

SAFEGUARDING AND PREVENT POLICY

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INTRODUCTION

The Safeguarding and Prevent Policy for STEGTA reflects the importance of our responsibility to safeguard and promote the welfare of all our Learners and staff by protecting them from physical, sexual or emotional abuse, neglect and bullying. We are committed to providing a caring, friendly and safe environment for all our Learners so that they can learn in a relaxed and secure atmosphere. We believe every learner should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

STEGTA have a statutory requirement under Sections 27 and 47 of the Children Act 1989 to assist the Local Authority Social Services Department acting on behalf of children in need. STEGTA will safeguard and promote the welfare of children in compliance with the DfE guidance Keeping Children Safe in Education (September 2022) and associated guidance Working Together to Safeguard Children (2018) in addition to the Care Act 2014. STEGTA also complies with the statutory guidance on children who run away or go missing from home or care RMFHC (January 2014) and The Prevent Duty (The Counter-Terrorism and Security Act June 2015) and Social Media for Online Radicalisation (July 2015) and these policies should be read in conjunction with these procedures and guidance.

The main aims of this policy are to ensure that staff are fully engaged in being vigilant about raising awareness; that they overcome professional disbelief that such issues will not happen at STEGTA and ensure that we work alongside other professional bodies and agencies to ensure that our Learners and staff are safe from harm. Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views. At STEGTA, we are fully committed to safeguarding and promoting the welfare of all learners and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. At STEGTA, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The principle objectives of this policy are that:

- All Learners and staff will know that STEGTA has policies in place to keep them safe from harm and that STEGTA regularly reviews its systems to ensure they are appropriate and effective.
- All learners and staff will know what safeguarding means and what the reporting process is
- All staff will understand what radicalisation and extremism are and why we need to be vigilant.

STEGTA's curriculum promotes respect, tolerance, and diversity. Learners and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

It is recognised that Learners or staff with low aspirations are more vulnerable to radicalisation and, therefore, we strive to equip our Learners and staff with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Learners and staff are briefed during induction about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the Internet. STEGTA staff will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties.

Through various training opportunities within STEGTA, we will ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; are aware of the process of radicalisation and how this might be identified early on.

This policy should be read alongside our policies and procedures on:

- Acceptable use of ICT Policy
- Complaints Policy and Procedure
- Whistleblowing Policy
- Health and Safety Policy
- Lone Worker Policy
- Low Level Concerns Policy
- MyConcern Process Map
- Lockdown Procedures
- Visitor Speaker Policy

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SAFEGUARDING

STEGTA are committed to safeguarding and promoting the welfare of all learners including young people and vulnerable adults.

- A vulnerable adult is defined as a person whom:
- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or at risk of abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

Employers also have a responsibility to the learners they employ. We also recognise that we have a duty to help employers, staff and learners to recognise their responsibilities, through guidance, support and training. As the employer of a learner, it is important that you understand your responsibilities to the learner and what safeguarding means to you. The following information should provide answers to some of the questions you may have.

The aims of this Policy are:

- To identify the expectations of staff in relation to safeguarding
- To ensure relevant and effective safeguarding practices are in place
- To ensure the right of every learner to learn within a safe environment
- To promote awareness to staff of the need to safeguard children and to recognise that safeguarding is everyone's responsibility
- To ensure that the fundamental rights and needs of our candidates and Learners are observed
- To prevent abuse through pastoral support offered to all candidate and Learners

- To raise awareness of different types of abuse and children in need issues
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse
- To ensure staff act professionally
- To deter potential, unsuitable individuals from applying to STEGTA by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- To reject at interview stage anyone where we have doubts about suitability
- To prevent the risk of abuse by ensuring procedures and standards are in place •
Enable all staff to recognise the signs and report accordingly

What is Safeguarding?

Safeguarding regulations have been around for a while, across a wide range of legislation, but were brought together by the Safeguarding Vulnerable Groups Act 2006. This legislation provides definitions of children and vulnerable adults and sets out the legislative framework of measures to protect them from harm.

- Promotion of health and development
- Ensuring safety and care
- Ensuring you are offered the best life chances
- Protection from abuse and neglect
- Prevention of bullying and harassment

The term 'safeguarding' embraces both child and vulnerable adult protection and preventative approaches to keep our students, staff and employers safe. Safeguarding encompasses students' health and safety, welfare and well-being.

STEGTA is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and employers to share this commitment. We have developed a Safeguarding Policy and Procedure that aims to meet this commitment.

STEGTA are committed to safeguarding and promoting the welfare of all learners including young people and vulnerable adults.

A Child is anyone under the age of 18

A vulnerable adult is defined as a person whom:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or at risk of abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

A potentially vulnerable adult is defined as a person whom:

Has mental health issues, is at risk of or experiencing abuse or neglect, has substance dependency issues or is experiencing one or 2 but not all of the classifications of a vulnerable adult.

What is Child Protection?

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child. A child is defined as anyone under the age of 18.

STEGTA has a mixture of 16-18 year olds and 19 plus learners, we have a responsibility to protect and support all our learners and staff regardless of their age. The difference is how you may respond and the referral partners the Safeguarding team may refer to. Where there are specific differences in procedures this is outlined within the policy.

Definitions

Safeguard	Protect from harm or damage with an appropriate measure
Vulnerable	Exposed to the possibility of being attacked or harmed, either physically or emotionally
A vulnerable adult	Is in need of special care, support, or protection because of age, disability, or risk of abuse or neglect
Safeguarding	Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism related activity
Vulnerability	Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

Types of Abuse

Child and Adult Abuse: Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are 4 main categories of abuse, which are: sexual, physical, emotional abuse, and neglect.

Sexual abuse	Forcing or enticing a person to take part in sexual activities, may involve physical contact, including assault by penetration or non-penetrative acts, may also include non-contact activities, such looking at or in the production of sexual images, watching sexual activities
Physical abuse	Is defined as the use of physical force that may result in bodily injury, physical pain, or impairment. Physical abuse may include but is not limited to such acts of violence striking, hitting, beating, pushing, shoving, shaking, kicking, pinching and burning.
Emotional/psychological abuse	A person subjecting another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or posttraumatic stress disorder.
Neglect by others	Where a parent, carer or guardian will actively and knowingly fail to care for or attend to the basic needs of a child or vulnerable adult. For example, not feeding a child and/or leaving them in the same clothes and not helping them wash for days on end.
Self-neglect	Is any failure of an adult to take care of themselves. It could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves. In this situation, family and carers would be expected to pick up on these signs and give or apply for appropriate care.
Financial abuse	Tactic used by abusers to limit and restrict their victims' access to their finances. For example, a young adult having their benefits taken away from them.
Discriminatory abuse	Is when you are picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.
Organisational abuse	Is where an institution fails to provide basic care for its residents. It is also related to gang culture where an individual is forced into committing crime for the financial gain of gang leaders.

It is important to be aware of more specific types of abuse that fall within these categories, they include but not an exhaustive list:

- Bullying and cyberbullying
- Child sexual exploitation
- Child Criminal exploitation
- Child trafficking
- Domestic abuse
- Female genital mutilation
- Grooming
- Peer on peer abuse
- Historical abuse
- Online abuse

Peer on peer abuse

What is Peer on Peer Abuse?

All children are capable of abusing their peers. This can manifest itself in a whole spectrum of behaviours including –

- Bullying including cyberbullying
- Sexual violence and harassment
- Physical abuse
- Sexting
- Upskirting (now a criminal offence and has reporting requirements)
- Initiation /hazing type violence and rituals

All Education providers need to include peer on peer abuse in their policies and procedures and all staff need to be aware of these and ensure they are part of their everyday practice. Although KCSIE 2022 refers to Child on child abuse instead of peer on peer abuse, due to the ages of our learners and our commitment to keep all learners safe, not just children we will continue to refer to peer on peer abuse.

Learners also need to know how to report concerns and know that they will be listened to and supported. These should include:

- Procedures to minimise the risk of peer on peer abuse
- How allegations are recorded, investigated and dealt with
- Clear processes as to how victims, perpetrators and any other learners affected will be supported
- Recognition of the gendered nature of peer on peer abuse but recognising, that all forms of this behaviour are unacceptable and will be taken seriously

Additional areas for consideration can be found in Sexual Violence and Sexual Harassment between Children in Schools and Colleges guidance (2021).

Sexual Harassment

This can be defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline. In the context of this guidance this means in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It can include • Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; • Sexual “jokes” or taunting; Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. This is also known as youth produced sexual imagery

Upskirting

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. Cases of 'up skirting' have a mandatory requirement for being reported.

Sexual Violence

In this guidance this refers to sexual violence in the context of child on child sexual violence. Children can and do abuse other children. Sexual violence covers a spectrum of behaviour. It can refer to sexual offences under the Sexual Offences Act 2013. This includes: - Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents. Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. It is important to know that: -

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- If a person is of a position of power – i.e. a teacher any sexual activity with a person under the age of 18 is illegal
- Sexual intercourse without consent is rape.

It is also important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation.

It is important that STEGTA consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Harmful Sexual Behaviour (HSB) Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context.

Hazing/Initiation

The practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

Cyberbullying

What is cyberbullying?

Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs.

Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications

Who is most at risk?

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

Definitions

Flaming	Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
Denigration	Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
Exclusion	Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
Outing	Sharing secrets about someone online including private information, pictures, and videos.
Impersonation	Tricking someone into revealing personal information then sharing it with others.
Harassment	Repeatedly sending malicious messages to someone online.
Cyberstalking	Continuously harassing and denigration including threats of physical harm.

Grooming

What does the term grooming mean?

- Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

What is sexual online grooming?

- Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so

- The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks
- Online groomers will tend to use chatrooms, which are focussed on young people. There are countless teen chat rooms on the internet
- Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming
- Grooming online is anonymous and children find it easier to trust an online 'friend' than someone they have met 'face to face'

Online Grooming

How do you know if a child is being groomed online?

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

Grooming – In Person

Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust. They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult. Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues.

To gain trust, groomers will

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation
- Take them on trips, outings or holidays

Children or vulnerable adults may not speak out about their situation because they

- Feel ashamed
- Feel guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

County lines

County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018).

Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.

In some cases the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing. Targeted areas are often suburban areas, market towns and coastal towns

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Children and young people often don't see themselves as victims or realise they have been groomed to get involved in criminality.

Signs to look out for include:

- Change in learner's mood and/or demeanour (e.g. secretive/ withdrawn/ aggressive/emotional)
- Substance misuse and/or drug paraphernalia
- Changes in the way learners dress
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc)
- Learner's going missing, maybe for long periods of time
- Learner's seen in different cars/taxis driven by unknown adults
- Absence from training and work, disengagement from apprenticeship
- An increase in anti-social behaviour
- Unexplained injuries

Modern day slavery

Anti-Slavery International, define modern slavery as “**when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom**”. This includes but is not limited to human trafficking, forced labour and debt bondage. People may end up trapped in slavery because they're vulnerable to being tricked, trapped and exploited, often as a result of poverty and exclusion and because laws do not properly protect them.

People can be particularly vulnerable to modern slavery when external circumstances push them into taking risky decisions in search of opportunities to provide for their families, or when people find they are simply pushed into jobs in exploitative conditions. Anyone could be pressed into forced labour, but people in vulnerable situations – such as being in debt, or not having access to their passport – are most at risk.

Modern slavery takes many forms. The most common are:

Human trafficking. The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal

Forced labour. Any work or services people are forced to do against their will, usually under threat of punishment

Debt bondage/bonded labour. The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt

Descent-based slavery (where people are born into slavery). A very old form of slavery, where people are treated as property, and their “slave” status has been passed down the maternal line.

Child slavery. When a child is exploited for someone else’s gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery

Forced and early marriage. When someone is married against their will and cannot leave. Most child marriages can be considered slavery

Domestic servitude. Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person’s home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

If you suspect someone is a victim of modern slavery you can report this Call the modern slavery helpline on 0800 0121 700 or report it online <https://www.modernslaveryhelpline.org/report>.

Domestic Abuse

Domestic abuse as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse.
- Physical or sexual abuse.
- Financial or economic abuse.
- Harassment and stalking.
- Online or digital abuse.

There are many referral agencies that can support victims of Domestic abuse this can depend on the learners age, sex and sexual orientation. It is important to not assume that all victims of Domestic abuse are women.

Child on Parent abuse

Child to Parent Abuse can include Physically, emotionally, psychologically and financially damaging behaviours, threats and incidents where the child is the perpetrator and their parent, carer or guardian is the victim.

As with all types of domestic abuse, under reporting is rife it is important that professionals can identify signs and symptoms where a family has not yet made a disclosure, so that they can be helped more quickly and effectively. In cases where a parent has bravely disclosed that they are being impacted by Child to Parent Abuse, it is imperative that they are listened to, believed and not judged. Support is available for victims of Child on parent abuse, a referral can be made by the Safeguarding team.

Non-Contact Sexual abuse

Non-contact abuse is where a person is abused without being touched by the abuser. This can be in person or online and includes:

- exposing or flashing
- showing pornography
- exposing a child to sexual acts
- making them masturbate
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone.

Non-consensual sharing of Intimate images

Laws apply to the sharing of intimate images without the consent of the person in the images. If you record, distribute or publish intimate images without the permission of the person featured in the images (sometimes called the subject of the images), you are guilty of an offence.

Depending on your intent in sharing the images, you can face a maximum prison sentence of up to 7 years. Protections have been put in place to ensure that the alleged victim is not further harmed or embarrassed during any prosecution.

Intimate images include any photograph or video of:

- A person's genitals, buttocks or anal region (and, in the case of women, their breasts)
- The underwear covering these parts of the body
- A naked person
- A person engaged in any form of sexual activity

it is an offence to make, distribute, possess or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person. The law is contained in Section 1 Protection of Children Act 1978. 'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide.

Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015.

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

There are specific organisations that can help with the removal of images

Revenge porn and Sextortion

Intimate Image Abuse, also referred to as 'Revenge Porn', is the act of sharing intimate images or videos of someone, either on or offline, without their consent with the intention of causing distress. This is against the law and included in the Criminal Justice and Courts Act (2015).

'**Sextortion**' is a form of blackmail. It involves threatening to publish sexual information, photos or videos about someone. This may be to extort money or to force the victim to do something against their will. Photos or recordings are often made without the victim realising or consenting or sharing under false pretences.

What can you do if you get blackmailed?

If you're over 18

- Get in touch with the Revenge Porn Helpline for more advice at 0845 6000 459
- If the threats are to share the image/video on Facebook, Instagram, TikTok or Bumble, and you meet the criteria below, Revenge Porn Helpline run a platform called StopNCII.org that can digitally hash intimate images/videos to prevent them from being shared publicly on these sites. This will not prevent content from being shared over private messages, such as Instagram direct messenger.

If you're under 18

REPORT REMOVE - [Report Remove | Childline](#)

Report Remove is safe, easy and free – all you need to do is follow these steps:

choose your age range

create a Childline account so we can send you updates on your report

report your image or video to the Internet Watch Foundation (IWF)

talk to a Childline counsellor if you want any extra support, or access support on the Childline website

check your Childline locker a few days after your report to see if you need to add any more information and to see updates on your report

report any issues with this process by sending an email from your Childline locker with the subject 'Report Remove' and as much information about the problem as you can.

Eating disorder

An eating disorder is a medical diagnosis based on your eating patterns. It involves medical tests on your weight, blood and body mass index (BMI). An eating problem means any relationship with food that you find difficult. Not every eating problem will be diagnosed as a disorder. Eating disorders are a diagnosed type of eating problem.

Bulimia

Bulimia nervosa, is associated with a cycle of what's called bingeing and purging.

Bingeing is eating large amounts of food in one go. Purging is acting to get rid of the food you have eaten after bingeing.

Anorexia

Anorexia nervosa, is simply not eating enough food. This means the person is not getting the energy they need to stay healthy. Anorexia is not about slimming and dieting, it's much more complex. At its core, it's often connected to low self-esteem, negative self-image and feelings of intense distress.

Binge eating disorder

Binge eating disorder is sometimes described as 'compulsive eating' people who suffer from this often feel unable to stop eating, even if they want to. Often individuals rely on food to make themselves feel better. Or might also use food to hide difficult feelings.

Other specified feeding and eating disorder (OSFED)

An OSFED diagnosis is given when an individual doesn't meet all the criteria for anorexia, bulimia or binge eating disorder. Previously, OSFED was known as 'eating disorder not otherwise specified' (EDNOS).

Substance misuse

Substance abuse usually suggests the misuse of a range of mind-altering substances such as alcohol, which is the most common form of substance misuse, and illegal drugs such as Ecstasy, cocaine or cannabis/marijuana. However, people can also misuse other substances such as prescription and over-the-counter (OTC) medicines, and even misuse solvents, caffeine, tobacco and food. Someone can use legal substances and not be addicted or even have a substance use disorder; however, "abuse" can result because they are using a substance in a way that is not intended or recommended, or because they are using more than the prescribed or recommended amount.

Most forms of substance abuse may give people a temporary feeling of well-being or of being in control, but all of them if continuously misused, can ultimately damage a person's physical and/or mental health, work, social situation, relationships and responsibilities.

Mental health

What is mental health?

Emotional stability, feeling safe and secure, the ability to form relationships and function in society, to make friends and make decisions, to enjoy life, be resilient, balanced and flexible, to care for oneself and others, etc.

What is mental ill health?

Extreme differences or difficulties in the way a person thinks, observes the world and experiences feelings. These can either be brief or occur over a long time. They can cause difficulties in a person's ability to care for themselves, to have relationships, make friends, make decisions, work or have any leisure activities.

Examples of mental health problems

- Dementia
- Mood disorders e.g. depression
- Anxiety disorders e.g. phobias, Obsessive- Compulsive Disorder (OCD), panic, Post-Traumatic Stress Disorder (PTSD)
- Eating disorders e.g. anorexia, bulimia,
- Compulsive eating
- Personality disorders
- Substance-related disorders
- Psychosis
- Schizophrenia
- Bipolar

There are many organisations available to support people with mental health issues. A directory of support organisations is available.

Anti-social behaviour

What Is Antisocial Behaviour?

Antisocial behaviour describes any behaviour that is disruptive and hostile towards others. Often times, such actions are characterised by intentional and voluntary aggression towards other individuals. Some behaviours may include:

- Theft, vandalism, and crime
- Lying and deceitfulness
- Violating social norms and rules
- Drug and alcohol abuse

Antisocial Behaviour Examples

Below are a few examples of antisocial behaviour:

- Consistently and carelessly playing loud music even after complaints
- Bullying and insulting a person or specific group of people
- Using violence and threats against a person or a group of people

- Vandalism, graffiti, and breaking public or private property
- Risky driving (e.g. while under the influence)
- Misuse of cars and vehicles (e.g. street racing)
- Littering on public or private spaces
- Trespassing private or public property

Three Types of Antisocial Behaviour

There are three key types of antisocial behaviour, characterized by distinct actions:

- Personal antisocial behaviour. Actions are described as being against a specific person or group. One example of this is bullying, such that the individual will target someone and bully them ruthlessly.
- Nuisance antisocial behaviour. An individual may cause a lot of trouble to a certain community. Examples of this may pertain to verbally or physically abusing disabled or elderly people.
- Environment antisocial behaviour. Actions that affect the environment, including buildings and public spaces. One example would be vandalism or littering carelessly.

There are many organisations that can help with Antisocial behaviour, a referral can be made from the safeguarding team to the correct organisation depending on where the victim lives.

IT SAFETY AND SECURITY

Use of the internet by learners of STEGTA is permitted and encouraged where such use supports the goals and objectives of the apprenticeship. Whilst in the centre internet access is restricted with a filter that alerts the training officer and the centre manager of any attempts to access restricted sites so that they can be dealt with promptly. There is an acceptable use of the Internet policy with clear guidance for both staff and learners, with clear understanding of sanctions that can be put in place if not adhered to.

CONTEXTUAL SAFEGUARDING

All staff, but especially the designated safeguarding team should be considering the context within which incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children/ vulnerable adults should consider whether wider environmental factors are present in a learner's life that are a threat to their safety and/or welfare. If a member of staff is not sure they can converse with the Safeguarding lead.

PREVENT

Another aspect of safeguarding is the PREVENT duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non-violent extremism. Counter-Terrorism and Security Act Sect 26 CTS Act places a duty on certain bodies (specified authorities – listed in Schedule 6) to have "due regard to the need to prevent people from being drawn into terrorism".

Guidance is issued under Section 29 of the Act:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support

- Work with sectors and institutions where there are risks of radicalisation that we need to address

Purpose of Prevent

Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities.

- It also aims to support institutions, such as schools, colleges and universities where this may happen.
- All frontline staff have a responsibility to report any instances where they think they have identified a Safeguarding issue to a Safeguarding Officer

Responsibilities

All staff have a legal responsibility under the Prevent Duty to make sure that:

- They have undertaken training in the Prevent Duty as identified by their management
- They are aware of when it is appropriate to refer concerns about learners to the Prevent officer, usually the provider's Safeguarding officer
- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice

The Prevent Strategy specifically

- Responds to the ideological challenge of terrorism and the threat from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address

What is CONTEST?

CONTEST is the Government's Counter Terrorism Strategy (June 2018). The aim of the strategy is to "reduce the risk to the UK and its interests overseas from terrorism, so that people can go about their lives freely and with confidence".

CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

Prevent: to stop people becoming terrorists or supporting terrorism

Pursue: to stop terrorist attacks

Protect: to strengthen our protection against a terrorist attack

Prepare: to mitigate the impact of a terrorist attack

What is Extremism?

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

What is Terrorism?

An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

What is radicalisation?

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs.

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

CHANNEL

What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Who does Channel work with?

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

How does Channel work?

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals.

If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

How will the person be involved in this process?

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services. To make a referral complete a safeguarding form and the safeguarding team will complete the referral process.

What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary. Raising a concern if you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.

SAFER RECRUITMENT

STEGTA carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk. The process is in place to ensure that all stages of the recruitment process contain measures to deter, identify, prevent and reject unsuitable people from gaining access to learners within STEGTA. This policy and the practical implementation of recruitment and selection processes also aim to meet all legislative requirements, any statutory or other guidance that may from time to time be issued in order to keep children and vulnerable adults safe and safer recruitment in education, as well as principles of general good practice. In addition, this policy aims:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

The recruitment process

Recruitment panel members will be appropriately trained or briefed. In accordance with statutory requirements, at least one member of the panel will have successfully completed safer recruitment training.

Job descriptions and person specifications

When a vacancy arises due to an employee leaving or moving to a different role, it cannot be assumed that a 'like for like' replacement is required. A review of the job description may highlight the fact that the existing role no longer meets current needs. Therefore, the requirements for any replacement or new role will be analysed prior to drawing up the Job Description and Person Specification which define the role.

A job description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role. The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children. In general, job descriptions will normally contain:

- The post title
- The main purpose of the job
- Who the person reports to
- If the person has reportees
- The main tasks or duties to be carried out
- The scope of the job to indicate its position within the organisation
- General statements relevant to all positions, such as requirements relating to equal opportunities and health and safety

As all work at STEGTA involves responsibility for the safeguarding of children, the job description will also make clear that the post holder may have direct or indirect contact with children and young people and as well as commitment to foster the health, safety and welfare of children they also have a general responsibility for safeguarding.

Shortlisting

To support safer recruitment and to ensure fairness in the process, the recruitment panel should take adequate time to properly scrutinise the applications.

For consistency it is recommended to assess each application against the criteria, including criteria specific to working with children through the use of a checklist

Highlight any gaps (in employment etc.) to be explored further at interview should the candidate be long/shortlisted

Look for evidence provided against the criteria set out in the person specification and the job description

Invitation to interview

Interview invitations to shortlisted candidates will normally include the following:

- Details of date, time, venue
- Direction and/or map, together with details of parking arrangements
- Where to report on arrival
- Likely length of the interview and information about any tests or exercise to be included in the process
- Details of the scope of the interview (to be based on the person specification and to include exploration of each candidate's suitability to work with children, together with any issues arising from the CV or references)
- Details of documents that candidates will need to bring with them, e.g. proof of identity, documents for the Immigration, Asylum and Nationality check, qualification certificates.

- A request that candidates let STEGTA know should they have any special requirements, or need any adaptations, to enable them to access the interview and selection process.
- A request that candidates inform STEGTA of their intention to attend, or otherwise, together with the necessary contact details.

Interviews

The recruitment and selection process, in particular interviews, will normally be carried out by two or more people. A set of the same basic questions to ask all shortlisted candidates should be prepared in advance. However, additional follow-up questions are likely to be needed at the interview itself as a means of probing for additional information. These questions will depend upon initial responses given by individual candidates. Interviews will be used to:

- (i) Focus on the requirements to carry out the duties of the job, as described
- (ii) Explore issues relating to the safeguarding and promoting the welfare of children, including:
 - Motivation to work with children and young people
 - To test attitudes, awareness and understanding of safeguarding
 - Ability to form and maintain appropriate relationships and personal boundaries with children and young people
 - Emotional resilience in working with challenging behaviours
 - Attitudes to use of authority and maintaining discipline.

A specific Safeguarding question will be asked to check the candidate's understanding of Safeguarding. This question will be asked by a panel member who is 'Safer Recruitment' trained.

- (iii) Be used to explore any relevant issues arising from references received prior to the interview.
- (iv) To investigate any gaps in employment, which will require the applicant's date of birth to be able to do this effectively.

Disclosure and Barring Service Checks

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiry about the applicant's criminal record and seek a disclosure through a DBS check.

STEGTA can undertake two types of criminal records checks depending on the role applied for:

1. Enhanced DBS check
This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for. This is used for admin staff and support staff who have no direct access with learners, but have access to learner files.
2. Enhanced DBS & barred list check (child)

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations. This is used for all teaching and support staff who have direct access to learners.

STEGTA is under a specific duty not to allow a barred person to work in regulated activity. Children's Barred List checks are completed through the process of an enhanced DBS with a Children's Barred List check. Isolated Barred List checks (formerly List 99 checks through Teachers Pensions) only check whether a person has been barred from teaching children and does not check all of the Children's Barred Lists. Therefore, it should not be relied upon in isolation for substantiating the suitability of a person to work with children.

If an enhanced criminal record check is required but the DBS certificate is not available before a person starts work in regulated activity, the CEO may allow the member of staff to commence work:

- after a satisfactory check of the barred list if the person will be working in regulated activity;
- and all other relevant checks have been completed satisfactorily;
- provided that the DBS application has been made in advance;
- with appropriate safeguards taken (for example, loose supervision).

Offers of employment

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

- Verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website;
- Obtain a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity using correct identification
- Two satisfactory references, one of which should be the current or most recent employer;

Single central register (SCR) of checks

STEGTA will ensure that it complies with statutory requirements for information to be recorded and retained on its SCR of pre-employment checks carried out in relation to employees and workers employed or engaged directly, as well as others who work in regular contact with children. Keeping Children Safe in Education 2021 guidance states: "Schools and colleges must maintain a single central record of pre-appointment checks, referred to in the Regulations as the register and more commonly known as the single central record. The single central record must cover the following: • all staff

- an identity check;
- a barred list check; (teaching staff and management with access to learners only) • an enhanced DBS check/certificate;
- References/verbal references;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

Visitors

STEGTA welcomes many visitors throughout the year. We are mindful of the need to make them welcome and have protocols in place to register them, ensure that they are aware of our important requirements with regard to areas like safeguarding and health and safety and they are accompanied by staff whilst in the building. All visiting staff must sign in and out of the building.

Visiting speakers will be asked to follow our visiting speakers protocol. Where possible names of visitors will be attained in advance and identification checked by reception. Please see the visitor speaker policy for more information.

DEALING WITH POLICE AND OTHER AGENCIES

There may be times when the police or other agencies wish to interview a learner whilst they are under the care of STEGTA. If the learner is under the age of 18, the safeguarding team should be immediately informed. No learner under the age of 18 should be interviewed or any informal conversation or searches carried out without a parent or carer present. Unless the allegations have come from the parent or carer in which case an independent advocate should be involved. The Safeguarding team should refer to Police and Criminal Evidence Act 1984, if they are at any point not sure of the learner's rights. STEGTA is not a part of any agreement with Safer Schools Police Officers (SSPO's) in Greater Manchester or any area within the UK of which it delivers training. Therefore the only time any officer can **request** entry to STEGTA's premises is if the situation is urgent or

- An on a basis of warrant issued by the courts
- Failing to turn up to the police station under bail conditions
- For escaping local authority or youth detention accommodation
- Or immediate threats of violence.

KEEPING YOURSELF SAFE - STAFF

To maintain yours and the learner's safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home or transporting learners to and from locations (this includes travelling in the car with a learner driving)
- Do not use sarcasm, insults or belittling comments towards learners

Personal relationships with learners

It also important to be mindful of the following when conducting yourself:

- You will naturally build a rapport with learners through delivery contact, and the learners may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on STEGTA behalf.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We have the opportunity to listen to their concerns and support them.
- Uphold confidentiality within certain remits when required, by the situation, but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting).
- If at any point, you feel unsafe in a learner's company inform the site manager, your line manager, the designated safeguarding officer and leave the premises.

Sexual relationships

- It is a crime to have a sexual relationship with a child aged under 16.
- It is also an offence for an adult to have a sexual relationship with a young person under 18 if the adult is in a 'position of trust' with that young person.
- This covers relationships between Education staff and students. In the main it applies as long as the young person is under 18, even if they are over the age of legal consent.

REPORTING

It is acknowledged that there may be times where the staff 'witness' an incident, action or event that may give them cause for concern. If any member of staff witnesses a potential safeguarding issue, they must treat it as a matter of urgency and contact one of the Designated Safeguarding Team. Any concern must be documented on MyConcern as soon as possible. Unless the Learner is in immediate harm, where the relevant authorities will be contacted immediately. In this situation ensure that the learner is accompanied and kept safe until the relevant authorities arrive. If the learner is 18 or under and a referral needs to be made to another agency – the learner must not be left alone.

We are committed to the safety and security of all learners at all times whilst in our care equally, we are committed to the safety and security of all staff at all times whilst in the Training centre, office or on Employer sites. Therefore, we recognise the issues and concerns in regard to reporting concerns regarding the care and welfare of the learners within the business. All staff are required to share any concerns in regard to any staff practices that compromise the safety of the learners to a designated safeguarding officer.

Failure to notify the designated safeguarding officer of any concerns regarding any incidents, events or practice by individual staff will result in referral to the safeguarding team, Ofsted and the police for investigation. Where external authorities are conducting their own enquiries, our own investigation will run in parallel without jeopardy to any official enquiries and the member of staff will be placed on suspension.

Any staff member who discloses a concern will be given assurance of confidentiality as far as practically possible, without jeopardy to any investigations by external authorities or our own investigation. Any staff member expressing a concern about their safety following a disclosure will be given all necessary support to enable them to continue in their role with security safely.

Reporting a concern

If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. You must report the issue to a designated officer, regardless of whether the learner agrees.

The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate.

If a learner/ parent has a concern/ allegation about a member of STEGTA staff:

All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their tutor about, they are to contact a STEGTA Designated Officer.

Contact details for the designated person are available in this policy and on STEGTA external website.

If a parent contacts, you to report a concern about their child. Ensure you listen and record the details as per a learner reporting a concern to you.

Ensure you have contact details for the parent. You must report the issue to the designated officer. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate.

Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults, and therefore no information should be passed to parents or carers without prior content to do so from the learner.

If you observe a safeguarding issue taking place within the working practices of an employer's setting - example would be a practitioner hitting a child or observing inappropriate restraint techniques. Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager.

Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform your designated safeguarding lead or member of the safeguarding team. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately. If a learner reports unsafe practices or safeguarding issues to you within their working environment advise the learner to follow in house reporting or whistle blowing procedures.

You may support the learner in speaking to the appropriate senior team members. Report the incident to your designated safeguarding officer who will offer additional guidance and signposting for the learner and will monitor.

It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to the designated safeguarding officer as soon as possible.

Actions where there are concerns about a child

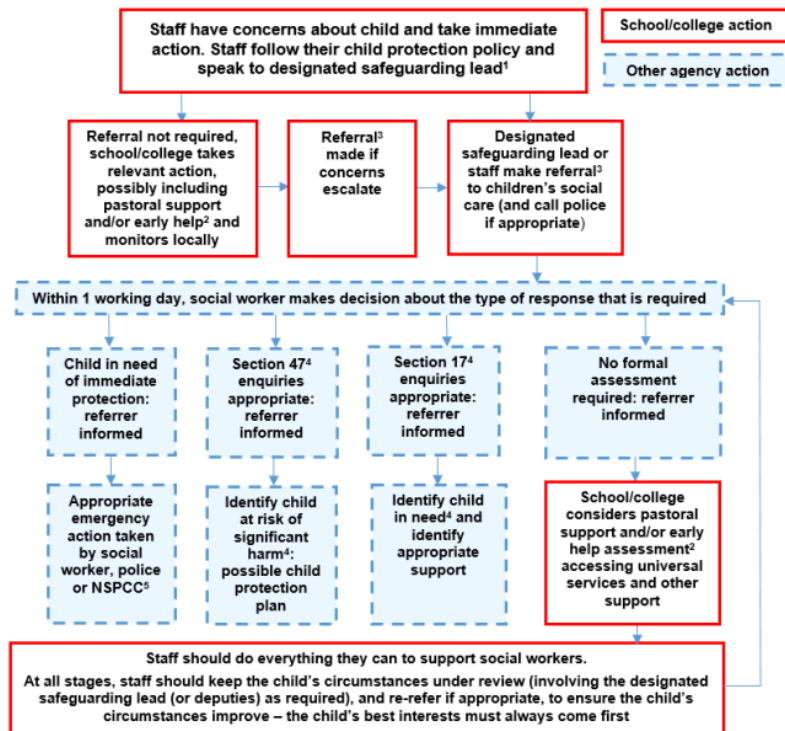


Figure 1 Keeping Childing Safe in Education 2022

Reporting for FGM

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth For the purposes of the duty, the relevant age is the girl’s age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information:

- Explain that you are making a report under the FGM mandatory reporting duty
- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work The girl's details: name, age/date of birth, address.

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means. Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it. FGM is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.

Reporting allegations against staff

If you have concerns regarding another member of staff for example if you feel a staff member has:

- behaved in a way that has harmed a learner, or may have harmed a learner and/or possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

A low-level concern means the allegations against that staff member do not meet the harms threshold and this person does not pose an immediate risk towards the students.

The adult in question may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- and is otherwise not considered serious enough to consider a referral to the LADO
- Examples of low-level concerns include:

- Being over-friendly with Apprentices
- Having favourites
- Engaging with a learner one to one in a secluded area
- Using inappropriate sexualised, intimidating, or offensive language

These examples exist on a wide spectrum, from behaviour that is seemingly harmless, to seemingly inappropriate behaviour that is actually innocent. However, on the other end of the spectrum, it could be behaviour that is intended to enable abuse and grooming in the future.

An allegation or concern can be logged using the allegations and low level concerns against staff Incident and Disclosure.

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with STEGTA’s staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s).

This document does not to replace suspension/formal disciplinary investigations in the event that concerns are either categorised as more serious than low level or when formal disciplinary procedures are required in relation to the low-level concern.

The form can be found here:
<https://forms.office.com/e/DEMCdnbaBB>



Further information on this process can be found in our Low level concerns policy

Storing and use of Allegations and Low-Level Concerns (LLC) and follow up information

Submission forms and follow-up information will be stored securely within STEGTA's safeguarding systems, with access only by the Chief Executive and DSL. This will be stored in accordance with STEGTA's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Chief Executive or the DSL.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave STEGTA, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

- whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

GUIDANCE FOR EMPLOYERS

Why is safeguarding necessary for employed learners?

Providers of government funded training have a duty to safeguard their learners and to take such steps that try to ensure the safety of its learners (especially children under 18 or vulnerable adults) at all times. As part of that duty, we will talk to you about what you can do to ensure that learners are not exposed to threats or dangers.

What are the responsibilities of an Employer?

To understand what is meant by safeguarding and promote the welfare of apprentices

Be aware of your statutory duties towards the welfare of children and vulnerable adults

Be familiar with our guidance, in particular, the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside apprentices (especially 16-18 year olds) are free from convictions and of sound character and judgement and will not pose as any threat or danger to apprentices.

What do I do if my apprentice discloses information to me?

- Re-assure the apprentice that they have done the right thing
- Record what the apprentice said, using their words where possible.
- Maintain confidentiality and do not discuss with others outside the Safeguarding Team
- Listen without making judgements
- Stay calm
- Try not to ask questions, but if you must, make sure they are open-ended questions to clarify understanding and not to probe or investigate
- Don't give an opinion or offer advice

- Don't promise confidentiality - explain you may need to talk to a designated safeguarding officer and report it, an adult apprentice can decline support or a referral to outside agencies – a learner under the age of 18 cannot. Employees working closely with children or vulnerable learners should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice.
- If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and report it as soon as possible.
- Any concern must be documented and submitted as soon as possible. Unless the apprentice is in immediate harm, where the relevant authorities will be contacted immediately.
- In this situation ensure that the apprentice is accompanied and kept safe until the relevant authorities arrive.

If you have any concerns about an apprentice, then please do not hesitate to contact one of STEGTA's designated safeguarding team.

SAFEGUARDING TEAM

MEET THE SAFEGUARDING TEAM



Michelle Rennie

Designated Safeguarding Lead

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07919 597848



Chris English

Deputy Safeguarding Lead

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07415071715



Sara Amatteis

Safeguarding Officer

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07896710857



Paul Howarth

Safeguarding Officer

paul@stegta.co.uk

07919 597824

REVIEW AND UPDATE ARRANGEMENTS

The Policy will be reviewed annually. The policy may also be amended from time to time to reflect and take account of changes in legislation. Any changes are to be approved by the Chief Executive.



Signed :Chief Executive

27/03/2023

Date :