

SAFEGUARDING & PREVENT POLICY

Designated Safeguarding Lead	Sarah Newbold
Safeguarding Officer	Vicki Wilson
Prevent Lead	Sarah Newbold
Version	008
Date Updated	13th January 2020

GI GROUP SAFEGUARDING & PREVENT POLICY

CONTENTS

Part 1: Safeguarding Policy		Page Number
1.	Introduction	3
2.	Overall aims	4
3.	Key Principles	4
4.	Key Processes	5
5.	Expectations	5
6.	The Designated Safeguarding Lead	5
7.	The Leadership and Management Team	6
8.	A Safer Workplace Culture	7
9.	Our Role in the Prevention of Abuse	7
10.	Safeguarding Apprentices who are Vulnerable to Extremism	8
11.	Safeguarding Apprentices who are Vulnerable to Exploitation, Forced Marriage, Female Genital Mutilation or Trafficking	9
12.	What we do when we are concerned	9
Part 2: The Key Procedures		
13.	Involving Parents / Carers	10
14.	Multi-Agency Work	10
15.	Our Role in Supporting Apprentices	10
16.	Responding to an Allegation about a Member of Staff	10
17.	Apprentices with Additional Needs	11
18.	Apprentices in Specific Circumstances	11
Appendices		
Appendix 1: Definitions and Indicators of Abuse		13
	1. Neglect	
	2. Physical Abuse	
	3. Sexual Abuse	
	4. Sexual Exploitation	
	5. Emotional Abuse	
	6. Responses from Parents	
	7. Disabled Apprentices	
	8. Cultural Safeguarding concerns	
Appendix 2: Dealing with a disclosure of abuse		16
Appendix 3: Allegations about a Member of Staff, or Volunteer		17
Appendix 4: Indicators of Vulnerability to Radicalisation		18
Appendix 5: Preventing Violent Extremism – Roles and Responsibilities of the Single Point of Contact (SPOC)		20
Appendix 6: Prevent Duty Procedure		21
Appendix 7: East Midlands – Prevent Referral Form		22
Appendix 8: Recommendations for Safeguarding and Prevent from DfE		24

Designated Safeguarding Lead (DSL)	Sarah Newbold
Safeguarding Officer	Vicki Wilson
Prevent Lead	Sarah Newbold

PART ONE: SAFEGUARDING POLICY

1. INTRODUCTION

Gi Group is committed to ensuring all Apprentices under 18 (and those aged up to 25 who have been looked after by a local authority at any time after attaining the age of 16, or have a learning disability) and adults at risk are kept safe, healthy and free from harm whilst attending learning programmes. Gi Group informs all Apprentices of the processes to follow if they have any concerns. Gi Group is committed to ensuring that it complies with its statutory duty under section 175 of the Education Act 2002 and the Children Act 2004.

All staff who have regular contact with Apprentices are enhanced Disclosure and Barring Service (DBS) checked. Gi Group staff recruitment procedures require information about past convictions and pending cases, taking up appropriate references, and checking previous employment histories.

Training in child protection issues is provided for all staff working with young people, and enhanced training in dealing with disclosure is provided to key staff, and those who are the nominated contacts for the implementation of this policy.

This policy exists to ensure that Gi Group implements appropriate arrangements and processes to ensure that staff at Gi Group has the right resources, skills and training to protect children, young people and adults at risk from harm. Gi Group recognises that where children, young people or adults at risk who are abused, or witness violence, may find it difficult to develop a sense of self-worth and that Gi Group may be the only stable and secure environment in the lives of those Apprentices at risk.

1.1 Safeguarding is defined as –

- Protecting children/adults at risk from maltreatment;
- Preventing impairment of children/adults at risk's health or development;
- Ensuring that children/adults at risk are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children/adults at risk to have the best life chances.

1.2 Gi Group is committed to safeguarding and promoting the welfare of all its Apprentices. We believe that:

- All children/young people/adults at risk have the right to be protected from harm;
- Children/young people/adults at risk need to be safe and to feel safe in our sites and branches;
- Children/young people/adults at risk need support which matches their individual needs, including those who may have experienced abuse;
- All children/young people/adults at risk have the right to speak freely and voice their values and beliefs;
- All children/young people/adults at risk must be encouraged to respect each other's values and support each other;
- All children/young people/adults at risk have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy healthy sociable Apprentice will achieve better educationally;
- Gi Group can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours; and
- All staff and visitors have an important role to play in safeguarding Apprentices and protecting them from abuse.

1.3 Gi Group will fulfil their local and national responsibilities as laid out in the following documents:-

- [Working Together to Safeguard Children \(DfE 2018\)](#)
- [Keeping Children Safe in Education: Statutory guidance for workplaces and colleges \(DfE September 2019\)](#)
- <http://www.derbyshirescb.org.uk/>
- [The Children Act 1989](#)
- [The Education Act 2002 s175 / s157](#)
- [Mental Health and Behaviour in Workplaces: Departmental Advice \(DfE 2014\)](#)
- [Prevent Strategy 2011](#)

2. OVERALL AIMS

2.1 This policy will contribute to safeguarding our Apprentices and promoting their welfare by:

- Clarifying standards of behaviour for staff and Apprentices;
- Contributing to the establishment of a safe, resilient and robust ethos in the workplace, built on mutual respect, and shared values
- Introducing appropriate work within the curriculum;
- Encouraging Apprentices and others (parents if appropriate) to participate;
- Alerting staff to the signs and indicators that all might not be well;
- Developing staff awareness of the causes of abuse;
- Developing staff's awareness of the risks and vulnerabilities their Apprentices face;
- Addressing concerns at the earliest possible stage; and
- Reducing the potential risks Apprentices face of being exposed to violence, extremism, exploitation, or victimisation.

2.2 This policy will contribute to supporting our Apprentices by:

- Identifying and protecting the most vulnerable
- Identifying individual needs where possible; and
- Designing plans to meet those needs.

2.3 This policy will contribute to the protection of our Apprentices by:

- Including appropriate work within the curriculum;
- Implementing child/adult at risk protection policies and procedures; and
- Working in partnership with Apprentices, parents and agencies.

3. KEY PRINCIPLES

3.1 These are the key principles of safeguarding:

- Always see the child/adult at risk first.
- Never do nothing.
- Do with, not to, others.
- Do the simple things better.
- Have conversations, build relationships.
- Outcomes not outputs.

3.2 In addition, Gi Group has identified the following key safeguarding messages for workplaces.

- Every Apprentice is entitled to a rich and rounded curriculum.
- Apprentices operate with funded money: this should be spent wisely, targeting resources on the evidenced needs of Apprentices at workplace now. Assurance and audit are important aspects of this.
- When issues arise, staff should speak to the appropriate Safeguarding Officer (or their line manager if there is a concern with the Safeguarding Officer), to address them internally where possible and escalating them when this is unsuccessful.

4. KEY PROCESSES

4.1 All staff should be aware of the guidance issued by <http://www.derbyshirescb.org.uk/>

5. EXPECTATIONS

5.1 All staff and visitors will:

- Be familiar with this safeguarding policy;
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.;
- Be involved in best practices and new information or awareness via several mediums;
- Be alert to signs and indicators of possible abuse (See Appendix One for current definitions and indicators);
- Record concerns and give the record to the Designated Safeguarding Lead, , or to the Safeguarding Officer (only in the case of the Designated Safeguarding Lead being compromised or absent);
- Deal with a disclosure of abuse from an Apprentice in line with the guidance in Appendix Two - you must inform the Designated Safeguarding Lead immediately, and provide a written account as soon as possible.

5.2 All staff will receive basic level one training at least once every three years. Key staff will undertake further training and notify all relevant staff of any changes to the policy.

6. THE DESIGNATED SAFEGUARDING LEAD

6.1 Our Designated Safeguarding Lead has responsibility and accountability for children/adults at risk protection, and together with the Leadership & Management Team, will be responsible for coordinating all Apprentice protection activity.

6.2 The Designated Safeguarding Lead will lead regular case monitoring reviews of vulnerable children/adults at risk. These reviews must be evidenced by minutes and recorded in case files.

6.3 When the workplace has concerns about a child/adult at risk, the Designated Safeguarding Lead will decide what steps should be taken and should advise any relevant personnel (confidentially) and any relevant agencies.

6.4 Protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child/adult at risk and/or family. A written record will be made of what information has been shared with whom, and when.

- 6.5 Protection records will be stored securely in a central place separate from any other records. Individual files will be kept for each child/adult at risk; the workplace will not keep family files. Files will be kept for at least the period during which the child/adult at risk is attending the workplace, and beyond that in line with current data legislation and guidance.
- 6.6 Access to these records by staff other than by the Designated Safeguarding Lead will be restricted, and a written record will be kept of who has had access to them and when.
- 6.7 Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home workplace policies and give due regard to which adults have parental responsibility.
- 6.8 **Do not disclose to a parent any information held on a child if this would put the child at risk of significant harm.**
- 6.9 If an Apprentice moves from our workplace, child/adult at risk protection records will be forwarded on to the Designated Safeguarding Lead at the new workplace, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two workplaces may be necessary, especially on transfer from primary to secondary workplaces. We will record where and to whom the records have been passed and the date.
- 6.10 If sending by post, records will be sent by 'Special/Recorded Delivery'. For audit purposes a note of all records transferred or received should be kept in either paper or electronic format. This will include the name, date of birth, where and to whom the records have been sent and the date sent and/or received.
- 6.11 Where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the Apprentice's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.
- 6.12 When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder.
- 6.13 In exceptional circumstances when a face to face handover is unfeasible, the Head of ESL will ensure that the new post holder is fully conversant with all procedures and case files.

7. THE LEADERSHIP AND MANAGEMENT TEAM

- 7.1 The Leadership and Management Team are the accountable body for ensuring the safety of the workplace.
- 7.2 The Leadership and Management Team will ensure that:
- The workplace has a safeguarding policy in accordance with the procedures;
 - The workplace operates, 'safer recruitment' procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers;
 - At least one senior member of the workplace's leadership team acts as a Designated Safeguarding Lead;
 - The Designated Safeguarding Lead attends appropriate refresher training every two years;
 - All other staff who work with children/adults at risk undertake training at three yearly intervals;
 - The workplace remedies any deficiencies or weaknesses brought to its attention without delay; and
 - The workplace has procedures for dealing with allegations of abuse against staff/volunteers.
- 7.3 The Leadership and Management Team review its policies/procedures annually.

- 7.4 The Designated Safeguarding Lead is responsible for child/adult at risk protection at the workplace.
- 7.5 The Designated Safeguarding Lead is nominated to be responsible for liaising with the local authority and other partner agencies in the event of any allegations. Any allegations involving the Designated Safeguarding Lead will be referred to the Safeguarding Officer. In the event that both Safeguarding Officers are not able to deal with an allegation, it will be referred to the Managing Director.

8. A SAFER WORKPLACE CULTURE

Safer Recruitment and Selection

- 8.1 The workplace pays full regard to 'Keeping Children Safe in Education' (DfES 2019). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS).
- 8.2 All recruitment materials will include reference to the workplace's commitment to safeguarding and promoting the wellbeing of Apprentices.
- 8.3 We recognise the stressful and traumatic nature of child/adult at risk protection work. We will support staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support as appropriate.

9. OUR ROLE IN THE PREVENTION OF ABUSE

- 9.1 We will provide opportunities for Apprentices to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.
- 9.2 All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole workplace approach.
- 9.3 Our safeguarding policy cannot be separated from the general ethos of the workplace, which should ensure that Apprentices are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

10. SAFEGUARDING APPRENTICES WHO ARE VULNERABLE TO EXTREMISM

- 10.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people, adults at risk and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 10.2 Gi Group values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both Apprentices and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

- 10.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children, young people and adults at risk vulnerable to future manipulation and exploitation. Gi Group is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 10.4 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Four.
- 10.5 Gi Group seeks to protect children/young people and adults at risk against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Risk Reduction

- 10.6 The Leadership and Management Team, Prevent Lead and Designated Safeguarding Lead will assess the level of risk within the workplace and put actions in place to reduce that risk. Risk assessment may include consideration of the workplace's diversity, the use of workplace premises by external agencies, integration of workers by targeted recruitment campaigns i.e.; tackling young unemployment, re-habilitation of ex-offenders, anti-bullying policy and other issues specific to the workplace's profile, community and philosophy.

Response

- 10.7 Our workplace, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will be the Prevent Lead. The SPOC for Gi Group is the Prevent Lead. The responsibilities of the SPOC are described in Appendix Five.
- 10.8 When any member of staff has concerns that an Apprentice may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person.
- 10.10 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

11. SAFEGUARDING APPRENTICES WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION, OR TRAFFICKING

- 11.1 Our safeguarding policy above through the workplace's values, ethos and behaviour policies provides the basic platform to ensure children/young people and adults at risk are given the support to respect themselves and others, stand up for themselves and protect each other.
- 11.2 Our workplace keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- 11.3 Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum.
- 11.4 Our workplace works with and engages our families and communities to talk about such issues.

- 11.5 Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- 11.6 Our Designated Safeguarding Lead knows where to seek and get advice as necessary.
- 11.7 Our workplace brings in experts and uses specialist material to support the work we do.

12. WHAT WE DO WHEN WE ARE CONCERNED

- 12.1 Where risk factors are present but there is no evidence of a particular risk then our DSL /SPOC advises us on preventative work that can be done within workplace to engage the pupil into mainstream activities and social groups. The DSL may well be the person who talks to and has conversations with the Apprentice's family (if appropriate, at no risk to the Apprentice) sharing the workplace's concern about the Apprentice's vulnerability and how the family and workplace can work together to reduce the risk.
- 12.2 In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible) –
- The DSL/SPOC can decide to notify the Multi-Agency network of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised; and
 - The workplace will review the situation after taking appropriate action to address the concerns.
- 12.3 If the concerns about the Apprentice are significant and meet the additional needs/complex need criteria, they will be referred to the Multi-Agency network. This includes concerns about an Apprentice who is affected by the behaviour of a parent or other adult in their household.

13. INVOLVING PARENTS / CARERS

- 13.1 In general, we will discuss any child/adult at risk protection concerns with parents / carers before approaching other agencies, and will seek their consent to making a referral to another agency. Appropriate staff will only approach parents / carers after consultation with the Designated Safeguarding Lead. However there may be occasions when the workplace will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.
- 13.2 Parents / carers will be informed about our safeguarding policy through our website.

14. MULTI-AGENCY WORK

- 14.1 We work in partnership with other agencies in the best interests of the Apprentices. The workplace will, where necessary, liaise with the workplace nurse and doctor, and make referrals to children's social care. Referrals should be made by the Designated Safeguarding Lead to the relevant region's Multi-Agency network (the DSL holds the contacts).
- 14.2 We will co-operate with any protection or prevent enquiries conducted by the police or social care: the workplace will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings.

15. OUR ROLE IN SUPPORTING CHILDREN/YOUNG PEOPLE/ADULTS AT RISK

- 15.1 We will offer appropriate support or referral to appropriate agencies to individual children/young people or adults at risk who have experienced abuse.
- 15.2 We will ensure the workplace works in partnership with parents / carers and other agencies as appropriate.

16. RESPONDING TO AN ALLEGATION ABOUT A MEMBER OF STAFF

- 16.1 This procedure should be used in any case in which it is alleged that a member of staff, visiting professional or volunteer has:
- Behaved in a way that has or may have harmed a child/young person or adult at risk
 - Possibly committed a criminal offence against or related to a child/young person or adult at risk; or
 - Behaved in a way that indicates s/he is unsuitable to work with children/young people or adults at risk.
- 16.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in workplace to abuse children/young people or adults at risk.
- 16.3 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people or adults at risk immediately. Allegations or concerns about colleagues and visitors must be reported direct to the DSL unless the concern relates to the DSL. If the concern relates to the DSL, it must be reported immediately to the Safeguarding Officer or the Managing Director and they will decide on any action required.

17. APPRENTICES AT RISK WITH ADDITIONAL NEEDS

- 17.1 Gi Group recognises that while all children/adults at risk have a right to be safe, some may be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug / alcohol abusers, etc.

18. CHILDREN IN SPECIFIC CIRCUMSTANCES

- 18.1 Guidance on children in specific circumstances is in the Birmingham Safeguarding Children Partnerships Guidance (used at a best practice model as Gi Group is national – Gi Group engages with each Children's Safeguarding Partnership relevant to the location of Apprentices) as listed below:

[Abuse Linked to Faith or Belief](#)

[Bullying](#)

[Child Sexual Exploitation](#)

[Children Affected by Gang Activity](#)

[Children from Abroad](#)

[Children Living away from Home](#)

[Children Missing from Care, Home or Education](#)

[Children of Parents who Misuse Substances](#)

[Children of Parents with Mental Health Problems](#)

[Disabled Children](#)

[Domestic Violence and Abuse](#)

[E-Safety – Children Exposed to Abuse through the Digital Media](#)

[Fabricated or Induced Illness](#)

[Families who Resist Change](#)

[Female Genital Mutilation](#)

[Forced Marriage](#)

[Marriage of a Looked after Child](#)

[Honour Based Violence](#)

[Neglect](#)

[Persons Posing a Risk to Children](#)

[Recruitment, Supervision and Training](#)

[Safeguarding children and young people against radicalisation and violent extremism](#)

[Self Harm or Suicidal Behaviour](#)

[Sexually Active Children and Young People \(including underage sexual activity\)](#)

[Trafficked Children](#)

APPENDICES

APPENDIX ONE

DEFINITIONS AND INDICATORS OF ABUSE

1. NEGLECT

Whilst Gi Group does not employ workers/Apprentices under 16, it is useful to have a holistic understanding of various abuse as it can be relevant to other categories of workers. References to children can also be read to include adults that are at risk, or who would not normally be considered 'at risk', e.g. in cases of domestic violence

Neglect is the persistent failure to meet a child/adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result 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/adult at risk from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child/adult at risk's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor workplace attendance or often late for workplace;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from workplace; or
- The child is left at home alone or with inappropriate carers

2. PHYSICAL ABUSE

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;

- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing clothes e.g. PPE or Uniform;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child/young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is 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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

4. SEXUAL EXPLOITATION

Child sexual exploitation occurs when a child or young person, or an adult at risk, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children's social care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.

5. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child/adult at risk such as to cause severe and persistent adverse on them. It may involve conveying to children/adults at risk 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 child/adult at risk opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include interactions that are beyond the child/adult at risk's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/adult at risk participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. RESPONSES FROM PARENTS/CARERS

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;
- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation of minor injuries;
- A persistently negative attitude towards the child;

- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child from home; or
- Violence between adults in the household.

7. DISABILITIES

When working with children/adults with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child/adult such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child/adult at risk's finances; or
- Inappropriate invasive procedures.

8. CULTURAL Safeguarding concerns

When working with children/adults from cultural backgrounds, practitioners need to be aware of cultural safeguarding concerns which include and not exhaustive to Honour Killings, Forced Marriages and Female Genital Mutilation [FGM] and that possible indicators of cultural abuse may also include:

- Withdrawn
- Not engaged
- Lack of stimulation
- Unresponsive
- May not participate in discussions around certain topics such as family
- Poor toileting arrangements

APPENDIX TWO

DEALING WITH A DISCLOSURE OF ABUSE

When an Apprentice tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the Apprentice. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the Apprentice. Assure her/him that you will try to help but let the Apprentice know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. People very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the Apprentice that it is not her/his fault.
- Encourage the Apprentice to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the Apprentice is trying to tell you.
- Praise the Apprentice for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the Apprentice that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the Apprentice may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the Apprentice again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the Apprentice's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be without delay, by the Designated Safeguarding Lead.

Children/adults at risk making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead.

APPENDIX THREE

ALLEGATIONS ABOUT A MEMBER OF STAFF, OR VOLUNTEERS

1. Inappropriate behaviour by staff/volunteers could take the following forms:
 - **Physical**
For example the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
 - **Emotional**
For example intimidation, belittling, scapegoating, sarcasm, lack of respect for rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
 - **Sexual**
For example sexualised behaviour towards Apprentices, sexual harassment, sexual assault and rape.
 - **Neglect**
For example failing to act to protect an Apprentice, failing to seek medical attention or failure to carry out an appropriate risk assessment.
2. If an Apprentice makes an allegation about a member of staff, visitor or volunteer the DSL should be informed immediately. The DSL should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The DSL should not carry out the investigation him/herself or interview Apprentices.
3. The DSL must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –
 - If the actions of the member of staff, and the consequences of the actions, raise credible protection concerns the DSL will notify relevant internal personnel and if needed, multi agencies including the Local Authority Designated Officer within the relevant Safeguarding Partnership
 - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the Apprentices, these should be addressed through the workplace's own internal procedures.
 - If the DSL decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on file.
4. Where an allegation has been made against the DSL, then the Safeguarding Officer and Managing Director the appropriate way forward.

APPENDIX FOUR

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that workplace staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - Identity Crisis – the Apprentice is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal Crisis – the Apprentice may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - Personal Circumstances – migration; local community tensions; and events affecting the Apprentice’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - Unmet Aspirations – the Apprentice may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
 - Special Educational Need – the Apprentice may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

APPENDIX FIVE

PREVENTING VIOLENT EXTREMISM – ROLES AND RESPONSIBILITIES OF THE PREVENT LEAD

The Prevent Lead for Gi Group is responsible for:

- Ensuring that staff of the workplace are aware that you are the SPOC in relation to protecting Apprentices from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing Apprentices from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of Gi Group in relation to protecting Apprentices from radicalisation and involvement in terrorism;
- Monitoring the effect in classrooms and at work to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the workplace about the safeguarding processes relating to protecting Apprentices from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the workplace for case discussions relating to Apprentices who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of vulnerable Apprentices into the Channel* process;
- Sharing any relevant additional information in a timely manner.

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Police Counter-Terrorism Unit, and it aims to

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Prevent Escalation Procedure can be found in Appendix Six.

Gi Group are committed to Safeguarding and Equality Diversity & Inclusion

APPENDIX SIX PREVENT DUTY PROCEDURE

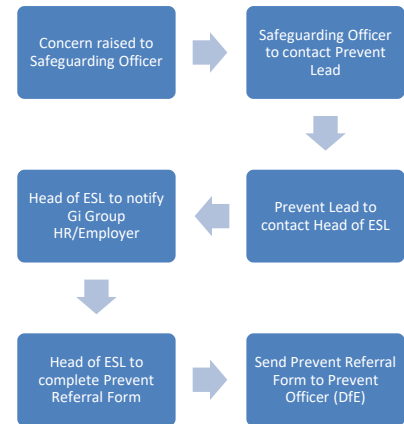
Reporting Procedure for Safeguarding Officers

Contact ESL Gi Group Prevent Lead, Sarah Newbold either through email at safeguarding@gigroup.com with details of your concern.

The Prevent Lead will escalate your concern to the Head of ESL. Working together the Prevent Lead and Head of ESL will notify Gi Group and complete the Prevent Referral Form and send to Sam Slack, Prevent Officer for the Department for Education for advice.

Mr Slack will then escalate to the appropriate personnel for action.

Head of ESL to ensure effective communication with all relevant parties.



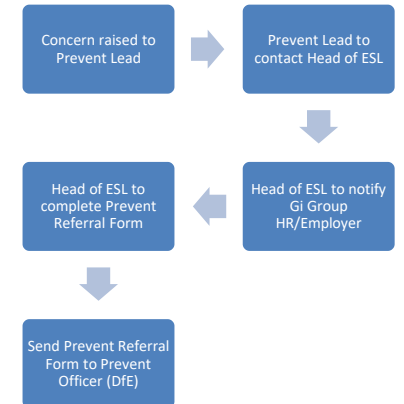
Reporting Procedure for Trainer/Assessor

Contact ESL Gi Group Prevent Lead, Sarah Newbold, either through email at safeguarding@gigroup.com with details of your concern.

The Prevent Lead will escalate your concern to the Head of ESL. Working together the Prevent Lead and Head of ESL will notify Gi Group and complete the Prevent Referral Form and send to Sam Slack, Prevent Officer for the Department for Education for advice.

Mr Slack will then escalate to the appropriate personnel for action.

Head of ESL to ensure effective communication with all relevant parties.



Reporting Procedure for Gi Group

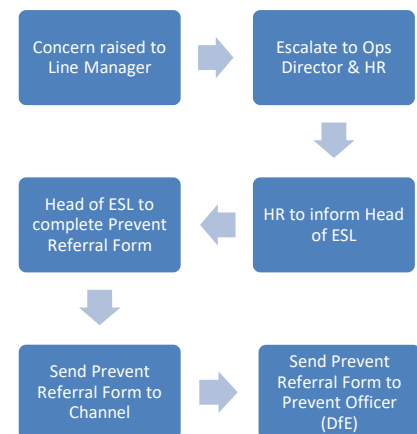
In the event that the concern does not directly involve Apprentices, a Gi Group staff member may raise the concern directly with their Line Manager.

The concern should be escalated via the Operations Director and HR Director, who will be responsible for informing the Head of ESL.

In the event that Apprentices are indirectly involved or exposed, the Head of ESL and the Prevent Lead will complete a Prevent Referral Form and send to Sam Slack, Prevent Officer for the Department for Education for advice.

Mr Slack will then escalate to the appropriate personnel for action.

In the event that the concern happens on a site where no Apprentices are involved or exposed, Gi Group to follow the normal Channel process, as per the Gi Group procedure.



It is imperative that this process and escalation takes place as soon as possible to safeguard the person/Apprentice and others.

APPENDIX SEVEN

East Midland Special Operations Unit - Special Branch



Restricted (when completed)

**East Midlands
Prevent Referral Form**

Information will be kept secure and confidential and will only be disclosed to those parties who have a legal and legitimate need to know.

Please complete the below details and email this form to: <p style="text-align: center; color: blue; font-weight: bold; margin: 5px 0;">EMSOU-SB-Prevent@Derbyshire.PNN.Police.UK</p> <p style="color: red; font-weight: bold; margin: 5px 0;">Do NOT Password Protect or Encrypt this document when submitting</p>		This will be dealt with by individual Police Force Prevent Teams.	
Please complete all details to the best of your knowledge. Leave blank if unknown.			
<u>Your details:</u>			
Surname		D.O.B	
Forenames		Relationship to individual	
Contact no.			
email			
Professional role (if applicable)			
Address			

<u>Individuals details and summary of concerns:</u>			
Please include as much detail as possible.			
Surname		D.O.B	
Forenames		Gender	
Contact no.			
email			
Social Media Username			
Ethnicity		Nationality	
		Place of Birth	

APPENDIX SEVEN

East Midland Special Operations Unit - Special Branch







Restricted (when completed)






Address			
Languages Spoken		English spoken?	
School or Educational Establishment			
Occupation			
Occupation Address			
Is the person aware of the referral?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Has anyone been consulted about this referral (safeguarding agency etc.)?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
If yes please give details			
Additional Info			






<u>Summary of Concerns</u>
Framed around Engagement, Intent and Capability






APPENDIX EIGHT

RECOMMENDATIONS FOR SAFEGUARDING AND PREVENT FROM THE DEPARTMENT FOR EDUCATION

Recommendation	ESL Action	Gi Group Action	In place?
Organisations develop safeguarding awareness amongst those involved in the recruitment process. Consideration should be given to a level of bespoke or specialist input to meet the needs of their role.		Branches and Sites have thorough induction processes with full audit of paperwork produced by potential candidates.	
Organisations develop systems for the early identification, recording & flagging as appropriate of welfare, learning & potential safeguarding needs of apprentices at time of recruitment.	Our apprentices are either temporary through Gi Group or are permanent with the Client. For those coming straight from the client, at Enrolment all documentation is thoroughly checked for validity and authentication. ESL validate all Apprentices with initial welfare call.	Branches and Sites have rigorous procedures where they check RTW documents, names and addresses of potential apprentices.	
The use of specific questionnaires to better ensure all potential safeguarding, Prevent, welfare issues are identified & explored at this stage would help to reduce risks where no face-to-face engagement takes place during recruitment.	We have a system in place whereby all apprentices are given the opportunity to disclose issues regarding welfare, safeguarding and prevent. Also Trainers/Assessors are trained to look for those at risk and report to the Safeguarding/Prevent Officer.		
Those providers with learners aged 16 to 18 should develop specific policies & procedures (or incorporate into existing ones) providing enhanced protection & support & protection for those learners & ensure that staff are aware of the greater risks to this group.	We have an Additional Learning Support in place and also all apprentices have regular reviews (8 – 10 weeks) at which time the full review process is covered which includes support and possible areas of concern.		

<p>Where possible face to face induction, at the earliest opportunity, should be the norm but where such practice does not exist (whether occasionally or as routine business) then inherent risks should be addressed through a robust, quality checked, process to ensure potential issues are identified & addressed.</p>	<p>All enrolment processes are completed on a face-to-face basis at which time our Trainers/Assessors are diligent in their duty to recognise potential causes of concern.</p>		
<p>Staff engaged in this area of business (recruitment & induction) should be provided with a level of Prevent & Safeguarding training that enhances their ability to identify issues which either basic or some online training may not equip them with.</p>	<p>All staff have completed Prevent training through the Education & Training Foundation as well as informed talks from the Department of Education's Prevent Officer. Literature is such as: Safeguarding & Prevent Booklet, Prevent Leaflet, Prevent Myth Busting, Let's Talk About It Campaign, Internal Communications, Apprentice Newsletter, Apprentice Survey, noticeboards, SLC sessions, reviews.</p>		
<p>The provision of detailed Learner Handbooks setting out all available support & safeguarding contacts should be a key requirement for inclusion in induction processes. Mandated & specific additional testing of understanding for more vulnerable learners (including 16 to 18 year olds) should be integrated into these processes & subject to quality checking.</p>	<p>At Enrolment all potential Apprentices are given a Learner Handbook and a Safeguarding & Prevent Booklet which details all support they can make use of. There are contact names and details for relevant organisations and also those for immediate contact in ESL.</p>		
<p>Mandated follow up contacts with learners in first month/6 weeks after start date to include reminders of key welfare support opportunities, contacts & to explore identified welfare & safeguarding issues.</p>	<p>All Apprentices are contacted within 5 weeks of beginning their apprenticeship. They are also contacted when midway through their apprenticeship programme to ensure that they are fully aware of all services they can avail of and to ensure that they are satisfied with the service we are providing to them.</p>		
<p>In order for assessors to be able to carry out this function effectively they must receive robust & role specific Safeguarding & Prevent training, including training in the exemplifying and promoting of British Values to learners, as required by Ofsted. The over reliance, in some cases, on broad, generic online training creates a risk that should</p>	<p>All staff have completed Prevent training through the Education & Training Foundation as well as informed talks from the Department of Education's Prevent Officer. At quarterly meetings all Trainers/Assessors receive consolidation/awareness training on British Values. These are then implemented into SLC sessions with apprentices and discussed during reviews.</p>		

be managed as a priority by providers.			
Assessor meetings with learners should primarily be face to face & timetabled to ensure that both learner & assessor can prepare in advance. Sessions should be of sufficient length to allow time for exploration of safeguarding & welfare matters as well as British Values & should be in an environment/location conducive to this.	During regular face to face reviews matters such as Prevent, Safeguarding, British Values, Wellbeing, Health and Safety and Equality and Diversity are covered. The length of each review depends on the Apprentice and are held at their place of work, so as not to be detrimental to them.		
Ensure that assessor reports on learners are structured to mandate questions regarding welfare & safeguarding/Prevent with both learner & employer.	All Trainers/Assessors have monthly IQA reports carried out on their caseload, in which Prevent, Safeguarding, British Values, Wellbeing, Health and Safety and Equality and Diversity are looked at through reviews, assessments and actual evidence.		
Providers should ensure that employers have a designated contact (SPOC) who has received (& evidenced) a level of safeguarding/Prevent training (including refreshers) deemed acceptable to the provider.	We have a Safeguarding Officer and a Prevent Officer in place to offer support to all Apprentices. They have undertaken training and are up to date in what is required of them.		
Employers to guarantee that the SPOC will be available to provide feedback to the assessor as well accepting responsibility for fulfilling the requirements on behalf of the employer as outlined in employer handbooks & contractual agreements.	The Safeguarding and Prevent Officers insist that the Trainers/Assessors include the topics - Prevent, Safeguarding, British Values, Wellbeing, Health and Safety and Equality and Diversity – in all contact with the Apprentice and monitor same through sampling of Reviews and evidence produced.		
Employers to be advised of all learning, H&S, safeguarding requirements through either a bespoke employer handbook &/or contractual agreement. Such a document (electronic or hard copy) to be delivered against receipt to the employer or their SPOC as well acknowledgement that all requirements are understood & measures are in place prior to learners commencing their placement.	All apprentices sign a contract to ensure that they will complete their apprenticeship. In return at Enrolment they receive advice on ESL contacts for Safeguarding, Prevent and wellbeing.		

Providers should develop programmes of learning supporting the BV agenda, ensuring that this supports learners to develop a mature & appropriate appreciation of BV & equips them for life in our modern society. This should be appropriate to each level & age group of learner.	Safeguarding, Prevent, British Values, Health and Safety, Wellbeing and Equality and Diversity are embedded throughout the whole of the Apprentice's journey. This is evident in SLC sessions and in evidence produced.		
Providers should develop clear policies regarding learner absence & these should be communicated to employers. Guidance to those investigating such issues must identify potential signs of common vulnerability, when such matters should be escalated & what interventions should be considered.	We have weekly reports detailed hours worked and also a Cause for Concern spreadsheet which has detail from the site/branch on all apprentices so that appropriate action can be taken if necessary.		
Providers should ensure that effective systems exist to quickly link absence to existing safeguarding/Prevent concerns so that full & rounded decision making can be made by the provider's Designated Safeguarding Person (DSP).	As above.		
The use of learner exit surveys is a useful tool to check on real life performance by both providers & employers. Analysis of such surveys is important to obtain broader picture understanding of issues across organisations.	On completion of an apprenticeship the apprentice completes a survey which is analysed to obtain data, in turn showing where improvements can be made, trends identified etc. Any apprentice being withdrawn from an apprenticeship programme will have an interview with their assessor prior to leaving to ascertain reasons etc at which time the Trainer/Assessor will attempt to solve any issues they can.		
Ensure effective systems are in place to flag learners leaving or completing their programme to safeguarding staff to allow the consideration of ongoing safeguarding implications & support to take place.	93% of our apprentices stay with Gi Group/Client after completion of their apprenticeship programme, therefore through the weekly attendance reports and cause for concern reports Gi Group/Client are aware of concerns and steps to be taken.		

Providers ensure that their response to the Prevent Statutory Duty is embedded within their Safeguarding policy & that they have clearly established external referral procedures, taking into account the need to respond beyond local boundaries.

Prevent is covered in the Safeguarding Policy, where definitions are given and steps to be taken to report concerns.

