

1. Introduction

Lavender International, (the Company) has safeguarding statutory duties and responsibilities in relation to its students/apprentices to protect them from any potential harm.

This policy outlines appropriate behaviour and procedures for employees and teachers to follow when working with students/apprentices. Should a vulnerable person be suspected of being in danger this should be reported to the Designated safeguarding officer as soon as possible.

The designated Student Safeguarding officer oversees safeguarding concerns and is responsible for passing on relevant information to the Local authority should the incident need immediate action.

2. Safeguarding Children

In relation to students/apprentices under the age of 18 years old, and classed as a child in law, the Company has a statutory duty, as set out in the Education Act 2002 and Children Act 2004, to promote and safeguard the welfare of children and have due regard to guidance issued by the Secretary of State at all times.

The Company adopts the definition used in the statutory guidance: Working Together to Safeguard Children 2015, issued by the Department for Education (DfE), which applies to all children and, defines safeguarding and promoting children and young people's welfare as:

- Protecting children from potential harm and maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable children to have the best outcomes

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Cases involving children under the age of 18 should always involve Child Social Care or a team equivalent.

3. Safeguarding Vulnerable Adults

In relation to students/apprentices 18 years and over, and classed as an adult in law, the Company has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act (including DoLs)

2005 and the Human Rights Act 1998. The Company must have regard to guidance always issued by the Secretary of State. The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:

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

The Care Act 2014 defines safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect.” The above duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support. Such concerns will be referred to the appropriate authorities, such as the Adult Social Care team.

4. Types of Abuse

The Safeguarding policy promotes training for the recognition and prevention of abuse to protect its employees, students, and apprentices. Such abuse includes:

- Physical - violent treatment (punching, beating, kicking, biting, burning, shaking), Female Genital Mutilation or otherwise harming someone physically.
- Psychological - intimidation, coercion, threats, harassment, humiliation, bullying, swearing or shouting, enforced social isolation, failure to respect privacy/dignity or online bullying.
- Sexual - rape, grooming, un-consensual / inappropriate touching or sexual actions, groping, or sexual actions that the individual could not consent to.
- Discriminatory - abuse based on any of the protected characteristics stated in the Equalities Act 2010. E.g., disability, race, religion, philosophical belief, sex etc.
- Neglect or Omission of needs - insufficient parenting or childcare, withholding of necessary medication, nutrition or access to healthcare, refusal to acknowledge medical needs or emergencies and failure to provide access to social care or educational services.

- Financial or owned property - theft or fraud, unauthorised withdrawal from a vulnerable person's account, pressured financial transactions, blackmail or exploitation regarding wills, inheritance or property.
- Self - Self-harm, serious injury or suicide, purposeful self-neglect such as starvation etc.
- Environmental - Lack of safeguarding regarding no supervision in the workplace or home, especially around dangerous or potentially harmful equipment that could result in accidents, lack of safe or suitable home and homelessness.
- Radicalisation - Individuals being exploited in the name of terrorism; potentially carrying out violent acts of terrorism against people or organisations.
- Immigration- 'Green card' or forced marriage exploitation for immigration status.

5. Inherent Principles of the Policy

Safeguarding is the responsibility of all employees with the Company playing its part in preventing, identifying and reporting abuse and neglect. As well as ensuring that safeguarding concerns are addressed, we will also ensure that students/apprentices are kept safe from harm whilst they are in our charge. To this end, this policy must be seen in conjunction with other relevant Company policies. The Company will not limit its view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should be considered.

6. Aims of the Policy

The aim of this policy is:

- To ensure that students/apprentices are effectively safeguarded from the potential risk of harm.
- The Company and that the safety and wellbeing of the students/apprentices is of the highest priority in all aspects of the Company's work.
- To help the Company maintain its ethos whereby employees, students, apprentices, and visitors feel able to articulate any concerns comfortably, safe in the knowledge that effective action will be taken as appropriate.
- To outline the Company's commitment to safeguard and promote the welfare of students/apprentices.

7. Purpose of the Policy

To ensure all employees:

- Are aware of their responsibilities in relation to safeguarding students/apprentices.
- Know the procedures that should be followed if they have a safeguarding cause for concern.
- Know how to access additional information regarding safeguarding.
- Are aware of the key indicators relating to child and adult abuse and/or neglect.
- Support the Company's commitment to safeguarding, child and adult protection.

8. Principles

The Company has a statutory duty to safeguard its students/apprentices.

This Company recognises its legal and moral duty to promote the well-being of students/apprentices and protect them from harm and respond to safeguarding concerns when they arise. We believe that every student/apprentice have, at all times and in all situations, a right to feel safe and protected from any situation or practice that result in them being physically, or psychologically harmed. We agree that we have a primary responsibility for the care, welfare and safety of the students/apprentices in our care, and we will carry out this duty through our day to day practices. In order to achieve this, all employees, in whatever capacity, will at all times act proactively in student/apprentices welfare matters, especially where there is a possibility that a student/apprentice may be at risk of significant harm.

Students/apprentices should be able to:

- Recognise and manage risks in different situations.
- Judge what kind of physical contact is acceptable and what is not acceptable.
- Recognise when their personal safety is threatened and when and where to get help.

We will design systems that will:

- Prevent unsuitable people working with students/apprentices.
- Promote safe practice and challenge poor and unsafe practice.

Students/apprentices worries and fears will be taken seriously if they seek help from an employee. If there are suspicions that a student's/apprentice's physical, sexual or emotional well-being is being, or is likely to be, harmed, or that they are being neglected or abused in any way, appropriate action will be taken. Any concerns will be reported to the Student Safeguarding Officer who make the appropriate referrals.

As a consequence, we:

- Assert that the whole Company is an integral part of the safeguarding processes.
- Accept totally that safeguarding students/apprentices is required and is an appropriate function for the whole Company and wholly compatible with their primary pedagogic responsibilities.
- Recognise that safeguarding students/apprentices while they are with us is a responsibility of the Company as a whole.
- Will ensure through training and supervision that everyone within the Company is alert to the possibility that a student/apprentice is at risk of or suffering harm, and know how to report concerns or suspicions.
- Will designate a senior member of staff (the Apprentice Welfare Officer) who is responsible for liaising with the Operations Director.
- Ensure (through the Operations Director) that all employees with designated responsibility for safeguarding students/apprentices will receive appropriate training.
- Will share our concerns with others who need to know and assist in any referral process.
- Will ensure that all members of the Company who have a suspicion that a student or apprentice may be suffering or may be at risk of suffering significant harm, refer such concerns immediately to the Apprentice Welfare Officer who will liaise with the Operations Director.
- Safeguard the welfare of students/apprentice whilst at the Company, through positive measures to address bullying, especially where this is aggravated by sexual or racial factors, disability or special educational needs, cyber bullying, or internet technologies.

- Will ensure through the recruitment and selection of paid employees that all people who work at the Company are suitable to work with children and adults who need safeguarding.
- Will act swiftly where an allegation has been made that an employee has committed an offence against a student/apprentice, harmed a student/apprentice, or acted in a way that calls into question their suitability for working with students/apprentices.

Any student or apprentice who fails to attend will be reported to the Operations Director in case this is a potential indicator of abuse or neglect.

9. Prevent

It is important that all students/apprentices are protected from the risk of radicalisation. Section 26 of 'the Counter-Terrorism and Security Act 2015' (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

It is the legal responsibility of The Company in its capacity as a provider of further education, to have regard to these duties from 1 July 2015. The duty also requires the Company to 'actively Safeguarding Policy Statement promote' the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Extremism

According to the Government Prevent Strategy, extremism is the "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs."

An individual may become vulnerable to extremist radicalisation through:

- Personal experiences of discrimination developing into outward grievance.
- The promise of increased self-esteem by gaining 'street-cred' or a 'rebel' persona.
- Being targeted by a charming and persuasive person who introduces them to a group that supposedly identifies with them, giving the individual a sense of belonging, identity or community.
- Idolisation of 'adventure' through danger.
- The search for a community and the answers to questions of faith and identity.

Employees and Management should be vigilant of the early signs of radicalisation, such as:

- Idolising violence
- Expressing agreement or sympathy with an extremist ideology
- Secretive or anxious behaviour
- Sudden change in appearance, friendships / peer relationships, or behaviour
- The possession of extremist, military or weapons manufacture, or any other such illegal literature or materials
- Advocating slogans and ideologies of known extremist groups

10. County Lines

The term County lines, as defined by the Government, "is used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons." The impact upon these young people is substantial, with these individuals being subjected to violence, abduction, slavery, addiction etc.

If an apprentice is suspected to become a victim of County lines, then a Notice of Concern form should be submitted to the Designated Safeguarding Officer and should include any information discovered about the person or regions mentioned in the referral. Should the situation be deemed to be a risk to the vulnerable individual then the Police should be notified immediately.

11. E-Safety

The Company recognises the useful nature of Social Networking and E-mail usage; however, usage will be monitored through company servers to ensure that there is no risk of abuse to our employees, students, and apprentices.

Risk of internet abuse use include:

- Online bullying
- Grooming
- Radicalisation

Any activity deemed abusive or harmful will be dealt with according to the Safeguarding policy and will be reported to the Designated Safeguarding Officer – see section 17.

Any distribution of teaching material via images, text or videos will be checked by course leaders, training assessors and the education provider of the Company.

Apprentices and employees will be informed of this policy during induction. It is the responsibility of apprentices and employees to adopt this policy and prevent any abusing or unsafe internet usage.

12. Sexting or Distribution of 'Indecent' Material

The distribution, production or possession of 'indecent' images, shared by themselves or by their peers, of someone under the age of 18 is illegal and will be addressed under the Safeguarding policy.

Consensual Sharing

Any images shared consensually and with no ulterior motive, be it in a joking or romantic context, can be addressed directly with no need to involve the authorities. One on one mentoring will be provided in support of the individuals and informing them of the dangers of sharing such content. In class social development sessions will also be presented for wider safety education of apprentices.

Un-consensual Sharing

Depending on the severity, any images shared without consent and with ill intent will be referred to the Police and/or Children's social care by the Designated Safeguarding Officer. Circumstances where incidents must be referred to the Police and Children's social care if the images:

- Involve an adult engaging in sexual acts with someone under the age of 18.
- Were produced through coercion / blackmail or the result of grooming.
- Involve an individual whose capacity to consent is in question, e.g., special needs.
- Depict the individual involved in sexual or violent acts beyond their developmental stage.
- Involve an individual who is believed to be at immediate risk of danger because of the images. E.g., someone already at risk of self-harm or suicide.
- Involve an individual engaging in sexual acts with someone under the age of 13.

Any distribution of material via images, text or videos will be checked by course leaders and training assessors of the Company. Apprentices and employees will be informed of this policy during induction and reminder information posters on E-

safety and IT acceptable use will be displayed in education and work rooms. The policy will be displayed upon computer login and apprentices will be required to read and agree before being allowed access to our computer facilities. The IT Usage policy will be available to apprentices on the Learner Portal.

13. Female Genital Mutilation (FGM)

In the UK, FGM was deemed a criminal offence in 1985, with it since becoming illegal in 2003 to take a child abroad to have such a procedure done if you are a UK national or full-time resident. Section 5B of the FGM Act 2003 introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their work to the police, where they are either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

The intended victim of such an offence may have no knowledge of it planned. Therefore, it is necessary to take note of anything unusual in her life she might mention, such as:

- A family member or 'cutter' staying with them from abroad.
- Their family planning a 'ceremony' for them to 'become a woman' or to 'prepare for marriage'.
- Having a history of girls being cut in their family; mother, aunt, sister etc.
- Surprise plans to go abroad, or 'home' to visit relatives.

Indicators that FGM may have already taken place are if the girl:

- Is uncomfortable or shows difficulty sitting, walking or standing.
- Requires more time to go to the bathroom.
- Displays changed behaviour, such as depression or anxiety, after an absence.
- Becomes withdrawn within class and from their peers.
- Is reticent to have normal medical examinations.
- May try to speak to someone about it but be embarrassed or too scared to explain fully.

If FGM is suspected, this will be reported to the Student Safeguarding Officer before involving the police and social services if the suspicion is deemed required

14. Designated Roles and Responsibilities

The Designated Student Safeguarding Officer is the Operations Director. In their absence, these matters will be dealt with by the Quality Manager. As the Local authority, it is their responsibility to report safeguarding risks and ensure that allegations are dealt with effectively and efficiently.

It is the responsibility of all employees, students, and apprentices to report anything safeguarding risks that they may have witnessed, or been told, to the Designated Safeguarding officer. They should also be informed if there is an allegation against someone who works with, or is responsible for, children/young adults.

Examples include:

- A crime committed against a child/young adult with the intent to harm or exploit.
- Displaying unsuitable behaviour around children/young adults, leaving their ability to look after their welfare in doubt.
- Causing harm to the child/young adult through their actions or behaviour.

15. Recruitment

In order to ensure that students/apprentices are protected while they are with us, we will ensure that our staff and volunteers are carefully selected, screened, trained and supervised.

We accept our responsibility to follow the guidance set out in the most up to date version of the statutory guidance 'Keeping Children Safe in Education'. In particular, we will ensure that the following checks are satisfactorily completed before a person takes up a position in the Company:

- Identity checks to establish that applicants are who they claim to be including having sight of an applicant's birth certificate, passport and/or driving licence
- Checking academic qualifications, to ensure that qualifications are genuine
- A reference is secured prior to offering employment
- Previous employment history will be examined, and any gaps accounted for

- Appropriate Enhanced Disclosure and Barring Service checks are completed such as a 3-year DBS check for tutors, staff and new recruits.

16. Induction, Training and Teaching

All members of employees who will come into contact with or who will be working with apprentices have completed online safeguarding awareness training by Education Training Foundation (ETF) which includes Prevent Duty and Equal Opportunities.

All new employees will undergo this training as part of their induction, as well as additional training which will give them an overview of the organisation and ensure they know its purpose, values, services and structure, as well as how to identify and report abuse and safeguarding concerns within the appropriate levels of confidentiality.

Apprentices will be taught Safeguarding within the classroom in an effort to prevent potential harm and help them identify and deal with risks through skills and knowledge gained on the course.

Information will also be distributed during Induction, through direct group delivery and external agencies/speakers on:

- Safeguarding
- Health and Safety
- Equality and Diversity
- Health relationships
- Prevent and Radicalisation
- Sexual Health
- Drug/alcohol dependency

Apprentices will be informed of the importance of these policies and are encouraged to let a member of staff or the safeguarding team know if they have any concerns, as well as being reminded through Safer Learning posters featuring the Designated Safeguarding Officer's contact information.

Policy folders such as Safeguarding, Prevent, Equality and Diversity etc. will be made available to apprentices.

17. Dealing with Concerns

It is the responsibility of those working with children and young adults to be vigilant in recognising abuse. A safeguarding cause for concern is an action, observation,

disclosure or discussion that makes an employee feel anxious about the safety or wellbeing of a student/apprentice.

It is important to note that, should an individual disclose information of abuse about themselves, that the receiving party be supportive but not ask any leading questions; only those that clarify. They should be clear that the information/incident will be reported to the Designated Safeguarding Officer who will forward the information to relevant authorities and inform them that further interviews may need to occur. Anything disclosed should be witnessed and recorded by a member of staff, preferably the Designated Safeguarding Officer, and anything recorded should be verbatim of the victim with nothing added or altered due to interpretation.

It is not the responsibility of any employee to investigate any suspicions or concerns that a student/apprentice is at risk of or is suffering significant harm. All suspicions should be reported to the Designated Safeguarding Officer, who will follow the escalation process in place for any safeguarding concerns.

All causes for concern must be recorded and passed to the Operations Director. We will work with any relevant authorities if necessary to investigate these concerns and resolve the issue. Completed records will be treated as confidential and retained by the Student Safeguarding Officer.

18. Conduct of Company Employees

The Company has a duty to ensure that high standards of professional behaviour exist among all employees who come into contact with students/apprentices and that all employees are clear about what constitutes appropriate behaviour and professional boundaries. At all times, employees are required to work in a professional way with students and apprentices.

All employees should be aware of the dangers inherent in:

- Working alone with a student or apprentice
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to and receiving gifts from students/apprentices
- Contacting students/apprentices through private telephones (including texting),
e-mail or social networking websites
- Disclosing personal details inappropriately
- Meeting students/apprentices and families outside Company hours or
Company duties

To avoid such situations employees are encouraged to:

- Treat everyone with respect and dignity
- Keep an appropriate distance to others within the workplace and classroom
- Choose words or actions carefully so they may not be misconstrued
- Encourage good communication between students/apprentices
- Make sure that all student/apprentice interaction is in an open space with others present

It is unacceptable to:

- Use bullying or humiliation against a student or apprentice as a control tactic
- Guarantee to a vulnerable individual that they will keep something secret
- Not acknowledge, report or challenge a vulnerable individual's allegations
- Not challenge any individual using vulgar or inappropriate language
- Keep student's/apprentice's safeguarding or personal information on personal devices
- Not report another member of staff should they witness or have suspicions of unacceptable behaviour or activity on that member's part

19. Allegations Against Company Employees

If anyone makes an allegation that any Company employee may have:

- Possibly committed an offence against or related to a student or apprentice
- Behaved in a way that has harmed or may have harmed a student or apprentice
- Behaved towards a student/apprentice in a way which indicates s/he would pose a risk of harm
- Endangered or is suspected of attempting to endanger a student or apprentice
- Possession of or involvement with sexual material relating to children
- Possession of or involvement with sexually explicit images showing extreme violence toward an individual
- Involved a student or apprentice or child in a sexual relationship
- Groomed a student or apprentice into extremist thinking and potential terrorist acts

Where there is cause for concern about the behaviour of an employee, the Whistle-blowing policy should be consulted in the Company Handbook QD 344 and the Student Safeguarding Officer will handle such allegations.

20. External Speakers

Any external speakers introduced within the teaching programme will be screened and vetted before being allowed access to the facility or contact with the apprentices. Upon gaining access they should wear a visitor badge and be accompanied by a member of staff throughout their visit.

The designated Safeguarding Officer must receive and assess all relevant information about the speaker, as well as any training materials they intend to present, from the event organiser beforehand. This should be done using the External Speaker checklist/approval form as found within the Trip activity and Risk Assessment document.

21. Photographing Students/Apprentices

To maintain students and apprentices' rights to privacy in accordance with Data Protection Act 2018 and GDPR, we will not allow images of students/apprentices to be used on Company websites, publicity, or press releases, without express permission from the student/apprentice (or their parent if the student is under 18). Students will be asked to sign a written consent form (QD 740). If the Company does obtain such permission, we will not identify individual students/apprentice by name without gaining further permission to do so.

22. Confidentiality and Sharing Information

The Company, and all employees, will ensure that all data about students/apprentices is handled in accordance with the requirements of the law and any national and local guidance in relation to data protection, confidentiality and information sharing. Any employee who has access to sensitive information about a student or apprentice or their family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know when there is a legal duty to share information.

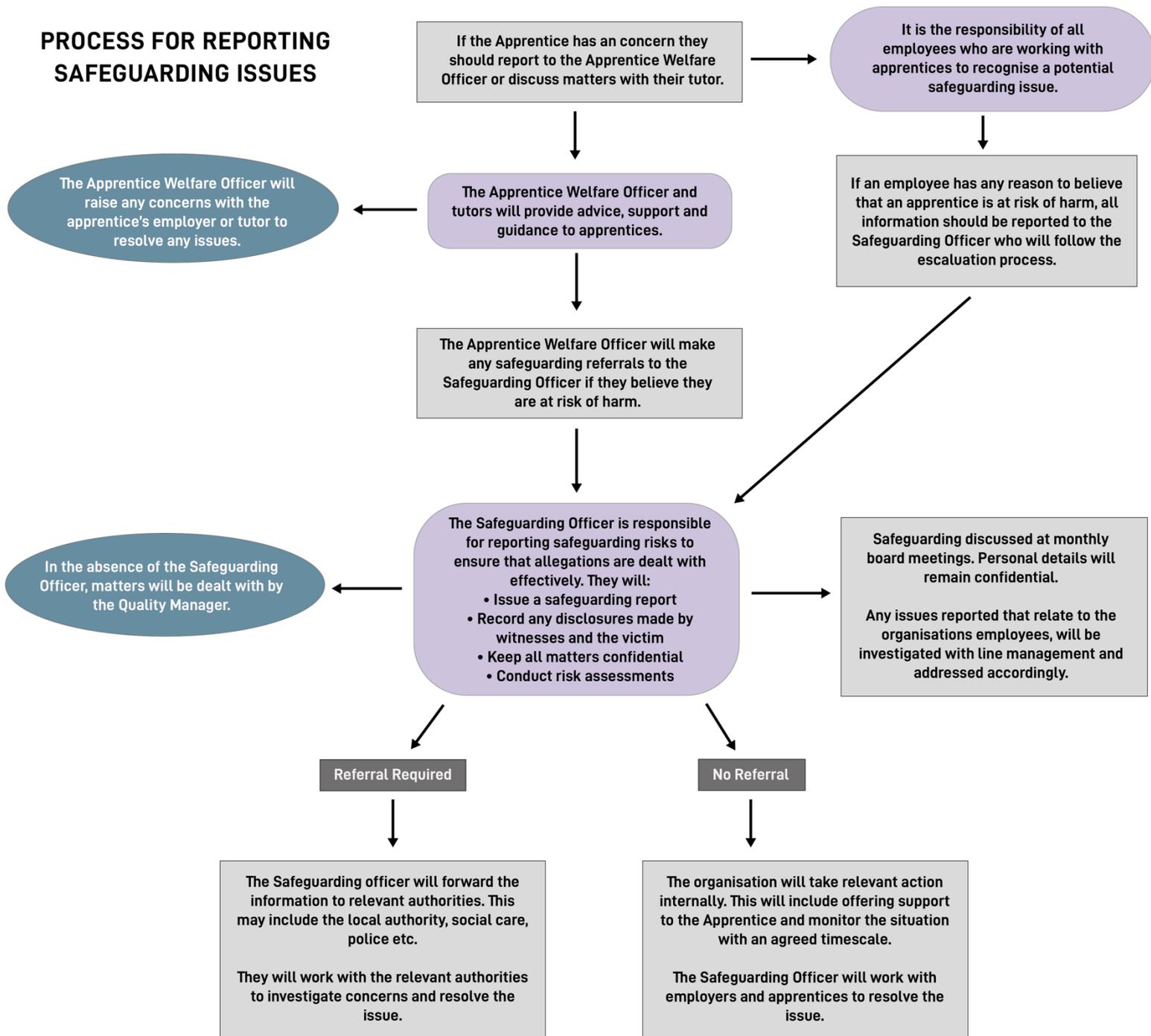
Regardless of the duty of confidentiality, working within the remit of our safeguarding duties, if any employee has reason to believe that a student/apprentice may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the Student Safeguarding Officer.

23. What Happens if the Safeguarding Policy is not Adhered to?

We will not tolerate behaviour which breaches the Safeguarding Policy and will initiate disciplinary or other action, if circumstances warrant, against those who contravene the guidance contained in it.

For related policies and procedures please see Lavender International NDT Ltd. Prevent policy QD 995, Equality and Diversity Policy QD 998 and IT acceptable use policy QD 992.

24. Process for Reporting Safeguarding Issues



25. Policy Review Log

This policy is to be reviewed annually with additional updates should new legislation be provided.

Approved/Authorised by:



Tim Armitt
Managing Director



Nicola Dodsley
Operations Director