



# **Safeguarding and Prevent Policy**

**October 2021**

This policy will be updated as our business changes in line with new legislation. It will be reviewed and updated as necessary, a minimum of once a year.

Rob Colbourne  
MANAGING DIRECTOR  
Reviewed 18<sup>th</sup> October 2021

# Contents

<b>1.0</b>	<b>General Statement of Policy</b>
1.1	Policy Statement
1.2	Policy Purpose
1.3	Policy Development
1.4	Policy Review
<b>2.0</b>	<b>Roles and Responsibilities</b>
2.1	PTP Board
2.2	Managing Director
2.3	Operations Director
2.4	Senior Designated Officer
2.5	Deputy Designated Officer
2.6	Safeguarding, Health, Equality & Diversity Committee
2.7	HR
2.8	All Employees
	Safeguarding Communication Flow Diagram
<b>3.0</b>	<b>Management of Safeguarding (preventative)</b>
3.1	Learners in our Training Centres
3.2	Learners in the Workplace
3.3	All learners
3.4	Safeguarding and Online Learning
3.5	Monitoring IT Usage
3.6	Learners with Delivery Subcontractors
3.7	Photographing Learners
3.8	Administering First Aid to Learners
3.9	Use of PTP Training Centre Rooms
3.10	Staff Recruitment, Selection and Pre-employment Checks
3.11	Staff Code of Professional Conduct
3.12	Staff Training
3.13	Risk Assessments
<b>4.0</b>	<b>Safeguarding Issues</b>
4.1	Types of Abuse and Neglect
4.2	Specific Safeguarding Issues
<b>5.0</b>	<b>Dealing with Concerns of Abuse and Neglect</b>
5.1	Key Principles to Work By
5.2	The 5 R's
5.3	Information Sharing and Confidentiality
5.4	If a Staff Member has a Concern About an Individual
5.5	If a third Party Reports a Concern about an Individual
5.6	If an Individual is in immediate danger or risk of harm
5.7	If a Staff Member Observes Abuse Taking Place
5.8	If an Individual Discloses Abuse to a Staff Member
<b>6.0</b>	<b>Dealing with Allegations of Abuse Against Members of Staff</b>
6.1	If a Staff Member Has a Concern About a Colleague's Conduct
6.2	If a Staff Member Has a Concern About Safeguarding Practices Within PTP or its Sub-contractors.
<b>7.0</b>	<b>Other Related PTP Policies</b>
<b>8.0</b>	<b>Useful Websites</b>
<b><u>Annexes</u></b>	<b>Annex 1</b> – Information on Regulated activity
	<b>Annex 2</b> - The 5 R's
	<b>Annex 3</b> – Identifying Abuse
	<b>Annex 4</b> - Dealing with Safeguarding Concerns – Additional Reminders
	<b>Annex 5</b> - Key contacts and Websites
	<b>Annex 6</b> - Coronavirus

## **Safeguarding Definition**

Safeguarding means protecting people's health, wellbeing, and human rights, and enabling them to live free from harm, abuse and neglect; and describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children, young people and adults.

Child Protection focuses on recognising abuse and neglect and acting on it, whereas Safeguarding looks at keeping young people and vulnerable groups safe from a much wider range of potential harmful influences and looks at preventative action, not just a reaction.

## **PTP's Prevent Agenda**

PTP acknowledges the importance of shared responsibility for the implementation of our Prevent Agenda and for the wellbeing of all our learners and staff. PTP's policies and procedures relating to safeguarding include and reflect the need to protect vulnerable individuals from the growing threat of radicalisation and being drawn into terrorism.

## **Note**

It is important to note that employees of PTP are not responsible for deciding whether learners have been abused or are being groomed/radicalised. Employees are responsible for recording and reporting any concerns to a **Designated Safeguarding Officer** (as specified within this policy) in a timely manner to ensure we are working together to safeguard learners under arrangements in place within this Policy and set down by the Local Safeguarding Children Board (LSCB); and in consideration of the Government's Counter-Terrorism Strategy (CONTEST), in particular the multi-agency intervention process referred to as '**Channel**'.

In the absence of a **Designated Safeguarding Officer**, concerns should be raised with a **PTP Director (as listed in section 2)**.

## **1.0 General Statement of Policy**

### **1.1 Policy Statement**

PTP believes that it is always unacceptable for a learner to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all learners by commitment to practices that protect them.

PTP recognises that:

- The welfare of the learner is paramount.
- All learners have a right to feel safe and should be protected whilst using PTP's services and PTP has an obligation to ensure this safety and protection.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse.
- Safeguarding is everyone's responsibility.
- Working in partnership with learners and with other agencies is essential in promoting a safe learning environment and engaging the learner in 'early help' wherever possible.

PTP will seek to safeguard learners and staff by:

- Providing a safe environment for individuals to learn in, and for staff to work in.
- Appointing a Designated Safeguarding Officer (who acts as Safeguarding Lead).
- Ensuring there is an appropriate Safeguarding Policy and procedure in place.
- Providing training to support staff to recognise signs of neglect, abuse, and poor mental health (including risk of radicalisation); and understand how to raise concerns or respond to disclosures.
- Adopting safeguarding guidelines through procedures and a code of conduct for staff and volunteers, as well as learners.
- Adopting safe staff recruiting practices.
- Sharing information about concerns with agencies who need it and involving the individual and their parents/carers appropriately.
- Valuing individuals, listening to them, and respecting them.
- Acting in the best interests of the individual.

### **1.2 Policy Purpose**

This policy sets out PTP's commitment to safeguard our learners (and staff) and provides a clear framework to fulfil that commitment in an environment where we promote safety and welfare of all. It details how to record and report potential abuse (including physical, sexual, and emotional) and neglect. It sets out our approach to ensuring safe staff recruitment practices, staff training, and how to deal with allegations of abuse. The Policy applies to all learners and staff, including senior managers and the board of directors, volunteers, agency staff, or anyone working on behalf of PTP.

### **1.3 Policy Development.**

PTP's Designated Safeguarding Officers, supported by the Safeguarding, Health, Equality & Diversity (SHED) Committee, have been charged with developing and updating the Safeguarding Policy (and associated procedures) and to positively promote the arrangements contained within them throughout the organisation.

PTP has adopted a learner-centred and co-ordinated approach to Safeguarding and is committed to fulfilling its responsibilities and promoting the welfare of all staff and learners and ensuring that we have a culture of vigilance that minimises any risk of harm. Our aim is to maintain an attitude of 'it could happen here' when shaping Policy and agreeing procedures.

The term 'learners' is used throughout this Policy to cover all ages of individuals as PTP works with post-16 learners who have left full-time education, as well as young people still in full-time education (through partnership arrangements). The policy pays due regard to the following:

*Working Together to Safeguard Children 2018*, which sets out the statutory functions of the local authority under the 1989 and 2004 Childrens Acts (recognising that we are an important part of the local authorities' wider safeguarding systems).

*Keeping Children Safe in Education 2021*, statutory guidance from the Department of Education, including, *What to Do if You are Worried a Child is being Abused*.

*Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012*, which aims to help avoid harm, or risk of harm, by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.

*Counterterrorism and Security Act 2015*, which under section 26 requires PTP, as a Training Provider, to have due regard to the need to prevent people from being drawn into terrorism, along with *Revised Prevent Duty Guidance: for England and Wales* and *Prevent Duty Guidance: for further education institutions in England and Wales*.

Ofsted's *Education Inspection Framework 2019*.

## **1.4 Policy Review**

The Policy will be reviewed on an on-going basis in accordance with changes to legislation. The formal review and on-going development of the policy will be led by the Senior Designated Safeguarding Officer and approved by the Managing Director at least on an annual basis in October. The policy was last reviewed 18<sup>th</sup> October 2021.

## **2.0 Roles and Responsibilities**

### **2.1 PTP Board**

The Board recognises and supports PTP's Safeguarding responsibilities and will engage with external partners as appropriate to support PTP to meet its safeguarding obligations and aims. Members will receive updates on PTP's arrangements from the Managing Director. The Board will appoint a 'Board Safeguarding Lead' to support the Managing Director and Designated Safeguarding Officer in exercising their responsibilities and will undertake training on Safeguarding as appropriate.

### **2.2 Managing Director (MD)**

Has overall and final responsibility for Safeguarding in the company (supported by the Board) and will deal with issues or concerns in the absence of a Designated Safeguarding Officer.

### **2.3 Operations Director**

Authorised to deal with issues or concerns, along with the MD, in the absence of a Designated Safeguarding Officer.

### **2.4 Senior Designated Safeguarding Officer (DSO)**

- Leads on Safeguarding for PTP, managing on a day-to-day basis and keeping up to date with safeguarding developments.
- Ensures working arrangements are in place to safeguard and promote the welfare of all learners and staff.
- Is the first point of contact within PTP for referrals and information on safeguarding.
- Responsible for making appropriate decisions in respect of reported concerns and liaising with the local authority and other external agencies as required in line with local authorities' policy.
- Ensures procedures as dictated by this policy are adhered to and that policy development and review takes place.
- Maintains securely records of safeguarding referrals and allegations of abuse.
- Oversees the referral process and follows up any referrals made, internally and with external agencies.
- Plans, develops, and manages staff training in conjunction with HR.
- Keeps the Managing Director up to date with Safeguarding arrangements and any policy changes required.

**2.5 Deputy Designated Safeguarding Officer (DSO)**

- Supports the Senior DSO in day-to-day management.
- Helps review and develop processes
- Helps shape and promote policy

**2.6 Safeguarding, Health, Equality & Diversity (SHED) Committee**

- Support the DSO in keeping staff and learners informed of Safeguarding updates
- Review the learning and working environment in training centres
- Help review and develop processes
- Help shape and promote policy

**2.7 HR**

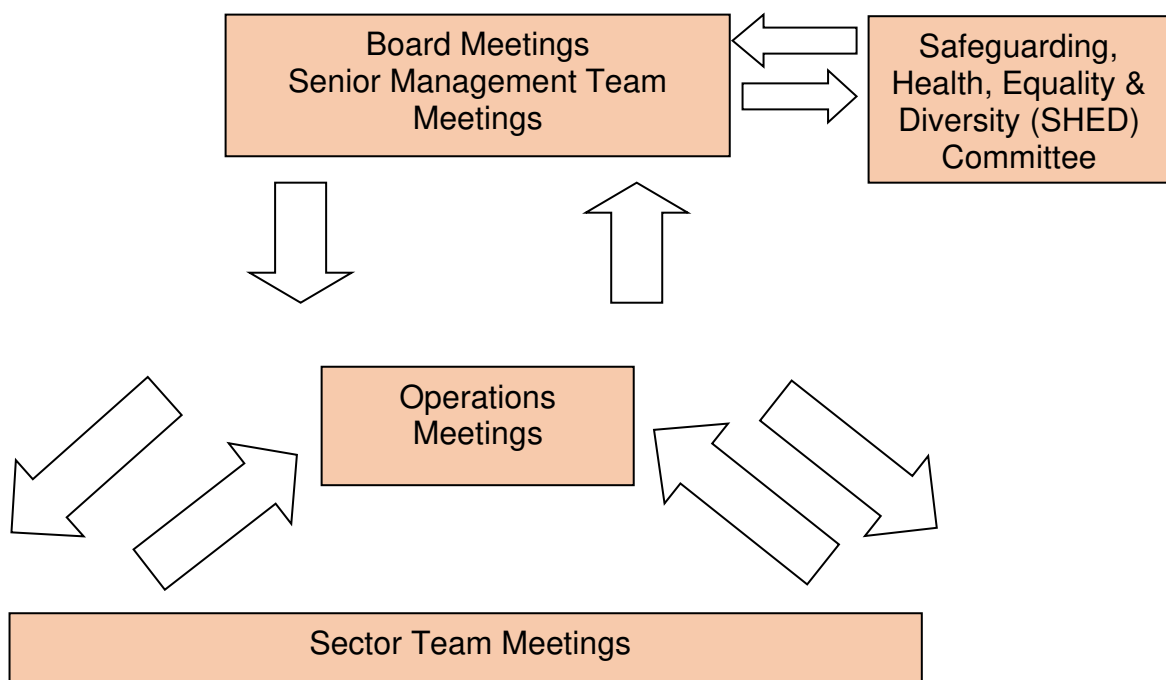
- Manages safer recruitment processes
- Helps review and develop processes
- Helps shape and promote policy

**2.8 All employees**

Have a responsibility to promote safeguarding to learners and employers; and to co-operate with management to ensure PTP offers a safe working environment for learners. All staff must abide by PTP's "Code of Professional Conduct" at all times and attend Safeguarding training as requested.

**The company have a Mental Health First Aider and completes mental health training with all staff.**

**Safeguarding Communication Flow Diagram**



Safeguarding is a permanent agenda item at management meetings and staff meetings. All staff have the opportunity to discuss Safeguarding at these meetings.

## 3.0 Management of Safeguarding (Preventative)

### 3.1 Learners in our Training Centres

All PTP staff have a collective responsibility for the Safeguarding of our learners when they are in our training centres. Learners are informed about Safeguarding during induction. Safeguarding is then embedded throughout the “learner journey”, continually raising awareness as part of PTP’s approach to safeguarding, our ‘Prevent Agenda’, Equality and Diversity and fundamental British Values ethos. Learners expected into centre are contacted if they do not attend and PTP have not been notified of the absence. The DSO is informed if contact cannot be made.

### 3.2. Learners in the Workplace

Safeguarding forms part of PTP’s Workplace Health and Safety Assessment procedure; raising awareness of the importance of Safeguarding with the learner, supervisors, and company representatives. All companies require an assessment regardless of the age, experience and status of the learners involved.

Safeguarding forms part of the learner induction and is embedded throughout delivery in the workplace.

Employed learners follow their employer absence procedures and employers are encouraged to notify either the Learning and Development Tutor (or DSO directly) if contact cannot be made. If hosting work experience learners, placement employers are contacted by PTP to check attendance; and employers contact PTP if the learner fails to return from a planned break or planned appointment.

We also recognise our responsibility in ensuring that any of our learners who may come into contact with vulnerable groups during work placements may also require appropriate checks or restrictions in placement (e.g., learner working with young children in a nursery).

Further guidance on work placement vetting can be found in our **Safety, Health and Welfare Policy and procedures**.

**Where learners are transferring from another provider, PTP will request any existing safeguarding records relating to the transferring learners.**

### 3.3 All learners

Delivery staff have access to learning resources for use with learners in our centres and with learners who are based in the workplace. PTP’s aim is to raise awareness and help learners stay safe and to build resilience to threats (including on-line threats). Learners are made aware of the support available and who they can contact if they have a concern or issue about their own, or others, safety. Details of PTP’s Designated Safeguarding Officers are also displayed in our Centres and we have a designated safeguarding email address. Learners agree to adhere to a Code of Conduct and Acceptable Usage Agreement. PTP has separate policies covering E- Safety and Responsibility and Domestic Abuse. PTP also acknowledges that learners can abuse their peers. PTP make clear to learners that ‘abuse is abuse’ and should never be tolerated. Learners are reminded regularly of who to report safeguarding issues and general concerns to. Learners are provided with general advice and guidance as required, and PTP will signpost learners to other organisations for support when relevant.

### 3.4 Safeguarding and Online Learning

Whilst teaching and meeting with learners online, PTP Tutors should ensure the following:

- Learners and Tutors wear appropriate clothing
- Lessons/meetings take place in appropriate areas, for example not in bedrooms unless background is blurred or changed.
- Language is kept as appropriate and professional during sessions and in chat functions
- Lessons are kept to a reasonable length of time and regular breaks from screens should be planned
- PTP’s normal policy of not contacting learners via social media should be adhered to

### 3.5 Monitoring IT Usage

PTP's in centre computers and training laptops are set so any unsuitable websites are automatically blocked as 'at risk' websites. Tutors monitor learners' activity whilst using IT equipment and PTP have achieved the Cyber Essentials Certificate which will be renewed annually.

Learners are taught about keeping safe online as part of our curriculum content.

### 3.6 Learners on programme through our Delivery Subcontractors

Subcontractors are required to have arrangements in place which at least meet PTP's own standards. As a minimum, we expect:

- A satisfactory quality systems audit, carried out by PTP's HR/Project Manager before delivery of provision commences.
- Safeguarding matters are considered to be well managed.

### 3.7 Photographing Learners

All persons wishing to record any images of learners e.g., Equality and Diversity events, must complete the necessary consent form. Staff should challenge any persons acting suspiciously and recording images of learners without consent.

With advances in technology, especially with mobile phones being able to record and transmit images, staff must be extra vigilant. Whilst a ban on the use of mobile phones is not practical and would be difficult to police, staff should certainly challenge any persons using recording equipment without consent.

Images of non-employed Children/Young People (14–17year olds) will not be used to promote PTP Training without the express permission of the parent or carer.

Further guidance on photographing learners can be found in the **Safeguarding Procedure**.

### 3.8 Administering First Aid to Learners

If employees are required to administer first aid to any learners, either as the result of abuse or a result of an accident, employees will observe the following guidelines:

- Where possible two employees should be present.
- The employees should, where possible, be a gender mix of male/female.
- Wherever possible, an employee of the same gender as the injured learner should administer any first aid required; however, this should not prevent administering first aid if the same gender is not available in any emergency.

In certain circumstances, the provision of first aid has to be immediate and it may not be possible to comply with all the above guidelines. In these circumstances, employees must remain vigilant and protect themselves from any allegations of inappropriate behaviour.

### 3.9 Use of PTP Training Centre Rooms

As part of PTP's aim to safeguard learners, staff and visitors, uphold British values and prevent individuals being drawn into terrorism, whilst acknowledging the fundamental right to freedom of speech, PTP has in place a Room Booking Protocol. Though relatively few in number, external use of rooms within PTP centres must also be controlled and assessed. Staff involved in booking rooms on PTP premises must follow the **Room Booking Procedure** and complete an assessment where appropriate.

### 3.10 Staff Recruitment, Selection and Pre-employment Checks

PTP strives to create a culture of safe recruitment and, as part of this, ensure that we have in place procedures that help deter, reject, or identify people who pose a risk of harm to our service users. Processes comply with *Keeping Children Safe in Education 2021*.



The Disclosure and Barring Service (DBS) was introduced in 2012, through the *Safeguarding Vulnerable Groups Act 2006* and *Protection of Freedom Act 2012*, its purpose to reduce the risk of harm to children and vulnerable adults.

PTP has DBS and Vetting Procedures in place as part of its recruitment processes to enable PTP to determine regulated or unregulated activity and carry out DBS checks as appropriate (see **Annex 1** for more information about regulated activity). The full legal definition of regulated activity is set out in *Schedule 4 of the Safeguarding Vulnerable Groups Act 2006* as amended by the *Protection of Freedoms Act 2012*.

PTP will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been if they had not resigned.

Further guidance can be found in *Keeping Children Safe in Education 2021*

Further staff guidance on PTP's Safer Recruitment processes can be found in the HR Policies and Procedures within the Staff Handbook and in the Human Resource Management Section of the Quality Manual.

Information about the Independent Safeguarding Authority can be found on the following website [www.gov.uk/disclosure-barring-service-check/overview](http://www.gov.uk/disclosure-barring-service-check/overview)

### **3.11 Staff Code of Professional Conduct**

All staff must clearly understand the need to maintain appropriate boundaries in their dealings with learners. All staff must adhere to PTP's Staff Code of Professional Conduct, which outlines PTP's behavioural expectations including acceptable use of technologies, staff/learner relationships, and communications (including social media).

PTP recognises that staff may sometimes be victims of false or malicious allegations of learner abuse and PTP's expectations also aim to minimise this risk. The Staff Code of Professional Conduct can be found in PTP's Staff Handbook.

### **3.12 Staff Training**

All staff and volunteers will be trained in Safeguarding as part of their induction programme and will have awareness and understanding of PTP's Safeguarding Policy and procedures. Safeguarding training will be updated regularly.

Staff CPD will be delivered through our Canvas system a Virtual Learning Environment where staff receive specific learning modules that are assessed related to Safeguarding, Mental Health and Well Being, Prevent and Equality and Diversity.

Staff will also receive regular safeguarding updates through PTP's communication meetings and the staff intranet (but at least annually to coincide with the Policy review schedule). It is the responsibility of the Designated Safeguarding Officers to raise awareness amongst staff on a regular basis.

PTP will ensure Designated Safeguarding Officers are trained to provide them with the skills and knowledge required to carry out their role. Formal training will be updated annually.

The DSO's knowledge and skills will also be updated regularly via on-line access to bulletins and safeguarding resources (but at least annually to coincide with the Policy review schedule); and agree to keep up to date with developments in Safeguarding and Prevent.

The rationale behind PTP's training model is to develop a competent, vigilant management framework. In doing so, the protection of learners will not rely solely on the screening of employees through recruitment and DBS disclosure process, but through a systematic approach to safeguarding and Prevent.

Training will be revised and developed in line with Government and local priorities.

Subcontractors will need to evidence a programme of safeguarding and Prevent training, and this will be managed by the HR/Project Manager.

Records of formal (internal and external) training will be held by HR showing who has been trained and when.

### Training Schedule for new Staff

New staff, as part of their induction programme, will complete the following training within the following timescales:

#### **Within 2 weeks of joining PTP:**

Introduction to Safeguarding – internal e-learning course via the staff intranet.

#### **Within 2 months of joining PTP:**

Formal **Prevent** training accredited by The Education and Training Foundation (ETF) which contains 4 modules, accessed via '[foundationonline](#)' (as appropriate to staff job role(s) – see below). Each module includes an on-line assessment.

	<b>*Prevent for Governors &amp; Board</b>	<b>Prevent for Leaders and Managers</b>	<b>Prevent for Practitioners</b>	<b>Prevent for Support Staff</b>	
*Board Members	✓				On-line Assessment
Operations Director		✓	✓		On-line Assessments
Line Managers		✓	✓		On-line Assessments
Delivery Staff &			✓		On-line Assessments
Support Staff				✓	On-line Assessments
Designated Persons		✓	✓	✓	On-line Assessments

\* New Board members will either attend a WRAP session or complete the on-line module as a minimum. SHED members will complete training as determined by their job role.

Staff will also attend scheduled Workshop to Raise Awareness of Prevent (WRAP) sessions. These will be scheduled according to demand based on staff recruitment levels.

#### **Within 4 months of joining PTP:**

Formal **Safeguarding** on-line training, accredited by The Education and Training Foundation (ETF). Staff will complete one of two courses based on their role (see below). Following the course staff will complete an on-line assessment.

Staff (delivery and support)	<b>Safeguarding in FE</b> <a href="#">‘foundationonline’ link to course</a>					
	<b>Module 1</b> Intro & Context	<b>Module 2</b> Safer Organisations	<b>Module 3</b> My Role	<b>On-line Assessment</b>		
All Line Managers	<b>Safeguarding and Safer Recruitment in FE</b> <a href="#">‘foundationonline’ link to course</a>					
Designated Persons & SHED Committee**	<b>Module 1</b> Intro & Context	<b>Module 2</b> Safer Organisations	<b>Module 3</b> My Role	<b>Module 4</b> Safer Recruitment	<b>Module 5</b> Support & Development	<b>On-line Assessment</b>

\*\* The Board's Safeguarding Lead will undertake the second course unless equivalent training has taken place via their job role.

### 3.13 Risk Assessments

Safeguarding and prevent are embedded as part of our risk assessment processes as detailed in the **Safety Health and Welfare Policy and Procedures**. Queries or concerns for a learner's (or staff member's) safety must be referred to the DSO.

## 4.0 Safeguarding Issues

### 4.1 Types of Abuse and Neglect

PTP recognises that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition. In most cases, multiple issues will overlap with one another. The following information is taken primarily from the *Keeping Children Safe in Education* guidance 2021 but can be applied to all individuals in the context of this Policy (although the Designated Safeguarding Officer will follow age related requirements when a referral from staff is received). Therefore, the word child' has been replaced with 'individual' to include children, young people and adults at risk of harm.

#### Abuse:

Abuse is a form of maltreatment of an individual. Somebody may abuse or neglect an individual by inflicting harm or by failing to act to prevent harm. They may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or by another child or children.

#### 4.1.1 Physical Abuse

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

#### 4.1.2 Emotional Abuse

The persistent emotional maltreatment of an individual such as to cause severe and adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on an individual. These may include interactions that are beyond the individual's developmental capability as well as overprotection and limitation of exploration and learning or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing individuals frequently to feel frightened or in danger, or the exploitation or corruption of individuals. Some level of emotional abuse is involved in all types of maltreatment of an individual, although it may occur alone.

#### 4.1.3 Sexual Abuse

Involves forcing or enticing an individual to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving individuals in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming them in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **4.1.4 Neglect**

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of their health or 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, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, the individual's basic emotional needs.

#### **4.15 Child Sexual Exploitation (CSE) And Child Criminal Exploitation (CCE)**

This is a form of sexual abuse where an individual or group take an advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. The abuse can be a one-off occurrence or a series of incidents over time. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A considerable number of children who are victims of sexual exploitation go missing from home, care, and education at some point.

### **4.2 Specific Safeguarding Issues**

PTP's Safeguarding approach aims to ensure staff, employers and learners are aware of potential safeguarding issues and be aware that issues can manifest themselves via peer-on-peer abuse, such as bullying/cyberbullying, gender-based violence/sexual assaults and sexual exploitation and harassment. The following gives an overview of some of the specific safeguarding issues that may affect our learners.

#### **4.2.1 Peer-on-Peer Abuse**

Peer-on-peer abuse is most likely to include, but may not be limited to, bullying (including cyberbullying), physical abuse, sexual violence & sexual harassment, initiating/hazing type violence rituals. PTP aim to minimise this by ensuring all learners are aware of our Learner Code of Conduct and Acceptable Usage Agreement (with clear procedures where our expectations are not met), underpinned by PTP's approach to Equality and Diversity and upholding British Values.

#### **4.2.2 Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).

#### **4.2.3 People who are missing**

Every year an estimated 200,000 people go missing in the UK. In some cases, missing adults may have made a choice to leave and 'start their lives over again', but the vast majority of missing people, children and adults, are vulnerable and need protection and support. PTP has an Attendance Policy for learners attending the centre and monitoring procedures for learners on work experience placements, so that staff can quickly identify potential safeguarding issues.

#### **4.2.4 Domestic Abuse**

Domestic abuse is defined by the Home Office as "any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults, aged 16 and over, who are or

have been intimate partners or are family members, regardless of gender and sexuality.” This includes honour-based violence, forced marriage and female genital mutilation (FGM). PTP has a separate Domestic Abuse Policy.

#### **4.2.5 Female Genital Mutilation (FGM)**

This comprises of all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. There are specific and timely **personal** reporting requirements for staff members receiving disclosure of, or having evidence of, FGM in under 18’s. There is a legal duty for FGM concerns to be reported to the police.

#### **4.2.6 Radicalisation**

Protecting individuals from the risk of radicalisation is seen as one of PTP’s wider safeguarding duties and is similar in nature to protecting individuals from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings.

PTP also has a separate Prevent Agenda to support our approach to raising awareness and building resilience to the threat of radicalisation and embedding British values within our curriculum.

Staff use the existing Safeguarding referral procedure if they have any concerns.

A ‘Prevent’ related referral received by the DSO may require the DSO informing the Counter-Terrorism Unit and our FE Prevent Co-ordinator, to ensure the most appropriate agency supports the individual.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.

#### **4.2.7 So-called Honour Based Violence**

So-called “honour-based abuse” encompasses crimes which have been committed to protect or defend the honour of the family and/or the community. This includes FGM, forced marriages & practices such as breast ironing. It often involves a wider network of family or community pressure. Abuse could be violent or non-violent abuse.

#### **4.2.8 Bullying**

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media, or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a person is adopted, in care or has caring responsibilities. It might be motivated by actual differences between individuals, or perceived differences.

The rapid development of, and widespread access to, technology has provided a new medium for ‘virtual’ bullying, which can occur in or outside the organisation. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click.

PTP has a separate Anti-Bullying Policy (including Cyber-bullying) that sets out PTP’s zero tolerance approach to all forms of bullying and it will never be passed off as ‘banter’. Any incidences of bullying or peer on peer abuse will be taken seriously and staff will reassure learners that they will be taken seriously, - and they will be supported and kept safe. It is understood that just because we have not seen it happen, we realise that it does not mean that it is not happening.

#### 4.2.9 Homelessness

Being homeless or being at risk of becoming homeless is a risk to someone's welfare. Concerns should be raised at the earliest opportunity so that relevant referrals can be made by the Designated Safeguarding Officer.

#### 4.2.10 Child Criminal Exploitation: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Gangs will enlist young or vulnerable people to transport goods from inner cities to rural or coastal areas. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

#### 4.2.11 Modern Slavery and Trafficking

Modern slavery includes the crimes of human trafficking, slavery, and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

#### 4.2.12 Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Links to Government sites giving more information on some of the main Safeguarding Issues can be found in **Section 8**.

For the main safeguarding issues and possible signs to look out for see **Annex 3**.

## 5.0 Dealing with Concerns of Abuse or Neglect

### 5.1 Key Principles to Work By

Staff need to understand how to deal with a concern/disclosure/allegation and know how to manage the requirement to maintain an appropriate level of confidentiality whilst liaising with the DSO, and other agencies as directed by the DSO. Staff are encouraged to follow these 4 steps:

**Be alert to signs** – alert to the signs of abuse and neglect, and to understand PTP procedures and referral process.

**Question behaviour** - the signs of child abuse might not always be obvious, and a learner might not tell anyone what is happening to them. You should therefore question behaviours if something seems unusual.

**Ask for help** - if you are at all unsure about a learner's welfare ask for help from the Designated Safeguarding Officer.

**Refer** – refer to the Designated Safeguarding Officer (DSO) or authorised Director in a DSO's absence, unless the learner is in immediate danger, where direct referral may be required.

## 5.2 The 5 R's

All staff have a responsibility to follow the 5 R's (Recognise, Respond, Report, Record & Refer) whilst engaged on PTP's business, and must immediately report any concerns about an individual's welfare to a Designated Safeguarding Officer (DSO) or to an authorised Director in a DSO's absence. Further guidance on the 5 R's can be found in **Annex 2**.

## 5.3 Information Sharing and Confidentiality

It is important to remember that throughout all stages of our processes, sharing information is an intrinsic part of our role. The decisions about how much information to share, with whom and when can have a profound impact on people's lives. Staff should weigh up what might happen if the information is shared against the consequences of not sharing the information. Early sharing of information is key to providing effective early help where there are emerging problems. Sharing information can be essential to put in place effective protection services.

Whilst legislation places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in an individual being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of staff and learners. Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

If a learner discloses information, staff must not promise that they will not tell anyone – this is ultimately against the best interests of the learner.

However, records and information must be retained confidentially as all reports will contain sensitive data. The DSO is responsible for retaining reports and information securely.

It is considered good practice that DSOs inform any person that they intend to refer their conduct or actions to Social/Care Services. However, the following exceptions apply:

- If sexual abuse is suspected within the family
- If there is evidence of fabricated or induced illness
- If to do so would place the child/person in more danger
- If to do so would place the staff member in danger

Further government advice on information sharing can be found at

[Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

***PTP take our staff's safety and welfare seriously and we expect staff to act within the realms of this policy when having concerns about a colleague's safety or welfare. The following will be applied (in the appropriate context) for any concerns about colleagues as well as learners.***

### 5.4 If a staff member has a concern about an individual

If a staff member has a concern about an individual (as opposed to the individual being in immediate danger) the staff member must report the concerns to the Designated Safeguarding Officer (DSO) (or authorised Director if DSO is unavailable) following the 5R's.

The Safeguarding Report Form will then be completed by the DSO who has received training in its completion. Any referral to an external agency by a director will be reported to the DSO. The DSO will follow-up on any referral where a response from the Agency/appropriate support is not forthcoming. The DSO is responsible for overseeing the referral process to external agencies.

### 5.5 If a third party reports a concern about an individual

If a staff member is informed of a concern about an individual, by another individual (learner, employee, or colleague), the staff member must report the concerns to the Designated Safeguarding Officer (DSO) (or authorised Director if DSO is unavailable) following the 5R's.

The Safeguarding Report Form will then be completed by the DSO who has received training in its completion. If necessary, the DSO will contact the Police, Local Authority or Child Protection Helpline for advice.

#### **5.6 If the individual is in immediate danger or risk of harm**

In an emergency situation, the staff member should contact the local authority's Social/Care Services and/or Police immediately and the DSO is informed. The DSO will follow this up when it is safe to do so by completing the Safeguarding Report Form and complying with the reporting procedure.

#### **5.7 If a staff member observes abuse taking place**

If a staff member observes abuse taking place, intervention may be required to protect and safeguard the individual.

Intervention is defined as being any direct action which is taken to safeguard individuals which is over and above observing the suspect or merely completing the Safeguarding Reporting Form.

#### ***Any intervening action should be taken with extreme caution.***

If intervention is required, it will be in response to an obvious incident e.g., a physical assault on a learner. The nature of the incident will dictate the response and action.

Where possible the Police should be summoned to intervene. However, if a delay would place the individual in further danger, staff members should take appropriate action. Anyone intervening must not place themselves at risk and must only use "reasonable force" as a last resort.

Once appropriate action has been taken, the incident must be immediately reported to the Managing Director, the Police, Social/Care Services or the Child Protection Helpline and the Safeguarding Report Form completed by the Designated Safeguarding Officer.

In appropriate cases, where it is safe to do so, the individual concerned should be made aware that their conduct or actions are unacceptable and are giving cause for concern.

Do not attempt to detain the individual or get involved in any physical contact.

PTP does not have insurance cover for any employee who fails to comply with this requirement.

#### **5.8 If an individual discloses abuse to a staff member**

All disclosures made must be treated seriously and whilst the sensitivity and confidentiality of the situation should be respected, such disclosures should be reported immediately using the established reporting procedure to the Designated Safeguarding Officer (DSO) (or authorised Director if DSO is unavailable). The DSO will complete the Safeguarding Report Form.

If necessary, the DSO will contact the Police (or local Prevent Officer), Local Authority or Child Protection Helpline for advice.

For further guidance on dealing with safeguarding issues, see **Annex 4**.

### **6.0 Dealing with Allegations of Abuse Against Members of Staff**

#### **6.1 If a staff member has a concern about a colleague's conduct**

Where a staff member has a concern about another staff member, they should report this to the Managing Director (MD) (which can be through the Designated Safeguarding Officer if preferred). They should not disclose the fact that they are making a report to the individual concerned or any other colleagues.

If the concern is about the MD, the Board's Safeguarding Lead should be informed, via the DSO if preferred.

If the concern is about a DSO, then the MD should be informed, (via another DSO if preferred).

The DSO, the MD and the Board's Safeguarding Lead (as appropriate to the allegation) will evaluate the need to notify the Local Authority Designated Officer (LADO), Children's Services and the Police.



The DSO (where appropriate) will oversee the procedure for dealing with the allegation and any liaison with the Local Safeguarding Children Board as required.

Further guidance on reporting a Colleague can be found in the Whistle Blowing Policy within the staff handbook.

## 6.2 If a staff member has a concern about safeguarding practices within PTP or its subcontractors

All staff should feel able to raise concerns about safeguarding practice or potential failures in PTP's (or its subcontractor's) regimes and know that such concerns will be taken seriously. For reporting procedure refer to paragraph 6.1 above.

## 7.0 Other Related PTP Policies

- Recruitment and Selection of Staff Policy
- Code of Professional Conduct
- Safety, Health & Welfare Policy
- Equality & Diversity Policy
- Disciplinary Procedure
- Whistleblowing Policy
- E-Safety and Responsibility Policy
- Anti-Bullying/Cyber Bullying Policy
- Domestic Abuse Policy

## 8.0 Useful Websites

<b>Disclosure and Barring Service</b>	<a href="https://www.gov.uk/government/organisations/disclosure-and-barring-service">https://www.gov.uk/government/organisations/disclosure-and-barring-service</a>
<b>Child Exploitation &amp; Online Protection Centre – Internet safety - CEOP</b>	<a href="http://www.ceop.gov.uk">www.ceop.gov.uk</a>
<b>Social Care Institute for Excellence</b>	<a href="http://www.scie.org.uk">http://www.scie.org.uk</a>
<b>Dignity in Care</b>	Website <a href="http://www.dignityincare.org.uk">www.dignityincare.org.uk</a>
<b>Care Quality Commission (CQC) national body that inspects and rate care providers</b>	CQC national Customer Service Centre Citygate Gallowgate Newcastle upon Tyne NE1 4PA Telephone: 03000 616161 <a href="https://www.cqc.org.uk/">https://www.cqc.org.uk/</a>
<b>West Midlands Police</b>	<a href="https://www.west-midlands.police.uk/keeping-you-safe/behind-the-badge/tackling-terrorism/">https://www.west-midlands.police.uk/keeping-you-safe/behind-the-badge/tackling-terrorism/</a> <a href="https://www.facebook.com/WMCTUPreventTeam/">https://www.facebook.com/WMCTUPreventTeam/</a>
<b>Online Safety</b>	<a href="https://beinternetlegends.withgoogle.com/en_uk">https://beinternetlegends.withgoogle.com/en_uk</a> <a href="https://www.disrespectnobody.co.uk/">https://www.disrespectnobody.co.uk/</a> <a href="https://www.saferinternet.org.uk/">https://www.saferinternet.org.uk/</a>

**Regulated Activity Relating to Children**

Regulated activity includes (exclusions apply):

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550197/Regulated\\_activity\\_in\\_relation\\_to\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf)

- a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional, or educational well-being, or driving a vehicle only for children,
- b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - personal care includes helping a child with eating and drinking, for reasons of age, illness or disability, or in connection with toileting, washing, bathing and dressing.
  - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

**Regulated Activity Relating to Adults**

There are six categories of people who will fall within the definition of regulated activity (and so will anyone who provides day to day management or supervision of those people). A broad outline of these categories is set out below:

(i) Providing health care

Any health care professional providing health care to an adult, or anyone who provides health care to an adult under the direction or supervision of a health care professional. Please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, for further details about what is meant by health care and health care professionals.

(ii) Providing personal care

Anyone who:

- provides physical assistance with eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails because of an adult's age, illness or disability.
- prompts and then supervises an adult who, because of their age, illness or disability, cannot make the decision to eat or drink, go to the toilet, wash or bathe, get dressed or care for their mouth, skin, hair or nails without that prompting or supervision; or
- trains, instructs or offers advice or guidance which relates to eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails to adults who need it because of their age, illness or disability.

(iii) Providing social work

The activities of regulated social workers in relation to adults who are clients or potential clients. These activities include assessing or reviewing the need for health or social care services, and providing ongoing support to clients

(iv) Assistance with general household matters

The provision of assistance to an adult because of their age, illness or disability, if that includes managing the person's cash, paying their bills or shopping on their behalf.

(v) Assistance in the conduct of a person's own affairs

Anyone who provides various forms of assistance in the conduct of an adult's own affairs, for example by virtue of an enduring power of attorney. Please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, for the further categories which are covered here.

(vi) Conveying

A person who transports an adult because of their age, illness or disability either to or from their place of residence and a place where they have received, or will be receiving, health care, personal care or social care; or between places where they have received or will be receiving health care, personal care or social care. This will not include family and friends or taxi drivers.

Safeguarding, if it is to impact on all aspects of our organisation must be the informed responsibility of all. All staff, senior managers, subcontractors, and work placement employers have a responsibility to make the learning environment safe and secure for all.

To do so you should consider and act on the **5 R’s**

- Recognition
- Response
- Reporting
- Recording
- Referral

### **Recognition – All Staff**

The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on our premises or in the home or in any other setting in which the learner may find themselves, all those playing a role in meeting the learners’ needs should be aware and informed so that possible abuse can be recognised, investigated, and acted on seamlessly and effectively.

Signs and symptoms of abuse of learners may include direct disclosure. Other people in a position to identify concerns include Learning and Development Tutors, employers, IQAs, other learners and those offering additional services, such as the Connexions Service. All of these should be trained to understand signs of possible abuse and know how, where and to whom to report concerns.

### **Response - All Staff**

Appropriate response is vital. No report of or concern about possible abuse should ever be ignored. In order to determine the most appropriate response, find out whether you are dealing with an allegation from a learner against a member of staff or a fellow learner, or another. Is this a disclosure from an individual alleging abuse to themselves or to another? Is it the reporting of a concern or suspicion? What, precisely, is alleged to have happened? Clearly understood detail is vital when reporting your concerns to a Designated Officer.

Do not lead or probe with questions. Remain calm and demonstrate interest and concern while questioning. Listen well. Inform the person sharing with you that concerns they have raised must be recorded and passed on so that possible abuse can be dealt with, and that this will be done on a limited “need to know” basis, with as few others as possible knowing the identity of the complainant and all in the chain of reporting will respect confidentiality.

Reassure that they have done the right thing in reporting their concerns and that you will do everything you possibly can to help. Do not make unrealistic promises. Ensure that testimony is passed to the Designated Officer so they can record on the Safeguarding Report Form, and that the complainant and subject of the complaint are treated in line with policy and guidance.

### **Reporting – All Staff**

The following staff are trained Designated Safeguarding Officers:

- Julie Heathcote
- Graham Ewers

They have received training and support to ensure they carry out this role effectively. During both staff and learner inductions the Designated Safeguarding Officer will be identified and there are safeguarding policy statements displayed at each training centre to inform the learners.

Report your concerns to the Designated Safeguarding Officer in the first instance. Should this be inappropriate for whatever reason, you should not hold back from reporting, but do so to an alternative Designated Officer or to an Authorised Director.

Once you have reported concerns about the abuse to the Designated Safeguarding Officer it is their responsibility to take further action.

### **Recording – Designated Safeguarding Officer**

Designated staff should record precisely what has been alleged, using the words of the complainant. Records should include accurate quotation. It should also, if felt appropriate, include factual observations about the observable physical and emotional state of the individual sharing their concerns with you.

### **Referral - Designated Safeguarding Officer**

Only the Designated Officer should mount an investigation into suspicions of abuse. An investigation may include questioning staff or learners. Actions of these sorts carried out by someone other than the Designated Officer could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case. An exception to this is where an allegation means it is inappropriate to involve the DSO, where the Whistle Blowing Policy will be applied.

**Physical Abuse - Signs & Symptoms**

- Unexplained injuries – frequent visits to GP or Hospital
- Person exhibiting self harm
- Unexplained bruising (unusual patterns or areas)
- Unexplained fractures
- Unexplained burns (particularly in unlikely areas)
- Person appears frightened or behaves differently when in the presence of particular people
- Pinch or grip marks on upper arms
- Bite marks
- Person exhibits a change in usual behaviour

**Sexual Abuse - Signs & Symptoms**

- Pregnancy as a result of an act of abuse
- Person is very withdrawn or unusually subdued
- Person experiences pain, itching or bleeding in genital/anal area
- Bruising on inner thighs, upper arms or chest

**Psychological Abuse - Signs & Symptoms**

- Person has low esteem, is fearful, anxious, depressed or withdrawn.
- Obsessive or ritualistic behaviour
- Changes in personality
- Reluctant to give eye contact
- Self harming
- Person may suffer from insomnia or sleep excessively
- Sudden over-eating and weight gain
- Loss of appetite and weight loss
- Person becomes compliant

**Financial Abuse - Signs & Symptoms**

- Lack of money, even on benefit days
- Considerable debt and lack of money for basic living requirements
- Always asking to borrow money
- Someone expressing sudden/inappropriate interest in a person and their money
- Sudden or unexplained withdrawals from a bank account
- Bank books, credit cards cheque books are “lost”

**Neglect – Signs and Symptoms**

- Sudden or continuous weight loss
- Poor physical appearance or condition/body odour, dirty clothes
- Low mood
- Decaying teeth, overgrown toenails
- A person may lack necessary aids like walking frames, hearing aids, spectacles
- Insufficient or inappropriate clothing

**Discriminatory Abuse - Signs and Symptoms**

- Withdrawn and anxious
- Self loathing/self harm
- Defensive behaviour
- Loss of self confidence - becoming self critical
- Reluctance to socialise outside of own/known culture/caste
- Anger and aggression
- Feelings of heightened vulnerability
- Self neglect in appearance and diet

## **Domestic Abuse – Signs and Symptoms**

- Withdrawn and anxious
- Self-loathing/self-harm
- Defensive behaviour
- Loss of self-confidence - becoming self-critical
- Reluctance to socialise outside of own/known culture/friendship group
- Anger and aggression
- Feelings of heightened vulnerability
- Self neglect in appearance and diet
- Absence and lateness
- Bruises and physical injuries

## **Bullying/Cyberbullying**

- Becomes withdrawn, anxious and lacking in confidence
- Stammers when talking
- Threatens suicide
- Feels ill in the morning and feels sick
- Unexplained cuts or bruises
- Becomes aggressive, disruptive or unreasonable
- Does not want to use the internet
- Nervous or jumpy when a cyber message is received

## **Drugs and Other Addictions**

- Withdrawal symptoms such as cravings, moodiness, bad temper, poor focus, frustration, bitterness and resentment
- Financial difficulties
- Having problems with the law
- Dropping of interests and hobbies

## **Fabricated or Induced Illness**

- Symptoms only appear when parent or carer are present
- Poor response to medication or other treatment
- Limiting of daily activities
- Excessive medical tests and procedures

## **Faith Abuse**

- Pre-occupied thinking and anxiety
- Obsessive thinking, fear
- Lack of sleep and concentration
- Stomach aches, sweating and headaches
- Overuse of control on people, groups and expression
- Pressure to attend church services

## **Peer on Peer Abuse**

- Becomes withdrawn, anxious and lacking in confidence
- Stammers when talking
- Threatens suicide
- Feels ill in the morning and feels sick
- Unexplained cuts or bruises
- Becomes aggressive, disruptive or unreasonable

### **Forced Marriage**

- Truancy/Absence
- Low motivation
- Lack of punctuality
- Self harm
- Depression and isolation
- Attempted suicide
- Eating disorders
- Family disputes
- Domestic violence

### **Child Sexual or Criminal Exploitation**

- Absences from class, going missing for periods of time
- Health problems that may indicate a sexually transmitted infection
- Mood swings or changes in temperament
- Using drugs and alcohol
- Displaying inappropriate sexualised behaviours such as over familiarity with strangers, dressing in a sexualised manner or consensual or non-consensual sharing of nude and semi-nude images and/or videos
- Unexplained physical harm such as bruising and cigarette marks
- Appearance of unexplained gifts, money or new possessions
- Changes in emotional well being

### **Mental Health**

- Recent social withdrawal and loss of interest in others
- Difficulty in performing familiar tasks
- Problems with concentration, memory or logical thought
- Heightened sensitivity to sights, sounds, smells or touch
- Loss of initiative or desire to participate in any activity
- Fear or suspiciousness of others
- Uncharacteristic, peculiar behaviour
- Dramatic sleep and appetite changes or deterioration in personal hygiene

Poor mental health can be an indicator that someone has suffered, or is at risk of suffering abuse, neglect or exploitation.

### **Trafficking/ Modern Slavery**

- Unpaid or paid very little
- Works excessively long and unusual hours
- Owes a large debt and is unable to pay it off
- Recruited through false promises concerning the nature of their job/work conditions
- Poor mental health or abnormal behaviour
- Lacks healthcare
- Has few or no personal possessions

### **Teenage Relationship Abuse**

- Changes in weight
- Anxious about who they can talk to, what they can wear or what they can do
- Have to check if they can do something
- Stop taking part in social activities or mixing with friends

### **Gangs and Youth Violence**

- Drug or alcohol abuse
- Decline in attendance and effort in classes/with work

- Self-harm
- Keeping late hours
- Having a lot of money or expensive items which can't be explained
- Change in clothing
- Use of hand signals to communicate with other members gang members
- Gang tattoos
- A change in friendships or relationships

### **Female Genital Mutilation**

- Having difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Having unusual behaviour after an absence
- Being reluctant to undergo normal medical examinations

### **Radicalisation**

- Changes in behaviour, becoming more withdrawn
- Extremist tattoos
- Changes in friends/social activities
- Suggesting that they are being discriminated against
- Trying to inflict own religious views on others
- Unexplained absence
- Viewing/sharing extremism websites or publications
- Evidence of homophobic, religion based or racist bullying

### **Homelessness**

- Household debt
- Rent arrears
- Domestic abuse and anti-social behaviour
- Self neglect in appearance and cleanliness

### **Child exploitation: County Lines**

- Absences
- Drug or alcohol abuse
- Decline in attendance and effort in classes/with work
- Change in friends
- Keeping late hours

If you suspect abuse to have taken place, have witnessed it taking place or you have received a report of abuse you should respond by:

- Remaining calm and not showing shock or disbelief
- Demonstrate a sympathetic approach by acknowledging regret and concern that what has been reported has happened
- Ensure that any emergency action needed has been taken
- Confirm that the information given to you is treated seriously
- Record everything you have heard, suspected, or witnessed and pass on the information to the Designated Safeguarding Officer, unless you need to alert the emergency services (in which case you will pass on all information and your action when completed)
- Give those who have disclosed information to you information about what steps you will take with the information given
- Inform those who have disclosed information that you will feedback with the results of any action
- **If you suspect a crime has taken place you must contact the Police.**

**When a Learner wants to confide in you - good practice****Do's**

- Be accessible and receptive
- Listen carefully
- Take it seriously
- Reassure learner they are right to tell
- Negotiate getting help
- Find help quickly
- Make careful records of what was said immediately

**Don'ts**

- Jump to conclusions
- Try to get the learner to “disclose”
- Speculate or accuse anybody
- Make promises you cannot keep

- Understand your role. You are not expected to make decisions whether abuse is occurring or not, but you are expected to report your suspicions.
- Make yourself fully aware and familiar with the Safeguarding Policy and Procedures.
- Report and record suspicions immediately.
- Do not place yourself in a position where a learner may misunderstand your actions or intent.
- Do not make physical contact with any learner unless it is unavoidably necessary within the context of your professional duties.
- Do not swear, use sexual innuendo or sexual references.
- Do not isolate yourself from view if dealing with a learner e.g., providing first aid.
- Do not directly accuse any person of abuse.
- Do not disclose your concerns to any other person other than your Designated Officer or Director
- Maintain confidentiality at all times but inform the learner who you will be informing.
- Any intervention should be done with extreme caution.
- Do not make any accusations.
- Where possible, two employees should be present if there is any contact with a member of the public suspected of acting inappropriately.
- Employees should monitor all activities which involve young people and vulnerable adults.

It is important to remember that, although a single event may create a serious risk to the person's well being; it is often the accumulation of events, each of which may appear small that causes serious harm.



Organisation	Contacts
Performance Through People	Julie Heathcote - Senior Designated Safeguarding Officer <a href="mailto:julieh@ptp-training.co.uk">julieh@ptp-training.co.uk</a> Confidential e-mail <a href="mailto:ask@ptp-training.co.uk">ask@ptp-training.co.uk</a>
<b>Walsall</b> <a href="http://mywalsall.org">Safeguarding In Walsall (mywalsall.org)</a>	
The Multi Agency Safeguarding Hub (MASH) (for early help with concerns about a child)	Tel: 0300 555 2866 Email: <a href="mailto:mash@walsall.gcsx.gov.uk">mash@walsall.gcsx.gov.uk</a> Evenings, weekends, bank holidays (out of hours) Emergency Response Team Tel: 0300 555 2922 or 0300 555 2836
Local Authority Designated Officer (LADO), Walsall Children's Services	Telephone: 01922 654040
Walsall Safeguarding Adults Board (for concerns about an adult)	<a href="http://wsab.co.uk/">http://wsab.co.uk/</a> Walsall Social Care and Inclusion Tel: 0300 555 2922 Textphone: 0845 111 2910 Email: <a href="mailto:initialintake@walsall.gov.uk">initialintake@walsall.gov.uk</a>
<b>Wolverhampton</b> <a href="http://wolverhampton.org.uk">Home - Wolverhampton Safeguarding Together</a>	
The Multi Agency Safeguarding Hub (MASH) (for early help with concerns about a child)	Tel: 01902 555392.
Adult Social Services (for concerns about adults)	<a href="https://www.wolverhamptonsafeguarding.org.uk/report-it">https://www.wolverhamptonsafeguarding.org.uk/report-it</a> Tel: 01902 551199 Out of hours telephone: 01902 552999
<b>Staffordshire and Stoke on Trent</b> <a href="http://staffsscb.org.uk">Home - Staffordshire Safeguarding Children Board (staffsscb.org.uk)</a>	
The Multi Agency Safeguarding Hub (MASH) (for early help with concerns about a child)	<b>Staffordshire First Response Service</b> Tel: 0800 1313 126 Fax: 01785 854223 Email: <a href="mailto:firstr@staffordshire.gov.uk">firstr@staffordshire.gov.uk</a> <b>Emergency Duty Service</b> Tel: 0845 604 2886  <b>Stoke-on-Trent Safeguarding Referral Team</b> Tel:01782 235100
Adult Social Services (for concerns about an adult)	<b>Staffordshire Adults Team (contact centre)</b> Tel: 0345 6042719 Out of hours: 0345 604 2886 (for emergencies only) Email: <a href="mailto:vastaffordshire@staffordshire.gov.uk">vastaffordshire@staffordshire.gov.uk</a>  <b>Stoke-on-Trent Adults Referrals (contact centre)</b> Tel: 0800 5610015
Local Authority Designated Officer (LADO), Children's Services	<a href="https://www.staffsscb.org.uk/Professionals/Key-Safeguarding/Managing-Allegations/Managing-allegations.aspx">https://www.staffsscb.org.uk/Professionals/Key-Safeguarding/Managing-Allegations/Managing-allegations.aspx</a> Via the First Response Team 0800 1313 126

<b>Birmingham</b> <a href="#">Multi-Agency Safeguarding Hub (MASH)   Lifestyles - children   Birmingham City Council</a>	
The Multi-Agency Safeguarding Hub (MASH) (for early help with concerns about a child)	Tel: 0121 303 1888 Outside of these hours contact the Emergency Duty Team Tel: 0121 464 9001 Secure email: <a href="mailto:Secure.MASH@birmingham.gcsx.gov.uk">Secure.MASH@birmingham.gcsx.gov.uk</a>
Local Authority Designated Officer (LADO) Team, Childrens Services	Tel: 0121 675 1669
Safeguarding Adults Board	If it is not an emergency call the "Adults & Communities Access Point" (ACAP) on 0121 303 1234 E-mail <a href="mailto:ACAP@birmingham.gov.co.uk">ACAP@birmingham.gov.co.uk</a> Out of hours - Duty Team on 0121 675 4806
<b>Sandwell</b> <a href="#">Home - Sandwell CSPSandwell , Safeguarding Adults Board (sandwellsab.org.uk)</a>	
Single Point of Contact (SPOC) for advice on potential referrals In support of MASH team	Tel: 0121 569 3100 Email: <a href="mailto:access_team@sandwell.gcsx.gov.uk">access_team@sandwell.gcsx.gov.uk</a>
Local Authority Designated Officer (LADO) Team, Childrens Services	Tel: 0121 569 4770 email <a href="mailto:sandwell_lado@sandwell.gcsx.gov.uk">sandwell_lado@sandwell.gcsx.gov.uk</a>
Adult Safeguarding Team	<a href="http://www.sandwell.gov.uk/safeguardingadults/">http://www.sandwell.gov.uk/safeguardingadults/</a> Tel: 0121 569 2266 Email: <a href="mailto:sandwell_enquiry@sandwell.gov.uk">sandwell_enquiry@sandwell.gov.uk</a> Tel: 0121 569 2266 Out of hours Emergency Duty Team Tel: 0121 569 2355
<b>Dudley</b> <a href="#">Multi Agency Safeguarding Hub (dudley.gov.uk)</a>	
Single Point of Access (SPA) (for concerns about a child)	Tel: 0300 555 0050 Out of office hours contact the Emergency Duty Team on 0300 555 8574
Adult Protection Team	<a href="http://safeguarding.dudley.gov.uk/report-it/">http://safeguarding.dudley.gov.uk/report-it/</a> Tel: 0300 555 0055 Outside of these hours an Emergency Duty Team is available on 0300 555 8574.
<b>Police</b>	
	Non-Emergency 101 Emergency 999 When to refer to police guidance <a href="https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf">https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf</a>
<b>'Prevent'</b>	

West Midlands Police	<a href="http://www.west-midlands.police.uk/keeping-you-safe/behind-the-badge/tackling-terrorism/">www.west-midlands.police.uk/keeping-you-safe/behind-the-badge/tackling-terrorism/</a>
Police Anti-Terrorism Hotline	If you have information about possible terrorist activity, call the police Anti-Terrorist Hotline: 0800 789 321

## **Annex 6- Coronavirus**

During the Coronavirus pandemic, PTP will continue to work using its existing policies and procedures.

PTP remains committed to ensuring that only suitable people are recruited, whether they will be working remotely or face to face. PTP's normal Safer Recruitment practices will therefore continue to be followed.

Delivery staff will maintain contact with learners, whilst observing coronavirus restrictions. Where staff are unable to contact learners, staff should discuss with their Line Manager and contact one of PTP's Designated Safeguarding Officers where appropriate. Staff will continue to recognise and raise concerns and will consider the heightened risks of domestic abuse and mental health issues.

All concerns will be reported as in normal circumstances, following PTP's policies. These state that all concerns are reported to one of PTP's Designated Safeguarding Officers or a PTP Director.

Government advice has been followed and this includes:

1. We have carried out a COVID-19 risk assessment and shared the results with the people who work here.
2. We have cleaning, handwashing and hygiene procedures in line with guidance
3. We have taken all reasonable steps to help people work from home
4. We have taken all reasonable steps to maintain a 2m distance in the workplace
5. Where people cannot be 2m apart, we have done everything practical to manage transmission risk.

The additional measures have also been taken:

1. We have placed interactive information in shared areas to reinforce the message regarding:
  - a. Hand cleaning
  - b. NHS Track and Trace
  - c. Gov.UK - Wash Hands, cover your face and maintain your space.
2. We check and record all staff and visitor temperatures.
3. We have an electronic Track and Trace sign in with QR code access
4. All areas have been reviewed and distancing built in, to all room and spaces on our premises.
5. All training room and office entrances have clear signage indicating maximum occupancy.
6. All Staff and Learners are required to wear face coverings when moving around our premises unless exempt.
7. Signage is reviewed and updated on a regular basis or as guidance changes.
8. All visitors are required to wear face coverings and sanitise before entering our premises.

Staff are reminded regularly on what steps to take should they test positive for contact or come into contact with someone who has tested positive.