



Safeguarding/ PREVENT Policy

Policy Review

Developed by: Tim Ward
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Signature: _____

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Reviewed by: Lisa Kiely (DDSO)

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Policy Statement

TradeTechs Northern Ltd is strongly committed to practices that protect children, young people and adults at risk from abuse, neglect, significant harm or radicalisation.

TradeTechs Northern Ltd recognise and accept their responsibility to develop the awareness of the risks and issues involved in Safeguarding. The company also recognises that it has a responsibility to protect staff from unfounded allegations of abuse. TradeTechs Northern Ltd is committed to working with existing local Safeguarding Boards, Health and Social Care partnerships, Police and the Channel Programme to ensure the safeguarding of its learners. TradeTechs Northern Ltd will work in accordance with the requirements of the Office of the Public Guardian (OPG) and the Mental Capacity (Amendment) Act 2019, supporting the six principles of Empowerment, Protection, Prevention, Proportionality, Partnership, and Accountability. The policy applies to all users/ all learners and staff of TradeTechs Northern Ltd, both on the premises and remotely. Any user of TradeTechs Northern's IT systems must adhere to the e-Safety Policy (Appendix 2) applies to all who use the internet and forms of electronic communication such as email, mobile phones, tablets and social media sites.

Definition

The term “children and young people” refers to “those under the age of 18”, however, Trade Techs Northern Ltd does not deliver to anyone under the age of 19 but for the purpose of this policy will include the following.

In relation to children and young people, TradeTechs adopts the definition used in the Children Act 2004, Apprenticeships, Skills, Children and Learning Act 2009 and the Department for Education (DfE) guidance document, Keeping Children Safe in Education 2023, Working Together to Safeguard Children 2018 which defines safeguarding and promoting children and young people’s welfare as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

Definition of Safeguarding Adults

The term 'adult at risk' is used in this policy to replace 'vulnerable adult' in accordance with OPG's statement, that the term 'vulnerable adult' may imply that some of the fault for abuse may lie with the victim of abuse.

It is also recognised that some adults are at risk of abuse. Accordingly, our policy and procedures also apply to allegations of abuse and the protection of Vulnerable Groups/ Adults Act 2006, the Care Act 2014, Mental Capacity (Amendment) Act 2019, by protection of the Freedoms Act 2012. Guidance on who is an 'adults at risk' is taken from 'No Secrets' (Department of Health 2000), which defines 'adults at risk' as: 'those adults who are or may be in need of community care services by reason of mental illness or other disability, age or illness'.

The definition of 'adults at risk' (but is not exclusive to) individuals with any of the following:

- Learning Difficulties
- Physical Impairments
- Sensory Impairments
- Mental illness Needs
- Age Related frailty
- Dementia
- Brain Injuries
- Drug or Alcohol Problems
- Domestic Violence

Prevent Duty

In respect of safeguarding individuals from radicalisation, TradeTechs Northern Ltd works to the Prevent element of the Government's Counter Terrorism Strategy and where deemed appropriate, seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic, or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Accountability and Responsibility Duty to Report

This Policy applies to all staff, employers and partnership organisations who have a legal responsibility to take seriously any safeguarding issues that come to their attention and follow the procedure as set out in Appendix 1 of this document.

- Policy and procedures are issued to all members of staff.
- Partners, Suppliers and Employers will be informed of this Policy and be responsible for reporting any concerns reported to them by contacting the Designated Safeguarding Lead.
- All learners are referred to this Policy at their induction.

Key staff with designated safeguarding responsibilities includes:

- **Managing Director:** To ensure the promotion of ALL Safeguarding throughout the organisation and all partnerships.
- **Designated Safeguarding Lead (DSL):** To record, document and act appropriately to ALL safeguarding disclosures, including low level risks.
- **Deputy Designated Safeguarding Lead (DDSL):** To act in the absence of the DSL to record, document and act appropriately to ALL safeguarding disclosures, including low level risks.

TradeTechs Northern Ltd has a Designated Safeguarding Lead (DSL) and a Designated Deputy Safeguarding Lead (DDSL). Incidents or concerns are reported at local level to the DSL or to the DDSL in the absence of the DSL. The DSL is responsible for monitoring and managing incidents or concerns and liaising with the respective safeguarding agencies. The DSL will produce an annual report on safeguarding issues raised.

Training

The company has a duty to promote safeguarding issues and measures to staff and ensure they:

Analyse their own practice against established good practice and assess risk to ensure their practice is likely to protect them from false allegations.

- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse
- Follow the guidelines provided for all staff, learners, related partners and employers
- All staff will undertake annual training on safeguarding to raise awareness of current issues and legislation.
- The DSL will attend the recommended Designated Safeguarding Lead Training every 2 years.

Employees who are responsible for recruitment of staff will also take further safeguarding training 'safer recruitment' to ensure that all policies, procedures and pre-employment checks are completed safely and accurately.

Disclosure Barring Service

The company recognises it has a responsibility to ensure safe recruitment and employment practices. Trade Techs Northern Ltd outsource the service of a registered company who complete Enhanced DBS checks on new and existing staff who frequently or intensively work with adults at risk in training, supervision advice and guidance.

Company: Durham City Childcare

Review

DSL and Director will review the Safeguarding Policy and associated relevant documents annually.

This policy and procedure should be read in conjunction with the Code of Conduct for Staff, Safeguarding/Prevent Flowchart and the Safeguarding leaflets issued to all learners at induction.

All staff should keep a copy of Appendix 1 – reporting guide

A very useful reference guide for all staff, partners and employers is Safer Practice, Safer Learning from the National Institute of Adult and Continuing Education (NIACE) <https://www.excellencegateway.org.uk/content/import-pdf4619>

PROCEDURE FOR REPORTING CASES OF SUSPECTED ABUSE INVOLVING CHILDREN/YOUNG PEOPLE OR ADULTS AT RISK.

THE DUTY TO REPORT

WE ALL have a legal duty to report cases of suspected abuse. If you have concerns that a child/young person or adults at risk who have been mistreated or abused or at risk of being radicalised, you **MUST** report this, see Adult Safeguarding Incident Reporting Form) which must go directly to the Designated Safeguarding Lead as soon as possible.

TYPES OF ABUSE

Categories of abuse and neglect can take many forms. Individuals should not be constrained in their view of what constitutes abuse or neglect and should always consider the circumstances of the individual case. The Care Act 2014 highlights the categories of abuse.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, including a brother or sister, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as fabricated or induced illness by proxy, or Munchausen Syndrome by Proxy.

Psychological/Emotional Abuse is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on him or her emotional development. This may include threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks. It may also involve conveying to that child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur because of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.

Domestic abuse is classed as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to Psychological, Physical, Sexual, Financial and emotional abuse, it also can include "honour" based violence, forced marriage and female genital mutilation (FGM). Domestic Violence is not confined to one gender or ethnic group.

Female Genital Mutilation (FSG). It is a legal requirement that any disclosures are reported to the police and the DSL is notified of this.

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether they are aware of what is happening or not. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include noncontact activity such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images.

Neglect and act of omission is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

Financial or material abuse is defined as the misappropriation of money or assets; transactions to which the person could not consent, or which were invalidated by intimidation or deception; OR, the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and unreasonable restriction on a person's right to control over their lives to the best of their ability. This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements.

Discriminatory abuse is defined as any form of abuse based on a person's age, race, gender - or any of the protected characteristics stated in the Equality Act 2010.

Organisational/ Institutional abuse includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Institutional abuse is defined as incidents of poor professional practice or neglect, and inflexible services. This can be through neglect or poor professional practice because of the structure, policies, processes and practices within an organisation. Organisational abuse may take the form of physical, financial, emotional abuse, inappropriate use of power and neglect.

Modern Slavery encompasses slavery, human trafficking, forced labour, forced marriage, cuckooing, and domestic servitude.

Self Neglect covers a range of behaviours related to neglecting to care for one's own personal hygiene, health or surroundings. An example of this behaviour is hoarding. The Care Act 2014 states A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour.

There are four additional types of harm that are not included in The Care Act, but they are also relevant to safeguarding adults. These are;

Peer on Peer abuse and harassment can be reported by staff, learners. As outlined in KCSIE 2023, paras 20 to 50 it is important not only to be vigilant for the forms of peer-on-peer abuse detailed in para 35 but also be mindful that just because nothing has been reported it does not follow that it is not happening. Remember to maintain an attitude that not only it can happen here, but there is also a likelihood that it is. You must report any concerns you have regarding actual or potential peer on peer abuse to a DSL immediately. Trade Techs Northern will make available mechanisms for learners to report concerns or allegations directly to a DSL online, by e-mail and by telephone. Peer on Peer abuse and harassment can take many forms such as:

- Bullying in person or online (aka trolling)
- Consensual and Non-Consensual sharing of indecent images.
- Sexual Harassment, including asking for nude or semi-nude images.
- Distributing nude or semi-nude images shared with them to others.
- Rape or Sexual Assault (inappropriate touching, kissing, masturbation)
- Sharing harmful or inappropriate content

- Attempting to radicalise a fellow learner Learners are also free to disclose any concern or allegations to a member of staff they feel comfortable talking with. In all cases the disclosure should be handled as outlined in the key duties to all staff.

Cyber Bullying Cyber-Bullying is a type of bullying which can involve the victim being harassed, humiliated, embarrassed, or otherwise targeted via the internet, social media or by mobile phone. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. It also includes the sharing and viewing of explicit images under the term '**sextortion**'. As highlighted in Section 184 of the Online Safety Act 2023.

Mate-Crime A "mate crime" is when "vulnerable people are befriended by members of the community who go on to exploit and take advantage of them" (The Safety Net Project, ARC). This can lead to, but not limited to, people losing their independence, financial, physical, and sexual abuse. Mate Crime can also lead to '**Cuckooing**' which is a practice where people take over a person's home and use the property to facilitate exploitation.

Forced Marriage. This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will, or coercion or pressure may be a factor. This does not include arranged marriages where both parties consent to enter the marriage. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence to force someone to marry.

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame.

Extortion is the process of the wrongful use of actual or threatened force, violence and intimidation to gain money or property from an individual or entity. Extortion generally involves threats toward a victim's person or property, or to their friends and family. Included under this terminology is illegal money lending, which is contained within the Illegal Money Lending Act 2016.

Deep Faking is classed as an image or recording that has been convincingly altered and manipulated to misrepresent someone as doing or saying something that was not actually done or said. This also includes alteration via artificial intelligence, and the sending, receiving and viewing of images solely or shown to other people. The sending of indecent images is classed as an offence under Section 187 of the Online Safety Act 2023, and the Sexual Offences Act 2023.

POSSIBLE SIGNS OF RADICALISATION CAN INCLUDE:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology

- The individual may change their appearance, their health may suffer (including mental illness) and they may become isolated from family, friends, peers or social groups.

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

DO

- **Do** listen very carefully to what they tell you.
- **Do** take what is said seriously and accept what you are told.
- **Do** stay calm and reassure the student that they have done the right thing in talking to you.
- **Do** write down as soon as you can exactly what you have been told.
- **Do** tell them that you must pass this information on but that only those that need to know will be told. Tell them to whom you will report the matter.
- **Do** preserve any evidence, taking pictures if possible and appropriate.

DO NOT

- **Do not** panic.
- **Do not** promise to keep things secret. You have a duty to refer a child/ young person or adult who is at risk.
- **Do not** lie or say that everything will be fine now that they have told.
- **Do not** criticise the abuser, especially if it is a parent/carer
- **Do not** ask lots of detailed or leading questions such as: 'What did he do next?' Instead, ask open questions such as: 'Anything else to tell me? 'Yes', or 'And...?'. Do not press for answers the learner is unwilling to give.
- **Do not** dispose of any evidence or allow the individual to wash themselves.

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

You must inform the Designated Safeguarding Lead immediately

In the highly unlikely event of not being able to contact the Designated Safeguarding Lead, or the Deputy Designated Safeguarding Lead and the matter is urgent, then contact the Local Authority or the police directly and report the matter to the Designated Safeguarding Lead at the earliest available opportunity.

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

THE ROLE OF THE DESIGNATED TEAM

When a member of staff refers a case of suspected abuse to the Designated Safeguarding Lead, this person will decide whether the situation should be referred to the Local Authority or the Police, or whether some other course of action is more appropriate.

If it is reported to the Local Authority, they will then take over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the Police.

A confidential record will be kept of all cases referred to the DSL, including details of cases referred to the Local Authority or the police. These records will be kept securely via a restricted file on TradeTechs Northern's SharePoint system, with any paper information held securely.

Disclosure of or being the subject of abuse is obviously a very difficult and distressing time for the adult at risk. They will be made aware of the support available to them and helped to initiate contact with this support if so desired.

Involvement in cases of suspected abuse can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone – a colleague, a friend, a partner – they should avoid this in order to respect the confidentiality of the adult at risk concerned and only talk to a member of the Safeguarding Team.

CHILD SEXUAL EXPLOITATION (CSE), CHILD CRIMINAL EXPLOITATION (CCE) AND MODERN SLAVERY

Modern Slavery, CSE and CCE are forms of abuse where an individual or group leverages an imbalance in power, do manipulate, force or deceive someone into taking part in sexual or criminal activity. There is often an inducement which may be financial, social or violent. Male and Female learners can be victims. Often the victims become trapped by this exploitation with family members threatened by the abusers, or the victim is entrapped into having a debt to repay.

Forms of CCE can include being forced or manipulated into:

- Transporting drugs or money through county lines.
- Money Laundering.
- Working in cannabis factories and farms.
- Shoplifting or pickpocketing.
- Committing Vehicle Crime.
- Threatening/committing serious crime on others.
- Carrying weapons such as knives.

The abuse may involve no criminal activity and, in this case, would be considered modern slavery. Often the abusers maintain tight control of the victims, providing the bare minimum to meet their basic needs and denying any forms of freedom. Involvement in CCE creates an increased risk that the victim also suffers CSE.

Forms of CSE can include being forced or manipulated into:

- Assault by penetration (rape, oral sex, insertion of objects.)
- Sexual Assault (kissing, rubbing, inappropriate touching, masturbation)
- Production of sexual images
- Looking at sexual images or watching sexual activities
- Behaving in sexually inappropriate ways

This abuse could be a one-off occurrence, it may involve the abuser committing an act on the victim or forcing the victim to commit an act on another, who may in turn be another victim or another abuser. The exploitation may even occur without the victim's knowledge where videos or images have been obtained without them being aware.

CSE can take place even where the victim is over the age of consent and believes themselves to be in a genuine romantic relationship. Full definitions of CCE and CSE along with indicators can be found in KCSIE 2023 Annex B

Appendix 1 - Reporting guide handout 'The 5 Rs'

This procedure **must** be followed whenever any member of staff, supplier or employer hears an allegation from a child or adult at risk, that abuse has, or may have, occurred or where there is a significant concern that a child or adult at risk, may be abused/radicalised, this includes peer to peer abuse and allegations made towards staff.

RECOGNISE

What is said:

- Accept what you are told – you do not need to decide whether it is true
- Listen without displaying shock or disbelief
- Create a safe, welcoming and calm environment

RESPOND

- Acknowledge their courage in telling you
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that “everything will be alright now” (it might not be)

REFER

- Respond but do not interrogate
 - Avoid leading questions but ask open ended ones
 - Clarify anything you do not understand
 - Explain what you will do next, i.e. inform the DSL
 - Explain that FGM must be reported to the police (this is a legal requirement)
- inform the DSL

RECORD

- Make notes as soon as possible – ensure that you complete the Reporting form with the appropriate information.
- Describe observable behaviour and appearance.
- Cross out mistakes – do not use Tippex.
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead

REPORT

- Facts
- Dates/ timelines (chronological)
- Who to (Universal Services/ Early Help/ Social Services)
- Next steps (Follow up/ Who does what)

Appendix 1 - Reporting guide handout continued.

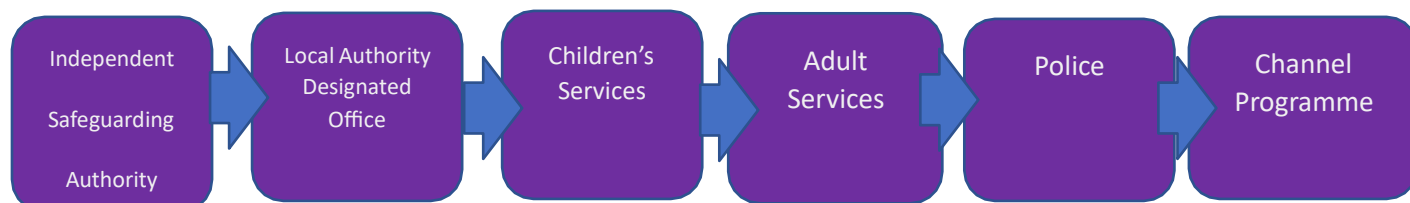
SUPPORT

- Consider what support is needed– you may need to give them a lot of your time to ensure they feel reassured and supported.
- Ensure you are supported – such interviews can be extremely stressful and time consuming
- Once reported to them, the DSL will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.

Contact Information:

Designated Safeguarding Lead (DSL) Tim Ward	Deputy Designated Safeguarding Lead (DDSL) Lisa Kiely
tim@tradetechs.co.uk	lisa@tradetechs.co.uk
Mobile: 07730568190	Mobile: 07595253592

Safeguarding Policy	Activity to promote the policy (Team meetings, training, update meetings)
Staff Awareness & Reporting	Staff to highlight any safeguarding, complaints, comments to "Designated Safeguarding Lead or Deputy Designated Safeguarding Lead"
Appointed Person	Designated Safeguarding Lead and Deputy Designated Safeguarding Lead
Appointed Person Action	Gather further information Form a judgment and inform relevant authority.



Safeguarding Adult Teams	Safeguarding Children Teams
<u>Middlesbrough</u> Telephone - 01642 065070 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.	<u>Middlesbrough</u> Telephone - 01642 726004 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.
<u>Redcar & Cleveland</u> Telephone - 01642 771500 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.	<u>Redcar & Cleveland</u> Telephone - 01642 130700 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.
<u>Stockton</u> Telephone - 01642 527764 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.	<u>Stockton</u> Telephone - 01429 284284 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.
<u>Hartlepool</u> Telephone - 01429 523390 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 130080.	<u>Hartlepool</u> Telephone - 01429 284284 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552.
<u>Darlington</u> Telephone - 01325 406111 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552	<u>Darlington</u> Telephone - 01325 406111 (Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm) All other times contact the Emergency Duty Team: 01642 524552
<u>FE/HE Prevent Co-ordinator North East Region:</u> Chris Sybenga chris.sybenga@education.gov.uk Mobile: 07384 456640	