



**CHILD PROTECTION AND SAFEGUARDING CHILDREN, YOUNG
PEOPLE AND VULNERABLE ADULTS POLICY**

SAFEGUARDING (INCLUDING PREVENT)

RAISE A CONCERN [HERE](#)

Policy aims and objectives

ACCIPIO is committed to the safeguarding and well-being of all our learners, we fully recognize the responsibilities for protecting vulnerable groups. This policy applies to all employees, contractors, visitors, learners and any volunteers working for or on behalf of ACCIPIO.

This document sets out ACCIPIO's responsibilities for staff with regards to safeguarding children, vulnerable adults and to prevent radicalization. It is for both internal and external use.

Our policy covers six main areas:

1. *Operating safer recruitment practices (Safer Recruitment and KCSiE 2019)*
2. *How we will raise awareness of safeguarding and PREVENT throughout the organisation and train our staff to have the knowledge and skills to deal with learners effectively and help keep them safe*
3. *Raise learner's and employer's awareness and ensuring that those most at risk have are equipped with the skills and knowledge to keep themselves safe*
4. *Develop, implement and monitor effectiveness of procedures and policies for raising, recording and investigating any cases or suspected cases of abuse*
5. *Identify procedures and resources for accessing additional support and guidance*
6. *Demonstrate how IT usage is monitored*

ACCIPIO recognise that because of our day to day contact with learners, our employees are well placed to observe the outward signs of abuse and therefore, we will:

- *Encourage and maintain an environment where learners feel secure, are encouraged to talk and are listened to;*
- *Ensure that learners know there are designated employees within the organisation who they can speak to and report any concerns to;*
- *Provide opportunities within our contact with learners to develop the skills they need to recognise and stay safe from harm.*

We adhere to the following legislation:

- *Working together to Safeguard Children 2018*
- *Children's ACT (1989, 2004)*
- *Safeguarding and Safer Recruitment in Education (2019)*
- *Safeguarding Vulnerable Groups Act (2006 (amended 2012))*
- *Protection of Freedoms Act (2012)*
- *Disclosure and Barring Service Code of Practice (2015)*
- *Sexual Offences Act (2003)*

- *Every Child Matters (2004)*
- *Equality Act (2010)*

To enhance our commitment to the safeguarding and wellbeing of our learners, we will:

- Ensure that we have a Designated Safeguarding Lead (DSL) who has appropriate training for this role.

*The DSL for ACCIPIO is **Graham McMullan**. Other employees who have responsibilities for safeguarding are **Sascha Benson-Cooper** (Deputy DSL) and **Karly Lattimore** (Board Representative).*

- Ensure that all staff are aware and understand their responsibilities in relation to safeguarding and in being alert to the signs and indicators of abuse and for referring any concerns directly to the DSL.
- Ensure that effective safeguarding procedures are developed, implemented and reviewed to ensure their effectiveness. These procedures are based in the 5 R's approach (Recognition, Response, Record, Report, Refer).
- Ensure that we develop links with relevant external agencies, local safeguarding boards and cooperate with any requirements with any safeguarding matters.
- Ensure that we keep written records of any safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Ensure all records are stored securely and in accordance with the Data Protection Act.

The **responsibility for safeguarding** not only rests with the Board, Directors, Senior Management Team and Designated Persons but with **every individual member of staff** employed or volunteering for our organisation.

Further commitments to safeguarding

Accipio is committed to safeguarding all learners. Accipio believes that anyone who participates in any learning activities is entitled to do so in an environment that is both safe and enjoyable.

Accipio will aim to safeguard children, vulnerable adults and adults by:

- Valuing them, listening to and respecting them.
- Maintaining policy, procedures and a code of conduct (where applicable) for staff and representatives which adheres to the requirements of the JCQ.
- Recruiting representatives safely by ensuring all necessary checks are made in line with current government guidance and legislation.

- Updating staff and Accipio representatives on the relevant policy and procedures and providing access to relevant information when changes are made.
- Ensuring that all assessments, communications, documentation, records, materials, personnel deployment, processes and procedures in no way undermine the interests of children and vulnerable adults but actively seek to protect them.
- Respecting confidentiality whilst sharing information about concerns with agencies who need to know and appropriately involving parents, carers, children and vulnerable adults.
- Providing effective support and management for staff and representatives.

While primarily intended to safeguard children and vulnerable adults, this safeguarding policy also serves to protect staff and representatives from unsubstantiated allegations of improper conduct.

Legal Context

How we define children, young people and vulnerable adults

Children & Vulnerable adults

For the purposes of this Policy, the term “children” refers to a child who has not yet reached their eighteenth birthday in England, Wales and Northern Ireland and their sixteenth birthday in Scotland, this also includes unborn children.

The Safeguarding of Vulnerable Groups Act (2006) no longer details adults as ‘vulnerable’ because of the setting in which an activity is received, nor because of the personal characteristics of the adult receiving these activities.

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

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

- Health care
- Personal care
- Providing social work
- Assistance with general household matters
- Assistance with the conduct of a person’s own affairs
- Conveying

ACCIPIO accept and recognise that due to safeguarding all learners, any adult can be subject to abuse and they do not have to be vulnerable as defined by the Act in order for ACCIPIO’s safeguarding procedure to be implemented.

Abuse

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 S Benson-Cooper, CEO - ACCIPIO

The following are examples of the types of abuse covered by this Policy; the list is not exhaustive.

- Physical abuse: actual or likely physical injury or suffering
- Emotional abuse: actual or likely severe adverse effect on the emotional and behavioural development caused by persistent or severe emotional ill treatment or rejection
- Neglect: failure to protect a vulnerable person from exposure to danger, or ongoing failure to carry out important aspects of care
- Bullying and harassment: conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment
- Sexual abuse: actual or likely sexual exploitation, particularly where the perpetrator holds a position of influence and/or trust

Types of abuse

Female Genital Mutilation (FGM)

FGM (female genital mutilation) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It is also known as 'female circumcision' or 'cutting', and by other terms. It is mainly carried out in parts of Africa and Asia. However, it is illegal in the UK and constitutes as child abuse.

FGM is usually carried out on young girls between infancy and the age of 15.

It is very painful and can cause serious issues and harm.

FGM is often carried out by a traditional practitioner with no medical training, sometimes this can also be carried out by a medical professional. It is often carried out against the will or consent of the girl, and often leads to the victim being restrained.

Breast Ironing

Breast ironing is practiced in some African countries, most notably in Cameroon. Girls aged between 9 and 15 have hot pestles or stones rubbed on their developing breasts to stop them from growing further. In the vast majority of cases breast ironing is carried out by mothers and grandmothers and the men in the family are unaware. Estimates are there are around 3.8 million women in Africa that have been a victim of breast ironing.

Breast ironing is seen as a protection to girls by making them seem child-like for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they become at risk of sexual harassment, rape, forced marriage and kidnapping.

Breast ironing is a form of physical abuse and has been condemned and identified as Gender-based Violence. In some countries it is not against the law! There are concerns that there are around 1,000 girls at risk in the UK.

Child Sexual Exploitation (CSE)

With around 16,500 children at risk of CSE, it is important to notice the signs of exploitation.

CSE is a type of sexual abuse involving control of a child through force, threats or manipulation. It can happen to both boys and girls. Often the first step is someone befriending a young person to gain their trust or have control over them. This is called grooming and can lead to children being abused or raped.

Children can be groomed online or in the real world, by a stranger or by someone they know.

An abuser can be any age, even the same age as the child. It will often involve an abuser providing something to a child such as food, drugs, alcohol, gifts or even simply affection, and victims are often tricked into thinking their abuser is a friend or even a 'boyfriend' or 'girlfriend'.

Once they have the child's trust or control over them, an abuser will then move on to physically or sexually abusing a child. They may steer conversations towards sexual experiences, asking the child to send sexual photos or videos of themselves which they might use to blackmail the child. They might threaten the child saying they will hurt their family or friends if they tell anyone.

Signs that a child may be being groomed:

- Being secretive about who they are talking to and where they are going
- Often returning home late or staying out all night
- Sudden changes in their appearance and wearing more revealing clothes
- Becoming involved in drugs or alcohol, particularly if you suspect they are being supplied by older men or women
- Becoming emotionally volatile
- Using sexual language that you wouldn't expect them to know
- Engaging less with their usual friends
- Appearing controlled by their phone
- Switching to a new conversation when you come near the computer

Less common behaviours:

- Being associated with gangs
- Becoming estranged from family
- Regularly missing school
- Associating with older men and women, particularly if they go missing and are being defensive about where they are and what they're doing
- Possessing items such as phones or jewellery that you haven't given them but which they couldn't afford to buy themselves
- Having more than one, or a secretive phone

You should be aware of the following signs of CSE and abuse:

- They are regularly suffering from STI's
- They have unexplained physical injuries, such as bruising
- Having mood swings or being emotionally volatile
- Self-harm or suicide attempts

ALWAYS CALL THE POLICE IF YOU THINK A CHILD IS BEING SUBJECT TO CSE.

ALWAYS REPORT YOUR CONCERNS TO THE DESIGNATED CHILD PROTECTION OFFICER/DESIGNATED SAGEGUARDING LEAD – GRAHAM MCMULLAN (07809573799) IMMEDIATELY.

Sexting

Sexting among children and young people can be a common occurrence where they often describe incidents as 'mundane'. Children and young people, involved in sexting incidents, will be dealt with (by the Police) as victims as opposed to perpetrators (unless there are aggravating circumstances).

If there is a report, or a suspicion of a sexting incident, it must be remembered that intimate images are typically considered to be illegal images which is why incidents need very careful management for all those involved.

ACCIPIO's policy is for all members of staff to report any suspected cases, or cases of sexting to ACCIPIO's safeguarding lead.

ACCIPIO's safeguarding lead will record all incidents of sexting. This includes actions taken and actions that are not taken, together with justifications.

Peer on Peer Abuse

ACCIPIO is committed to protecting children, young people and vulnerable adults from peer-on- peer abuse. Peer-on-peer abuse includes:

- Young people aged 16 and 17 who experience physical, emotional, sexual and/or financial abuse, and coercive control, in their intimate relationships.
- Young people aged under 18 who are sexually abused in the context of exploitive relationships, contexts and situations of a person of any age, including another young person.
- Any young person under the age of 18, who demonstrated behaviour outside of their normal parameters of development
- Serious youth violence including murder, rape and GBH between young people under the age of 18.

ACCIPIO's policy is for all members of staff to report any suspected cases, or cases of peer-on-peer abuse to ACCIPIO's safeguarding lead.

Honour Based Violence

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

It is often linked with family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion
- Want to get out of an arranged marriage
- Want to get out of a forced marriage
- Wear clothes or take part in activities that might not be considered traditional within a culture

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

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

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

Forced Marriage

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

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

ACCIPIO's policy is for all members of staff to report any suspected cases, or cases of forced marriage to ACCIPIO's safeguarding lead.

Knife Crime

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Knife crime is a term used commonly in the media to refer, primarily to street-based knife assaults and knife carrying. However, there are many different criminal offences relating to knives. For example:

- it is an offence to threaten or cause harm to a person with a bladed weapon
- some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18
- Offences such as robbery or assault can be aggravated if a knife is involved
- It is also an offence to carry a knife in a public place without good reason.

According to Ofsted paper: Safeguarding Children and Young People in Education from Knife crime, in the last 12 months since September 2018, knife crime had increased by 68.4% across England and Wales compares with 12 months up to September 2014 and 55% across the Metropolitan Police Service area of London over the same period. Public perception of knife crime being a problem in London has increased and 26% of respondents to the London Public Attitude Survey 2018 felt that knife crime was a problem compared with 20% a year earlier.

Knife crime is an increasing safeguarding risk to children and young people, both at school and in their local communities. Whilst there is no clear answer to the question of the cause of knife crime

Where a child or young person discloses that they may be at risk, or ACCIPIO suspect that there may be cause to be suspicious that a young person is at risk or involved in knife crime then all cases are to be reported to ACCIPIO's safeguarding lead.

Human Trafficking

Human Trafficking involves men, women and children being brought into a situation of exploitation using violence, deception or coercion and forced to work against their will. People can be trafficked for many different forms of exploitation such as forced prostitution, forced labour, forced begging, and forced criminality, domestic servitude, forced marriage, forced organ removal. When children are trafficked, no violence, deception or coercion needs to be involved: simply bringing them into exploitative conditions constitutes trafficking.

People trafficking and people smuggling are often confused. People smuggling is the illegal movement of people across international border for a fee and upon arrival in the country of destination the smuggled person is free. The trafficking of people is fundamentally different as the trafficker is facilitating the movement of that person for the purpose of exploitation. There is no need for an international border to be crossed in cases of trafficking, it occurs also nationally, even within one community.

ACCIPIO's policy is for all members of staff to report any suspected cases, or cases of forced marriage to ACCIPIO's safeguarding lead.

Code of conduct

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Accipio will behave appropriately at all times in terms of safeguarding children and vulnerable adults by following a Code of Conduct. (Appendix)

Our leaders aim to promote equality of opportunity and diversity exceptionally well so that the ethos and culture of the provider prevent any form of direct or indirect discriminatory behaviour. Leaders, staff and learners do not tolerate prejudiced behaviour. The promotion of fundamental British values is at the heart of the provider's work.

We aim for our learners feel safe and know how to raise concerns. We will be proactive in assessing safeguarding risks and taking action to prevent them. We have a strong track record of raising awareness among staff and learners of safeguarding issues, listening to learners' concerns and acting on them.

CHILDREN MISSING IN EDUCATION

The London Child Protection Procedures define a child as missing if their whereabouts are unknown, whatever the circumstances of their disappearance. Sometimes children stay out longer than agreed as boundary testing activity. These children have taken unauthorised absence and would not usually come with the definition of missing.

According to police figures, around 360000 children/young people run away each year. The real number is likely to be more, as not all cases are recorded. Children looked after are three times more likely to run away than other children.

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

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

ACCIPIO has drawn up this policy to deal with children or young people who miss training in these circumstances, particularly on repeat occasions and for these children and young people who leave their training programme without clear indication of where they will be continuing their education.

ACCIPIO have taken information from the DfE guidance including Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges 2019.

ACCIPIO recognises that the high majority of all training takes place on-line through video conferencing and on-site at an employer's premises and it is recognised that there may be

occasion when a child or young person will need to cancel an appointment. This policy covers those instances of absence where:

- There is a repeated pattern of absence
- The reason for absence is unclear or unexplained
- A member of staff has raised concerns about the nature of the child or young person's absence

In these instances, ACCIPIO's safeguarding lead or deputy should be consulted. Where a child or young person is deemed to be at risk, ACCIPIO's procedure for reporting suspected abuse to children, young people and vulnerable adults is followed.

MODERN SLAVERY

Modern Slavery refers to the illegal exploitation of people for personal/ commercial gain. Victims trapped in servitude they were deceived or coerced into. Modern Slavery may include:

- *Criminal Exploitation* - pick pocketing, shoplifting, drug trafficking.
- *Domestic Servitude* - forced to work in private houses with restricted freedoms, long hours, and no pay.
- *Forced labour* - long hours, no pay, and poor conditions, verbal and physical threats.
- *Sexual Exploitation prostitution and child abuse*
- *Other forms* - Organ removal, forced begging, forced marriage and illegal adoption

Possible indicators that an individual is being subject to modern slavery is where an individual may:

- Look malnourished or unkempt
- Be withdrawn, anxious and unwilling to interact
- Appear under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access or control of their passport or identity documents or use false or forged documents
- Appear scared, avoid eye contact, and be untrusting
- Show signs of abuse and/or have health issues
- Show old/untreated injuries, or delay seeking medical care with vague/inconsistent explanation for injuries
- Appear to wear the same or unsuitable clothes, with few personal possessions
- Fear authorities and in fear of removal or consequences for family
- Be in debt to others or a situation of dependence

ACCIPIO's policy is for all members of staff to report any suspected cases, or cases of modern slavery to ACCIPIO's safeguarding lead.

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Gangs, County Lines, Serious violence & Crime

ACCIPIO recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support learners to keep them safe. All staff have been trained and recognise the need to be vigilant for the signs that may include:

- Unexplained gifts/new possessions – these can indicate learners have been approached by/involved with individuals associated with criminal networks/gangs, this includes children and adults at risk
- Children and adults at risk who go missing for periods of time or regularly come home late
- Children and adults at risk who regularly miss training or do not take part in education
- Change in friendships/relationships with others/groups
- Children and adults at risk who associate with others involved in exploitation
- Children and adults at risk who suffer from changes in emotional well-being
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing ➤ Signs of assault/unexplained injuries

In these instances, ACCIPIO's safeguarding lead or deputy should be consulted. Where a child, adult or young person is deemed to be at risk, ACCIPIO's procedure for reporting suspected abuse to children, young people and vulnerable adults is followed.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

E-safety

Our E-safety Policy provides guidance on how we use the internet and social media and our procedures for doing this. It also outlines how we expect our staff, children and adults at risk, who are enlisted on our programmes, to behave online. The purpose of the policy is:

- To protect all children, young people and adults at risk who make use of technology whilst in our care.
- to provide staff, children and adults at risk with a policy regarding on-line safety and how to respond to it.
- To ensure our organisation is operating in line with our values and within the law regarding how we behave on-line.

Reporting Policy and Procedures

RESPONDING TO SAFEGUARDING CONCERNS

Roles and Responsibilities

Any member of Accipio who suspects that a child or vulnerable adult is at risk of harm or abuse

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will take personal responsibility to report their concerns. Not reporting concerns may put children and vulnerable adults at further risk of harm.

Reporting concerns, suspicions and allegations

Any member of staff who either knows of, is told of, or strongly suspects any incident of current or historic abuse has a duty to report the information immediately to the DSL or DDSL.

What is a disclosure?

A disclosure is when a person tells you something that has affected them, for example about instances of current or historic abuse. Some things that may be shared with you include self-harm and physical, sexual or emotional abuse, and you may notice signs of neglect. They may also have a concern about something that has happened online or through social media.

Concerns about safeguarding children and vulnerable adults may arise in different situations. Staff may:

- Witness or observe something firsthand or **online or through social media**
- Receive information by phone/email/letter/in person
- Receive learners work that raises potential safeguarding concerns

The following guidance will be followed if staff or representatives receive an allegation of child or vulnerable adult abuse or if a disclosure or allegation of abuse is being made to them by a child or vulnerable adult. Staff will:

- Listen to what is being said with an open mind.
- Not ask probing or leading questions designed to get them to reveal more.
- Never stop a person who is freely recalling significant events.
- Check their understanding of the situation, without being investigative.
- Explain that they cannot keep such information confidential, and that they have a responsibility to report what has been said to Accipio. It is important to record if the person has consented to having the information shared.
- Make a note of the discussion, taking care to record the timing, setting and people present as well as what was said
- Ensure that any medical attention needed is addressed as a priority.

Reporting Information

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Accipio Safeguarding Concerns Report Form (see Appendix) will be used to record as much information as possible about the situation. This will include:

- What has happened
- Where and when
- Who was involved?
- Any contact details
- What action, if any, has so far been taken

Staff will pass on what information they have, even if the informant has only divulged a little or will not give their details. The information may join up with reports from someone else. All information will be treated as confidential and staff and representatives will not to talk about this information with anyone other than their agreed. Safeguarding contact as rumour spreads quickly, can be damaging and might even hinder any investigation that may result. This information will be passed immediately (within 5 working days).

We understand that it can be difficult to talk about and hear such difficult things. If you follow the Do's and Don'ts, it will help you offer the best support possible.

Do:

- remain calm, approachable and receptive
- listen carefully, without interrupting
- acknowledge you understand how difficult this may be
- make it clear that you are taking what is said seriously
- reassure them that they have done the right thing in telling you
- let them know that you'll do everything you can to help them
- make a written record of exactly what has been said.

Don't:

- promise confidentiality
- ask leading or probing questions
- investigate
- repeatedly question or ask them to repeat the disclosure
- discuss the disclosure with people who do not need to know
- delay in reporting the disclosure to the Safeguarding team.

Information sharing

If the allegation could constitute a potential risk of abuse to a child or vulnerable adult then Accipio will always share the information with relevant agencies in order to protect the child or vulnerable adult. If there is insufficient information to enable a referral then the reasons for this will be recorded.

Accipio recognises its responsibility to protect the identity of anyone reporting suspected or actual abuse and no information will be made available externally without careful consultation and prior approval at senior level.

Prevent & Safeguarding

The grooming of Children, Young People and Vulnerable Adults for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed where there are concerns that a child or young person is at risk of radicalisation or has already been radicalised.

The government defines extremism as 'vocal or active opposition to Fundamental British Values including democracy, respect and tolerance of different faiths and beliefs. Also included in the definition of extremism is calling for the death of a family member of the armed forces.

Radicalisation is the process by which people come to support terrorism and violent extremism and, in some cases, then participate in terrorist activities. There is no obvious profile of a person likely to become involved in extremism, or a single indicator of when a person might adopt violence in support of extremist ideas. Possible indicators that a person is at risk or has been radicalised can be found in the Appendix.

Children, young people and vulnerable adults can be exposed to harmful, extremist ideology in the immediate family through the impact of extreme beliefs held by family members including parents and carers or family and friends who live outside the family home but have an influence over the child's life. Older children or young people might be radicalised over the internet.

The Governments strategy to reduce the risk from terrorism identifies the need not only to stop terrorist attacks but also prevent people from becoming terrorists. The Governments' strategy for countering terrorism is CONSENT and the Prevent Strategy forms part of this.

CONTEST has four key strategies:

- Pursue: to stop terrorist attacks
- Prevent: to stop people becoming terrorists or supporting terrorism
- Protect: to strengthen our protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack.

Prevent address all forms of terrorism and nonviolent extremism which can create an atmosphere conducive to terrorism and can popularize views which terrorists then exploit. The Prevent Strategy makes clear that preventing people becoming terrorists of supporting terrorism requires challenge to extremist ideas where they are used to legitimate terrorism and are shared by terrorist groups.

Work to safeguarding children, young people and adults, including the provision of early intervention to protect and divert people away from being drawn into terrorist activity is central to the Prevent Strategy.

Staff who observe any behaviour or who hear or are told anything significant by a child, young person or others, must report their concerns to the designated named safeguarding person.

If ACCIPIO has any significant concerns about a learner, or others beginning to support terrorism and / or violent extremism, it is required to discuss with the local police so that they can be part of further work to address the issue. ACCIPIO will work to the Prevent element of the Governments' Counter Terrorism Strategy, and where deemed appropriate seeks external support through referrals to the Channel Programme

Channel provides a mechanism for assessing and supporting people who may be targeted by violent extremists or drawn into violent extremism. Channel use existing collaboration between local authorities, the police, statutory partners and the local communities to:

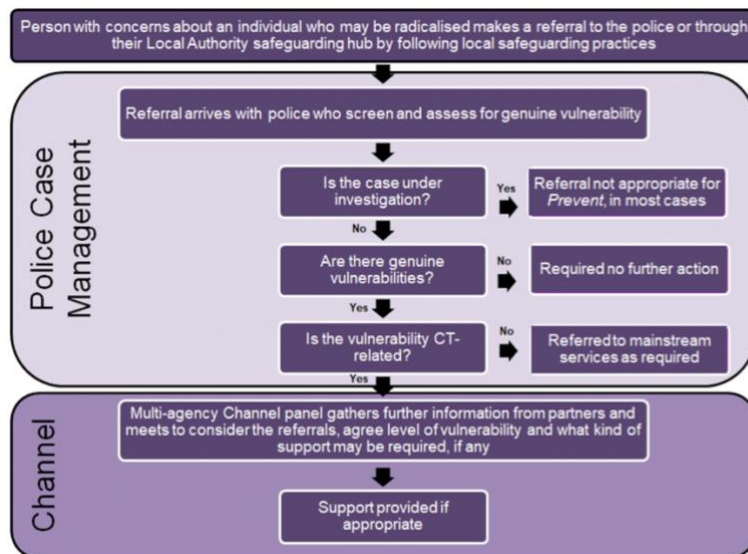
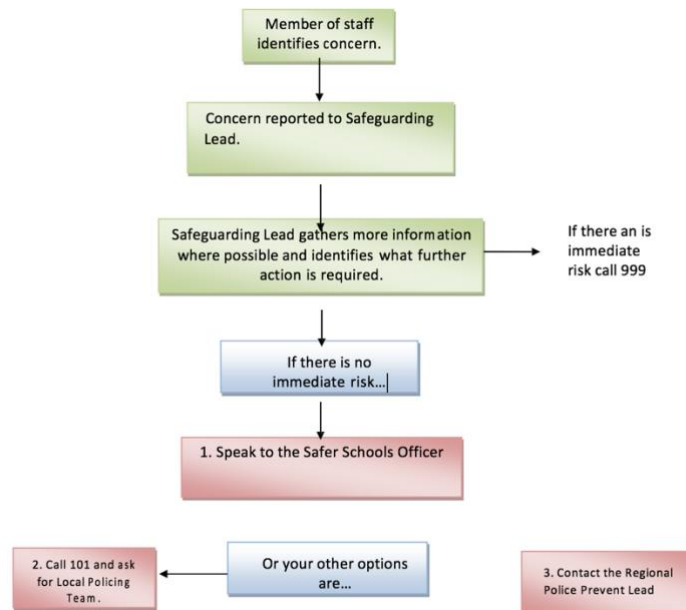
- Identify individuals at risk of been drawn into violent extremism
- Assess the nature and extent of the risk
- Develop the most appropriate support for the individual concerned

Web-Filtering and Monitoring

ACCIPIO's policies and procedures for IT usage and monitoring state that under the Counter Terrorism and Security Act 2015, all students and staff are obliged to adhere to the content within this policy.

All staff are obliged to be connected to the ACCIPIO Virtual Private Network, which monitors website access and blocks certain content.

The CHANNEL Process



Source: Home Office

Legislation and Regulation when we recruit

Key Legislation

1. Children Act (1989)
2. The Children's Act (Scotland) (1995)

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3. The Children's Order (Northern Ireland) 1995
4. Safeguarding Vulnerable Groups Act 2006
5. Protection of Freedoms Act 2012

Criminal Justice and Court Services Act 2000: Section 26 and Schedule 4 - Offenders and individuals banned from working with children and/or vulnerable adults

Contracting with Accipio

Under the Criminal Justice and Court Services Act 2000, it is an offence punishable by imprisonment to apply for work with children and/or vulnerable adults if an individual has been:

- Convicted of a Schedule Four Offence and/or;
- Put on the Protection of Children Act List and/or;
- Put on the Protection of Vulnerable Adults List (POVA) and/or;
- Considered unsuitable or banned from working with children under section 142 of the Education Act of 2002.

If such information is received as a result of a criminal records check from the Disclosure & Barring Service (England & Wales) or Disclosure Scotland or Access NI, the individual will be immediately reported to the police. Accipio will take the necessary appropriate action. It is also an offence for anyone knowingly to employ such a person in such a capacity, either on a voluntary or a paid basis.

Enhanced DBS Checks & Referencing

Before any contract of employment is signed the following must be adhered to:

It is a requirement of employment for all of our Training and Assessment Coaches to complete an Enhanced DBS check, this check will be carried out on all delivery staff (TAC, IQA, Managers). A basic DBS check will be conducted on those employees who are working in the office and dealing with learner data, queries etc.

Enhanced DBS checks will be conducted on a three-yearly basis, random DBS checks may be sought on an annual basis or as and when a concern is raised.

Before any member of staff is employed by Accipio Ltd, reference checks will be completed. This will be as a minimum most recent/current employer and one other reference (preferably a previous manager or employer).

Should any queries or concerns be raised through this process, action may be taken. In order to ensure proper safer recruitment, those who do not satisfy the requirement of the enhanced DBS check and reference checks will have their offer withdrawn.

Implementation

In order to achieve the successful implementation of this policy, Accipio will:

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- Issue the Safeguarding policy statement to all its staff, partner organisations to ensure that it will be available on request to learners and other interested parties
- Ensure that issues concerning safety and confidentiality are addressed as an integral part of qualification development, review and assessment guidance
- Sign a Disclosure Declaration Form covering offences, cautions, reprimands, warnings etc.
- Complete a new Disclosure Declaration Form when their circumstances change

DESIGNATED SAFEGUARDING LEAD

The designated safeguarding lead within Accipio is, as of September 2021 – Graham McMullan.

Graham McMullan

Tel: 07809 573 799

Tel: 020 7117 2690 ex 7

Email: graham@accipio.com

Email: safeguarding@accipio.com

DESIGNATED SENIOR SAFEGUARDING LEAD

The senior safeguarding lead within Accipio is **Karly Lattimore**, Non-executive Director – Apprenticeships.

Email: safeguarding@accipio.com

Tel: 020 7117 2690 ex 7

London PREVENT Team

Name: Jennie Fisher (HE Regional PREVENT Co-ordinator for London)

Email: jennie.fisher@education.gov.uk | 07880 469 588

Apprentice Support

Apprentices can access support in various ways to talk to us, get additional information, advice and guidance and how to raise a concern.

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An apprentice can raise a concern at any time by following our reporting process. They can call, email or talk to us face-to-face. Key contact information can be found above in this policy, this information is also contained within the learner handbook/programme guide and on all of our websites.

The Hub has a wealth of learning resources which we ask all apprentices to complete, these eLearning modules are:

- PREVENT
- British Values
- Safeguarding
- Cyber Bullying
- Promoting a health and safety environment
- Leaders and workplace wellbeing
- Equality, diversity and inclusion
- Health and safety responsibilities
- Supporting staff welfare
- Careers information, advice and guidance
- Awareness and compliance quiz (on above eLearning modules)

We also provide apprentices with access to information and contact details for the Citizens Advice Bureau, ACAS and other useful sources of information. We also raise awareness through newsletters and insights, where we raise awareness for safeguarding and provide additional resources and information to apprentices where they can get independent support, advice and guidance. For example, we promote woman's safety and provide information on where to get more help and support for PREVENT, online safety, domestic abuse, drugs and alcohol support, forced marriage and other areas within the safeguarding umbrella.

APPENDIX

KEY DEFINITIONS AND CONCEPTS

Although the legal context is different for vulnerable adults, much of the following information on the types of abuse and neglect of children is also applicable to vulnerable adults. However, we do not train people under the age of 16.

Abuse and Neglect – Children

It is generally accepted that there are five main forms of abuse. The following definitions are taken from Working Together to Safeguard Children (HM Government 2006) and Safeguarding Children: Working Together under the Children Act 2004.

Abuse and neglect are forms of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family, institutional setting or community setting; by those known to them, or by a stranger. They may be abused by adult/s or another child or children.

1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness. An important indicator of abuse is where bruises or injuries are unexplained, or the explanation does not fit the injury.

2. Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making a child feel or believe they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve serious bullying causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

3. Sexual Abuse

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

4. Neglect

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Neglect is the persistent failure to meet a child’s basic physical and psychological needs, likely to result in the serious impairment of the child’s health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child’s basic emotional needs.

5. Bullying

Bullying may come from another child or an adult. Bullying is defined as - deliberate hurtful Behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.

Safeguarding Children and Vulnerable Adults V3.0 Safeguarding Reference Group September 2015 19

There are four main types of bullying.

- Physical (e.g. hitting, kicking, slapping),
- Verbal (e.g. racist or homophobic remarks, name-calling, graffiti, threats, abusive text messages, abuse via social media),
- Emotional (e.g. tormenting, ridiculing, humiliating, ignoring, isolating from the group),
- Sexual (e.g. unwanted physical contact or abusive comments).

Vulnerable Adults Abuse - Definitions

Adult abuse is:

- A violation of an individual’s human and civil rights by any other person or persons
- Any behavior towards a person that deliberately or unknowingly causes him or her harm, endangers their life or violates their rights.
- Physical, sexual, emotional, financial or through neglect or discrimination.
- Perpetrated by an individual, a group or an organisation “No Secrets” DOH 2000 Financial Abuse, Discriminatory Abuse & Institutional Abuse
- Financial abuse is abuse or misuse of possessions or money. Indicators may be an unusual shortage of money to pay bills, to buy food or to maintain adequate living conditions.
- Discriminatory abuse is harassment or similar discriminatory or derogatory treatment, which is racist, sexist or refers to disability.
- Institutional abuse or Practice abuse is neglect due to bad or poor care practice or unsatisfactory professional practice and low standards.

DISCLOSURE DECLARATION FORM

Due to the nature of the services, we will require disclosure of any criminal convictions, cautions etc... (including the penalty or penalties imposed) which are not spent (for the purposes of the Rehabilitation of Offenders Act).

The information received will be treated with the utmost confidentiality and will be used by the Safeguarding Panel to reach a conclusion as to whether a contract will be offered to the applicant. The information received around disclosures will, unless there are exceptional circumstances, be securely destroyed after a period of 6 months.

Please note that disclosure of offences will not in itself mean that a contract of services will not be issued. ACCIPIO shall make a decision after careful consideration of the individual circumstances and with due regard to the safeguarding risks.

I can confirm that I have read and understood the Safeguarding Disclosure Declaration Form and due to the nature of my services am willing to provide details of any criminal convictions.

Have there been any changes to the status of your registration with any regulatory body?

Yes/No

Have you any convictions which are unspent (for the purposes of the Rehabilitation of Offenders Act)?

Yes/No

Has any child been removed, temporarily or permanently, from your care as a result of child protection proceedings?

Yes/No

Signed:

Dated:

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CODE OF CONDUCT

We will:

- Listen to, value and respect everyone as an individual.
- Appropriately involve learners/students in decision making
- Encourage and praise achievement
- Actively contribute to an organisational culture where inappropriate Behaviour is not tolerated
- Provide an example of the good conduct you wish others to follow
- Ensure that whenever possible there is more than one adult present during activities with children and vulnerable adults, or at least that you are within sight or hearing of others
- Not give out personal information, or share email addresses, mobile phone numbers etc.... with any child, young person or vulnerable adult
- Report all allegations/suspensions of abuse by seeking further support and guidance, including any allegation made against yourself or other staff
- Report all low-level concerns to the DSL immediately. Low level concerns can be anything from stress to wellbeing
- Ensure that any concerns about inappropriate behaviours are quickly and appropriately reported on to the Safeguarding Leads within Accipio
- Be aware that some children and vulnerable adults may behave inappropriately. Any sanctions and approaches to discipline used will be appropriate to age and understanding
- Representatives who come into contact with children and vulnerable adults will always avoid:
 - Being alone or out of sight of others.
 - Where privacy is required, the door will be left ajar having ensured that others have been informed and are within earshot
 - Transporting learners by car on one's own
 - Having unnecessary physical contact
 - Engaging in or allowing sexually provocative games or activities
 - Making or permitting suggestive or discriminating remarks to/or about children or vulnerable adults
 - Meeting children or vulnerable adults outside of organised/formal interaction
 - Entering a room where learners may be changing their clothes or are not fully dressed.
 - Participating in, or tolerating any bullying not engage in sexual relationships with learners (which may in any event constitute a criminal offence)

- Taking any photographs or videos which include any participant unless authorised by the appropriate member of staff and the learner/parental (for children) consent has been given
-

INCIDENT REPORT FORM

Safeguarding Incident Record

Please use this form to record incidents or concerns. It is important that we maintain records of incidents to staff to pass to local safeguarding agencies or the Police. These records will also be used to produce an annual report on Safeguarding. Please send copy to Safeguarding Lead and Deputy.

Name of staff member. Full contact details if possible:
Concern or incident:
Date, time and location:
Action taken:
Follow up from Head of Department & Safeguarding Officer:

Name (print):

Signature:

Date:

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