



Safeguarding Policy

March 2017

Introduction

The Safeguarding Policy of Aspire Advance Achieve Ltd (3aaa) reflects the importance of safeguarding and promoting the welfare of children (those under the age of 18). This Policy is based on the guidance issued by the Department of Education – Keeping Children Safe in Education (2016), Working Together to Safeguard Children and Young People (2015) *WT*. It references The Prevent Duty (Appendix 2), Forced Marriage, and Female Genital Mutilation (FGM)

This Policy aims to detail the framework for promoting and ensuring the safeguarding and protection of all applicants and apprentices. Safeguarding means “recognising that the needs, wellbeing and safety of all our applicants and apprentices are considered at all times and that actions relating to this are in line with legislation, recommendations and guidelines. All adults who work with children and young people are accountable for the way in which they exercise authority, manage risk, use resources and safeguard children and young people.

A duty is placed on 3aaa to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with children and young people are competent, confident and safe to do so.

This Policy is drawn up in accordance with the Local Safeguarding Children Board (LSCB) Child Protection Procedures and this Policy should be read in conjunction with these procedures and guidance – a copy of these are available from the Academy Manager.

The aims of this Policy are:

- To identify the expectations of staff in relation to safeguarding
- To ensure relevant and effective safeguarding practices are in place
- To ensure the right of every applicant and apprentice to learn within a safe environment
- To promote awareness to staff of the need to safeguard children and to recognise that safeguarding is everyone’s responsibility
- To ensure that the fundamental rights and needs of our applicants and apprentices are observed
- To prevent abuse through the pastoral support offered to all applicants and apprentices
- To raise awareness of different types of abuse and children in need issues
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse
- To ensure staff act professionally
- To deter potential, unsuitable individuals from applying to 3aaa by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- To reject at interview stage anyone where we have doubts about suitability
- To prevent the risk of abuse by ensuring procedures and standards are in place within our Academies to enable all staff to recognise the signs and report accordingly

3aaa have a statutory requirement under Sections 27 and 47 of the Children Act 1989 to assist the Local Authority Social Services Department acting on behalf of children in need. 3aaa will safeguard and promote the welfare of children in compliance with DfE guidance *Keeping Children Safe in Education (2016) KCSIE (September 2016)* and associated guidance *Working Together to Safeguard Children (2015) WT*. 3aaa also complies with the statutory guidance on children who run away or go missing from home or care (January 2014) and The Prevent Duty (The Counter-Terrorism and Security Act June 2015) and Social Media for Online Radicalisation (July 2015).

Responsibilities of Staff

All staff have a duty to safeguard and promote the welfare of our applicants and apprentices. We all have a **statutory** and moral duty to protect children and young people. If you hear, or become aware of anything that leads you to believe that the safety or welfare of any child or young person is at risk due to neglect, physical, emotional or sexual abuse, you **MUST** pass on the information to the DSL. Additionally, staff should remember to:

- Be alert to signs of abuse as well as other children in need issues
- Refer any specific concern to the Safeguarding Team and or Designated Safeguarding Lead (DSL)
- Be prepared to contribute to whatever actions are needed to safeguard the applicant or apprentice
- Read at least Part 1 of KCSIE (September 2016)
- Abide by the Sexual Offences Act 2003
- Be confidential
- Refrain from physical contact – children and young people should only be touched in ways that are appropriate to our professional or agreed role and responsibilities
- Treat children and young people with dignity and respect even in those circumstances where difficult or challenging behaviour is observed
- Advise a colleague if 1:1 working is required

Definitions of Child Abuse

See Appendix 1.

Children in Need and Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues and the Safeguarding Team and Designated Safeguarding Lead will liaise with appropriate external agencies. Issues that may arise that staff should be aware of and look out for are:

- Mental Health Problems
- Domestic Violence
- Long Term Absence (Fabricated or Induced Illness)
- Faith Abuse
- Gangs and Youth Violence
- Gender Based Violence including Violence Against Women and Girls (VAWG)
- Bullying including Cyber Bullying
- Female Genital Mutilation (FGM)
- E Safety
- Child Sex Exploitation (CSE)
- Forced Marriage
- Teenage Pregnancy
- Teenage Relationship Abuse
- Self-Harm or Suicidal Thoughts

- Extremism, Radicalisation and Terrorism
- Risk Taking Behaviour
- Drug or Alcohol Abuse
- Sexting
- Trafficking, Exploitation and Modern Slavery
- Living with a family member's addiction to Drugs, Alcohol or behaviour such as Gambling

3aaa is committed to ensuring:

- All staff are appropriately trained
- All staff adhere to the Safer Recruitment practices
- All staff have appropriate pre-employment checks
- Equal treatment for all regardless of sex, disability, religion or belief, sexual orientation, gender reassignment, age, race, ethnic origin, marital status, pregnancy or maternity
- This policy will be reviewed at least annually

Designated Safeguarding Lead

The Board of Directors of 3aaa are responsible for safeguarding. The Safeguarding Team and Deputy Safeguarding Lead is Kate Whittaker, Head of Apprentice Engagement and Customer Service. The Designated Safeguarding Lead is Sacha McCarthy – Director of Quality and Performance. Both the DSL and DDSL have been fully trained for the demands of the role in child protection, inter-agency working, participation in any case conferences, supporting children in need, record keeping and promoting a culture of listening to children and young people. The DSL and DDSL undergo refresher training at least every 2 years provided by the local authority or an external welfare agency acceptable to the LSCB. 3aaa will ensure all staff who routinely have contact with children and young people are trained and receive refresher training regularly in line with advice from the LSCB. Contact details for DSL and DDSL as follows:

Kate Whittaker, Deputy Designated Safeguarding Lead katewhittaker@3aaa.co.uk, telephone - 07772657501

Sacha McCarthy, Designated Safeguarding Lead, Director of Quality and Performance, sachamccarthy@3aaa.co.uk Telephone - 07471357360

3aaa Head Office, Aspire House, Sitwell Street, Derby, DE1 2JT, safeguarding@3aaa.co.uk, telephone 01332 880 515

Guide for Reporting Concerns

Staff should refer any specific concerns to the DSL or DDSL. In most circumstances concerns are managed by the DSL or DDSL but the following exceptions apply:

- Children in need – should be referred to the local children's social care department
- Children at risk – must be referred to the local children's social care department immediately
- Allegations against staff – must be referred to the LADO within 1 working day
- Allegations against the DSL or DDSL – must be referred to the LADO within 1 working day
- If a crime has been committed – must be reported to the police within 1 working day

Reporting for FGM

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; or
- 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 of the girl 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.

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

Please see Appendix 3 for a full process map of reporting FGM.

Induction, Training and Staff Qualifications

Every new member of staff, including part-time staff, temporary, visiting and contract staff working for 3aaa, should receive appropriate training on:

- Their responsibilities in being alert to the signs of abuse and other stated 'children in need' issues
- The procedures for recording and referring any concerns to the Designated Safeguarding Lead
- The Safeguarding Policy
- The Prevent Duty (The Counter-Terrorism and Security Act 2015) – Appendix 2
- Forced Marriage
- FGM
- Part 1 of KCSIE (September 2016)
- Virtual College mandatory training – Safeguarding and Prevent

Procedures for Dealing with Cases

Safeguarding plays an integral part in 3aaa's policies and procedures. Staff receive compulsory training which supports all aspects of safeguarding including an understanding of signs of abuse in children and young people and examples of abuse by staff. It is important that children and young people receive the right help at the right time to address risks and prevent issues escalating, acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child or young person, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

The Role of the LSCB (Local Safeguarding Children Board)

The Local Safeguarding Children Board (LSCB) was established by the Children Act 2004 to give a statutory responsibility to each local authority for inter-agency working to ensure co-operation and agreement when working together to safeguard and promote the welfare of children and young people (under the age of 18 years).

Agencies that work within a LSCB are:

- Local authorities, including district councils
- The Police including the British Transport Police
- The probation service
- NHS including Strategic Health Authorities, Designated Special Health Authorities, Primary Care Trusts, NHS Trusts and NHS Foundation Trusts
- Organisations providing services under Section 114 of the Learning and Skills Act 2000
- Prisons and Young Offender Institutions and Secure Training Centres

It is important that Academy Managers know how to access the LSCB. Most local authorities offer free safeguarding training and updates that could be of benefit to the local Academy staff team.

What to do if you are Concerned about a Child or Young Person's Welfare

- Discuss your concerns with your Manager or the Safeguarding team or DSL
- Complete a Safeguarding Report Form
- If a child or young person is at SIGNIFICANT risk of IMMEDIATE harm, contact the LSCB directly and advise the Safeguarding Team or DSL who will contact the LADO

What to do if a Child or Young Person makes a Disclosure

- A disclosure may happen at any time, remain calm, listen carefully and allow the child or young person to speak for if they want to
- Staff should be aware that the way in which they talk to the child or young person may have an effect on the evidence which is put forward if there are subsequent criminal proceedings – do not question the child or young person, ask leading questions or make suggestions
- Remember the TED principles (Tell me, explain to me, Describe to me)
- Make accurate notes including age, time, date, place and people who are present as well as what was said/disclosed – the nature of any injuries, if applicable, should also be included
- If the allegation the child or young person makes against a member of staff, inform the Safeguarding Team or DSL immediately
- If one young person bullies another young person, this should be treated as a child protection concern where there is “reasonable cause to suspect that the young person is suffering, or likely to suffer, significant harm” – refer to the Bullying Policy

This Policy Should be Read in Conjunction with:

- Whistle Blowing Policy
- Health and Safety Policy
- Safer Recruitment Guidelines
- First Aid Procedure
- KCSIE Part 1 (2016)
- Anti-Bullying Policy
- Staff Code of Conduct (Included in the 3aaa staff Handbook) including 1:1 Teaching, Breach of Trust
- E-Safety policy
- Social Media Policy
- Equality and Diversity Policy

Appendix 1

Definitions of Child Abuse

1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or young person. It may also be caused by the parent/carer fabricating or inducing illness in a child or young person.

- **Possible signs:**

Bruising, burns, bite marks, parent/carers frequently alleging illness in a child or young person, body covered in hot weather, self-harm.

- **Impact of physical abuse:**

It can lead to neurological damage, physical injuries, disability and occasionally death. Harm may be caused directly by the abuse itself or by the abuse taking place in a wider family context of conflict. Physical abuse has been linked to aggressive behaviour, emotional and behavioural problems and educational difficulties.

2. Neglect

Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child's or young person's health or development. It may involve a parent/carer failing to provide adequate food, shelter, and clothing, access to medical care, failure to protect a child or young person from physical harm, as well as excluding a child or young person from home or abandonment.

- **Possible signs of neglect:**

Constant hunger, poor personal hygiene, poor state of clothing, frequent lateness or nonattendance for lessons, untreated medical problems.

- **Impact of neglect:**

Severe neglect of young children is associated with major impairment of growth and intellectual development. Persistent neglect can lead to serious impairment of health and development and long-term difficulties with social functioning, relationships and educational progress.

3. Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child or young person such as to cause severe and adverse effects on the child's or young person's emotional development. It may involve conveying to a child or young person that he/she is worthless, unloved or inadequate, or valued only in so far as they meet the needs of another person.

- **Possible signs of emotional abuse:**

Physical, mental and emotional development lags, over-reaction to mistakes, extremes of passivity or aggression, continual self-depreciation, self-harm, inappropriate emotional response to painful situations.

It may be when an adult constantly behaves in an uncaring or hostile way towards a child or young person, perhaps by bullying, rejecting, frightening or criticising them.

- **Impact of emotional abuse:**

Emotional abuse has an important impact on a developing a child's or young person's mental health, behaviour and self-esteem. It can be especially damaging in infancy. Domestic violence, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse. Some level of emotional abuse is involved in all types of mistreatment of a child or young person, though it may occur alone.

4. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child or young person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts including non-contact activities [e.g. exposure to pornographic material, watching sexual activities or encouraging children and young people to behave in sexually inappropriate ways).

- **Impact of sexual abuse:**

Self-harm, inappropriate sexualised behaviour, depression, loss of or poor self-esteem, aggressive behaviour, lack of trust, running away from home.

- **In making professional judgements, consider:**

The frequency of bruising/injury, context of injury, explanation from child or young person.

Appendix 2

The Prevent Duty (The Counter-Terrorism and Security Act 2015)

All FE providers have a duty to safeguard their Learners and Apprentices. A new term 'The Prevent Duty' is being used within safeguarding to ensure young people are kept safe and within the law. The strategy is not about preventing 3aaa Apprentices from having political and religious views and concerns, but about supporting them to use those concerns or act on them in non-extremist ways.

Section 21 of the CTS Act 2015 places a duty on Training Providers, listed in Schedule 3 of the Act, to have "due regard to the need to prevent people from being drawn into terrorism".

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 are British Values?

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs". Training providers are expected to encourage young people to respect other people with regard to the protected characteristics set out in the Equality Act 2010.

Staff Responsibilities

All staff have a responsibility to:

- Undertake training
- Be aware of when it is appropriate to refer concerns to the Safeguarding Team and DSL
- 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 day to day work ethic and practice
- Read the Equality and Diversity Policy

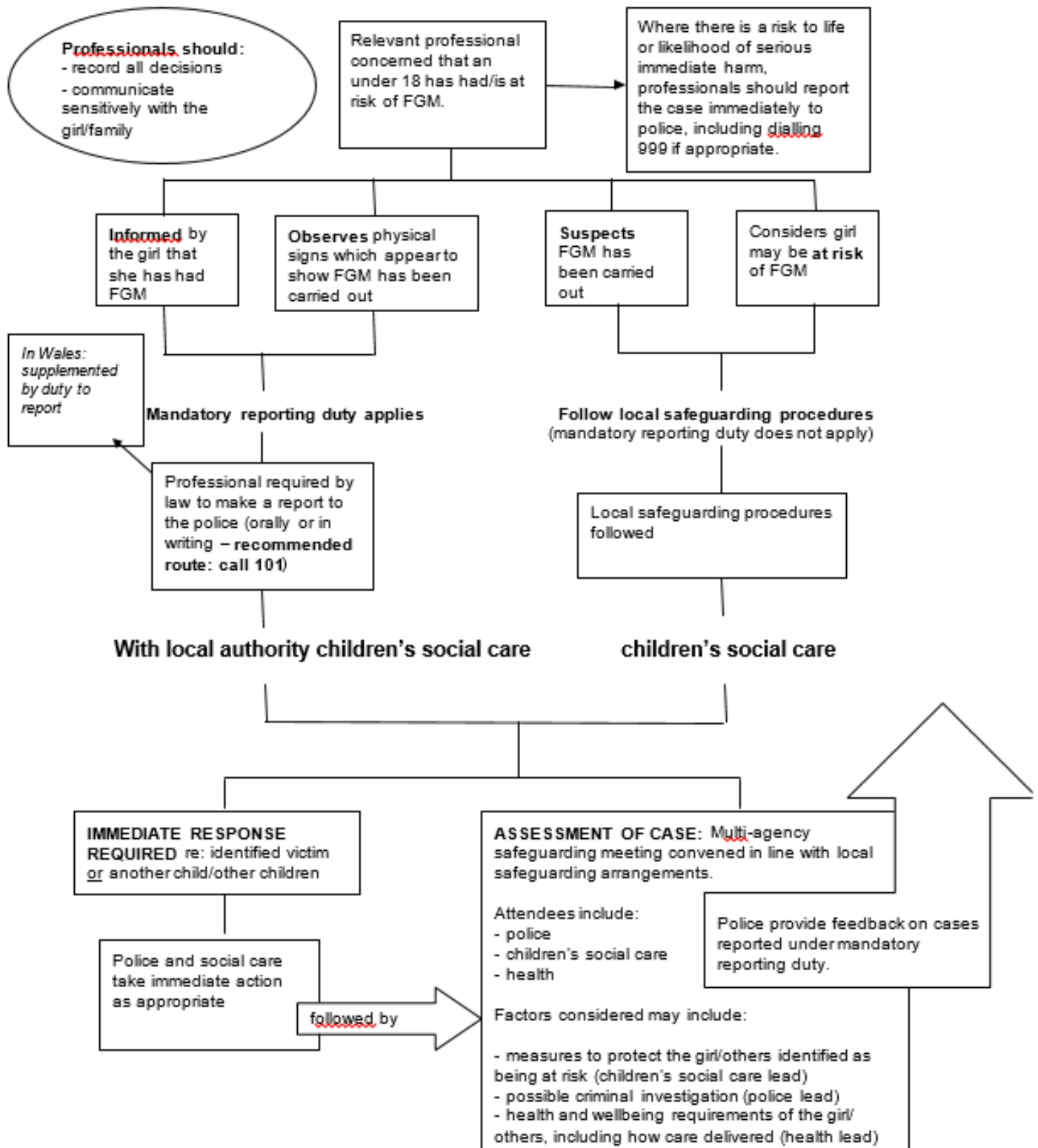
Appendix 3

FGM mandatory reporting process map

This process map is intended to demonstrate where the FGM mandatory reporting duty fits within existing processes. It is not intended to be an exhaustive guide, and should be considered in the context of wider safeguarding guidance and processes.

Response initiated by police, in consultation

Response initiated by local authority



Signposting

Advice for Young People by Young People (coping with drug or alcohol or other difficult situations at home or with a parent)

Alternative to Samaritans (for Young People)

Get Connected is a confidential 24 hour free telephone helpline that might be a suitable alternative to the Samaritans – www.getconnected.org.uk or 0808 808 4994

Bullying (including Cyber)

Workplace http://www.supportline.org.uk/problems/bullying_at_work.php

Cyber <http://www.nhs.uk/Livewell/Bullying/Pages/Cyberbullying.aspx> or <http://www.saferinternet.org.uk/about/helpline>

Child Sex Exploitation

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/what-is-child-sexual-exploitation/> or <http://www.stopitnow.org.uk/> or 0808 1000 900

Domestic Violence

For women: <http://www.nationaldomesticviolencehelpline.org.uk/> or 0808 2000 247

For men: http://www.mensadvice.org.uk/mens_advice.php.html or 0808 801 0327

Drug or Alcohol Abuse

Drugs - <http://www.talktofrank.com/> or call: 0300 123 6600 text: 82111

Alcohol - <https://www.drinkaware.co.uk/understand-your-drinking/is-your-drinking-a-problem/alcohol-support-services> or call: 0300 123 1110

Both - <http://www.addaction.org.uk/>

Eating Disorders

B-Eat - <https://www.b-eat.co.uk/support-services/helpline> or Adults 0345 634 1414 email

help@beat.co.uk. Under 25's 0345 634 7650 email fyp@b-eat.co.uk

<http://www.eatingdisorderssupport.co.uk/help/links-resources>

E-Safety

<http://www.saferinternet.org.uk/about/helpline> or 0844 381 4772

Extremism, Radicalisation and Terrorism

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

or 020 7340 7264 email: counter.extremism@education.gsi.gov.uk

Faith Abuse

<http://www.equalityadvisoryservice.com/app/home> or 0808 800 0082

FGM

<http://www.nhs.uk/NHSEngland/AboutNHSservices/sexual-health-services/Pages/fgmresources.aspx> or 0800 028 3550

Forced Marriage

Karma Nirvana Victim Support 0800 5999 247 <https://www.gov.uk/guidance/forced-marriage>

Forced Marriage Unit email fmunit@fco.gov.uk or 020 7008 015; Outreach email

fmunitoutreach@fco.gov.uk; Facebook: Forced Marriage page; Twitter: @FMUnit

Gangs and Youth Violence

For concerned adults - <http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/stayingsafe-away-from-home/gangs-young-people/> or 0808 800 5000

For young people - <http://www.childline.org.uk/Pages/Home.aspx> or 0800 1111

Gender Based Violence

Solace Advice Hub email advice@solacewomensaid.org.uk or 0808 802 5565

Women and Girls Network Advice Hub email advice@wgn.org.uk or 0808 801 0660 24

Hour Domestic Violence Helpline 0808 2000 247

Living with a Family Member's Addiction to Alcohol or Drugs

<http://www.nhs.uk/Livewell/drugs/Pages/caring-for-a-drug-user.aspx> or 0300 123 6600

<http://www.adfam.org.uk>

Long Term Absence

<http://fitforwork.org/employee/> or 0800 032 6235

Mental Health Problems

<http://www.nhs.uk/conditions/stress-anxiety-depression/pages/mental-health-helplines.aspx>

Self-Harm or Suicidal Thoughts

Suicide <http://www.nhs.uk/conditions/Suicide/Pages/Introduction.aspx>

Self-Harm <http://www.nhs.uk/conditions/Self-injury/Pages/Introduction.aspx>

Sexting

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/> or call: 0808 800 5000
(18 and over) 0800 1111 (under 18)

Teenage Pregnancy

<http://www.nhs.uk/conditions/pregnancy-and-baby/pages/teenager-pregnant.aspx#close> or 0300 123 2930

Trafficking, Exploitation and Modern Slavery

<http://www.salvationarmy.org.uk/human-trafficking> or 0300 303 8151