

## Safeguarding Children and Vulnerable Adults

### Introduction

- The Safeguarding of staff and apprentices at ABM Training UK Ltd is the responsibility of all parties involved with the training provider. Safeguarding, along with the associated elements of Child Protection and the Prevent agenda are integral to all activities associated with the training provider whether on or off site. Our objective is to ensure that all staff working for, or on behalf of ABM Training, understand their responsibilities in relation to safeguarding those at risk and know who to escalate concerns to within ABM Training. Promoting safeguarding is embedded throughout the organisation.
- Aspects included under the 'umbrella' of Safeguarding and for which the training provider has a responsibility in supporting all apprentices includes:

### Keeping staff and apprentices safe within and outside of the training provider from:

- Radicalisation
- Accidents
- Crime
- Bullying and harassment including cyber bullying
- Maltreatment
- Domestic violence and bullying
- Financial abuse
- Discrimination abuse
- Abuse – there are many categories of abuse and include areas such as physical, emotional, sexual and neglect
- In addition to these you must be aware of how to identify the signs of the abuse categories outlined in the 'Keeping Children Safe in Education' document and how to respond and report on them

### To support staff and apprentices to keep themselves:

- Healthy (including drugs/alcohol abuse, nutrition, exercise)
- Safe (Health and Safety, domestic violence)
- E-Safety (Internet, text, websites, safe from cyber bullying, grooming and radicalisation) Filters will be applied to search engines in line with recommendation from ESFA Prevent Lead & E-safety policy.
- Direct meetings with Lead prevent officer from ESFA, DofE to ensure correct procedures, training and support is given

### To ensure that staff and apprentices:

- Feel safe whilst undertaking activities organised by the training provider
- Know how to report instances of bullying and harassment and that reporting procedures are clear
- Know how to report abuse including radicalisation and FGM

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| <b>VERSION NO:</b><br>2.0        | <b>PREPARED BY:</b><br>Gilly McDonald-Smith                         |   |
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### To signpost apprentices to relevant services to make informed decisions regarding:

- Sexual health
- Diet
- Criminal activity
- Alcohol
- Drugs
- Relationships
- Hot topics

### To assist and raise awareness of staff in understanding, managing and supporting:

- Apprentices with Learning Difficulties and Disabilities (LLDD)
- Adults with Learning Difficulties and Disabilities (ALDD)
- Apprentices from ethnic minority backgrounds
- English for Speakers of Other Languages (ESOL) apprentices
- Students with Mental Health issues (e.g. depression, anxiety, self-harm, emotional issues)
- Children in Care (CIC), care leavers and young carers
- Young people seeking asylum
- Young Offenders/Rehabilitation of Offenders
- Apprentices with any of the Protected Characteristics:
  - Race
  - Age
  - Disability
  - Sexual orientation
  - Gender
  - Gender reassignment
  - Marriage and civil partnerships
  - Pregnancy and maternity
  - Religion and belief

### To ensure that staff and students are fully aware of the requirements of:

- Safeguarding and keeping themselves safe
- Child Protection (the reporting of abuse or neglect)
- The wider abuse categories of: child sexual exploitation, bullying including cyber-bullying, domestic violence, drugs, fabricated or induced illness, faith abuse, female genital mutilation, forced marriages, gangs and youth violence, mental health, private fostering, radicalisation, sexting, teenage relationship abuse and trafficking

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### These are to be achieved through:

- An apprentice induction programme that provides an effective introduction to safeguarding and Prevent (Side by Side)
- An ongoing learning programme that embeds and reinforces all aspects of safeguarding and Prevent (Specific Discussion points and questioning)
- A staff induction programme that provides an effective introduction to safeguarding and Prevent
- A staff development programme that continually upskills staff in their understanding and application of safeguarding through all their activities
- An effective introduction for employers to ensure responsibilities are highlighted
- Policies and procedures that promote and reinforce safeguarding for staff and apprentices
- An area on OneFile providing information for staff
- An area on the ABM website providing information for apprentices
- Apprentice resources including information on:
  - Apprentice safeguarding and Prevent
  - E-Safety
  - Respect

### Personnel Responsible for Safeguarding

- Designated Safeguarding Leads – Gilly McDonald-Smith, Moira Haines
- Training Provider Directors – Rebecca Wade, Moira Haines

### Safeguarding Training

There is a training provider requirement for all staff:

- To undertake Safeguarding training, which includes Child Protection and Prevent at induction and annual mandatory updating (recorded on appraisal)
- To undertake Equality, Diversity and Inclusion (EDI) training at induction and three yearly mandatory updating (monitored and recorded at appraisal)
- To undertake Prevent and Female Genital Mutilation (FGM) training annually (monitored and recorded at appraisal)
- To undertake additional training as required, in response to changes to policies or procedures and individual roles within the training provider

Other training will include:

- Managers to undertake nationally recognised training
- All staff involved in staff recruitment to undertake 'Safe Recruitment' training
- Designated Safeguarding Leads to update training as stipulated by current guidance

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All staff are required to ensure that they are familiar with training provider policies and procedures related to safeguarding and Prevent including:

- Safeguarding strategy
- Child and Vulnerable Adults Protection
- Prevent
- E-Safety
- Health and Safety
- Equality, Diversity and Inclusion (EDI)
- Additional Learning Support
- Apprentice Disciplinary
- Employer Responsibility / Service Level Agreement
- Computer Use of Information and Learning Technology
- Apprentice Confidentiality and Data Protection
- Staff Code of Conduct
- Recruitment and Selection Procedures (incorporating Safer Recruitment)
- Confidential Reporting Code and Procedure (whistle-blowing) for the investigation of irregularities
- Lone Working
- Safeguarding Code of Conduct for Contractors, Visiting Trainers and Volunteers
- Visitors Protocol
- External Speakers

Managers, Internal Quality Assurers (IQA), Tutor/Assessors and Trainers are responsible for knowing their apprentices and to identify if apprentices are at risk with particular reference to 1.2.5 above.

### **Managers and IQAs will support with the following additional responsibilities:**

Apprentices at risk of not completing their programme are deemed to be 'at risk' – this does not infer a risk of physical danger but relates to being at risk of dropping out of their course or not succeeding. Tutors should ensure that all parties involved in the apprentices' programme (e.g. Functional Skills etc.) are informed of the needs of the apprentice and appropriate strategies for managing those apprentices to maximise their opportunity for success.

Where staff are not clear of strategies for managing 'at risk' apprentices, it is their responsibility to seek support and to undertake appropriate training to address their skills need through the staff development programme or by reporting the training need to their line manager and/or Director.

### **Tutor/Assessor Responsibility**

All staff are responsible for ensuring the safety and well-being of all apprentices and other staff members. However, Tutors/Assessors have a specific responsibility for the safeguarding of apprentices in their caseload. In line with their job role they should ensure that:

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They know their apprentices through:

- Examination of application, recruitment and enrolment documentation
- Understanding of initial assessment
- Recognise behaviour and individual character traits

They ensure that the following is in place in response to the above:

- Recommendation for change of programme, if appropriate
- Additional Learning Support (Language, English, Maths)
- Signpost to external partners and services, as appropriate

### Apprentice Induction

All apprentices must have Safeguarding and Prevent included in their Induction Programme and be made aware of:

- Training provider policies related to safeguarding and Prevent
- Their responsibility for their own and others' safety
- How to report any instances related to Safeguarding, Child Protection or radicalisation or contact with extremist groups
- Completion of "Side by Side"

### Information Sharing in respect of Children, Young People and Vulnerable Adults

- Guidance is available to support tutors in understanding issues around sharing information about young people and vulnerable adults
- All sharing of information must comply with the Data Protection Act and Apprentice Confidentiality Policy

### Employers and Partners

- The procedure for employers/work placements must be followed for all apprentices to ensure that all workplace Health and Safety has been checked. Apprentices and employers/work placements must be familiar with the requirements of safeguarding at work training.
- Employers/work placements are issued with the training provider guidance on Safeguarding and Child Protection. This ensures that ABM Training maintains its commitment to safeguarding its apprentices when engaged in activities related to their training programme. The guidance outlines what is meant by Safeguarding, safeguarding measures that should be put in place and who to contact at the training provider regarding safeguarding or Child Protection concerns or questions.
- In appropriate areas, where DBS checks are required, this is confirmed by the training provider and retained by the employer/work placement. Enhanced level checks are necessary for apprentices in specific areas and are carried out as needed.

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### Safe Recruitment

ABM Training has clear procedures which must be followed by all managers employing staff. These are outlined in the Recruitment and Selection Policy and comply with the safeguarding statutory guidance outlined in Keeping Safe in Education. ABM Training will undertake appropriate recruitment and vetting checks on individuals who are being considered for employment working with children, young people and adults at risk. The process ensures compliance with guidance issued by the Department of Education, Ofsted, UK employment legislation and appropriate professional bodies.

### Contractors, Volunteers and Returning Apprentices

- In the case of these groups, the training provider will make judgements of risk when offering contracts. The individual making these arrangements is responsible for ensuring that in the of:
- Contractors – the employers have undertaken appropriate checks on its own staff and that they are fully aware of the Code of Conduct for Contractors.
- Visiting Trainers/Volunteers – must be accompanied from the reception area to the place of activity. Visiting trainers should not be left unaccompanied with apprentices at any time unless in the areas of the building open to the general public. Refer to the Code of Conduct for Visiting/Sessional Trainers and the Visitors Policy.
- For the purposes of safeguarding, Volunteers should be treated as employees and must be DBS checked and a reference obtained.
- Returning apprentices (alumni) must sign in as a visitor and be accompanied as per the Visitor Policy.

### Induction of Staff

All staff undergo an induction programme co-ordinated centrally. All staff are required to undertake Safeguarding, Prevent and equality, diversity and inclusion training as part of their induction programme. It is the responsibility of the line manager of every new member of staff to confirm completion of this training prior to confirming their appointment at the end of their probationary period.

### Responding to Safeguarding Disclosure and or Suspicion

Where an apprentice at risk discloses or discusses potential abuse or harm the staff member should be able to; Recognise, Respond, Reassure, Record and Report.

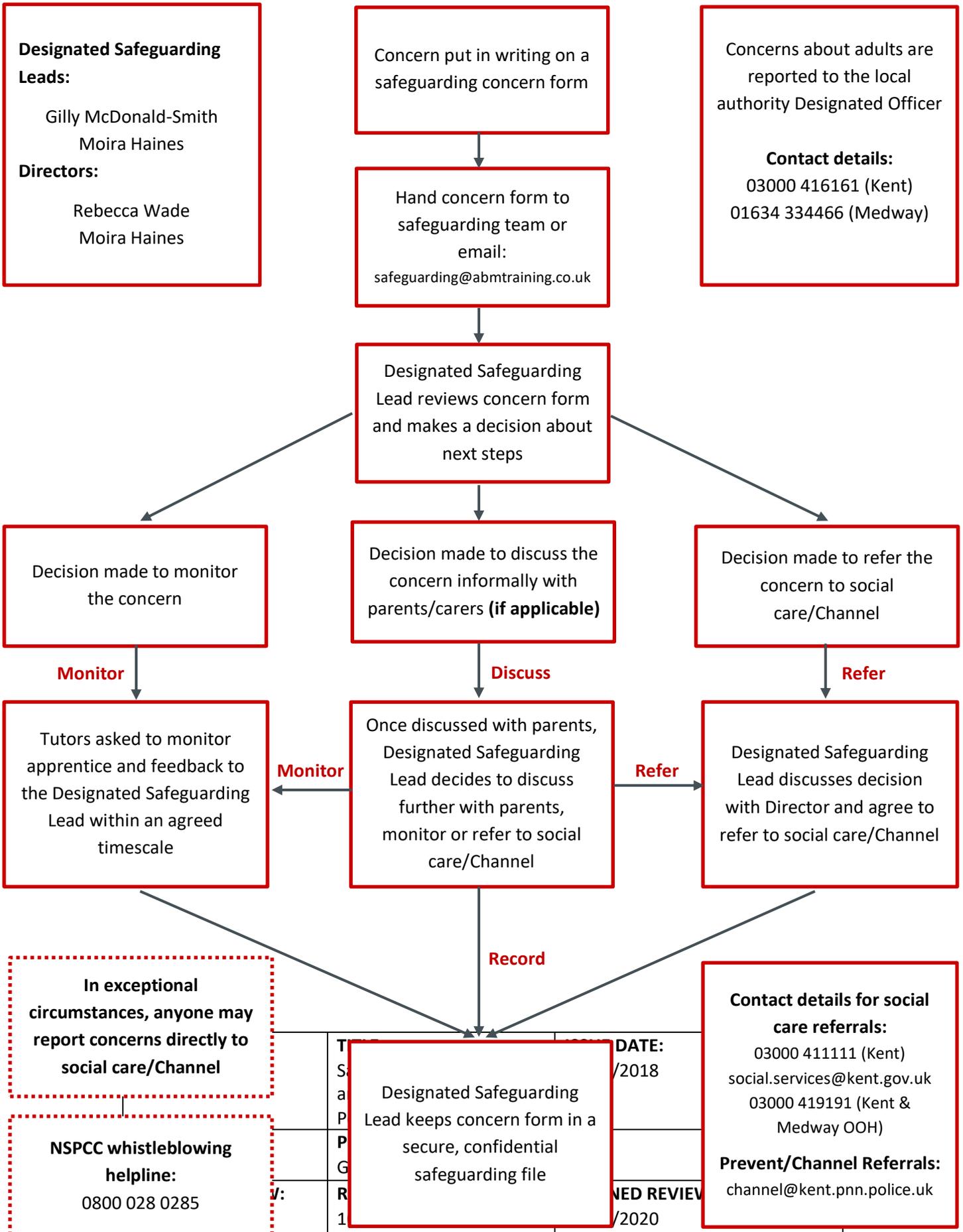
Safeguarding concerns should be reported to a Designated Safeguarding Lead. Examples of a safeguarding concern (but not exhaustive): if abuse is suspected or if a disclosure is made by a apprentice. We will work in partnership with other agencies to ensure that concerns or allegations of abuse are appropriately referred for investigation to the most appropriate agency.

If the concern regards radicalisation a report should be made to a Designated Safeguarding Lead.

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# ABM5: Safeguarding Policy

Below Reporting a Concern Flow Chart



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### Procedure for Dealing with Concerns

ABM staff who have regular contact with students are well placed to observe significant changes in apprentice's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, apprentices may choose to share their concerns with staff they feel they can trust and with whom they are comfortable. Staff need to know how to respond sensitively to a apprentice concerns and who to approach for advice. Whilst ABM staff are not responsible for investigating abuse it is essential that any suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation, are acted on and treated seriously.

ABM Training takes a holistic view of the welfare of its apprentices and recognises that a wide range of contextual factors may be impacting on the wellbeing of a young person or adult at risk. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities, attendance and behaviour and learning differences. The safeguarding officer will consider the full picture in dealing with cases brought to his/her attention.

The following guidelines should be followed by staff:

- Stay calm and reassure the young person that she/he is right to tell someone of his/her concerns.
- **Do not promise confidentiality.** Be honest. Explain who you need to pass the information on to and why (i.e. the appropriate person in College who will seek further advice and help.) The apprentice can accompany you if he/she wishes. Only the people who need to know will be told.
- Allow the apprentice to speak in his/her own way and at his/her own pace, avoid interrupting when they are recalling significant events.
- Do not be judgemental but make a professional assessment about the likelihood of harm occurring.
- Do not 'interview' the apprentice, do not ask leading questions. Factual questions are permitted in order to gather as much information as possible to create a full picture of what has happened so that this can be reported to a safeguarding officer.
- Only clarify what the apprentice is trying to say and ascertain whether there are any immediate issues of safety for them or others.
- Note as accurately as possible what was said, use the apprentice's own words and do not interpret what they are saying. Include the time, context and location of the disclosure. Date and sign the notes. In addition to the apprentices add the address, date of birth, telephone contact.
- Do not investigate any suspicions, allegations or incidents of abuse, but report them within the hour (or as soon as practicable) to a Safeguarding Officer and pass on all written notes.
- The Safeguarding Officer will seek advice from a Designated Safeguarding Lead who will then contact the local authority Children's and/or Adults Services, local Prevent Coordinator or other agencies as appropriate.
- Where there is a concern that a apprentice is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm' the Designated Safeguarding Lead will refer immediately to Children's/ Adults Services at the appropriate local authority.

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- Where there is concern of a real threat to life emergency services must be contacted immediately.
- In exceptional circumstances if the Designated Safeguarding Leads are not available advice should be sought from the Directors or a member of the Senior Leadership Team, who will liaise with the required services as appropriate.

### Dealing with allegations of misconduct against staff under Safeguarding and Child Protection

- All allegations must be reported to a Designated Safeguarding Lead as soon as a member of staff is aware of an allegation. ABM Training has a legal duty to report concerns within one working day to the Local Authority Designated Officer
- The member of staff may be suspended if it is considered that they or anyone else is at risk, or if there is good reason to believe the continued attendance of the member of staff cannot be permitted.
- Where an allegation has been made against a member of staff, the Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of ABM Trainings procedures and/or policies. Consideration should also be given to the training needs of staff.

### Data Management

The implementation of this policy requires the processing of personal and sensitive data of students and/or members of staff. This will be done in accordance with the terms of Data Protection legislation as amended by the General Data Protection Regulations (2018) (GDPR) and as set out and interpreted in ABM Trainings data management, storage, retention and disposal policies and related statements. The main requirements under the current legislation and ABM's policy are as follows:

- Data subjects will be informed what data is being collected and for what purposes
- Data will be stored safely and securely with robust access arrangements in place
- Consent to share data will be requested where/when this is necessary
- Data will only be shared on a need-to-know basis and using secure transfer mechanisms
- Data will not be retained for any longer than is necessary
- Digital and hard copy data will be securely destroyed when it is no longer needed, or the retention period has expired

### Policy Review

- The effectiveness of this policy will be kept under continuous review in the light of experience and best practice. This will involve consultation with staff, managers, apprentices when appropriate and the Safeguarding Officers.
- The Policy will be subject to annual approval by the Safeguarding Officers or as required should substantive changes be proposed in-year.

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# ABM5: Safeguarding Policy

**Strategic Lead:** Gilly McDonald-Smith

**Safeguarding Officers:** Gilly McDonald-Smith, Moira Haines

**Main ABM office number:** 01634 799950

**Out of normal working hours:** 07956 371967

## Safeguarding & Prevent Duty Links, Guidance & Additional Support

**Kent Police 0800 789 321 / 101 / 999**

**Hotline number 0800789321**

**Prevent/Channel Referrals** - Reporting [Channel@kent.pnn.police.uk](mailto:Channel@kent.pnn.police.uk)

**IAG** [www.kent.police.uk/advice/terrorism/](http://www.kent.police.uk/advice/terrorism/)

[www.gov.uk/ACT](http://www.gov.uk/ACT) for information on the government's Action Counters Terrorism campaign.

**Prevent Lead Kent County Council-** Nick Wilkinson - 03000 41 41 41

**Kent Safeguarding Children's Board** - <https://www.kscb.org.uk/guidance/extremism-and-radicalisation2>

Access to E-learning and Home Office Prevent Duty Catalogue, Legislative updates

**Kent County Council Social Care Referrals** – 03000 411111 [Social.services@kent.gov.uk](mailto:Social.services@kent.gov.uk)

03000 419191 (Kent & Medway Out of Hours)

**Prevent KCC** - <https://www.kent.gov.uk/about-the-council/strategies-and-policies/community-safety-and-crime-policies/contest/prevent>

### **Local Authority Designated Officer (LADO)**

If you have concerns about a member of staff and need to contact the Local Authority Designated Officer (LADO) you can do so using the following contact number 03000 41 08 88. The LADO may also be contacted by using the following email address [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk).

Current practice guidelines for Kent are available here: [Managing Allegations Against Staff Practice Guidance](#)

Kent LADO Referral Forms are available here:

- [Kent LADO Referral Form for Professionals](#)
- [Kent LADO Referral Form for Parents and Carers](#)

For further guidance please use the links below:

- [Keeping Children Safe in Education 2015 \(PDF, 662.1 KB\)](#)
- [Disqualification Guidance 2015 \(PDF, 731.1 KB\)](#)
- [Fostering \(KCC\)- Allegations & Complaints Against Foster Carers \(PDF, 128.9 KB\)](#)
- [AMA Wider Workforce Guidance on Safe Working Practice \(PDF, 326.6 KB\)](#)

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**KATO** - for Support and Training and Information. Courses offered by Certified Providers and endorsed by KATO, Information to support on measures that should be in place, updates on legislation.

<https://www.kato-training.org/safeguarding-prevent/> 01795 432606

**AELP** Association of Employment and Learning Providers

<https://www.aelp.org.uk/search?term=prevent> 0117 986 5389

Access to training, advice and guidance surrounding Training and Documentation needed for Prevent/Safeguarding

**Government Links to Guidance for FE Providers**

[www.gov.uk/government/publications/the-prevent-duty-in-further-education-and-skills-providers](http://www.gov.uk/government/publications/the-prevent-duty-in-further-education-and-skills-providers)

<https://www.gov.uk/government/publications/prevent-duty-guidance>

**Education & Training Foundation** – Guidance information & Training support 020 3740 8280 regular speakers at KATO

[www.preventforfeandtraining.org.uk/home/practitioners/guidance-materials/](http://www.preventforfeandtraining.org.uk/home/practitioners/guidance-materials/)

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