant to our Business are as follows:

- A new definition of regulated activity (covering those who have the most contact with children and who care for adults)
- The repeal of controlled activity (this category covered people who had less contact with children and vulnerable adults)
- The repeal of registration and continuous monitoring of those working with vulnerable groups
- The repeal of additional information (provided by the police to employers but not to applicants) — although police may still provide such sensitive information under common law
- A minimum age of 16 at which someone can apply for a DBS check
- A more rigorous “relevancy” test for when the police release information held locally on an enhanced DBS check.

Care Act 2014

An Act to make provision to reform the law relating to care and support for adults and the law relating to support for carers; to make provision about safeguarding adults from abuse or neglect; to make provision about care standards; to establish and make provision about Health Education England; to establish and make provision about the Health Research Authority; to make provision about integrating care and support with health services; and for connected purposes.

The Disclosure and Barring Service

From 1st December 2012 it replaced the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

The DBS are responsible for:

- Processing requests for criminal records checks
- Deciding whether it is appropriate for a person to be placed on or removed from a barred list
- Placing or removing people from the DBS children’s barred list and adults’ barred list for England, Wales and Northern Ireland
- The DBS search police records and, in relevant cases, barred list information, and then issue a DBS certificate to the applicant.
- Referrals are made to DBS when an employer or organisation, e.g. a regulatory body, has concerns that a person has caused harm, or poses a future risk of harm to vulnerable groups, including children.
- The Protection of Vulnerable Adults Scheme (POVA) is now administered through

the DBS. The Vetting and Barring Scheme (VBS) is now administered through the DBS.

Portable checks have been available from 17 June 2013 through the Update Service. This is subscription-based and allows individuals to keep their DBS certificates up to date so they can take it with them when they move jobs or roles. This means that checks can be carried out for free online to see if any new information has come to light since the certificate's issue. To do this, an individual must consent, be legally entitled to apply for a DBS certificate of the same type and level as that they wish to check, and be subscribed to the Update Service.

Three types of certificate are available:

- Criminal Conviction Certificate (or basic disclosure)
- Criminal Record Certificate (or standard disclosure)
- Enhanced Criminal Record Certificate (or enhanced disclosure).

Basic disclosure

A basic disclosure shows details only of unspent convictions under the Rehabilitation of Offenders Act 1974. A basic disclosure is issued to the job applicant only and he or she may use the certificate for any purpose.

Standard disclosure

A standard disclosure is issued jointly to the individual and the registered employer and provides information on spent and unspent convictions, warnings, reprimands and cautions.

Standard disclosures are only available for positions which are exempt from the Rehabilitation of Offenders Act 1974.

Enhanced disclosures

Enhanced disclosures are also issued jointly to both the individual and the registered employer and include a check of local police records as well as those checks carried out in a standard disclosure.

An enhanced disclosure would be appropriate for roles that involve caring, training, supervising or being in sole charge of children or adults at risk, e.g. teachers, doctors, social workers, scout/guide leaders, etc. All staff with access to apprentices will undergo an Enhanced DBS through Verifile. Please contact Philippa Plumpton to arrange your DBS.

People working with children or adults at risk also have to be checked against the lists held by the DBS which replace those previously held by the Department of Health and the Department of Education of people deemed unsuitable to work in schools with children or with adults at risk.

The New Definition of “Regulated Activity”

Under the Protection of Freedoms Act 2012 a new, more restricted, definition of “regulated activity” has been established. Regulated activity requires both enhanced checks and checks of the barred lists. The new definition applies from September 2012. Verifile ensures that we remain compliant with the regulations relating to disclosure etc. and our job roles

have been approved based on the current guidance.

The new definition of regulated activity relating to adults no longer labels them as “vulnerable”. Instead, the definition identifies the activities that lead to that adult being considered vulnerable at that particular time. There are six categories of people who fall within the new definition of regulated activity relating to adults (their managers and supervisors are also included); they are people who:

Provide healthcare (i.e. healthcare professionals and those who provide care under their supervision)
Provide personal care (including physical assistance, supervision and training of those unable to care for themselves due to age, illness or disability)

Provide social work

Keeping Children Safe in Education 2020

This is statutory guidance from the Department for Education (the department) issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015.

Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children who will be referred to from this point as apprentices. For the purposes of this guidance apprentices includes everyone under the age of 18

What staff should know and do

An apprentice centred and coordinated approach to safeguarding

- Estu Academy and their staff are an important part of the wider safeguarding system for apprentices. This system is described in statutory guidance Working Together to Safeguard Children.
- Safeguarding and promoting the welfare of apprentices is everyone’s responsibility. Everyone who comes into contact with apprentices and their families has a role to play.
- In order to fulfill this responsibility effectively, all tutors should make sure their approach is apprentice-centered. This means that they should consider, at all times, what is in the best interests of the child.
- No single person can have a full picture of an apprentice’s needs and circumstances. If apprentices and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- Safeguarding and promoting the welfare of apprentices is defined for the purposes of this guidance as:
 - protecting apprentices from maltreatment;
 - preventing impairment of apprentice’s mental and physical health or development;
 - ensuring that apprentices grow up in circumstances consistent with the provision of safe and effective care; and

- taking action to enable all apprentices to have the best outcomes.
- Children includes everyone under the age of 18.

4. DEFINITION OF TERMS

Child Apprentice

A child is legally defined as anyone under the age of 18.

Adult Apprentice at Risk

A person aged 18 years or over who is or may be in need of community care services by reason of mental health, age or illness, and who is or may be unable to take care of themselves, or protect themselves against significant harm or exploitation. The term replaces 'vulnerable adult'.

Abuse

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act. In all forms of abuse there are elements of emotional abuse. Adults at risk may also suffer additional types of abuse such as being manipulated financially or being discriminated against. Other examples of abuse include inflicting physical harm such as hitting or misuse of medication, rape and sexual assault or exposure to sexual acts without informed consent, emotional abuse such as threats, humiliation and harassment, exploitation, ignoring medical or physical needs, withholding of necessities of life such as food or heating. This list is not definitive.

Types of Abuse

Physical abuse

- Bodily assaults resulting in injuries e.g. hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- Bodily impairment e.g. malnutrition, dehydration, failure to thrive
- Medical/healthcare maltreatment
- Sexual abuse
- Rape, incest, acts of indecency, sexual assault
- Sexual harassment or sexual acts to which the adult at risk has not consented or could not consent or was pressured into consenting.
- Sexual abuse might also include exposure to pornographic materials, being made to witness sexual acts and encompasses sexual harassment and non-contact abuse.

Psychological/emotional abuse includes:

- Including threats of harm, controlling, intimidation, coercion, harassment, verbal abuse, enforced isolation or withdrawal from services or supportive networks.
- Humiliation, bullying, shouting, swearing
- Peer to Peer abuse through physical acts, or cyber bullying

Neglect

Including 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 nutrition and heating.

Financial or material

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Discriminatory

Including racist, sexist, or based on a person's disability, and other forms of harassment, slurs or similar treatment.

Multiple forms of abuse may occur in an ongoing relationship or abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of adults at risk, negligence or ignorance.

No abuse is acceptable, and some abuse is a criminal offence and must be reported to the Police as soon as possible.

All staff at Estu Academy are required to report any suspected abuse. If an apprentice fails to attend sessions, this must be investigated.

Spent Convictions Under the Rehabilitation of Offenders act 1974

If a person convicted of an offence is not convicted again during a specified 'rehabilitation period', the conviction is 'spent' (this would not include serious criminal offences). Usually the person does not have to reveal or admit the conviction, nor can an employer refuse to employ someone because of the spent conviction.

However there are some exceptions, particularly to protect apprentices and other vulnerable groups. An employer should not ask for a DBS Disclosure or for details of spent criminal convictions unless the post is one covered under the Rehabilitation of Offenders Act exceptions order or there is statutory obligation to do so.

Social Services Department

If there is a concern about the possible abuse of an apprentice, the local authority social services department should be contacted. It is their legal responsibility to find out if abuse has taken place. It is NOT the role of Estu Academy to decide whether abuse has taken place, only

to report allegations to Social Services or the Police. If we investigate the suspected abuse, it could actively damage chances of the case reaching resolution. Contact should only be made once the Designated Safeguarding Officer or Lead has been notified, to ensure the correct procedure is followed.

Local Safeguarding Children Boards (LSCBs)

The LSCBs are statutory bodies set up by local authorities. They have replaced the Area Child Protection Committees which were non-statutory. Every local area now needs to have an LSCB. The aim is to ensure that key agencies work together effectively to ensure that apprentices are safeguarded properly. The core membership of LSCBs is set out in the Children Act 2004, and includes local authorities, health bodies, the police and others.

Definition of child protection

There is no legal definition of child protection, but services aim to identify those children who are at risk of serious harm. Child protection aims to keep children safe where there is serious risk of harm. Serious risk of harm may arise from a single event or a series of concerns over time.

Estu does not operate in isolation and accepts that Child Protection & Safeguarding is the responsibility of all adults and agencies working together in collaboration.

Estu recognises its responsibilities for Child Protection and safeguarding

Estu acknowledges that child abuse does happen and anyone within the organisation may encounter an apprentice who has been abused. The organisation also recognises that because of the day-to-day contact with apprentices, all staff are well placed to observe the outward signs of abuse, and will be trained through induction accordingly. All staff should be vigilant and alert to the signs of abuse or neglect and follow the set procedures as outlined in the DCSB Child protection Procedures and we comply with the requirements placed on providers in the KCSIE September 2021 guidance.

Prevent Strategy Prevent and Counter Terrorism Prevent is the strand of the counter-terrorism work stream that aims to stop people becoming terrorists or supporting terrorism. The Prevent strategy is based on the conclusions of the Prevent Review published June 2011.

Challenging extremist ideas

Preventing terrorism will mean challenging extremist ideas that are conducive to terrorism or are shared by terrorist groups.

Prevent objectives

The objectives for Prevent are to:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it
- prevent vulnerable people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with a wide range of sectors (including education, criminal justice, faith, charities, the internet and health and social care) where there are risks of radicalisation which needs to be addressed
- If you have concerns that an adult at risk may be a victim of radicalisation please contact the Designated Safeguarding Officer or Lead.

All staff undertake annual safeguarding training and, PREVENT/CHANNEL training also on an annual basis.

Rights and Responsibilities

Responsibilities of Estu Academy

To ensure staff and volunteers are aware of the safeguarding and PREVENT policy and are adequately trained

To notify the appropriate agencies if abuse is identified or suspected

To support and where possible secure the safety of apprentices and ensure that all referrals to services have full information in relation to identified risk and vulnerability

To complete DBS check's for volunteers and employees that have access to or work with apprentices at risk

Responsibilities of Estu Academy employees and volunteers

- To be familiar with the adult protection policy and procedures
- To take appropriate action in line with the policies of Estu Academy
- To declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct, possible resulting in dismissal
- All staff must 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.
- All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- Have an awareness of Child Criminal and Child Sexual Exploitation and acknowledge how the experiences of females and males can be very different
- Maintain accurate records

The apprentice has the right:

- To be made aware of this policy
- To have alleged incidents recognised and taken seriously
- To receive fair and respectful treatment throughout
- To be involved in any process as appropriate
- To receive information about the outcome

Support for those who report abuse

- All those making a complaint or allegation or expressing concern, whether they be staff, service users, carers or members of the general public should be reassured that:
 - They will be taken seriously
 - Their comments will usually be treated confidentially, but their concerns may be shared if they or others are at significant risk
 - If apprentices, they will be given immediate protection from the risk of reprisals or intimidation
 - If Staff they will be given support and afforded protection if necessary in line with the Public Interest Disclosure Act 1998.

5. Good Practice

- Recruitment of staff and volunteers Follow Estu Academy recruitment procedures and policies, including: Risk assessment of role to assess need for DBS Disclosures
- Check references thoroughly including appropriate Disclosure
- All staff and volunteers have a duty to declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct, possibly resulting in dismissal
- All staff who hold a DBS will have this refreshed every 3 years.
- Training Familiarisation with all Estu Academy policies and procedures during induction which takes place during the first two weeks of starting with the Company and beyond if required. All staff are required to undertake Safeguarding training and complete an annual refresh of the training.
- Further training, dependent on nature of role, e.g. Risk assessment & management, types of abuse and recognising signs of abuse
- Keeping appropriate records
- Listening skills
- Refresher training is also undertaken with all employees on an annual basis and in instances of major change or incidents.

Management and Supervision

It is the line manager's responsibility to clarify with the worker or volunteer their roles and responsibilities regarding their relationships with adults at risk with whom they may be in contact. Regular supervision for staff and volunteers will monitor the work and offer the opportunity to raise any issues.

Record Keeping

There should be a written record of any concerns. This confidential information will be kept in a locked drawer by the appropriate person, and will be kept for as long as deemed necessary, in line with Data Protection principles. All incidents should be discussed in supervision with line manager.

Records kept by paid workers about adults at risk should only include:

Contacts made

Referrals made, including date, time, reason and referral agency

Estu may have specific projects that need to keep more detailed records, and these will be identified by the Manager and made known to the team.

Planning wherever possible paid staff and volunteers should avoid lone working with an adult at risk. But if unavoidable, one to one contact should take place in an environment where other staff or volunteers are present or within sight.

Access to independent bodies

Any individual who comes into contact with Estu Academy staff or volunteers regularly, should be given information on their right to talk with an independent party, and their name and contact arrangements which are included in section policy. This could form part of the normal registration process.

Identification of Abuse

Physical abuse signs

Note: Some aging processes can cause changes which are hard to distinguish from some aspects of physical assault e.g. skin bruising can occur very easily due to blood vessels becoming fragile.

- A history of unexplained falls or minor injuries
- Bruising in well protected areas, or clustered from repeated striking
- Finger marks
- Burns of unusual location or type
- Injuries found at different states of healing
- Injury shape similar to an object
- Injuries to head/face/scalp
- History of GP or agency hopping, or reluctance to seek help
- Accounts which vary with time or are inconsistent with physical evidence
- Weight loss due to malnutrition, or rapid weight gain
- Ulcers, bed sores and being left in wet clothing
- Drowsiness due to too much medication, or lack of medication causing recurring crises/hospital admissions

Sexual abuse signs

- Disclosure or partial disclosure (use of phrases such as 'It's a secret')
- Medical problems, e.g. Genital infections, pregnancy, difficulty walking or sitting
- Disturbed behaviour e.g. depression, sudden withdrawal from activities, loss of previous skills, sleeplessness or nightmares, self-injury, showing fear or aggression

to one particular person, repeated or excessive masturbation, inappropriately seductive behaviour, loss of appetite or difficulty in keeping food down.

- Behaviour of others towards the adult at risk
- Circumstances – e.g. two individuals found in a toilet area, one in a distressed state

Psychological/emotional signs:

- Isolation
- Unkempt, unwashed, smell
- Over meticulous
- Inappropriately dressed
- Withdrawn, agitated, anxious not wanting to be touched
- Change in appetite
- Insomnia, or need for excessive sleep
- Tearfulness
- Unexplained paranoia, or excessive fears
- Low self esteem
- Confusion

Neglect signs

- Physical condition poor
- Clothing in poor condition
- Inadequate diet
- Untreated injuries or medical problems
- Failure to be given prescribed medication
- Poor personal hygiene

Financial or material signs

- Unexplained or sudden inability to pay bills
- Unexplained or sudden withdrawal of money from accounts
- Disparity between assets and satisfactory living conditions
- Extraordinary interest by family members and other people in the person's assets
- Discriminatory signs Lack of respect shown to an individual
- Signs of substandard service offered to an individual
- Exclusion from rights afforded to others, such as health, education, criminal justice

Other signs of abuse

- Inappropriate use of restraints
- Sensory deprivation e.g. spectacles or hearing aid
- Denial of visitors or phone calls
- Failure to ensure privacy or personal dignity
- Lack of flexibility of choice e.g. bedtimes, choice of food
- Restricted access to toilet or bathing facilities
- Lack of personal clothing or possessions
- Controlling relationships between staff and apprentices

People who might abuse

Abuse can happen anywhere and can be carried out by anyone e.g.:

- Informal carer's, family, friends, neighbours

- Paid staff, volunteers
- Other service users or tenants
- Strangers

WHAT TO DO - To act or not to act

All allegations or suspicions are to be treated seriously. No abuse is acceptable, and some

abuse is a criminal offence and must be reported to the Police as soon as possible. To determine the appropriate action, it is important to consider:

Risk – does the apprentice, staff member or volunteer understand the nature and consequences of any risk they may be subject to, and do they willingly accept such a risk?

Self-determination – is the apprentice able to make their own decisions and choices, and do they wish to do so? Seriousness – Several factors will determine whether intervention is required. The perception of the victim must be the starting point. Factors informing assessment of seriousness will include:

- The perception by the individual and their vulnerability
- The extent of the abuse
- The length of time it has been going on
- The impact on the individual
- The risk of repetition or escalation involving this or other
- Adults at risk
- Is a criminal offence being committed?

Summary

The employee or volunteer's primary responsibility is to protect the apprentice if they are at risk

Each employee or volunteer has a duty to act

Employees or volunteers should not have to cope alone

Practice Guides - Actions and Priorities

THE FIRST PRIORITY SHOULD ALWAYS BE TO ENSURE THE SAFETY AND PROTECTION OF INDIVIDUAL AT RISK. TO THIS END IT IS THE RESPONSIBILITY OF

ALL STAFF TO ACT ON ANY SUSPICION OR EVIDENCE OF ABUSE OR NEGLECT AND TO PASS ON THEIR CONCERNS TO A RESPONSIBLE PERSON OR AGENCY.

The Designated Safeguarding Lead is Paul Conroy who can be contacted on paulc@vsstraininganddevelopment.co.uk, or alternatively on 07855 868353 if Paul cannot be reached please contact Philippa Plumpton on philippap@vsstraininganddevelopment.co.uk or 07803 824524.

In situations of immediate danger, take urgent action by calling the relevant emergency services (e.g. Police, ambulance, GP)

Remember to have regard to your own safety. Leave the situation if it is not safe for you. Listen to the individual, offer necessary support and reassurance.

Issues of confidentiality must be clarified early on. For example staff or volunteers must make it clear that they will have to discuss the concerns with their supervisor.

Where an individual expresses a wish for concerns not to be pursued then this should be respected wherever possible unless the apprentice is under the age of 18 years old.

However, decisions about whether to respect the apprentice's wishes must have regard to the level of risk to the individual and others, and their capacity to understand the decision in question. In some circumstances the individual's wishes may be overridden in favour of considerations of safety.

Decisions to override the apprentice's wish not to take the matter further should if possible be the product of discussion with appropriate Safeguarding Lead. Note your concerns and any information given to you or witnessed by you. Report concerns to the appropriate Safeguarding Lead by completing the safeguarding concern record form.

Remember it is not a requirement to obtain evidence. By supporting the apprentice and carefully logging any information given to you at this stage, you will lay the foundations for an effective formal investigation.

Understand the need not to contaminate, or to preserve evidence if a crime may have been committed.

Discussion and Decision Making

Information should be shared with your Designated Safeguarding Lead, who must approve any actions to be taken and any documentation or correspondence being sent out.

When considering the decision as to whether to refer elsewhere (e.g. to Police, Social Services, Care Quality Commission) the following should be taken into account:

- The wishes of the apprentice, & their right to self-determination
- The mental capacity of the individual
- Known indicators of abuse
- Definitions of abuse
- Level of risk to this individual
- The seriousness of the abuse
- The effect of the abuse on the individual
- Level of risk to others
- The effect of the abuse on others
- Whether a criminal offence has been committed

- Whether other statutory obligations have been breached (e.g. NCSC)
- The need for others to know
- The ability of others (e.g. Police, Social Services) to make a positive contribution to the situation

Issues with Mental Capacity and Consent

The consent of the apprentice must be obtained except where:

- The apprentice lacks the mental capacity to make a decision, and a risk assessment indicates that referral would be in their best interests
- Others may be at risk
- A crime has been committed

Who to refer to and raise concerns with:

- Social Services
- Emergency Social Services duty team, if urgent and outside normal office
- Relevant hospital Social Services team if the individual is in hospital
- Community Mental Health Team where the individual has an ongoing mental health need
- Care Quality Commission where there are issues relating to standards and regulations in care homes and domiciliary care agencies. Hospital Trusts/Primary Care Trusts where there is a complaint of abuse by a member of staff
- The Police, if there is an emergency where delay may result in serious harm to the individual or if the abuse may constitute a crime

Required information, if known, which will be requested when you make a referral or report your concerns:

- Details of alleged victim – name, address, age, gender, ethnic background including principle language spoken, details of any disability
- Details of GP and any known medication
- Whether the individual is aware of and has consented to the referral/report.
- The mental capacity of the individual (are there any concerns/doubts about this?)
- If appropriate advise agency on preferred/advised method or environment when approaching the alleged victim or perpetrator.
- Also, any relevant information, for example:
 - Reasons for concerns and therefore this referral
 - Details of how these concerns came to light
 - Specific information relating to these concerns
 - Details of any arrangements which have already been made for the protection of the apprentice or any immediate action taken
- Details of anyone else to whom this referral has also been made

- Details of the alleged perpetrator and if they are an adult at risk
- Details of alleged abuse and information about suspicions
- Details of any other background information
- An impression of how serious the situation might be
- Details of any other professional involved
- Details of Carers and any significant family members, neighbours, friends

Information passed on must be relevant, necessary and up to date, confirm in writing information given verbally.

Summary of expected Behaviours:

Do's and Don'ts Staff member or volunteer should:

- Stay Calm
- Listen patiently
- Reassure the person they are doing the right thing by telling you
- Explain what you are going to do
- Report to relevant Manager
- Write a factual account of what you have seen, immediately.

Staff member or volunteer should not:

- Appear shocked, horrified, disgusted or angry
- Press the individual for details (unless requested to do so)
- Make comments or judgements other than to show concern
- Promise to keep secrets
- Confront the abuser
- Risk contaminating evidence

Discuss with the Relevant Manager who will:

- Ascertain whether the situation might fall within the definitions of abuse outlined in this policy
- Consider the individual's capacity to make decisions
- Ascertain whether an advocate or appropriate adult might be necessary
- Ascertain any immediate action required
- Ascertain whether an investigation is necessary in accordance with internal personnel policies and procedures
- Where abuse is suspected conclude that a referral be made to the appropriate agency

National Organisations

- Action On Elder: 080 8808 8141 Raise awareness of elder abuse and provides information.
- Alzheimer's Society National Helpline 0845 300 0336

- Ann Craft Trust Tel: 0115 951 5400 A national association working with staff in the statutory, independent and voluntary sectors in the interests of people with learning disabilities who may be at risk from abuse.
- Counsel and Care: 0845 300 7585 10.30 – 4.00 Advice Line. This organisation has particular expertise in residential and nursing home care and runs an advice line for older people, carers and relations.

Elder Abuse Response

Freephone 0808 808 8141 10.00 – 4.30. A confidential helpline service providing information on emotional support for anyone including professions/paid workers.

MIND info line

Tel: 0845 7660 163 Information re mental health related issues. Help in finding out options and local services. Mon – Fri 9.15 – 5.15.

Relatives and Residents Association

Advice Line 0207359 8136 Email: advice@reles.org Help information or advice about a relative who is in a care home or about to enter one Records Management

Promotion and Training in Safeguarding and PREVENT

- The Managing Director sends out updates to all staff when received to keep staff updated on Safeguarding and PREVENT guidance
- As Safeguarding Designated Officer, the Managing Director is registered with Safeguarding leads for the Local Safeguarding Children's Boards in the areas where we deliver apprenticeships
- All staff are required to undertake annual refresher training in Safeguarding and PREVENT
- All staff are to ensure that apprentices receive the appropriate support or guidance required regarding Safeguarding or PREVENT utilising the organisations and processes detailed within this policy.
- Safeguarding and PREVENT is an agenda item in all team meetings, monthly 121's, apprenticeship monthly reports for employers and caseload reviews to ensure that all staff are aware of the importance and embed our policy and processes.

Online Delivery and Security Precautions

- All tutors are to ensure that apprentices are in an appropriate environment to undertake a session
- Where an apprentice has to step away from the session, the tutor must ensure that the camera and sound is switched off on the apprentices screen

- Estu has achieved Cyber Essentials accreditation to show virus controls in place to protect network
- Access is restricted to a 'need to know basis' for all positions so access to information/data is limited to those that need it through the use of restricted drives and security groups
- Random checks of search history of all staff take place to ensure that no inappropriate sites are being accessed by staff.

Monitoring

All staff are to complete the Safeguarding record form and forward to the Designated Safeguarding Lead (DSO) with er directly by email or to the confidential@vsstraininganddevelopment.co.uk email

The DSO will conduct an initial investigation and where appropriate will escalate to the concerns to the required organisations and contacts

Our safeguarding and PREVENT policy has been updated to include Zoom and online delivery practices taking place

Access & Storage

The Policy is found on the shared drive in the Estu Academy Shared Drive and is available to all staff.

Revision History

Version No.	Date	Amendment
1	Aug 21	Policy Creation due to merging separate Safeguarding and Prevent Policies
2	Oct 21	Updated to include new legislative changes
Next Revision Date (12 months or when significant change)	Oct 2022	

Authorisation

Signed:	
Print:	Paul Conroy
Date:	1 October 2021
Position:	Managing Director