



TEMPLEGATE TRAINING
ACADEMY CIC

Templegate Training Academy

Safeguarding Policy

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Safeguarding Policy - Statement

As an employer and training provider, Templegate Training Academy recognises that it has a legal duty to ensure, as far as is reasonably practicable the health, safety and welfare of young people and adults at risk.

In order to protect young people and adults at risk from harm, Templegate Training Academy will act in accordance with the following legislation and guidance:

- Safeguarding Vulnerable Groups Act 2006
- The Children's Acts 1989 and 2004
- Education Act (2002) section 175
- Rehabilitation of Offenders Act 1974
- Sexual Offences Act 2003
- Safeguarding Children and Safer Recruitment in Education (2007)
- 'Working Together to Safeguard Children' 2019
- 'No Secrets Guidance'

Templegate Training Academy has appropriate procedures in place for responding to situations in which they believe a young person or adult at risk has been abused or is at risk of abuse, which also cover circumstances in which a member of staff, volunteer or other worker is accused of, or suspected of, abuse.

Templegate Training Academy also recognises that it has, through its staff, a duty to take such steps as are reasonable to see that young people and adults at risk are safe from harm. Templegate Training Academy also recognises that young people and adults at risk may suffer harm from sources outside the company's remit.

Where signs of such harm are apparent, Templegate Training Academy encourage these to be reported to the appropriate external agency.

This policy aims to:

- Establish and maintain an environment where young people and adults at risk feel secure, are encouraged to talk and are listened to when they have a worry or concern.
- Ensure young people and adults at risk know that there are Templegate Training Academy staff that they can approach if they have concerns.
- Include opportunities for young people and adults at risk to develop the skills they need to recognise and stay safe from abuse.
- Inform staff, employers and others working with Templegate Training Academy about their responsibilities for safeguarding young people and adults at risk.

- Enable everyone to have a clear understanding of how these responsibilities should be carried out

Commitment

Templegate Training Academy wish to promote ways in which individual members of staff and companies that Templegate Training Academy contract with can put their own measures into practice to ensure, so far as is reasonably practicable, the health, safety and welfare of vulnerable groups.

By providing a code of conduct and training to all Templegate Training Academy staff (please see Professional Boundaries document) it helps to safeguard and protect all staff from the risk of false allegations of abuse or poor practice. Templegate Training Academy provide training on company policies for safeguarding, health and safety and equality and diversity during induction and provide on-going training as required.

Templegate Training Academy ensure opportunities for young people and adults at risk to participate regardless of their age, culture, disability, gender, language, racial origin, and religious belief, sexual orientation in the courses on offer in an enjoyable and safe environment.

Templegate Training Academy take reasonable steps to protect young people and adults at risk from harm or abuse, neglect or discrimination and to respect their rights, wishes and feelings.

Templegate Training Academy undertake to act swiftly and appropriately, to investigate all suspicions and allegations of poor practice and abuse and to involve the appropriate agencies if and when required.

Scope & Responsibilities

Abuse is behaviour towards a person that either deliberately or unknowingly causes a person harm or endangers their life or their human or civil rights. It can be passive or active. Abuse can be a one off or something that is repeated.

All Templegate Training Academy members of staff must have an awareness and an understanding of this policy and its procedures to enable them to comprehensively understand their individual responsibilities and help promote best practice in the safeguarding of young people and the protection of adults at risk.

Templegate Training Academy members of staff must be fully effective in safeguarding young people and the protection of adults at risk. All Templegate Training Academy

members of staff must have an awareness and recognition of the types of abuse and a full understanding of the duty to report suspected or actual abuse.

It is not a member of staff's responsibility to decide whether or not abuse has taken place or if a child or young person is at risk of significant harm from someone (unless this duty is specifically referenced in a member of staff's job contract, description and responsibilities).

All members of staff do however have duty and a responsibility to respond immediately where abuse of any form is suspected to ensure that the appropriate agencies can investigate and take any necessary action to protect a young person or adult at risk. Members of staff must not investigate suspicions or allegations – they must notify and report to the Designated Safeguarding Officer.

Templegate Training Academy staff are well placed to observe outward signs of abuse, changes in behaviour and failure to develop in the young people they work with. They should be aware of the important role Templegate Training Academy has in the early recognition of the signs and symptoms of abuse, and the appropriate referral process.

The Designated Safeguarding Officer has the responsibility for coordinating action within the training provider and for liaising with the appropriate agencies. Staff with a designated responsibility for Safeguarding receive the appropriate training.

It is the role of the Designated Safeguarding Officer to:

- Promote positive safeguarding procedures and practice
- Receive information and offer advice about safeguarding concerns, maintain secure records and take appropriate action
- Be familiar with national and local safeguarding guidance and referral procedures
- Assess the development needs of staff and coordinate training
- Keep all staff informed of good practice
- Monitor safeguarding cases within the organisation

HR are responsible for the recruitment of staff, and as such complete appropriate police checks for members of staff who are working with learners on a regular basis. Please see the Disclosure Policy and the Recruitment of Ex-Offenders Policy.

The Senior and Quality Management Team are responsible for the approval of the Safeguarding Policy and ensure that staff members are aware of the policy and engage in staff development opportunities.

All members of staff are responsible for ensuring that learners always feel safe and secure, maintain correct behaviour, feedback with positive reinforcements and project a professional image at all times. Staff must report any issues that are raised with them and have a duty to report any suspicion of abuse.

Staff Training

All staff will receive induction Training and yearly safeguarding training to familiarise themselves with safeguarding issues and responsibilities, to keep updated with legislation and refresh their knowledge.

- The DSL and deputy DSL undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.
- The Designated Professionals deliver training at least annually to all staff in the setting.
- All staff members receive safeguarding and child protection updates as required (for example, through emails, e-bulletins and weekly staff meetings).
- All new staff and temporary staff are required to attend an induction session with the Designated Safeguarding Lead within their first week at the setting.
- Volunteers/students are familiarised with Safeguarding and Prevent policies and procedures.

Human Resources – Safer Recruitment

TTA pays full regard to 'Keeping Children Safe in Education'. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

Candidates are informed of the need to carry out enhanced criminal records checks (DBS checks) before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We undertake criminal record checks (DBS) for all staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the learners.

TTA's recruitment procedures are reviewed regularly to ensure that they take into account safe recruitment.

Recognising Types of Abuse

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect, or an omission to act – an individual may abuse or neglect a child, young person or adult at risk by failing to prevent an act of harm. In all forms of abused there are elements of emotional abuse.

Adults at risk may also suffer additional types of abuse such as being manipulated financially or being discriminated against. Other examples of abuse include inflicting physical harm such as hitting or misuse of medication, and sexual assault or exposure to sexual acts without informed consent, emotional abuse such as threats, humiliation and harassment, exploitation, ignoring medical or physical needs, withholding necessities of life such as food or heating.

Child Protection and Safeguarding Issues

The statutory guidance 'Keeping children safe in education' (2019) provides guidance on a range of abuse or safeguarding issues including:

- Abuse
- Bullying (including Cyber)
- Child criminal exploitation - County lines
- Child sexual exploitation
- Domestic abuse/violence
- Drug & substance misuse
- Fabricated or induced illness
- Faith based abuse
- FGM
- Forced Marriage
- Gender based violence towards women & girls
- Gangs and youth violence
- Homelessness
- Modern day slavery and human trafficking
- So called 'honour-based' violence
- Peer on peer abuse
- Preventing radicalisation (the Prevent duty)

Private Fostering
Relationship abuse
Self-harm
Sexting
Sexual violence and sexual harassment
Up Skirting

Types of Abuse

There are four main types of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Additionally, adults at risk may also experience:

- Financial or material abuse
- Discriminatory abuse
- Institutional abuse
- Professional abuse
- Significant harm

It is not the purpose of this policy to provide a generalised representation of abuse.

Children, young people and adults at risk may experience any combination of these types of abuse, but each group have specific vulnerabilities. For example, current legislation requires us to not only protect the vulnerable from abused and neglect, but to actively promote the welfare of children and young people – not just to protect but to safeguard.

Bullying is not defined as a form of abuse in ‘Working Together’ but there is clear evidence that it is abusive.

Abuse is defined as ‘a single or repeated act of lack of appropriate action occurring within any relationships where there is an expectation of trust, which causes harm or distress.

Abuse is defined in 'No Secrets Guidance' as the 'violation of an individual's human or civil rights by any other person'.

1. Physical Abuse

Physical abuse occurs when non-accidental harm is caused to the body by the use of force, which results in pain, injury or a change of the person's natural physical state.

Examples of physical abuse include hitting, slapping, pushing, kicking, misuse of medication, restraint, inappropriate sanctions, rough handling, pinching, punching, shaking and burning.

2. Emotional/Psychological Abuse

Psychological or emotional abuse is behaviour that has a harmful effect on a vulnerable adult or young person's emotional health or development.

Some examples of emotional abuse include:

- Threats of harm
- Verbal abuse
- Isolation or withdrawal of services or support networks
- Withholding affection, shouting
- Depriving a person of a right to choose, information or privacy
- Any behaviour that has a harmful effect on an adult at risk or young person's emotional health and development
- Deprivation of contact
- Humiliation, blaming, controlling, intimidation, coercion, harassment

3. Sexual abuse

Sexual abuse is the involvement of an adult at risk or a young person in sexual activities or relationships which are for the gratification of the other person and which:

- They have not consented to
- Or they cannot understand
- Are not able to consent to
- Which violates the individual's expressed cultural or religious preferences, sexual taboos or family custom and practice

Examples of sexual abuse include:

- Assault or sexual acts to which the individual has not consented or was pressurised into consenting
- Inappropriate touching and fondling
- Indecent exposure or attempted penetration

4. Neglect and acts of omission:

Neglect is behaviour that results in an individual's basic needs not being met.

Examples of neglect and acts of omission include:

- Ignoring medical or physical health needs
- Individual's physical condition/appearance is poor
- Failure to provide access to appropriate health, social care or emotional services
- The withholding of the necessities of life such as medication, nutrition and heating

5. Financial or material abuse:

Financial or material abuse involves the use of an individual's property, assets or income without their informed consent or making financial transactions that they do not understand to the advantage of the other person.

Examples of financial or material abuses include:

- Theft
- Exploitation and pressure in connection with wills, property or inheritance or financial transactions
- The misuse or misappropriation of property, possessions or benefits

6. Discriminatory Abuse:

Discriminatory abuse is behaviour that makes or sees a distinction between people as a basis for prejudice or unfair treatment. Examples of discriminatory abuse include racism, sexism, ageism, slurs or similar treatment.

7. Institutional abuse:

Institutional abuse involves the collective failure of an organisation to provide an appropriate professional service to vulnerable people. It can be seen or detected in

processes, attitudes or behaviour that amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and stereotyping.

8. Professional abuse:

Professional abuse is the misuse of power and of trust by a professional. Professional abuse can include:

- The failure of a professional to act on suspected abuse
- Poor care practice or neglect in the provision of services
- Culpability as a result of poor management systems structures

9. Significant harm:

Significant harm can be taken to include not only ill treatment including sexual abuse and forms of ill treatment which are not physical, but also the impairment of, or an avoidable deterioration in physical or mental health, and the impairment of physical, intellectual, social or behavioural development.

10. Peer on Peer Abuse:

Learners can abuse other learners. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

11. Bullying (including Cyber)

While bullying between learners and young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a person's wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as the TTA operates a zero-tolerance approach. Bullying can take many forms including: -

Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures)

Physical: Pushing kicking, punching or any use of aggression and intimidation.

Racial: Racial taunts, use of racial symbols, graffiti, gestures.

Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.

Verbal: Name calling, spreading rumours, teasing.

Cyber: All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

12. Child Criminal Exploitation – County Lines

Criminal exploitation of vulnerable adults and children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children, young people and vulnerable adults to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

The leaders of these gangs are likely to exploit children and vulnerable adults, often without them realising it, to move (and store) drugs and money. They use coercion, intimidation, violence (including sexual violence) and weapons.

There may be signs of a change in a young/vulnerable person's behaviour such as:

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly dishevelled
- Having hotel cards or keys to unknown places

13. Child sexual exploitation (CSE)

CSE is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. The manipulation or 'grooming' process involves befriending children, gaining their trust and often feeding them drugs and alcohol, sometimes over a long period of time before the abuse begins. The abusive relationship

between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying, grooming and sexting. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Key indicators of children being sexually exploited may include;

- Going missing for periods of time or regularly coming home late;
- Regularly missing college or education or not taking part in education;
- Displaying inappropriate sexualised behaviour
- Receiving unexplained gift or gifts from unknown sources
- Associating with other young people involved in exploitation;
- Having multiple phones
- Mood swings or changes in emotional wellbeing
- Seen at strange meeting places (hotels or known places of concern)
- Having older boyfriends / girlfriends
- Self-harming / drug or alcohol misuse
- Injuries (physical)

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

Inappropriate relationships - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend - Abuser grooms' victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

Organised exploitation and trafficking - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

14. Female Genital Mutilation (FGM)

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. **This practice is illegal in the UK.** FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman
- Sustained permanent serious injury

The Serious Crime Act 2015 sets out a **legal duty** on professionals as it is **mandatory** that they notify the police when they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18.

15. Forced Marriage

Forced Marriage is a marriage conducted without the consent of both parties and where duress is a factor. It is an entirely separate issue from an arranged marriage which is freely entered into and the two should not be confused.

Acts such as Forced Marriage and other so called 'honour crimes' come under the definition of Domestic Violence and a child who is subjected to this is at risk of significant harm through physical, sexual and emotional abuse.

Young people forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm.

Learners who fear they may be forced to marry often come to the attention of, or turn to, an education professional before seeking help from the police or social services. Often the learner's friends report it to the education professional. Education professionals are in an ideal position to identify and respond to a victim's needs at an early stage.

If the learner fears they may be forced to marry, they have limited choices:

- To remain with the family and try to resolve the situation

- To accede to the family's wishes
- To flee the family
- To seek legal protection

Remember:

- Remaining with the family and trying to resolve the situation can place the learner in danger.
- Acceding to the family's wishes means the learner is returning to an abusive situation.
- Learners fleeing a forced marriage that has not yet taken place may be reported as missing by their families. The forced marriage aspect of the case may not be apparent when the report is made.
- If the learner has dual nationality, they may have two passports, one British and one from the other country of their residence.

What to do if a learner seeks help or if you have suspicions that a learner may be forced to marry

You must:

- Ensure that non-attendance including authorised absence from college is reported immediately.
- If you have concerns for the safety of a learner under 18 years old liaise with a TTA Safeguarding Officer immediately for advice and report the incident. They will take the responsibility for following Local Safeguarding Children Board (LSCB) and TTA Safeguarding procedures
- If you cannot locate a Safeguarding Officer, then contact MASH Adult Safeguarding Services for the area that the learner resides and Police immediately for advice.
- If you have concerns for the safety of a learner over 18 years old explain all the options to the learner, recognise and respect their wishes. If the learner does not want any referral to be made, e.g. to the Police, staff will need to consider whether the learner's wishes should be respected or whether the learner's safety requires that further action be taken. If you do take action against the learner's wishes, you must inform them.
- **If the learner is a vulnerable adult**, referrals should be made in accordance with the local Multi-Agency Adult Protection Committee procedures and protocols to protect vulnerable adults from abuse. This will be done by a Safeguarding Officer. Staff must notify a College Safeguarding Officer of their concerns. If a Safeguarding Officer cannot be contacted you must contact the Police, Social Services or the Forced Marriage Unit, but you must also notify a Safeguarding Officer of this referral. Due to the nature of forced marriage and honour-based violence, you need to be aware that it's not always safe or the best place for someone to be with their family and the practice of attempting to resolve cases through family counselling, mediation, arbitration and reconciliation.

- See the learner immediately in a private confidential place, where the conversation cannot be overheard.
- See the learner on their own – even if they attend with others.
- Develop a safety plan in case the learner is seen i.e. prepare another reason why you are meeting.
- Establish if there is a family history of forced marriage, i.e. siblings forced to marry. Other indicators may include domestic violence, self-harm, family disputes, unreasonable restrictions (e.g. withdrawal from education, being confined to home) or missing persons within the family.
- Refer to a TTA Safeguarding Officer, who will contact the local police, Child/Adult Protection Unit (MASH) if there is any suspicion that a crime has been, or may be, committed. They will also liaise with the police if there are concerns about the safety of the learner or the learner’s siblings.

Do Not:

- Treat such allegations merely as a domestic issue and send the learner back to the family home.
- Ignore what the learner has told you or dismiss out of hand the need for immediate protection.
- Approach the learner’s family or those with influence within the community, to attempt mediation, as this will alert them to your concerns and may place the learner in danger.
- Contact the family in advance of any enquiries by the police, adult/children’s social care or the Forced Marriage Unit, either by telephone or letter.
- Share information outside TTA Information Sharing protocols without the express consent of the learner.
- Breach confidentiality except where necessary in order to ensure the learner’s safety.

What to do if a learner is going overseas imminently.

- Try to gather as much of the following information as possible, as there may not be another opportunity if the learner is intending or is travelling overseas.
- This information may help the Forced Marriage Unit to locate the learner and assist to repatriate them.
- A photocopy of the learner’s passport for retention. Encourage them to keep details of their passport number and the place and date of issue.
- As much information as possible about the family (this will need to be gathered discreetly) including:
 - **Full name and date of birth of the learner under threat**
 - **Their father’s name**
 - **Any other addresses of the learner or family based in the UK**
 - **Any addresses where the learner may be staying overseas**
 - **Potential spouse’s name**

- **Date of the proposed wedding**
- **The name of the potential spouse's father (if known)**
- **Addresses of the extended family in the UK and overseas.**
- Information that only the learner would be aware of (this may assist any subsequent interview at an Embassy/British High Commission in case another person of the same sex/age is produced pretending to be the learner).
- Details of any travel plans and people likely to accompany the learner.
- Names and addresses of any close relatives remaining in the UK.
- A safe means by which contact may be made with the learner e.g. a secret mobile telephone that will function overseas. Record the number.
- An estimated return date. Ask that the learner contact you without fail on their return.
- A written statement by the learner explaining that they want the police/children's social care/third party to act on their behalf if they do not return/make contact by a certain date.

Remember: Give the learner the contact details of the nearest British High Commission/Embassy.

Further Information: Advice can be sought from specialist caseworkers at the Forced Marriage Unit on 020 7008 0151 or website www.fco.gov.uk/en/fco-inaction/nationals/forced-marriage-unit/

West Midlands Police: Forced Marriage www.west-midlands.police.uk/

Forced Marriage Unit: www.gov.uk/guidance/forced-marriage

16. Modern Slavery and Human Trafficking

Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators. There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

Someone is in slavery if they are:

- Forced to work - through mental or physical threat;

- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.
- Not allowed to speak freely during conversations when another person is also present and dominates the conversation.

Contemporary slavery takes various forms and affects people of all ages, gender and races.

Human trafficking involves an act of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting them.

Possible Indicators:

- Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality.
- Whilst by no means exhaustive, this is a list of some common signs:
- Victim is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else;
- The victim has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The victim looks malnourished, unkempt, or appears withdrawn.
- They have few personal possessions and often wear the same clothes
- Clothes that they wear may not be suitable
- The victim is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live
- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.
- Fear of authorities
- The victim perceives themselves to be in debt to someone else or in a situation of dependence

17. English as Additional Language (EAL)

TTA recognises the importance of identifying vulnerable learners that may be at risk of abuse or learners that may have additional support needs. Given that TTA has a very high proportion of EAL students, all staff must be aware of the particular difficulties that this could present. Staff should be very clear in giving instructions and ensure that they are not misunderstood so as to place the student or themselves in a difficult situation regarding safeguarding and the potential for an allegation to be made. TTA will regularly liaison with other professionals and agencies that support the student and their families and will work closely with the local partners to provide safeguarding information in various languages.

Recognising Abuse

The abuse of adults at risk or young people is often detected through symptoms or indicators. There are often physical indicators of maltreatment or neglect such as bruises, bites, burns, fractures. However, symptoms can also reveal themselves through emotional, psychological behavioural patterns such as depression.

Responding Professionally

Templegate Training Academy staff should be concerned about a young person or adult at risk if he or she displays signs of abuse or neglect, or where they may have disclosed harm to others.

Concern about safeguarding issues includes any area where the health or physical and/or emotional wellbeing of a young person or adult at risk, is at risk. This could include incidents of bullying, signs of drug or alcohol dependency.

Staff may become aware of the potential abuse of an individual through their own or other's suspicions or by the victim or the abuser disclosing the abuse. It is important that such disclosures are responded to in a supportive and professional way.

It is important to remember that if someone discloses abuse, it is because they want the abuse to stop, they are asking for help.

Key things to do:

- When an individual discloses abuse, always take it seriously. Speak to them in a calm, sensitive way. Listen carefully and make sure you record what was said, including the date, time and place.

- Allow the individual to communicate at their own pace.
- Ask questions for clarification only and avoid asking questions that suggest a particular answer. Asking leading questions might compromise a subsequent investigation.
- Make sure your record does not contain your own opinions, just the facts.
- Do not make judgements.
- Re-assure the individual that they have done the right thing by telling someone, and inform them what you are going to do next.
- Explain that it is likely that the information will need to be shared with others, never promise to keep secrets.
- You cannot agree not to tell anyone else, because you will need to disclose the information to certain people to make the individual safe.
- Ensure the safety of the individual and any other person at risk.
- If the individual needs medical attention, call the emergency services or a doctor as appropriate, and inform your manager immediately.
- The importance of accurate recording cannot be stressed enough. If there is any further action or investigation, an accurate account is vital.

It is not the responsibility of individual members of staff to investigate or make judgements on suspected instances of abuse. This is a matter for the relevant external agencies, or in appropriate cases, the company.

Allegations against a member of staff:

Where an allegation is made against a member of staff identifying that he or she has:

- Behaved in a way that has or may have harmed a young person or adult at risk
- Possibly committed a criminal offence against/related to a young person or adult at risk
- Behaved toward a young person or adult at risk in a way which indicates that he or she is unsuitable to work with young people or adults at risk

The person learning of the allegation should record the nature of allegation and any other relevant information and immediately report it to the Designated Safeguarding Officer.

The Designated Safeguarding Officer will liaise with Directors to complete an investigation and will decide on the most appropriate course of action.

Whistleblowing

Templegate Training Academy operates a whistleblowing policy which encourages a culture of openness within our organisation and aims to prevent malpractice. With the introduction of the Public Interest Disclosure Act 1998, all workers now have legal protection from any form of retribution, victimisation or detriment as a result of publicly disclosing certain serious allegations of malpractice.

The policy will apply in cases where a staff member genuinely and in good faith believes that one of the following sets of circumstances is occurring, has occurred or may occur within their line of duty:

- A criminal offence has been committed, is being committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail with any legal obligation to which he or she is subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That the health and safety of any individual has been, is being or is likely to be endangered.
- That the environment has been is being, or is likely to be damaged.
- That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Anyone who wishes to raise or discuss any issues which might fall into any of the above category should contact their line manager in the first instance who will treat the matter in strictest confidence. If this is not appropriate, they should contact the HR Manager. All complaints will be viewed seriously and treated confidentially.

Allegations against staff and adults in a position of trust

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.

N.B. Guidelines set out within the TTA's Disciplinary Procedure will be adhered to for internal investigation purposes.

If a learner or vulnerable adult makes an allegation against a member of staff at the TTA the CEO must be informed immediately.

If the CEO is implicated in the concerns you should discuss your concerns with the Local Authority Child Protection Officers who will initiate appropriate action in the same manner as allegations made against other staff in TTA and inform the Safeguarding Designated Lead Governor at the end of their enquiries.

If you have safeguarding concerns relating to the parents/carers of learners and you are aware that they work with the learners, young people or vulnerable adults, you must inform the designated staff for safeguarding and protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied

If an allegation of abuse is made against a member of staff in work-based provision not directly linked to TTA, it must be reported to the Police. The CEO must be informed.

The member of staff should have no contact with the learner concerned and must not be informed of the allegation prior to referral.

Any individual (including volunteers, paid employees and those in work-based placements) who come into contact with learners and vulnerable adults have a legal and moral duty to safeguard and promote their welfare. This duty requires individual staff to ensure the safety of a learner or vulnerable adult involved in any activity or interaction for which that person is responsible.

The Children Act 2004, through the Stay Safe outcome places a duty upon organisations to promote the well-being of young people. This includes the need to ensure that all adults who work with or on behalf of young people in these organisations are competent, confident and safe to do so.

The majority of adults who work with young people and vulnerable adults act professionally: Adults who work with young people and vulnerable adults are responsible for their own actions and behaviours and should avoid any contact which would lead any reasonable person to question their motives and intentions.

It is recognised that working with learners and vulnerable adults can result in tensions between adults and the learner concerned such that misunderstandings can occur, and it is here that the behaviour of adults can give rise to allegations of abuse being made against them. TTA has robust staff conduct guidance to ensure staff are aware of their responsibilities when interacting with learners and vulnerable adults.

However, allegations may be genuine and research shows that there are adults who will deliberately seek out, create or exploit opportunities to abuse learners and vulnerable adults.

It is therefore essential that all possible steps are taken to safeguard young people and vulnerable adults, and that adults working with them are safe to do so.

It is acknowledged that individuals may have concerns about the possibility of an allegation being made against them and for that reason it is important that they familiarise themselves with behaviours that may be considered as constituting gross misconduct and misconduct, and those which would be considered illegal.

Circumstances where misunderstanding may arise:

- Dress and appearance
- Personal living space
- Gifts, rewards and favouritism
- Communication with young people and vulnerable adults (including the use of technology)
- Social contact
- Sexual contact
- Young people and vulnerable adults in distress

Where an allegation has been made against a member of staff which calls into question their ability to safeguard and promote the welfare of learners and vulnerable adults, their suitability to work with these learners and is likely to result in a breakdown of public confidence, these will be investigated in line with the appropriate TTA Safeguarding Board Procedures.

The Local Authority Designated Officer – LADO

Working Together requires agencies that are members of the Local Safeguarding Children's Board to have identified individuals within their agency who are responsible for the management of allegations against members of staff (The CEO and the Designated Governor)

The Local Authority Designated Officer (**LADO- Paul Cooper - 01902 550661**) will be notified of all allegations against adults in position of trust at TTA. The LADO has overall responsibility

on behalf of Wolverhampton Local Safeguarding Children's Board for managing such allegation, regarding young people.

Power and Positions of Trust

All adults working with learners and vulnerable adults are considered to be in a position of trust, as a consequence of their knowledge, position and/or the authority invested in their role. This equally applies to volunteers.

This means that adults should **not**:

- Use their position to gain access to information for their own or other's advantage.
- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine young people / vulnerable adults
- Use their status and standing to form or promote relationships which are of a sexual nature or may become so.

This means that adults should:

- Ensure that an unequal balance of power is not used for personal advantage or gratification
- Maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others
- Report or record any incident where their behaviour may be misinterpreted with a Senior Manager at the earliest opportunity

Confidentiality

In any safeguarding matter, the welfare of the child, young person or adult at risk is paramount. Only a restricted number of people within the organisation will have access to information that involves such incidents. Information will be shared on a 'need to know' basis.

Policy Review

This Policy will be reviewed annually or wherever a significant change to either legislation or procedures occurs.

Any Safeguarding concerns to be reported to Designated Safeguarding Lead Sapheena Khan or Deputy Lead Olivia Wainwright.

Key Contacts

West Midland Safeguarding and Child Protection contact details

Agency	Contact Details
Wolverhampton Children's Services	01902 555392
Walsall Children's Services	0300 555 2866
Dudley Safeguarding	0300 555 0050
Birmingham Children's Advice & Support Service (CASS)	0121 303 1888
Sandwell Children Trust	0121 569 3100

Staff and Professional Concerns

Wolverhampton Local Authority Designated Officer (LADO): Paul Cooper – 01902 550661

Emergency

Wolverhampton Adult Social Care (Concerns about adults) 01902 551199
Forced Marriage Unit 020 7008 0151
West Midlands Police 999 or 101

Other Organisations

Black Country Women's Aid 0121 553 0090
NSPCC Helpline 0808 800 5000
Child Line 0800 1111
24 hours National Domestic Violence Freephone Helpline 0800 2000 247
Shelter – for housing advice 0808 800 4444
MIND – mental health charity 0300 23 3393

Victim Support	0808 1689 1111
National Stalking Charity	0808 802 0300
Survivors UK - Adult survivors of childhood abuse or male rape	0203 598 3898

NB - All Contacts checked and correct – December 2019. Please contact a member of the Safeguarding Team if found to be incorrect or changed.