



## **APPLIED BUSINESS ACADEMY**

# **PREVENT/ SAFEGUARDING POLICY**

### **Document Control Summary**

<b>Purpose</b>	To set out the measures ABA takes to ensure the protection of Learners & Staff
<b>Author</b>	<b>Director</b>
<b>Date of Implementation</b>	<b>August 2020</b>
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<b>Deputy Safeguarding Teams</b>	<b>Nithya Gopalakrishnan, Muhammad Iftikhar, Shamila, Trupti Bolke</b>
<b>Date of Next Review</b>	<b>August 2021</b>

### **Revisions and Updates**

<b>Date</b>	<b>Details</b>
<b>1<sup>st</sup> September 2020</b>	<b>Policy Updates: Keeping Children &amp; Adults Safe in Education</b>

## 1 Policy Statement

- 1.1 Applied Business Academy (ABA) is committed to the protection of any children, young persons or vulnerable adults who come into contact with our organisation, but it is also equally committed to safeguarding the interests of staff and learners who work or come into contact with vulnerable persons.
- 1.2 Applied Business Academy (ABA) is committed to ensuring so far as is reasonably practicable the safety of children<sup>1</sup>, young persons<sup>2</sup> and vulnerable adults<sup>3</sup> who are on its property or who are engaged in our activities at any location. In particular, we require that a written risk assessment is completed for all activities organised for children, young persons and vulnerable adults, before any young person or child is admitted as a student.
- 1.3 This policy reflects ABA's commitment to promoting and ensuring the safety and well-being of all learners, while recognising the importance of having in place particular procedures and practices in support of groups of learners that are or become vulnerable.
- 1.4 Applied Business Academy (ABA) will maintain procedures and practices which safeguard and promote the wellbeing of all its learners by identifying and applying best practice within the sector and ensuring that the Learner Safeguarding Policy and Procedures comply with legislative requirements and government recommendations.

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<p><b>Local Authority contact information:</b></p> <p><b>For under 18 s (and those up to 24 with an EHCP- education and health care plan)</b></p> <p><b>For over 18 s without an EDPC, identified as vulnerable – Social Care</b></p> <p><b>In emergencies</b></p>	<p><a href="https://www.londonscb.gov.uk/contacts/safeguarding-contacts/">https://www.londonscb.gov.uk/contacts/safeguarding-contacts/</a></p> <p><a href="https://www.cityoflondon.gov.uk/services/adult-social-care/Pages/safeguarding-adults.aspx">https://www.cityoflondon.gov.uk/services/adult-social-care/Pages/safeguarding-adults.aspx</a></p> <p>Call 999</p>

**Worried about Exploitation? Call the NSPCC Exploitation Helpline 0808 800 5000**

## 2 The Scope of this Policy

- 2.1 This policy sets out how Applied Business Academy (ABA) implements the Safeguarding legislation and best practice set out in Paragraph 3 below.
  - 2.2 Our policy is to establish clear guidance regarding Safeguarding issues and to establish key principles, structures and monitoring arrangements which are applicable to all members of staff and programme participants.
  - 2.3 All staff are responsible for, and have an impact on, the quality of our service and delivery. We recognise that the welfare of our staff and learners is paramount and that all have the right to work in a safe environment.
  - 2.4 This policy applies to all staff including directors and managers, full time and part time staff and learners, irrespective of where their learning takes place and to partner organisations we work with.
  - 2.5 When Applied Business Academy (ABA) works with a partner organisation, we will ensure that the partner organisation has in place its own Safeguarding Policy, and that it is regularly reviewed and updated. During teaching and learning sessions, staff will update learners with relevant Safeguarding items. We will ensure that all staff receive appropriate Safeguarding training - updated annually.
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<sup>1</sup> For the purposes of this policy, a **child** is any person under the age of 16 years

<sup>2</sup> For the purposes of this policy, a **young person** is a person aged 16 or 17

<sup>3</sup> For the purposes of this policy, a **vulnerable adult** is defined as a person over the age of 18 years who, by reason of mental or physical disability, age or illness may be unable to take proper care of herself or himself

### 3 Legislation/ Statutory Framework/ Guidance

- 3.1 The Children Act 1989 provides the legal framework for the protection of children in the UK. Under the Children Act a child is defined as any person less than 18 years of age.
- 3.2 The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with Children and Vulnerable Adults. Applied Business Academy (ABA) is required under this legislation to apply for an enhanced disclosure.
- 3.3 Working Together to Safeguard Children, 1999 is a Government Guidance document which sets out how all agencies and professionals should work together to promote Children and Vulnerable Adults welfare and protect them from abuse and neglect and requires all educational organisations to follow the procedures for protecting children from abuse which are established by the Area Child Protection Committee. The guidance makes clear that educational organisations are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or is at risk of abuse – these procedures should cover circumstances in which a member of staff is accused or suspected of abuse.
- 3.4 DfEE Circular 10/95 (Protecting Children from Abuse: The Role of The Education Service) derives from the Education Act 2002 and places the following responsibilities on all educational organisations:
- a) Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
  - b) A designated person should have responsibility for co-coordinating action within the organisation and for liaising with other agencies.
  - c) Staff with designated responsibility for child and Vulnerable Adult protection should receive appropriate training.
  - d) Educational organisations should be aware of and follow the procedures established by the Area Child Protection Committee and, where appropriate, by the Local Education Authority or Social Services Department.
  - e) Educational Organisations should have procedures, of which all staff are aware, for handling suspected cases of abuse of children, including procedures to be followed if a member of staff is accused of abuse.
  - f) Circular 10/95 also states that “parents should be made aware of the (educational organisation’s) Child and Vulnerable Adult protection policy and the fact that this may require cases to be referred to the investigative agencies in the interests of the child.”
  - g) Applied Business Academy (ABA) follows the detailed guidelines set out in Circular 10/95 in dealing with all cases of abuse or suspected abuse against children. Section 175 of the Education Act 2002 This section of the Act requires providers to safeguard and promote the welfare of child and Vulnerable Adults. Applied Business Academy (ABA) will follow any guidance issued on this section of the Act.
  - h) The Company will keep its policy and procedures on Child and Vulnerable Adult protection under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of Children and Vulnerable Adults.

3.5 Children's Trusts bring together all services for children and young people in a local area to focus on improving outcomes for all children and young people. The outcomes that are most important to children and young people are:

- Being Healthy
- Staying safe
- Enjoying and achieving
- Economic wellbeing
- Making a positive contribution

## **4 Learner Safeguarding Policy Statement**

4.1 To ensure that comprehensive and effective safeguarding practices exist within Applied Business Academy (ABA) and that a culture of adherence to and continuous development of those practices is established and maintained, we will:

- Require all staff to provide and assure a safe environment for learners at all times.
- Establish and maintain procedures and practices which minimise risks to all learners;
- Publish and promote the right of every learner to work within a safe and cooperative learning and working environment;
- Provide information and educate learners about how to stay safe;
- Provide training to maintain the awareness of all staff so that they recognise and react responsibly to apparent and potential instances of abuse or neglect of learners;
- Articulate and maintain procedures for identifying, investigating and reporting cases (or suspected cases) of abuse or potential for harm to learners;
- Collaborate and cooperate with external agencies to establish, maintain and coordinate procedures and arrangements for ensuring the safety of the learners, keeping the welfare of the learner at the centre of any action taken.

## **5 Policy Implementation and Responsibilities**

5.1 Applied Business Academy (ABA) regards the promotion of Safeguarding measures as a mutual objective of management and staff.

5.2 It is our policy to do all that is reasonable to ensure the Safeguarding of all those who have dealings with us, including programme participants and other visitors.

5.3 Applied Business Academy (ABA) is responsible for ensuring this policy is adhered to and all members of staff and programme participants have an obligation to co-operate in the operation of this policy.

## **6 Our Commitment – General Principles**

### 6.1 Applied Business Academy Limited:

- will carry out our responsibilities under all relevant legislation, regulations and formal guidance for the protection of children and vulnerable adults
- maintains as one of our highest priorities the health, safety and welfare of all children and vulnerable adults involved in courses or activities which are our responsibility
- has a duty to ensure that our employees fulfil their responsibilities to safeguard and promote the welfare of children and vulnerable adults, and to prevent child abuse and to report any abuse discovered or suspected
- will advise all parents/ guardians/ carers of learners under 18 of the existence of our Child and Vulnerable Adult Protection Policy and Procedures, and the fact that this may require cases to be referred to the investigative agencies in the interests of the child
- will advise children and vulnerable adults who are students about the standards of behaviour and conduct they can expect from staff and volunteers and of what to do if they experience or suspect abuse
- will work with appropriate local agencies to ensure that children are safeguarded through the effective operation of the Children and Vulnerable Adult protection procedures
- recognises that any child and vulnerable adult can be subject to abuse and all allegations of abuse will be taken seriously and treated in accordance with our policies and procedures
- recognises that it is the responsibility of all staff to act upon any concern no matter how small or trivial it may seem
- recognises our responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse
- requires all staff to follow the *Code of Behaviour for Children and Vulnerable Adult Protection*, which is appended to this policy document (Appendix B), and will draw the attention of staff to this code of conduct and procedures in induction and relevant training
- is committed to supporting, resourcing and training those who work with, or who come into contact with, children and vulnerable adults and to providing appropriate supervision
- will prepare and implement an action plan to ensure that it fulfils its duties to protect children and vulnerable adults

## **7 Disclosure & Barring Service (DBS) checks (previously CRB checks)**

7.1 Applied Business Academy (ABA) will ensure that ALL new members of staff will undergo DBS Checks (formerly CRB clearance).

7.2 The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) have merged to become the Disclosure and Barring Service (DBS). CRB checks are now called DBS checks.

7.3 As this process can take up to four months, Applied Business Academy (ABA) will ask all new employees to sign a declaration, stating that they are not aware of any convictions that could hinder their employment at the Company.

7.4 Further to this, all managers will be asked to keep members of staff waiting for clearance under observation.

7.5 To ensure that Applied Business Academy (ABA) meets the requirements set out in the Child and Vulnerable Adult Protection Policy, the company will now seek to obtain DBS clearance for every member of staff working on a full time, part time basis. To support this process, the updated Child and Vulnerable Adult Protection Policy will be issued to every member of staff, and Child and Vulnerable Adult Protection briefing sessions will be held to communicate the policy and implications of the 1999 Child Protection Act.

7.6 Members of staff (or volunteers acting as agents of Applied Business Academy Limited) will only be permitted to have substantive contact with children, young persons or vulnerable adults if they have had DBS checks. 'Substantive contact' will be determined in the light of the following:

- (a) No-one without Enhanced DBS clearance will be permitted to be in sole charge of a child, young person or vulnerable adult or a group thereof.
- (b) Excluding casual insubstantial contact, no-one without Enhanced DBS clearance will be permitted to have one-to-one contact with a child, young person or vulnerable adult.
- (c) No-one without Enhanced DBS clearance may be appointed as a peer mentor or as a personal tutor – or to other offices with similar responsibilities – for a child, young person or vulnerable adult.

## **8 Safeguarding – Changing Priorities, E.G Radicalisation and FGM**

8.1 Applied Business Academy (ABA) will ensure that we keep abreast of new and changing safeguarding issues, for example the risks of Radicalisation and FGM (Female Genital Mutilation) to children and vulnerable adults.

8.2 We are aware of The Female Genital Mutilation Act 2003 and Channel (a multi-agency approach to protect people at risk from radicalisation) and will ensure staff are aware of how to spot and raise concerns.

### **Honour-based violence which includes FGM and forced marriage.**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her

- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information-

explain that you are making a report under the FGM mandatory reporting duty:

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

In line with safeguarding best practice, you should contact the girl and/or her parents or

guardians as appropriate to explain the report, why it is being made, and what it means.

Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

Forced marriage is an abuse of human rights, a form of violence against women and men, where it affects children, child abuse and where it affects those with disabilities abuse of vulnerable people. A forced marriage is one in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental incapacity, cannot) consent to the marriage and violence, threats, or any other form of coercion is involved. Coercion may include emotional force, physical force or the threat of physical force, and, financial pressure. In an arranged marriage, both parties have consented to the union but can still refuse to marry if they choose to.

*FGM and forced marriage is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.*

### **13. Grooming- What does the term grooming mean?**

- Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

*What is sexual online grooming?*

- Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so
- The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks
- Online groomers will tend to use chatrooms, which are focused on young people. There are countless teen chat rooms on the internet
- Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming
- Grooming online is anonymous and children find it easier to trust an online 'friend' than
- someone they have met 'face to face'

*How do you know if a child is being groomed online?*

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit

- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

### *Grooming – In Person*

- Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust
- They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult

*Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues*

To gain trust, groomers will:

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation
- Take them on trips, outings or holidays

Children or vulnerable adults may not speak out about their situation because they:

- Feel ashamed
- Feel guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

## **14. Contextualised Safeguarding**

The paragraph on contextual safeguarding in KCSiE 2020 now reads: 'All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.'

## **15. Keeping Yourself Safe**

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

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home
- Do not use sarcasm, insults or belittling comments towards learners
- Personal relationships with learners

You will naturally build a rapport with learners/ apprentices and they may see you as a confident and support, but be sure to maintain professional boundaries whenever carrying out work on Applied Business Academy (ABA) 's behalf. Be respectful and appreciate you are in a position of trust.

- Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination ensure a member of the site staff is aware where you are and monitors this
- Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting)
- If at any point, you feel unsafe in a learners company inform the site manager, your line manager, the DSL and leave the premises

## **16. Safer Recruitment**

Applied Business Academy (ABA) carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements. See Safer Recruitment policy for further detail on recruitment procedures.

## **17. Disclosure and Barring Service Checks**

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions. Please see Safer Recruitment Policy for additional information. Staff will only be offered a start date when an enhanced DBS check has been completed with no disclosures.

## **18. Internet Safety, IT, Cyber Security and virtual lessons**

The internet is used in Applied Business Academy (ABA) to raise educational standards, to promote learner achievement, to support the professional work of staff and to enhance the school's management functions. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our learners with all the necessary I.T skills that they will need in order to enable them to progress confidently in their educational careers and onward towards their working environments when they leave education.

*Safeguarding pupils and teachers online*

Most children are being educated at home during the coronavirus (COVID-19) outbreak, so leaders and teachers are having to adjust to remote education strategies. While this is happening, it is important that schools and colleges continue to follow safeguarding procedures.

As set out in the [Coronavirus \(COVID-19\): safeguarding in schools, colleges and other providers](#) guidance, online education should follow the same principles set out in your school's staff behaviour policy (sometimes known as a code of conduct).

Keeping teachers safe when providing remote education is also essential. Remote education is a new experience for both staff and learners, so it's important that schools and colleges understand how to approach safeguarding procedures online.

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

There's now a link to new DfE guidance on [teaching online safety in schools](#)

Some of the benefits of using I.T and the internet in education are:

For learners:

- unlimited access to worldwide educational resources and institutions such as art galleries, museums and libraries
- contact with education in other countries resulting in cultural exchanges between learners all over the world
- access to subject experts, role models, inspirational people and organisations. The internet can provide a great opportunity for learners to interact with people that they otherwise would never be able to meet
- an enhanced curriculum; interactive learning tools; collaboration, locally, nationally, and globally
- self-evaluation; feedback and assessment; updates on current affairs as they happen
- access to learning whenever and wherever convenient
- freedom to be creative
- freedom to explore the world and its cultures from within a classroom
- social inclusion, in class and online
- access to case studies, videos and interactive media to enhance understanding
- individualised access to learning

For staff:

- professional development through access to national developments, educational materials and examples of effective curriculum practice and classroom strategies
- immediate professional and personal support through networks and associations
- improved access to technical support
- ability to provide immediate feedback to learners and parents
- class management, attendance records, assessment and assignment tracking

*For parents (learners under 18 and those identified as vulnerable)*

Communication between Applied Business Academy (ABA) and parents/carers may be through e-mail and telephone messages. This form of contact can often be considered to be more effective, reliable and economic. Text messages and letters will also inform parent/carers of details relating to attendance, behaviour and other appropriate matters.

### *Roles and Responsibilities*

The Safeguarding Lead:

- has day-to-day responsibility for E-Safety issues and has a leading role in establishing and reviewing Applied Business Academy (ABA) E-Safety policies and documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an E-Safety incident taking place
- provides advice for staff, as required and advises learners on E-safety and how to stay safe
- liaises with the Local Authority through the LADO for incidents that are defined as Safeguarding concerns and appropriate referrals made
- receives reports of E-Safety incidents and creates a log of incidents to inform future developments (following Applied Business Academy (ABA) Safeguarding reporting procedures)

### *The Role of Parents/Carers (for under 18 s or those defined as vulnerable or 'at risk')*

Parents/Carers play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. Applied Business Academy (ABA) will take every opportunity to help parents/carers understand these issues through home/education liaison. Parents and carers will be encouraged to support in promoting good E-Safety practice and to follow guidelines.

### *Virtual lessons and live streaming*

Should schools and colleges choose to provide remote education using live streaming or pre-recorded videos, guidance from the National Cyber Security Centre (NCSC) on [which video conference service is right for your school](#) and [using video conferencing services securely](#) could help schools to set up video conferencing safely, if this is the chosen approach.

In addition, [guidance from the UK Safer Internet Centre on safe remote learning](#) includes detailed advice on live, online teaching, and the [safeguarding guidance from London grid for learning \(LGfL\)](#) includes platform-specific advice.

Teaching from home is different to teaching in the classroom. Teachers should try to find a quiet or private room or area to talk to learners, parents or carers. When broadcasting a lesson or making a recording, consider what will be in the background.

In some areas, schools and colleges may also be able to seek support from their local authority when planning online lessons and activities, and considering online safety.

*Cyber security* is how individuals and organisations reduce the risk of cyber attack. Cyber security's core function is to protect the devices we all use (smartphones, laptops, tablets and computers), and the services we access - both online and at work - from theft or

damage. It is also about preventing unauthorised access to the vast amounts of personal information we store on these devices, and online.

Cyber security is important because smartphones, computers and the internet are now such a fundamental part of modern life, that it's difficult to imagine how we'd function without them. From online banking and shopping, to email and social media, it's more important than ever to take steps that can prevent cyber criminals getting hold of our accounts, data, and devices.

Cybercriminals don't care that the world is going through a Pandemic- the risk and likelihood of a Cyberattack during these times has never been higher.

Action Fraud is the UK's national reporting centre for fraud and cybercrime and monitors and investigates cyberattacks. They have reported a 400% increase in reported cyberattacks, including phishing attacks on hospitals during Covid.

Cyber criminals exploit weaknesses in software and apps to access your sensitive personal data, but providers are continually working to keep you secure by releasing regular updates. These updates fix weaknesses, so criminals can't access your data. Using the latest versions of software, apps and operating system on your phone, tablet, or [smart device](#) can immediately improve your security. Remember to update regularly, or set your phone, tablet or [smart device](#) to automatically update so you don't have to think about it. Ensure all devices are running Malware and Anti-virus software, change passwords regularly and don't share these or input passwords in public places, Ensure you reduce Permissions to a 'Need'

In the 2020/2021 academic funding year, it is mandatory that you hold the Cyber Essentials certificate to access any delivery funding.

Learn more and start now:

[www.esfa-cyber-essentials.com](http://www.esfa-cyber-essentials.com)

## **19. Child criminal exploitation and child sexual exploitation (an addition to the KCSiE 2020)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This paragraph goes into more detail in the main body and annex.

## **20. Mental Health**

This is a new section in KCSiE 2020 identifying schools and colleges having an important role in supporting the mental health and wellbeing of pupils. Recognising that in some cases mental health is an indicator of a child suffering or at risk of abuse. Schools and colleges should be familiar with Mental health and behaviour in schools guidance and the Link programme. Training for senior mental health leads will be available to all state funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health.

New paragraphs have been included to help staff connect mental health concerns with safeguarding. 'All staff should also be aware that mental health problems can, in some

cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however are well placed to observe day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.'

There is a section on mental health in Part two 'The management of safeguarding' where links are provided for additional information.

01926 436 212 | [online@educare.co.uk](mailto:online@educare.co.uk) | [twitter.com/](https://twitter.com/)

## 21. Multi-agency working

Changes to this section in the KCSiE 2020 are to clarify the expectations for all agencies, including schools, in the context of the phasing out of local safeguarding children boards (LSCBs)- specifically to be aware of and follow these new local arrangements, this includes our senior leadership team, DSL and governing board.

As a reminder, our 3 safeguarding partners are:

- Local authority (LA)
- Clinical commissioning group within the LA
- police within the LA

## 22. Cyberbullying?

Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs

Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications

*Who is most at risk?*

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

*Definitions of cyberbullying*

<b>Flaming</b>	Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
<b>Denigration</b>	Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
<b>Exclusion</b>	Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.

<b>Outing</b>	Sharing secrets about someone online including private information, pictures, and videos.
<b>Impersonation</b>	Tricking someone into revealing personal information then sharing it with others.
<b>Harassment</b>	Repeatedly sending malicious messages to someone online.
<b>Cyberstalking</b>	Continuously harassing and denigration including threats of physical harm.

### **23. Upskirting ( is now a form of peer-on-peer abuse)**

It's a criminal offence and is now listed in KCSiE 2020.

**Definition:** upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

### **24. Serious violent crime**

The recent update states that all staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school/ training
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

### **25. County Lines**

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>

### **26. Data Protection (please also see Data Protection policy)**

All details and actions taken are recorded on the personal file of the learner. There may be different recording requirements dependent on the context of your work, however, to remind you, here are the key principles:

- Be clear
- Ensure you include the key details of the learner and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

*What happens to the recording of the disclosure and other information gathered?*

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally, the Applied Business Academy (ABA) reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure.

*Covid and Test and Trace.*

Our working practices fully reflect the advice and guidance given from government and we ensure we are aware of regular updates within this every changing environment. We ask upon arrival to our sites that you not only sign in but give your consent to our commitment to Test and Trace in case of any outbreaks of Coronavirus and the need to contact all stakeholders who may need to isolate.

<https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance>

The statement from Deputy Chief Executive Paul Arnold as the ICO publishes initial guidance for businesses asked to record and maintain personal data of customers, staff and visitors in support of the test and trace scheme.

Deputy Chief Executive Paul Arnold said:

“For the public health benefits to be realised from these new measures it is important people feel able to share their personal data with confidence. So, people can have this trust and confidence in the way their personal data will be kept safe and used properly as they prepare to return to their favourite pubs, restaurants and local businesses, we want to help businesses to get things right first time as they adapt to new ways of working.

“We’ve published ICO advice - [clear, simple steps that businesses can take](#) as they introduce customer and visitor records. And we’ll be supporting [government guidance](#) with a series of [Q and As](#) on our coronavirus online hub that will give more detail. We also have a team of experts offering advice and support through our [small business helpline](#).

“We appreciate the challenge that many small businesses face in introducing unfamiliar arrangements at speed. Our focus is on supporting and enabling them to handle people's data responsibly from the outset and, while we will act where we find serious, systemic or negligent behaviour, our aim is to help the thousands of businesses that are doing their best to do the right thing.

"We'll continue to update our guidance on this and other coronavirus-related data protection issues on our [dedicated web hub](#)."

## 27. Whistleblowing and Complaints (please also see associate policies)

*"What do I do if I am worried that another member of staff is acting in a way that may be unsuitable in practice, or may be causing harm to another person or even committing a criminal offence against another person?"*

Where an allegation is made against a staff member, either employed or associate, the matter immediately to the DSL. If there is a risk arising to operational delivery, then key partners should then be informed. The DSL will then decide whether the incident is a potential safeguarding matter or should be dealt with under Applied Business Academy Limited, Complaints Policy and disciplinary procedures.

If the allegation is of a safeguarding nature and constitutes:

- A concern which may mean the employee is not suitable to practice with children, young people
- A concern which has led to the possible harm to a learner
- A safeguarding concern which may be criminal in its nature or intent  
Then this should be reported as per local procedures, to the (Local Authority) and Designated Lead

8.3 The [www.gov.uk](http://www.gov.uk) website provides updated guidance and legislation.

## 28. Supported documentation.

Applied Business Academy (ABA) not only ensures whether arrangements for Safeguarding learners are appropriate and effective (Ofsted EIF Sep 2019) but we have also implemented outstanding measures to ensure that safeguarding policy and procedures are fully embedded into the learning journey whether the learner has employed (apprentices) or non- employed status and we work closely with employers to ensure the most effective systems are in place.

KCSiE has been recently reviewed in Sep 2020 (KCSiE).

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

The guidance sets out the legal duties that you **must** follow to safeguard and promote the welfare of children and young people, under the age of 18 in your School.

**All** School employees should read at least **Part 1** of the guidance.

### Who does this apply to?

All bodies listed **must** also ensure that all employees read at least Part 1 of the guidance and ensure that mechanisms are in place to assist employees in understanding and discharging their role in accordance with the document.

## **What has changed?**

The key changes that you need to be aware of, in relation to HR and Employment matters include the definition of safeguarding, managing allegations against supply teachers, and the explicit inclusion of mental health. Summary of new guidance:

Part one of KCSIE sets out what all staff need to know, what they need to look out for and where they should report their concerns. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

### **Part 1 – Safeguarding information for all employees**

Now includes information on mental and physical health in relation to safeguarding and the welfare of children. There is further guidance signposted to support this. It also provides employees with further information about child criminal exploitation and child sexual exploitation.

#### **Part 1 – paragraph 56**

Reference has been added to make it explicitly clear what School and College employees should do if they have safeguarding concerns about another employee who may pose as a risk or harm to children. This also applies to supply staff and volunteers who work at the School or College.

### **Part 2 – The management of safeguarding**

Paragraph 70 now includes an additional link to 'When to call the police guidance' from the NPCC and paragraphs 74-81 confirm the new multi-agency working arrangements that are now in place.

Part two of the revised KCSIE sets out the responsibilities of governing bodies and proprietors to safeguard and promote the welfare of children and includes guidance on the safeguarding policies and procedures they should have in place. The wording in this section has been updated to reflect the three safeguarding partners system is now running. The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working together to safeguard children. A link to NPCC guidance has also been added.

*When to call the police has also been added.*

It should help designated safeguarding leads to understand when they should consider calling the police and what to expect when they do.

*Multi-agency working*

New safeguarding partners and child death review partner arrangements are now in place. It is important that schools and colleges understand their role in the three safeguarding partner arrangements and local arrangements.

### *Information sharing*

Updated to provide further clarification about GDPR and withholding information. 'Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.'

Paragraph 86 includes a link to the DfE Data Protection tool kit for Schools. Paragraphs 93-95 make it mandatory for Schools to provide a broad and balanced curriculum about safeguarding, including online safety.

### **Part 3 – Safer recruitment**

No change

### **Part 4 – Allegations of abuse made against teachers, including supply teachers, other staff, volunteers and contractors**

Now includes guidance on how Schools and Colleges should ensure allegations against supply teachers are handled.

### **Part 5 – Child on child sexual violence and sexual harassment**

No change

### **Apprenticeship Provision programme response to Covid has also been reviewed in Sep 2020.**

Reviewed guidance on the apprenticeship programme response to COVID-19 has been published on 1st Sep 2020 to support those returning to work and education provision and forms an important part of our Safeguarding processes and flexibilities of delivery:

<https://www.gov.uk/government/publications/coronavirus-covid-19-apprenticeship-programme-response>

This document also provides guidance on how apprentices can safely return to the workplace and educational settings, as well as the actions that training providers should take for the return of all apprentices from September.

It should be read alongside the [safer working guidance](#), the [Further Education \(FE\) autumn term guidance](#), and the government's [coronavirus guidance and support for businesses](#).

"Our objective for these measures is to support all employers to retain their apprentices and to support apprenticeship training and assessment providers to continue to deliver services to apprentices where possible, so that they may progress and complete their apprenticeships

as planned. Although apprentices are returning to the workplace and educational settings, our guidance still aims to help all parties through this period of transition”

This version focuses on:

- ✓ Information on the actions that training providers should take for the return of apprentices in September 2020.
- ✓ As apprentices return to work, assessment centres and educational settings, training providers, employers and EPAOs consider how best to minimise the risks of coronavirus transmission when determining how and when training and assessment takes place.
- ✓ Apprenticeship delivery can be extremely flexible and it is up to training providers, employers and EPAOs to agree how training is delivered, and how assessments are undertaken. They may want to take advantage of more than one delivery method to balance any risks from coronavirus with providing a full educational experience.
- ✓ We ask that training providers, employers and EPAOs consider how much apprentices from different employers mix with other learners and staff when training in an educational setting or undertaking assessment.
- ✓ Updated guidance on workplaces and assessment centres. Additional information on local outbreaks, contingencies for outbreaks, and links to the wider FE guidance.

# APPENDIX A

## Child and Vulnerable Adult Protection Procedures

*These procedures should be read in conjunction with the Department of Health document 'What to do if you're worried a child is being abused (Summary)' 19 May 2003.*

### 1 Purpose

- 1.1 The purpose of these guidelines is to ensure that the rights of children and vulnerable adults are protected through staff awareness of the issues and the following of the statutory and local guidelines in the reporting of concerns.
- 1.2 It is the responsibility of all Applied Business Academy Ltd staff to record and report Child Protection concerns, i.e. where they believe a child has been or is at risk of abuse, neglect or significant harm. This responsibility extends to all staff and not just those specifically working with under 18s.

### 2 Definition of Terms

- 2.1 The Child and Vulnerable Adult Protection Policy describes the support and protection procedures for all learners under the age of 18, or vulnerable learners over this age, who may be “at risk” of abuse.

#### 2.2 The Definition of a “Child”

“Child” is defined as all young people under the age of 18, in accordance with the 1989 Children Act.

#### 2.3 The Definition of a “Vulnerable Adult”

“Vulnerable Adult” is defined as, “a person who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”, in accordance with County Council’s adult protection procedures.

### 3 Categories of Abuse

- 3.1 Children can be potentially abused within the family, community, and in organisations by employees (including those employed to promote their welfare and protect them from abuse), volunteers, visitors, and fellow students, the following are broad categories of abuse.
  - **Physical Abuse:** may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child and vulnerable adult. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child and Vulnerable Adult who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen's syndrome by proxy'.

- **Emotional Abuse:** is the persistent emotional ill-treatment of a child or vulnerable adult such as to cause severe and persistent effects on the child and vulnerable

adult's emotional development. It may involve conveying to children or vulnerable adults that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in children and vulnerable adults. It may involve causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children and vulnerable adults. Some level of emotional abuse is involved in all types of ill-treatment of a child or vulnerable adult, though it may occur alone.

- **Sexual Abuse:** involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.
- **Neglect:** is the persistent failure to meet the child's or vulnerable adult's basic physical and/ or psychological needs, likely to result in the serious impairment of the child or vulnerable adults health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child or vulnerable adults from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or vulnerable adults basic emotional needs.
- **Significant Harm:** Some children or vulnerable adults may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.
- **Financial Abuse** Some children and vulnerable adults may be abused or exploited financially including fraud and extortion.

## 4 Director, Deputy and Advisors

4.1 All schools, colleges and providers are required to have a designated member of staff, who is assigned to act on child and vulnerable adults' protection concerns.

4.2 At Applied Business Academy (ABA) our Designated Safeguarding/Prevent Officer is our Director & CEO, P R R Gillella, and he is responsible for co-ordinating action within the organisation and liaising with other agencies.

4.3 The CEO has overall responsibility for Safeguarding and is required to know:

- how to identify signs and symptoms of abuse and when to make a referral
- local Child and Vulnerable Adult protection procedures and the Child Protection Manager's role within them
- roles/ responsibilities of investigating agencies and how to liaise with them
- requirements of record keeping
- child protection conference conduct and how the Child Protection Manager or other members of staff can make an appropriate contribution

## 5 Advice to Staff on When to Take Action & How

5.1 Once you suspect or know of any abuse of any child or vulnerable adult, you should immediately inform the Designated Safeguarding/Prevent Officer in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the Designated Safeguarding/Prevent Officer to discuss your concerns. You should also contact the CEO if you know or suspect that a member of staff or student has a previous history of abuse of children and/or vulnerable adults.

5.2 If, following your initial contact with the Designated Safeguarding/Prevent Officer, it is decided that the matter should be taken further; a written report must be prepared. A written report is essential to prevent any misrepresentation of your findings, and should be sent to the CEO within 24 hours of the raising your suspicion. The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the child or vulnerable adult concerned, as accurately as you are able to record it. The report should be signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the CEO.

In some extreme instances it may be appropriate for the staff or DSO to phone 999

5.3 If a child or vulnerable adult comes to you with a report of apparent abuse, you should listen carefully to the child or vulnerable adult, using the following guidelines. When listening to a child or vulnerable adult staff must:

- allow the child or vulnerable adult to speak without interruption
- never trivialise or exaggerate the issue
- never make suggestions
- never coach or lead the child or vulnerable adult in any way
- reassure the child or vulnerable adult, let them know you are glad they have spoken up and that they are right to do so
- always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the child or vulnerable adult – spare them having to repeat themselves over and over
- be honest – let the child or vulnerable adult know that you cannot keep this a secret; you will need to tell someone else
- try to remain calm – remember this is not an easy thing for them to do
- do not show your emotions – if you show anger, disgust or disbelief, they may stop talking this may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- let the child or vulnerable adult know that you are taking the matter very seriously
- make the child or vulnerable adult feel secure and safe without causing them any further anxiety

5.4 The Designated Safeguarding/Prevent Officer will be responsible for recording essential information about each case and for collecting reports and notes as appropriate.

5.5 Any detailed information about a case will be confined to the Project Manager, Director and (if not involved in the allegations) the parents/ guardians/ carers. The Manager(s) and staff reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis.

## **6 What Happens Next?**

6.1 Taking into account all the information available, the Designated Safeguarding/Prevent Officer will decide on the next steps, which may include taking no further action.

6.2 Where the Designated Safeguarding/Prevent Officer and CEO decide that further action is necessary, this may be to:

- Seek further advice from The Children's Trust.
- Make a referral to the appropriate agency, as signposted.
- Report the incident to a designated Social Worker, as signposted.
- Report the matter to the police if a crime is suspected. If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

**All reported disclosures regardless of outcome must also be reported internally within Applied Business Academy (ABA) through the completion of the 'Safeguarding Incident form'** in conjunction with the written referral to the appropriate local authority safeguarding team.

The form has 3 parts:

- Part 1 outlines the basic details of the referral and part 2 the details of the incident being reported. Both part 1 and 2 must be completed at the same time following the disclosure.
- The form must then be anonymised by removing the person's personal details and password protected and sent by email to the DSL

Part 3 of the form must be completed within 7 days subsequent to the submission of Parts 1 and 2 once the outcome of the referral is known and resubmitted as detailed above.

**It may be a requirement of Contract to report all Safeguarding concerns- please ensure contract compliance at all times**

6.3 The CEO may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the child/ren, other students, staff, parents or carers involved) the CEO will make the necessary arrangements.

## **7 Confidentiality**

7.1 Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the child and vulnerable adults is the overriding concern.

7.2 The degree of confidentiality will be governed by the need to protect the child or vulnerable adults.

- 7.3 The child or vulnerable adults should be informed at the earliest possible stage of the disclosure that the information will be passed on.
- 7.4 All conversation regarding a child or vulnerable adults should always be held in private.
- 7.5 Applied Business Academy (ABA) complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of a child and vulnerable adults.
- 7.6 **Whatever happens, you should always be open and honest with the child or vulnerable adult if you intend to take the case further.**
- 7.7 Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the Designated Safeguarding/Prevent Officer or CEO.

## **8 Allegations Against Staff**

- 8.1 ABA's primary concern is to ensure the safety of the child and vulnerable adults. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally whatever the validity.
- 8.2 There may be occasions where a child or vulnerable adult will accuse a member of staff of physically or sexually abusing them. In some cases, this may be false or unfounded.

However, in some cases the allegations may be true. Any instance of a child or vulnerable adult being abused by a member of staff is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to health and career.

- 8.3 In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the Designated Safeguarding/Prevent Officer, who must then:
- Take such steps as s/he considers necessary to ensure the safety of the child or vulnerable adult in question and any other child or vulnerable adult who might be at risk.
  - Report the matter to the local social services department.
  - Ensure that a report of the matter is completed by the person who reported the original concern.
- 8.4 If the allegation concerns one of the management team, the matter should be discussed with the Designated Safeguarding/Prevent Officer, who will report to the Principal, in addition to following the normal procedures for Child and Vulnerable Adults Protection. If the allegation concerns the Principal the matter should be discussed with the Designated Safeguarding/Prevent Officer, who will follow the normal procedures for Child and Vulnerable Adults Protection.

### **Prevention of Covid 19**

Please see our recently reviewed Health and Safety Policy taken from the most recent gov.uk guidance for education settings at 6<sup>th</sup> Sep 2020.

# APPENDIX B

## Code of Behaviour for Child and Vulnerable Adult's Protection for Applied Business Academy (ABA) Staff

### 1 Introduction

- 1.1 Applied Business Academy (ABA) recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff come into contact with children and vulnerable adults and to guarantee the safeguarding and protection of children and vulnerable adults and staff.
- 1.2 However, below are the standards of behaviour required of staff in order to fulfil their roles and duty of care. This code should assist in the safeguarding and promotion of the welfare of children and vulnerable adults and in the protection of both children and vulnerable adults and members of staff.

### 2 Staff Conduct

#### 2.1 Staff **must**:

- Adhere to the Child and Vulnerable Adults Protection Policy and Procedures at all times, including acting to promote children and vulnerable adults welfare, prevent abuse and report any abuse discovered or suspected.

#### 2.2 Staff **must never**:

- Engage in rough, physical games including horseplay with children and vulnerable adults/ students.
- Allow or engage in inappropriate touching of any kind. The main principles of touch are:
  - touch should always be in response to the child or vulnerable adult's need
  - touch should always be appropriate to the age and stage of development of the child or vulnerable adults
  - touch should always be with a child or vulnerable adult's permission
- Do things of a personal nature for children or vulnerable adult that they can do for themselves or that their parent can do for them.
- Physically restrain a child or vulnerable adult unless the restraint is to prevent physical injury of the child and vulnerable adults/other children/visitors or staff/yourself.  
**In all circumstances physical restraint must be appropriate and reasonable; otherwise, the action can be defined as assault.**
- Make sexually suggestive comments to or within earshot of a child or vulnerable adult.

- Have children or vulnerable adults on their own in a vehicle. Where circumstances require the transportation of children or vulnerable adults in their vehicle, another member of staff must travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting children or vulnerable adults as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a child or vulnerable adult on their own, it is essential that another leader and the parent is notified immediately
- Take a child or vulnerable adult to the toilet unless another adult is present or has been made aware (this may include a parent, group leader).
- Spend time alone with a child or vulnerable adult on his/her own, outside of the normal tutorial/ classroom situation. If you find you are in a situation where you are alone with a child or vulnerable adult, make sure that you can be clearly observed by others.
- Engage in a personal relationship with a child or vulnerable adult/student, or a child or vulnerable adult who becomes a student, beyond that appropriate for a normal teacher/ student relationship.

### **3 Implications for Staff**

- 3.1 Staff who breach any of the above may be subject to the disciplinary procedure. If an allegation against a member of staff has occurred, then an investigation will be carried out.
- 3.2 Applied Business Academy (ABA) reserves the right to suspend any member of staff under the Child and Vulnerable Adult Protection Policy to safeguard young people and vulnerable adults whilst an internal and/or external investigation takes place.
- 3.3 The company can implement its own internal investigation during any stage of this process, which may result in disciplinary action against a member of staff.
- 3.4 Should the company decide to suspend an employee following implementation of the Child and Vulnerable Adult Protection Policy, the following procedure will be followed:
- a) The employee concerned will be required to attend a meeting with the CEO. The employee will have the opportunity to be accompanied by a colleague, or a trade union representative.
  - b) During the meeting, the employee will be provided with written confirmation of the suspension, and the opportunity to ask any questions with regards to the contents of the letter.
  - c) If the suspension is subject to external investigation, the company management representatives will be unable to discuss the details of any allegations made under the Child Protection Act (1999).

## **APPENDIX C**

### **Preventing Extremism and Radicalisation**

Prevent is part of a Government initiative to develop a robust counter terrorism programme – CONTEST. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

The PREVENT duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non-violent extremism. This is extended to Employers when working with learners. Our expectation is that all employers with whom we work have a shared ethos to keeping learners safe.

This policy can be viewed on our website.

Our policies are identified to both new staff and learners at initial induction and when relevant changes occur.

## 2. Counter-Terrorism and Security Act

Sect 26 CTS Act places a duty on certain bodies (specified authorities – listed in Schedule 6) to have "due regard to the need to prevent people from being drawn into terrorism".

Guidance is issued under Section 29 of the Act:

- ✓ Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- ✓ Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- ✓ Work with sectors and institutions where there are risks of radicalisation that we need to address

### *Purpose of Prevent*

- Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities
- It also aims to support institutions, such as schools, colleges and universities where this may happen
- All frontline staff have a responsibility to report any instances where they think they have identified a Safeguarding issue to their Designated Safeguarding Lead

### *Responsibilities*

All staff have a legal responsibility under the Prevent Duty to make sure that:

- They have undertaken training in the Prevent Duty as identified by their

management

- They are aware of when it is appropriate to refer concerns about learners to the Prevent officer, usually the provider's Safeguarding officer
- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice

*The Prevent Strategy will specifically*

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address

### 3. Definitions

#### What is CONTEST?

**CONTEST** is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.'

**CONTEST** has four strands, often known as the four Ps. The aims of the 4 Ps are:

**PREVENT** - to stop people becoming terrorists or supporting violent extremism

**PURSUE** - to stop terrorist attacks through disruption, investigation and detection

**PREPARE** - where an attack cannot be stopped, to mitigate its impact

**PROTECT** - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places

#### What is Extremism?

The Government has defined extremism as "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". This also includes calls for the death of members of the British armed forces.

#### What is Terrorism?

An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

#### What is radicalisation?

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the

only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

## **1. What is Channel?**

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

### *Who does Channel work with?*

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

### *How does Channel work?*

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

### *How will the person be involved in this process?*

A person will always be informed first if it is felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

### *What happens with the referral?*

Referrals are first screened for suitability through a preliminary assessment by the

Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary. Raising a concern if you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding or duty of care procedures within your organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.

## **2. Our responsibility**

It is our responsibility to protect learners and employees from radicalising influences. We do this by building learners and employee's resilience to extreme narratives during our curriculum and ensuring this is embedded within the full learning journey. During support and supervision, we identify any vulnerabilities or worrying changes in behaviour and know what to do if you have concerns about an apprentice or employee. Or close communication with Employers ensures this ethos and commitment is shared as it is crucial for all education establishments and employers to be involved in the Prevent strategy. Applied Business Academy (ABA) has a part to play in fostering shared values and promoting cohesion. We focus on the risks of violent extremism, which represents the greatest threat at the national level while recognising that other forms of violence and extremism can and do manifest themselves within Applied Business Academy (ABA) and other training settings. The Prevent Strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate, and to listen and support the learner's voice.
2. To break down segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society
3. To ensure learner safety and that Applied Business Academy (ABA) is free from bullying, harassment and discrimination
4. To provide support for learners who may be at risk and appropriate sources of advice and guidance
5. To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives, the strategy will concentrate on four areas:

### *Leadership and Values*

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation
- Building staff and learner understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

### *Teaching and Learning*

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner's voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion

- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- Encouraging active citizenship/participation and learner's voice

#### *Learner Support*

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective learner support services
- Listening to what is happening at Applied Business Academy (ABA) and the community
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping learners and staff know how to access support at Applied Business Academy (ABA) and/ or through community partners
- Supporting at-risk learners through safeguarding and crime prevention processes
- Focussing on narrowing the attainment gap for all learners

#### *Managing Risks and Responding to Events*

To ensure that Applied Business Academy (ABA) monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on Applied Business Academy (ABA)
- Understanding and managing potential risks within Applied Business Academy (ABA) and from external influences
- Responding appropriately to events in local, national or international news that may impact on learners and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within Applied Business Academy (ABA) i.e. Safeguarding and Prevent risk assessment
- Ensuring plans are in place to respond appropriately to a threat or incident
- Developing effective ICT security and responsible user policies

Applied Business Academy Ltd is committed to providing a secure environment for learners, where they feel safe and are kept safe and where equality and inclusion are actively promoted.

If you believe someone is at risk of radicalisation you can help them obtain support and prevent them becoming involved in terrorism by raising your concerns and making a referral to our Designated Safeguarding/Prevent Officers.

When operating this policy Applied Business Academy Ltd uses the following definition of extremism:

(where is this definition from- please advise?)

*'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;** and/or calls for the death of any person, whether in this country or overseas.*

Confidential Anti-Terrorist Hotline 0800 789 321 In an emergency, always dial 999

To contact the Prevent Team phone 101  
Extension 3397

**For further information:**

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

To access free Government Prevent training:

<https://www.elearning.prevent.homeoffice.gov.uk/>

### **3 Ethos**

There is no place for extremist views of any kind in Applied Business Academy Ltd, whether from internal sources – learners, staff or directors; or external sources – community, external agencies or individuals. Our learners see our classes as a safe place where they can, at appropriate times, explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to protect this freedom.

We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the development of learners. Education is a powerful weapon against this; equipping people with the knowledge, skills and critical thinking, to challenge and debate in an informed way and to ensure that they thrive, feel valued and not marginalised.

### **4 Practice**

At Applied Business Academy Ltd we promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We understand our legal duty to balance freedom of speech and protecting student/staff welfare.

*Teaching Approaches.* We teach and encourage learners to respect one another and to respect and tolerate difference. We strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches they may experience elsewhere may make it harder for them to challenge or question these radical influences.

In our provision this will be achieved by good teaching. We will ensure that all our teaching approaches help our learners build resilience to extremism and give learners a positive sense of identity through the development of critical thinking skills. We will:

- Make a connection with learners through good teaching design and a learner centred approach.
- Facilitate a 'safe space' for dialogue, and
- Equip our learners with the appropriate skills, knowledge, understanding and awareness for resilience.

This approach will be embedded within the ethos of our providers so that learners know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution.

*Safeguarding.* As part of wider safeguarding responsibilities staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of the provider, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Learners accessing extremist material online, including through social networking sites.
- Partner providers, local authority services, and police reports of issues affecting learners in other providers or settings.
- Learners voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Extreme Anti-Western or Anti-British views.

*External Speakers and Events.* In order to comply with the duty, we have policies and procedures in place for the management of events held on our premises. These policies will apply to all staff, students and visitors and clearly set out what is required for any event to proceed.

**NB: If any member of staff has any concern regarding a venue or event, they should contact the Designated Safeguarding/Prevent Officers**