

Safeguarding and Prevent Policy

January 2026 V4

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To be reviewed annually

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CHILD PROTECTION and SAFEGUARDING CHILDREN, YOUNG PEOPLE & ADULTS AT RISK OF ABUSE OR NEGLECT POLICY

INTRODUCTION

Castle and Co Training Ltd trading as Career Crafters (CC) is committed to the safeguarding and well-being of all of our learners and fully recognises its responsibilities for protecting adults at risk of abuse or neglect groups. Our policy applies to all staff, learners, contractors, visitors and volunteers working on behalf of or in conjunction with CC.

This policy has been developed in accordance with the principles established by the Children Act 1989 and the Children Act 2004, the Education Act 2002, and relevant government safeguarding guidance. [Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.]

Safeguarding at Career Crafters includes protection from radicalisation and extremism (Prevent). Prevent is embedded within all safeguarding processes, including staff training, curriculum delivery, employer engagement, and referral procedures, and is treated as a safeguarding concern in all cases.

This policy is in line with statutory guidance for schools; colleges and further education; [Keeping Children Safe in Education \(KCSIE\) 2025](#), [Working Together to Safeguard Children \(2023\)](#), [London Child Protection Procedures \(currently 7th Edition – London Safeguarding Children Partnership\)](#), [‘What to do if You are Worried a Child is Being Abused’ 2015](#)

There are five main elements to our policy:

1. Ensuring we operate safer recruitment practices in accordance with the legislative document. safer recruitment practices in line with Keeping Children Safe in Education (2025).
2. Raising awareness of safeguarding throughout the organisation and ensuring that staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe
3. Raising awareness of safeguarding to all of our learners and ensuring that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe
4. Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse
5. Establishing safe environments in which adults at risk of abuse or neglect can learn and develop

We recognise that because of the day-to-day contact with learners, our staff are well placed to observe the outward signs of abuse. CC will therefore;

- Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to
 - Ensure learners know that there are designated staff within CC whom they can approach if they are concerned or worried
 - Include opportunities within our ongoing assessment process and classroom delivery
 - For learners to develop the skills they need to recognise and stay safe from abuse
- We recognise and adhere to the statutory requirements within the following key safeguarding legislation and statutory guidance including:
- Working Together to Safeguard Children (2023)
 - Children's Act (1989, 2004)
 - Safeguarding Vulnerable Groups Act SVGA (2006 amended 2012)
 - Protection of Freedoms Act (2012)
 - Disclosure and Barring Service Code of Practice (2012)
 - Sexual Offences Act (2003)
 - Equality Act (2010)
 - Prevent Duty Guidance (latest FE version)
 - Channel Duty Guidance (2023)

To support our commitment to the safeguarding and well-being of all of our learners and with regard to the above legislation we will;

Ensure that we have a Designated Person for Safeguarding who has received appropriate training and support for this role. The Designated Person for Safeguarding is Shilpa Patel (Manager) and other members of staff with specific responsibilities for Safeguarding are Amjid Hamid (Operations Manager) and Julie Gilchrist (safeguarding officer-assessor).

- Ensure that all staff and learners are aware of our Designated Persons for Safeguarding. This will be communicated via our staff and learner induction process, internal training and awareness sessions, via the learner handbook.
- Ensure that all staff are aware and understand their responsibilities in relation to Safeguarding and in being alert to the signs and indicators of abuse and for referring any concerns directly to the Designated Person for Safeguarding
- Ensure that effective Safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of Recognition, Response, Record, Report, and Refer.
- Ensure that we develop effective links with relevant external agencies, local safeguarding partnerships and cooperate fully with safeguarding partnerships and statutory agencies in relation to safeguarding referrals
- Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies
- Ensure all records are stored securely and in accordance with UK General Data Protection Regulation and Data Protection Act 2018

CC recognises its responsibility to safeguard young people and vulnerable adults from abuse, neglect and exploitation. Due to the nature of our work, staff may be among the first to identify concerns about a learner's welfare.

All staff therefore have a responsibility to remain vigilant, respond appropriately to safeguarding concerns, and report them in accordance with this policy. Safeguarding is the responsibility of all staff, not only the Directors, Senior Management Team and Designated Safeguarding Leads.

We will ensure that our Safeguarding Policy and Procedures are reviewed at least annually to ensure that they are still relevant and effective.

Understanding Safeguarding

What is Safeguarding?

Safeguarding refers to the action taken to promote the welfare of children and adults at risk of abuse or neglect and protect them from harm. Safeguarding may involve instances in which a young or vulnerable learner is suffering or likely to suffer from harm.

Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

What are the benefits of effective Safeguarding?

- When learners feel safe and secure, they can concentrate on learning.
- Learners can rely on those people in positions of trust.
- Staff are protected from malicious and misplaced allegations.
- Staff are clear about individual responsibilities, roles and boundaries.
- Learners are appropriately protected and all issues are dealt with effectively.

How do we define Young / Vulnerable learners?

A child or young person is defined as anyone under the age of 18.

The Safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that particular time.

New definition of regulated activity relating to adults

An adult is a person aged 18 years and over. There are six categories within the new definition of regulated activity.

1. Health care
2. Personal Care
3. Providing Social Work
4. Assistance with General Household Matters
5. Assistance in the Conduct of a Person's own Affairs
6. Conveying

Definition and types of Abuse or Neglect

This section closely reflects the procedures and guidance in the London borough of Redbridge Safeguarding Children Board and the Home Office document "*Working Together to Safeguard Children*" 2023.

'Child abuse and neglect' is a generic term encompassing all ill treatment of children, young people and vulnerable adults, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the person's health or development.

Abuse and neglect are forms of maltreatment of a young or adults at risk of abuse or neglect learner. Somebody may abuse a young or adults at risk of abuse or neglect learner by inflicting harm, or by failing to prevent harm.

Young or adults at risk of abuse or neglect learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

Working Together to Safeguard Children (2023) sets out definitions and examples of the four broad categories of abuse:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed in them.

These may include interactions that are beyond the person's developmental capacity, as well as over-protection and limitation of exploration and learning, or preventing them participating in normal social interactions. It may involve serious bullying causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

Neglect

Neglect involves the persistent failure to meet a person's basic or physical and/or psychological needs, likely to result in the serious impairment of the person's health and development. Neglect

may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a person's basic emotional needs.

In respect to adults at risk of abuse or neglect, the Local Authorities typically recognise several forms of abuse affecting adults at risk, including: :

- Financial Abuse is defined as the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or deception; or the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and any unreasonable restriction on a person's right to control over their lives to the best of their ability.
- Discriminatory Abuse is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation or marital status.
- Institutional Abuse is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of providers rather than the persons receiving the service

The grooming of children and young people for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed when there are concerns that a child or young person is at risk of radicalisation and extremism.

Additional types of abuse and unsafe activities which we recognise and which have become more prevalent in recent times are:

- Online abuse and exploitation
- Child-on-child abuse
- Youth-produced sexual imagery
- Radicalisation and extremism
- Child criminal exploitation, including county lines activity
- Bullying and Harassment
- Discriminatory Abuse
- Financial Abuse
- Domestic Violence
- Alcohol and Drugs
- Crime
- Cyber-bullying

Safeguarding concerns may arise both in person and online. Staff should remain alert to online risks including cyberbullying, online grooming, exploitation, algorithm-driven radicalisation, AI-generated content, and the use of encrypted platforms.

Signs and Indicators of possible abuse

When considering whether there is enough information and evidence to suggest a young or adult at risk of abuse or neglect learner has been abused, there are a number of possible indicators. However, there may also be a perfectly reasonable explanation so it is important to remain

vigilant but not be over zealous nor jump to conclusions. There may also be no signs or indicators or abuse, however this does not necessarily mean that a report of abuse is false.

Signs suggesting physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because of playing a contact / rough sport etc
- Injuries that have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, unkempt appearance, dirty clothes etc
- Changes in routine

Signs suggesting sexual abuse

- Any allegation made by an individual
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of **adult sexual behaviour**
- Sexual activity through words, play or drawing
- Individuals who are sexually provocative or seductive
- Severe sleeping disorders
- Eating disorders

Signs suggesting emotional abuse

- Changes or regressions in mood or behaviour
- Nervousness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention seeking behaviour

FEMALE GENITAL MUTILATION

Female Genital Mutilation (FGM) is a form of child abuse and is such dealt with under the Providers Safeguarding Children, Young People and Vulnerable Adults Policy. At CC, expect safeguarding to be everybody's responsibility and expect all staff adhere to and follow these policies.

The World Health Organisation defines FGM as below: "Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons"

CC have taken information from several documents including the Government Home Office guidelines and the Ofsted Guidelines for "Inspecting Safeguarding"

The UK government has written advice and guidance on FGM that states; "FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation and the child's right to life, their right to their bodily integrity, as well as their right to health. The UK government has signed a number of international human rights laws against FGM, including the Convention on the Rights

of the child” “UK communities that are most at risk of FGM includes Kenyans, Somalis, Sundanese, Sierra Leoneans, Egyptians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani Women”

Indications that a child or young person is at risk of FGM • The family come from a community that is known to practice FGM • In conversation a child or young person may talk about FGM • The child or young person may express anxiety about a special ceremony • A child or young person may talk or have anxieties about forthcoming holidays to their country of origin

Where CC have any concerns that a Child or Young Person is at risk of Female Genital Mutilation then we refer the matter to the relevant Local Authority Safeguarding Partnership and the police in line with statutory reporting duties.

Where a child or young person discloses that they are victims, or may be victim of FGM, CC procedure for reporting suspected abuse to children, young peoples and adults at risk of abuse or neglect is followed.

CC can also:

- Circulate and display materials about FGM
- Display relevant information (for example, details of the NSPCC’s Helpline and appropriate black and minority ethnic women’s groups)
- Ensure that a private telephone is made available should students need to seek advice discreetly
- Inform colleagues/raise awareness of the issues around FGM – as well as including appropriate training in continuing professional development

CHILDREN MISSING IN EDUCATION

The London Child Protection Procedures defined a child as missing if their whereabouts are unknown, whatever the circumstances of their disappearance. Sometimes children stay out longer than agreed as a boundary testing activity. These children have taken unauthorised absence, and would not usually come within the definition of missing. (n.b, Local Safeguarding Children Boards do not exist and have been replaced with Local Safeguarding Children Partnerships).

According to police figures, around 360,000 children/young people run away each year, although the real number is likely to be more, as not all cases are recorded. Children looked after are three times more likely to run away than other children.

The child/young person may be missing from care or home because they are suffering physical, sexual or emotional abuse and/or neglect. Children/young people who go missing may be victims of sexual exploitation and trafficking. In addition, young people who are missing may be fleeing forced marriage or ‘honour’ based violence.

Many of these young people stay with friends or family members, but some do not have access to support and could be at risk of significant harm through physical or sexual abuse. They may end up in potentially harmful situations including sleeping rough.

Children/young people missing from education are also at risk of harm.

YOUTH-PRODUCED SEXUAL IMAGERY

Youth-produced sexual imagery among children and young people can be a common occurrence; where they often describe these incidents as 'mundane'. Children and young people, involved in youth-produced sexual imagery incidents, will be dealt with (by the police) as victims as opposed to perpetrators (unless there are aggravating circumstances)

If you have a report (or you suspect) a youth-produced sexual imagery incident remember that intimate images are typically considered to be illegal images which is why incidents need very careful management for all those involved

CC's policy is for all members of staff to report any suspected cases, or cases of youth-produced sexual imagery to CC's safeguarding lead.

CC's safeguarding lead will record all incidents of youth-produced sexual imagery. This included action are taken and actions that are not take, together with justifications

CHILD SEXUAL EXPLOITATION (CSE)

Child exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs of wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears to be consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to sexual intercourse
- Can still be abuse even if the sexual activity appears consensual
- Can include both contact and non-contact sexual activity
- Can take place in person or via technology , or combination of both
- Can involve force or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and put on social media, for example)
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse may be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- Is typified by some form of power imbalance in favour of those perpetrating abuse

CHILD-ON-CHILD ABUSE

CC recognises that abuse can occur between children and young people. This is referred to as **child-on-child abuse** and can take place both in person and online.

Child-on-child abuse will always be taken seriously and will not be dismissed as banter, teasing or part of growing up.

Examples of child-on-child abuse may include:

- bullying, including cyberbullying
- physical abuse such as hitting, kicking or pushing
- sexual violence or sexual harassment
- coercive or controlling behaviour
- sharing of nudes or semi-nudes (youth-produced sexual imagery)
- upskirting
- initiation or hazing-type behaviour

All staff should be aware that learners may be both victims and perpetrators of abuse.

Any concerns relating to child-on-child abuse must be reported immediately to the Designated Safeguarding Lead (DSL) in line with this safeguarding policy. All reports will be taken seriously and managed in accordance with safeguarding procedures.

HONOUR BASED VIOLENCE

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of a family or community.

- It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:
 - Become involved with a boyfriend or girlfriend from a different culture or religion
 - Want to get out of an arranged marriage
 - Want to get out of a forced marriage
 - Wear clothes or take part in activities that might not be considered traditional within a particular culture

Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include

- Domestic abuse
- Threats of violence
- Sexual or psychological abuse
- Forced marriage
- Being held against your will or taken somewhere you don't want to go
- Assault.

CC policy is for all members of staff to report any suspected cases, or cases of honour-based violence to CC safeguarding lead.

FORCED MARRIAGE

A person may be at risk of forced marriage if their family belongs to a community which practices arranged marriage—but this does not necessarily mean any marriage will be forced

Indicators may be that their family makes preparations for a holiday, they talk about going abroad and/or a ceremony taking place with a sense of reluctance, they say goodbye to friends with a sense of this being permanent or they seem distressed or tearful.

CC policy is for all members of staff to report any suspected cases, or cases of honour-based violence to CC's safeguarding lead.

SAFEGUARDING STRUCTURE AND RESPONSIBILITIES

CC has in place an organisation structure for safeguarding children and adults at risk of abuse or neglect. Key senior staff with designated responsibility include:

- Designated Safeguarding Officer (Operations Director), who is a member of CC Senior Management Team
- Deputy Safeguarding Officer (Director), who is a member of CC Senior Management Team
- Safeguarding Officer (Business Manager) who is a member of CC Senior Management Team
- Human Resource Department (Office & Finance manager) who is a member of CC Senior Management Team
- Safeguarding champion (assessor/tutor)
- The Designated Safeguarding Lead (DSL) has strategic oversight of safeguarding and Prevent and reports regularly to senior leaders and governance structures.

The designated Safeguarding Officer is a Senior Member of CC Leadership Team. They have a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people and the promotion of a safe environment for children, young people and adults at risk of abuse or neglect within the Provider.

This includes:

- Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the County council's Department of Children and young People's services, or other agencies (such as the Police or Channel) as appropriate
- Providing advice and support to other staff on issues relating to child/vulnerable adult protection
- Maintaining a proper record of any child/vulnerable adult protection referral, complaint or concern (even when the concern does not lead to a referral)
- Ensuring that all staff receive basic training in child/vulnerable adult issues and are aware of the Providers Child/Vulnerable Adult Protection Procedure.

In those areas where staff and learners work with children and adults at risk of abuse or neglect as part of their roles, a manager is nominated to have safeguarding responsibility in this area

CC takes the view that all staff and learners are required to take shared responsibility for the protection and safety of children, young people and adults at risk of abuse or neglect on site.

It is expected that all parents/guardians (either learners or from the general public) who bring children into CC's sites or any external facilities/events abide by the Code of Behaviour as well as Health and Safety Regulations

Processes are in place to check suitability of staff and learners working directly with children and young people. Some staff and learners across the company will be in regular or significant contact with children, young people or adults at risk of abuse or neglect in the course of their teaching or other work. There is a commitment that such staff and learners have a satisfactory Disclosure and Barring Service (DBS) enhanced check in place. In line with recommendations from 'The Birchard Inquiry report (2004)' - recommendation 19 'New arrangements should be introduced requiring those who wish to work with children or young adults, to be registered.'

CC has processes in place to ensure that external speaker/trainers on site are checked.

SAFEGUARDING IN EMPLOYER SETTINGS

As an apprenticeship provider, the organisation recognises that a significant proportion of learning takes place in employer settings.

The organisation ensures that:

- Employers understand their safeguarding and Prevent responsibilities
- Learners are supported to report concerns in the workplace
- Safeguarding is discussed during progress reviews
- Any concerns arising in employer settings are managed in line with safeguarding procedures

CONTROL MEASURES

CC believes that children, young people and adults at risk of abuse or neglect have rights as individuals and should be treated with dignity and respect. CC strive to provide a safe environment for any young person or adults at risk of abuse or neglect in its care whilst they are studying, visiting premises or participating in CC activity

Activities at CC that involve children/young people and adults at risk of abuse or neglect, in organising teaching and delivery of services, are risk managed and will be supported by risk assessments and reasonable, proportionate adaptations to their activities as appropriate will be made

Where adaptations are reasonable and proportionate, CC puts into place a number of 'control measures' in order to safeguard the wellbeing of children, young people and adults at risk of abuse or neglect. These are kept under review and added to as necessary

As a condition of admission to certain programmes of study where they will come into close contact with children, young people and adults at risk of abuse or neglect (typically in initial

teacher education, health and social care), learners (may or will be) required to undergo a DBS or Enhanced Disclosure and Barring Service check prior to the commencement of placement/training activity. CC is obliged to refuse admission if the DBS disclosures disqualifies the applicant from practicing in their chosen field.

These procedures are issued to all members of staff and all new learners to the Provider during their induction. Further staff training (mandatory) is provided to all CC staff and renewed annually.

Roles and Recruitment

Job descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding and promoting the welfare of learners having due regard to CC's Child and Adults at Risk of Abuse or Neglect protection policy

A person specification setting out the key selection criteria is available for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with children, young people and adults at risk of abuse or neglect.

Advertising of posts externally as appropriate

A requirement for those appointed to produce documentary evidence of academic/vocational qualifications

Standard interview questions for tutor appointments and other key staff who work with children, young people and adults at risk of abuse or neglect exploring their suitability in this respect. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicants.

Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be the applicant's existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no work experience

A policy on obtaining a satisfactory Disclosure and Barring Service (DBS) and 'barred list' check for appropriate positions as a condition of employment at the provider

All CC staff members, contractors and volunteers are advised to minimise physical contact with learners, except for reasons of health and safety, or where physical contact may be necessary as part of their learning.

CC reserves the right to deny employment to individuals where permitted criminal record checks suggest they may pose a danger to the learning community

CC also reserves the right to suspend and/or dismiss staff members, in accordance with its employment procedures, from employment or undertaking a specific role with respect to that employment. This may apply if information was withheld, when requested, about their criminal record at the point of employment, or a criminal record acquired during employment.

All members of staff working closely with children, young people or adults at risk of abuse or neglect have to be alert to the possibilities of abuse, radicalisation and any concerns about the

behaviour of any adult with respect to that child, young person or adults at risk of abuse or neglect should be reported in accordance with procedures. This will be supported by relevant training, skills development and updates to ensure recognition, response, reporting, recording and referral are all to the required standard.

Any staff member who considers themselves to be a adult at risk of abuse or neglect, can seek support from CC's Human Resource Department who will as required support with appropriate occupational health screening or counselling.

DBS disclosures will be obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Service Act 2000) with children, young people or adults at risk of abuse or neglect as per IAS guidelines; CC where appropriate evaluate information to determine individuals' appropriateness to work in such activity.

Where staff are not engaged in regulated positions, but are involved in activities that may involve children, young people or adults at risk of abuse or neglect, a risk management approach is taken to delivery of learning and teaching, and activities involving the wider public

SEXUAL HARASSMENT

Under equality law, reasonable steps must be taken to prevent sexual harassment of workers by their colleagues. The Equality Act 2010 defines sexual harassment as unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment can be a one-off incident or an ongoing pattern of behaviour and can happen in person or online using messaging tools, email or social media. Examples include but are not limited to:

- flirting, gesturing or making sexual remarks about someone's body, clothing or appearance
 - asking questions about someone's sex life
 - telling sexually offensive jokes
 - making sexual comments or jokes about someone's sexual orientation or gender reassignment
 - displaying or sharing pornographic or sexual images, or other sexual content
 - touching someone against their will, for example hugging them
 - sexual assault or rape
- Apprentices are encouraged to explore and discuss sexual harassment stereotyping in their industries.

STAFF CODE OF CONDUCT

The code of conduct should guide all actions taken by staff and anyone else working on behalf of CC.

If it is necessary to act contrary to it (for example visiting a learner in their home) you should only do so after discussion and approval with your line manager.

Place the safety and well-being of learners first – before any organisational or personal goals and before any loyalty to colleagues and friends

Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been, inappropriate

Be committed to actively preventing the exploitation and abuse of young or adults at risk of abuse or neglect learners

Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual learner with respect and dignity. Respect each learners' boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem

The focus of your relationship with a learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Facebook or Twitter.

Do not take illegal drugs whilst at work, do not drink alcohol prior to or during contact with learners and do not smoke with or in front of adults at risk of abuse or neglect learners.

Do not give learners alcohol, tobacco products or any form of drug or medication. You should not assist learners in anyway, in obtaining these items.

Do not engage in or tolerate the bullying or harassment of any person

Ensure all lone working with young or adults at risk of abuse or neglect learners is undertaken with caution and awareness in mind

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

Maintain a safe and appropriate emotional and physical distance from young or adults at risk of abuse or neglect learners

- Do not make sexual or discriminatory comments of any kind
- Engage in rough or sexually provocative games
- Make sexual comments / innuendos
- Lending or borrowing money or property
- Exclusive or secretive relationships
- Inviting young or adults at risk of abuse or neglect learners into your home
- Inappropriate reading materials / internet use

Unacceptable forms of restraint All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or adults at risk of abuse or neglect learners. If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or adults at risk of abuse or neglect learner who is upset and administering first-aid are examples of

necessary and acceptable behaviour. Employees should, however, endeavour to minimise any possible misunderstanding of their actions.

ALLEGATIONS TO STAFF

CC will following the following process for investigating staff, where staff have been accused of behaving towards young children under the age of 18 and adults at risk of abuse or neglect in a harmful way, i.e. committed a criminal offence, posed a risk of harm or behaved in a way that indicated they may not be suitable to work with children and adults at risk of abuse or neglect.

Initial response to an allegation:

Where identification of harm has been identified, there may be immediate risk of harm, the local authority or police should be contacted immediately.

The lead Designated safeguarding officer is responsible for ensuring that the child or adult at risk of abuse or neglect is not at risk and referring cases to local authority

When dealing with allegations CC will:

- Apply common sense and judgement
- Deal with allegations quickly, fairly and consistently
- Provide effective protection for the child or adult at risk of abuse or neglect and support the person subject to the allegation

CC will ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO we will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:

- Was the individual in learning at the time of the allegations?
- Did the individual, or could they have, come into contact with the child?
- Are there any witnesses? and
- Was there any CCTV footage?

Where there is concern about the welfare of other children in the community or the member of staff's 's family, there will be discussions of these concerns with the designated safeguarding lead and a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

Where the initial discussion leads to no further action, the case manager and the LADO should:

- Record the decision and justification for it; and
- Agree on what information should be put in writing to the individual concerned and by whom.

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager will discuss how and by whom the investigation will be undertaken. In

straightforward cases, the investigation should normally be undertaken by Lead safe guarding officer.

Where required contact will be made with local authorities to provide for an independent investigation of allegations.

The lead safe guarding office will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, or a combination of these.

Suspension is the decision of the employer and only implemented where:

- There is cause to suspect a child is at risk of harm; or
- The allegation warrants investigation by the Police; or
- The allegation is so serious that it might be grounds for dismissal; and
- The employer is unable to implement strategies to enable children to be kept safe. Suspension is, therefore, the last course of action.

Every effort should be made to reach a conclusion in all cases even if:

- The individual refuses to cooperate, having been given a full opportunity to answer the allegation and make representations;
- It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete.

If immediate suspension is considered necessary, the rationale will be recorded and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.

Compromise agreements must **not** be used (i.e. where a member of staff agrees to resign provided that disciplinary action is not taken and that a future reference is agreed). A settlement/compromise agreement which prevents the employer from making a DBS referral when the criteria are met for so doing would likely result in a criminal offence being committed by the employer for failure to comply with the duty to refer. The organisation must make a referral to the Disclosure and Barring Service to consider whether to add the individual to the barred list. This applies irrespective of whether a referral has been made to local authority Children's Social Care and/or the designated officer or team of officers. It is an offence to fail to make a referral without good reason.

The welfare of a child is paramount and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. CC will offer appropriate welfare support at such a time and recognise the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Employers have a duty of care to their employees. They should:

- Manage and minimise the stress caused by the allegation
- Inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- Advise the individual to contact their trade union representative, or a colleague for support;
- Appoint a named representative to keep the person informed about progress of the case;
- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved should be:

- Formally told about the allegation as soon as possible. [120] The case manager should consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- Kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see [paragraphs 372-380](#)).

The lead safeguarding officer should take advice from the LADO, police and children's social care to agree the following:

- Who needs to know and exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it should arise.

CC will use the following definitions to determine the outcome of an allegation

- **Substantiated**: there is sufficient evidence to prove the allegation;
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- **False**: there is sufficient evidence to disprove the allegation;
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the allegation is substantiated and:

- The person is dismissed; resigns, or otherwise ceases to provide his or her services; or

- The employer ceases to use the person's services.

CC has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the Lead safe guarding officer should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to social care may be appropriate. If a report is shown to be deliberately invented or malicious, CC will consider whether any disciplinary action is appropriate against the individual who made it.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the lead safe guarding officer will consider how best to facilitate that. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. Also considered will be how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

CC will review with LADO the circumstances of the case to determine whether there are any improvements to be made to internal procedures of practice

PROCEDURES FOR REPORTING CASES OF SUSPECT ABUSE INVOLVING CHILDREN, YOUNG PEOPLE AND ADULT AT RISK OF ABUSE OR NEGLECT

THE DUTY TO REPORT

CC and all its members of staff have a legal duty to report cases of suspected abuse. If you, as a member of staff, have concerns that a child, young person or adults at risk of abuse or neglect has been mistreated or abused, you MUST report this.

WHAT TO DO IF YOU NOTICE ABUSE

You may become aware of potential abuse in two main ways:

You may observe signs in a learner that lead you to suspect that they have been physically, emotionally or sexually abused, or suffered severe neglect, or are becoming radicalised; or in addition in the case of a adults at risk of abuse or neglect, that they may be experiencing financial, discriminatory or institutional abuse.

The learners themselves may disclose to you that they have been abused.

If a learner discloses to you that they (or indeed another child, young person or adult at risk of abuse or neglect) have been, or are being abused/radicalised

DO

- Listen very carefully to what they tell you
- Take what is said seriously and accept what you are told
- Stay calm and reassure the learner that they have done the right thing by talking to you Write down as soon as you can exactly what you have been told
- Tell them that you must pass this information on but only to those that need to be told. Tell them to whom you will report the matter

DO NOT

- Panic.
- Promise to keep things secret. You have a duty to refer a child, young person or adult at risk of abuse or neglect who is at risk
- Lie or say that everything will be fine now that they have told you
- Criticise the abuser, especially if it as a parent or carer.
- Ask lots of detailed questions. Instead ask open questions such as 'Anything else to tell me?'
- Press for answers that the learner is unwilling to give

It is important that the person to whom the disclosure is made does not investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.

It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. All written records should be handled confidentially.

If a child, young person or adult at risk of abuse or neglect discloses to you that they or another have been abused/radicalised, or if you suspect from what you observe that they are being abused, YOU MUST REPORT THIS to the designated safeguarding officer or in their absence the deputy safeguarding officer.

Concerns relating to radicalisation or extremism must be treated as safeguarding concerns and reported in line with this procedure.

If a disclosure/concern involves a member of CC staff, you must contact and report it to the Human Resource department.

If for any reason you are unable to contact a member of the designated team and the matter is urgent, then contact the Local Authority or the Police directly and report the matter to the designated safeguarding officer at the next available opportunity.

In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support rather than to worry alone or do nothing.

THE OPERATION OF THE DESIGNATED SAFEGUARDING TEAM

When a member of staff refers a case of suspected abuse to a member of the designated safeguarding team, he or she decides whether or not the situation should be referred to the Local Authority, the Police or Channel, or whether some other course of action is more appropriate. In coming to a decision about what action to take the member of the designated team may take advice from the Provider's contacts at the Local Authority. If they consider that abuse/radicalisation has taken place, or that a child, young person or adult at risk of abuse or neglect is at risk of abuse, they will formally notify the Local Authority, the Police or Channel about this.

At this point the Local Authority takes over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the police.

Involvement in cases of suspected abuse/radicalisation can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone (a colleague, a friend or a partner) they should avoid this in order to respect the confidentiality of the child, young person or adult at risk of abuse or neglect concerned. If a member of staff feels that they need to talk to someone, they should contact the Human Resources Department.

Disclosure of, or being the subject of abuse is obviously a very difficult and distressing time for the child, young person or adult at risk of abuse or neglect, who needs to be offered continued support by CC. The child, young person or adult at risk of abuse or neglect should be made aware of the support available to them and helped to initiate contact with this support if so desired.

A confidential record will be kept of all cases referred to the designated safeguarding team, including details of cases referred to the Local Authority, the Police, Channel or other services. These written records will be kept securely, with any paper information held securely by the designated safeguarding officer.

MONITORING AND IMPACT

The effectiveness of safeguarding (including Prevent) is monitored through:

- Safeguarding and Prevent referral data
- Staff training completion and impact
- Learner voice and feedback
- Employer feedback
- Quality assurance activities (observations, reviews)

This information is used to identify trends, inform training, and strengthen safeguarding practice.

SAFEGUARDING STUDENTS' FLOWCHART FOR REFERRAL

CC employee has Safeguarding concerns about a student. If the employee is in ANY DOUBT about a student's welfare then they should always complete the Disclosure Form and follow this up with a phone call



Employee completes the Disclosure Form and sends to the Designated Person **Shilpa Patel** (07958085658) immediately. If the Designated Person is unavailable, the Deputy Designated Person **Apu Vyas** (07909 967 777) is contacted. If neither of these managers are available then please speak to **Maria Teer HR** (020 3150 0567) The employee may feel the circumstances warrant calling and speaking to one of the Safeguarding Working Group first depending on the severity of the issue. A member of the team will be there to support in this instance.



Designated Person will enter details onto the Incident Register and decide what further action needs to be taken and will keep CC employee updated



If there is an immediate risk of significant harm the police (999) will be contacted together with the relevant external agency. The Incident Register will be updated with outcomes and actions



If there is no immediate risk to the student but this is more an issue of guidance, support will be given from the Safeguarding team and if necessary the student signposted to organisations that can support. Register will be updated with outcomes and actions.

If allegation or concern is regarding a member of Career Crafters, immediately report incident/concern to the HR Officer/Designated Person **Maria Teer** : 020 3150 0567, a Disclosure Report Form will be completed, once details have been sent across to **Maria Teer**, the sender must ensure that all emails and the saved Disclosure Form are deleted, so that the only record of the incident is saved in one secure place to comply with GDPR. You will receive acknowledgement that the form and associated emails have been received safely.

CAREER CRAFTERS SAFEGUARDING INVESTIGATION FORM

Details of safeguarding investigation				
Name:				
Address:				
Date of Birth:				
Details of Investigation				
Lead Investigating Officer:				
Topics				
1.	Background (including general living situation of adult at risk):			
2.	Details of incident / concern:			
3.				
	Date	Time	Source	Details
4.	Reported Victim's views:			
5.	Investigation findings from Interview(s) with Adult at Risk:			

6.	Investigation findings from Interview(s) with others:
7.	Investigation findings from Forensic/Medical Evidence:
8.	Investigation findings from Circumstantial (supporting) evidence:
9.	Investigation findings from Documentation (chronological list of documents referred to and key information):
10.	Investigation findings from other sources:
12.	Police investigation findings (if taking place):
13.	Analysis of evidence:
13.	Conclusions (Summary of key evidence):

14.	Recommendations:
15..	Other relevant information:

Signature of Investigating Officer

Designation

Date

STUDENT DISCLOSURE FORM

Student Name:		Skills Tutor:	
Employer: Address:		Date:	
Provide details below of the <u>disclosure</u> including what the student said and the dates of any incidents. Provide as much detail as possible: How/Where/What/When/Who			
Provide details of the <u>advice to the student</u> . Include signposting, IAG and details of what was said: Remember as per the safeguarding Policy you must not under any circumstances investigate any accusations. You must not take any further action yourself unless agreed with the Designated Person; this includes contacting parents or outside agencies. As far as it is possible the wishes and the views of the student will be taken into account.			
<u>Actions</u> What is the student's expectation of the next steps? <i>(Once details have been sent across to the safeguarding officer, the sender must ensure that all emails and the saved Disclosure Form are deleted, so that the only record of the incident is saved in one secure place to comply with GDPR. You will receive acknowledgement that the form and associated emails have been received safely).</i>			
Date sent to Officer of HR:		Date actioned by HR:	
HR action taken:			
Date for review:			

The completed form should be sent to Shilpa.patel@careercrafters.uk on the day of the initial discussion with the student.

PREVENT AND SAFEGUARDING GUIDANCE SUPPORTING INDIVIDUALS VULNERABLE TO VIOLENT EXTREMISM

1. POLICY STATEMENT & PURPOSE

- 1.1 Castle and Co Training Ltd t/a Career Crafters (CC) is committed to providing a safe and secure environment for all children and young people where they are encouraged to talk and listened to. CC recognises its legal duty to work with other agencies in protecting vulnerable young people from 'significant harm' and responding to possible safeguarding issues. The framework for such procedures is defined and informed by the relevant guidance from the Department for Children, Schools and Families (DCSF), in particular the guidance document "*Working together to Safeguard Children*" (2023) and the Model Safeguarding Policy provided by the local Safeguarding Partnership.
- 1.2 The purpose of this policy is to ensure that procedures are in place so that every young person who is a student at CC is safe and protected. The policy will give clear direction to staff, volunteers and regular visitors about how concerns are managed and acted on. This will include protecting young people who may be subject to abuse (child protection), young people who may be vulnerable to being drawn into violent extremist activity. (Preventing Violent Extremism and particularly Objective 3 of the Prevent strategy)
- 1.3 CC seeks to adopt an open and accepting attitude towards young people as part of its general responsibility for pastoral care, CC hopes that parents and students will feel free to talk about any concerns or worries which may affect educational progress and that they will see CC as a safe place if there are any difficulties at home or wider community.

2. INTRODUCTION

- 2.1 CC fully recognises the contribution it can make in protecting young people from harm and supporting and promoting the welfare of all. The key elements of this policy are prevention, protection and support.
- 2.2 The Children Acts 1989 and 2004 state that a child is anyone who has not yet reached their 18th Birthday, although in certain circumstances, the age limit can be extended, e.g., in the case of a person with learning difficulties or in cases where there has been an 'abuse of trust'.

3. MAIN PRINCIPLES

- 3.1 CC promotes an ethos where young people feel secure, are encouraged to talk and are listened to. We will not make promises that we cannot keep and we will not keep secrets. Every young person will normally be told by the member of staff they have chosen to talk to, what will happen next.
- 3.2 CC recognise the positive contribution it can make towards Objective 3 of the PREVENT strategy: "Supporting vulnerable individuals who are being targeted and recruited to the cause of violent extremism." CC will continue to empower young people to create communities that are more resilient to extremism and protecting the well-being of particular students or groups who may be vulnerable to being drawn into violent extremist and criminal activity. It will continue to promote and reinforce shared values: to create space for free and open debate as well as providing support for students who may be at risk.
- 3.3 The risk of radicalisation to support terrorism and violent extremism is identified as vulnerability in Chapter 3 of "Working together to Safeguard Children" (2023)

A more detailed definition is:

Radicalisation: is the process by which people come to support terrorism and violent extremism and, in some cases, then to participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism, or a single indicator of when a person might move to adopt violence in support of extremist ideas.

- 3.4 Potential diagnostic indicators identified in the Channel Guidance³ 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 extremist
 - Seeking to recruit others to an extremist ideology

Staff who observe any behaviour or who hear or are told anything significant by a child/young person or others, must report their concerns to the designated Named Person/Child Protection Co-ordinator for CC.

If CC has any significant concerns about a young person beginning to support terrorism and/or violent extremism, it is required to discuss them with the nominated local police officer so they can be part of further work to address the issues.