

Introduction

Lavender International, has safeguarding statutory duties and responsibilities concerning its Apprentices to protect them from any potential harm.

Lavender International believes that it is always unacceptable for a child, young person, or adult to experience abuse of any kind and recognises its responsibility to safeguard and promote the welfare of children, young people, and adults at risk, by a commitment to practice that protects them.

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

This policy should outline appropriate behaviour and procedures for employees and tutors to follow when working with 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 Safeguarding Lead oversees safeguarding concerns and is responsible for passing on relevant information to the Local authority should the incident need immediate action.

We recognise that:

The welfare of the child, young person, or adult at risk is paramount.

All children or adults at risk, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have a right to equal protection from all types of harm or abuse.

Working in partnership with children, young people, and adults at risk, their careers, and other agencies is essential in promoting the young people and adults at risk welfare.

The purpose of this policy is:

To provide protection for the children, young people, or adults at risk who receive Lavender International services, including the children of adult members or users.

To provide staff with guidance on procedures they should adopt if they suspect a child, young person, or adult at risk may be experiencing, or be at risk, harm, or radicalisation.

This policy applies to all staff, including senior managers and any staff working on behalf of Lavender International.

We apply the following 6 principles of safeguarding.

- empowerment (Apprentices being supported and encouraged to make their own decisions and informed consent),
- prevention (better to act before harm occurs),
- proportionality least intrusive,
- response appropriate to the risk presented,
- protection,
- partnership,
- accountability

OUR COMMITMENT

All our employees who work with Apprentices have a crucial role to play in shaping their lives. You have a unique opportunity to interact in ways that are both affirming and inspiring.

This policy has been produced (and is supported by Information, Advice, and Guidance), to help you to establish safe and responsive environments which safeguard all and reduce the risk of you being unjustly accused of improper or unprofessional conduct.

We all have a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society.

The policy aims to ensure you are aware of and understand your responsibilities, and those of others, signs there might be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

The aims of this Policy are:

- Identify the expectations of staff concerning safeguarding.
- Ensure relevant and effective safeguarding practices are in place.
- Ensure the right of every apprentice to learn within a safe environment.
- Promote awareness to the staff of the need to safeguard children, vulnerable adults, and all people and to recognise that safeguarding is everyone's responsibility.
- Ensure that the fundamental rights and needs of our apprentices are observed.
- Prevent abuse through the pastoral support offered to all applicants and apprentices.
- Raise awareness of different types of abuse and children in need issues.
- Provide guidelines for staff in handling matters relating to actual or suspected child abuse.
- Ensure staff act professionally.
- Deter potential, unsuitable individuals from applying to Lavender International by demonstrating our attentiveness and vigilance concerning safeguarding through our website and job advertisements.
- Reject at the interview stage anyone whom we have doubts about the suitability.
- Prevent the risk of abuse by ensuring procedures and standards are in place.



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We will seek to safeguard children, young people, and adults at risk by:

- Valuing them, listening to them, and respecting them.
- Adopting child/adult protection guidelines through procedures and a code of conduct for staff and Apprentices.
- Recruiting staff and Apprentices safely, ensuring all necessary checks are made.
- Sharing information about child/adult protection and good practice with children, parents/carers, staff, and Apprentices.
- Sharing information about concerns with agencies who need to know and involving parents/carers and young people/adults at risk appropriately.
- Providing effective management for staff through supervision, support, and training. Safeguarding and Prevent training will be included in the mandatory induction for staff and will be updated every 3 years.

SCOPE

This policy should be read in conjunction with part 1 of 'Keeping Children Safe in Education September 2023, Contextual Safeguarding (May 2020 update), The Prevent Duty (Departmental advice for schools and childcare providers 2015), and Work-based Learners and the Prevent statutory duty – Guidance for providers (May 2021)

Lavender International recognises that it has a moral and statutory duty under Education Act 2002 and the Children Act 1989 and Section 26 of the Counterterrorism and Security Act 2015 to safeguard and promote the welfare of Apprentices. These documents offer guidance and outline procedures that must be followed in all cases of suspected abuse and situations of serious risk.

It applies to all learners under the age of 18 or those over 18 who are considered to be 'adults at risk'.

A 'child' is anyone under the age of 18 years and up to their 18th.

The term 'vulnerable adult' has been used to replace 'adult at risk'. This is because the term 'adult at risk' may wrongly imply that some of the fault for the abuse lies with the adult abused.

An adult aged 18 years or over 'who is or may require community care services because of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (DH, 2000). This definition is taken from the current Department of Health guidance for local partnerships.



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Additional Designated Safeguarding Officers are listed below –

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Operations Manager -Madeleine Best -:07718235842 Madeleine@lavender-ndt.com

Operations Director – Nicola Dodsley - Nic@lavender-ndt.com

Director Tim Armitt - tim@lavender-ndt.com

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DEFINITIONS

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances.

The Safeguarding Agenda includes a wide range of potential risks.

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Cybercrime
- Domestic abuse
- Substance misuse
- Fabricated or induced Illness
- Faith abuse
- Forced marriage.
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender-based violence
- Radicalisation
- Sexting
- Peer on Peer abuse, including Sexual Harassment
- Relationship abuse, including teenage relationship abuse.
- Trafficking and modern slavery
- Breast ironing
- Mental health concerns
- Sexual violence and sexual harassment, including child-on-child abuse.
- Children missing in education.

A child is defined as anyone under the age of 18. An adult at risk is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or



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personal circumstances. Alongside the Safeguarding Agenda risks above this could be due to, and not limited to any of the following:

- Living in sheltered housing.
- Receiving any form of healthcare.
- Receiving a welfare service to support their need to live independently.
- Receiving a service due to their age or disability.
- Living in residential accommodation such as a care home.
- Receiving domiciliary care in their own home.
- Poor numeracy and literacy skill, or specific learning need.
- English is not a first language.
- Unsupportive employer.
- Under-represented group.
- Acting as a carer for another family member.
- Background in offending or is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Has a disability or social need?
- Has special educational needs (whether they have a statutory Education, Health and Care Plan).
- Lives 'In Care' or has recently transitioned out of Care.
- Is a young carer.
- Is frequently missing/goes missing from care or home.
- Is within a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues domestic abuse, or generally unsupportive.

Types of abuse and neglect

Lavender International uses the following as definitions of abuse for children, young people, and adults at risk of harm, and Lavender International operates a zero-tolerance operation on each of the below:

Abuse: a form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness.

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the developmental capability, as well as overprotection and limitation of



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exploration and learning, or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing victims to frequently feel frightened or in danger, or the exploitation or corruption of other. Additionally, 'revenge porn' has been identified as a specific criminal offence (Criminal Justice and Courts Act 2015).

The Act creates a new criminal offence of disclosing private sexual photographs and films without the consent of an individual who appears in them and with intent to cause that individual distress. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Sexual abuse and harassment: Sexual abuse involves forcing or enticing a child, young person, or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Peer on Peer/Child on Child Abuse: Peer-on-peer abuse includes but is not limited to: physical and sexual abuse, sexual harassment and violence, emotional harm, on and offline bullying and teenage relationship abuse. Peer on peer and child on child-on-child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability, or other differences. It can result in significant, long lasting, and traumatic isolation, intimidation, or violence to the victim.

Up skirting: Up skirting is specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress, or alarm. The revised version of Keeping Children Safe in Education lists up skirting as one example of peer-on-peer abuse.

Sexual Consent: Consent is an agreement between people to engage in a sexual activity. Consent means freely choosing to say 'yes' to a sexual activity. It's needed for any kind of sexual activity, from touching or kissing to intercourse. It's always clearly communicated - there should be no mystery or doubt. There are laws around who can consent and who can't. Without consent, any sexual activity is against the law and can be harmful.

Neglect: Neglect is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment).



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- protect from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate care-givers) or
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under-reported or challenged concern.

Forced Marriage: This involves a young person, or adult at risk of harm being forced into a marriage against their will.

Child Sexual Exploitation: Child sexual exploitation (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 that is often misunderstood by victims and outsiders as consensual. Although the victim can indeed be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited (Barnardo's 2012).

Gang Culture/County Lines: County lines is a form of criminal exploitation where urban gangs persuade, coerce, or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns, and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse. Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime.

Domestic Violence: The Home Office defines domestic violence as, "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance, and escape, and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation intimidation, or other abuse that is used to harm, punish, or frighten their victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable. Other forms of abuse or behaviour put children at risk; the links below provide useful information.

Female Genital Mutilation: This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

Financial or Material Abuse: This applies to largely adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Bullying: Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as Lavender International operates a zero-tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- 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.
- Online: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people and adults may experience cyberbullying, grooming, sexual abuse, sexual exploitation, emotional abuse, financial abuse, or identity fraud.

Cyberbullying involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, X and WhatsApp are used by cyberbullies to put out their communications. Who is most at risk? Children using social media unsupervised. Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

- Flaming online fights usually through emails, instant messaging, or chat rooms where angry and rude comments are exchanged.
- Denigration putting means online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- Exclusion intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
- Outing sharing secrets about someone online including private information, pictures, and videos.
- Impersonation tricking someone into revealing personal information then sharing it with others.
- Harassment repeatedly sending malicious messages to someone online.



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Cyberstalking Continuously harassing and denigration including threats of physical harm.

To reiterate, Lavender International operates a zero-tolerance policy against all types of abuse, please see Bullying and Harassment Policy (AQD 20) for more information.

Safeguarding Children

In relation to 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 always issued by the Secretary of State.

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.

Safeguarding Adults

In relation to 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 the 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 are 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 to any person who is aged 18 or over and



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at risk of abuse or neglect because of their need for care and support. Such concerns will be referred to the appropriate authorities, such as the Adult Social Care team.

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 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.

Principles

Lavender International has a statutory duty to safeguard all apprentices.

Lavender International recognises its legal and moral duty to promote the well-being of apprentices protect them from harm and respond to safeguarding concerns when they arise. We believe that every apprentice has, always and in all situations, a right to feel safe and protected from any situation or practice that results in them being physically, or psychologically damaged.

We agree that we have primary responsibility for the care, welfare, and safety of the Apprentices in our care, and we will carry out this duty through our day-to-day practices. To achieve this, all employees, in whatever capacity, will always act proactively in the Apprentice's welfare matters, especially where there is a possibility that an apprentice may be at risk of significant harm.

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 from working with the apprentices.
- Promote safe practices and challenge poor and unsafe practices.

Apprentice worries and fears will be taken seriously if they seek help from an employee. If there are suspicions that an Apprentices 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 Designated Safeguarding Lead in the first instance who will liaise with the Operations Director to make any appropriate referrals.



Consequently, we:

- Assert that the whole Company is an integral part of the safeguarding processes.
- Accept totally that a Safeguarding apprenticeship is required and is an appropriate function for the whole Company and wholly compatible with their primary pedagogic responsibilities.
- Recognise that safeguarding 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 an Apprentice is at risk of suffering harm and knows how to report concerns or suspicions.
- Will designate a senior member of staff (The Designated Safeguarding Lead) who is responsible for liaising with the Operations Director.
- Ensure (through the Operations Director and quality manager) that all employees with designated responsibility for 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 an apprentice may be suffering or may be at risk of suffering significant harm, refer such concerns immediately to the Designated Safeguarding Lead who will liaise with the Operations Director.
- Safeguard the welfare of apprentices 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, cyberbullying, 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 offense against an apprentice, harmed an apprentice, or acted in a way that calls into question their suitability for working with apprentices.

Any apprentice who fails to attend the sessions planned and is uncountable will be reported to the Designated Safeguarding Lead in case this is a potential indicator of abuse or neglect.

Prevent

All Apprentices must be protected from the risk of radicalisation. Section 26 of 'the Counterterrorism 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".



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It is the legal responsibility of Lavender International 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.

Radicalisation and Prevent Radicalisation

is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views. At Lavender International, we are fully committed to safeguarding and promoting the welfare of all apprentices and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

At Lavender international all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The principal objectives of this policy are that: All staff will understand what radicalisation and extremism are and why we need to be vigilant. All apprentices and staff will know that Lavender International has policies in place to keep them safe from harm and that Lavender International regularly reviews its systems to ensure they are appropriate and effective.

Lavender International staff promotes respect, tolerance, and diversity. Apprentices and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others. It is recognised that apprentices or staff with low aspirations are more vulnerable to radicalisation and, therefore, we strive to equip our apprentices and staff with confidence, self-belief, respect, and tolerance as well as setting high standards and expectations for themselves.

Apprentices and staff are briefed during induction and as part of ongoing standardisation and training; about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the Internet.

Lavender International staff, undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties. Through various training opportunities within Lavender International we ensure that our staff are fully aware of the threats, risks, and vulnerabilities that are linked to radicalisation; and are aware of the process of radicalisation and how this might be identified early on.

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."



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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.

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 forms 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 on these young people is substantial, with these individuals being subjected to violence, abduction, slavery, addiction, etc.

If an apprentice is suspected of becoming 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 and Designated Safeguarding Officer should be notified immediately.

Some of the signs of county lines involvement and exploitation are:

- A person meeting unfamiliar adults or a change to their behaviour.
- The use of drugs and alcohol.
- Acquiring money or expensive gifts they can't account for.
- Lone children from outside of the area.
- Individuals with multiple mobile phones, tablets, or 'SIM cards.
- Young people with more money, expensive clothing, or accessories than they can account for.



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- Unknown or suspicious-looking characters coming and going from a neighbour's house.
- Relationships with controlling or older individuals or associations with gangs.

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 apprentices or employees.

Risks 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 for the company - see Dealing with Concerns.

Any distribution of teaching material via images, text, or videos will be checked by course leaders and tutors.

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 abuse or unsafe internet usage.

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 inform 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.



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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 the course leader, tutors, and the education provider 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.

Femal Genital Mutilation (FGM)

In the UK, FGM was deemed a criminal offence in 1985, with it 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 that requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in those under 18s whom 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 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 the 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.



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If FGM is suspected, this will be reported to the Designated Safeguarding Lead who will liaise with the Lead Provider before involving the police and social services if the suspicion is deemed required.

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

How to respond to signs or suspicions of abuse

All Lavender International staff should report their concerns to a member of the Lavender International Safeguarding Team, there will always be a member of the designated safeguarding team available to respond to any allegations/suspensions/concerns of abuse.

The safeguarding team includes members of the senior management team. All members of the team will receive training to carry out these roles and this will be reviewed and updated regularly.

Sometimes concerns about a child/adult may not be about abuse. You may be concerned that a child or family may need some help in making sure all a child/adult's needs are met or to address a particular problem. Examples of this might be where a child is suffering because of poverty, getting into trouble in the community, or has a disability and needs extra help. In these instances, staff would still be expected to ask for advice from a member of the safeguarding team.

How to respond to a child/young person or adult telling you about abuse

What to do:

- stay calm.
- listen, hear, and believe.
- ask open-ended questions for clarification only.
- give the child/young person/adult time to say what they want.
- reassure and explain that they have done the right thing in telling. Explain that only those people who need to know will be informed.
- act immediately following the procedure in this policy.
- record in writing as near as verbatim as possible what was said as soon as possible.
- report to a member of the safeguarding team.
- consider their immediate safety.

What not to do:

- do not over-react. It is extremely unlikely that the child/young person/adult is in immediate danger.
- do not probe for more information, questioning the child/young person/adult may affect how their disclosure is received later.
- do not make assumptions, paraphrase, and do not offer alternative explanations.
- do not promise confidentiality to keep.
- do not make negative comments about the alleged abuser.
- do not 'gossip' or disclose any information with colleagues about what has been said to you.
- do not make the child/young person/adult repeat the story unnecessarily.



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It is the duty of anyone who works with children/young people/ adults to report and record disclosure of abuse. A cause for concern form must be completed, and the required processes followed.

It is not for staff to decide whether a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with according to this procedure. If the disclosure is made by a parent/guardian/carer, you should follow the same procedure and refer them to a Designated Safeguarding Lead.

Individual staff should never deal with abuse disclosures in isolation and should always refer to a Designated Safeguarding Lead with responsibility for child/adult protection. The decision whether to report suspected abuse to Social Services or the Police will be made collectively by the Safeguarding Team.

No member of staff should give an apprentice their personal phone number, email address, or home address or have a 'Facebook' link with a learner.

Lavender International will:

- Provide a safe environment for children, young people, and adults at risk of harm to learn in.
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agents.
- Work effectively with others as required by 'Working Together to Safeguard Children (2022).

Lavender International will approve and review policies and procedures:

- Ensuring systems are in place and effective in relation to the identification of children, young people and adults at risk of harm, and procedures for reporting concerns are widely known.
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with apprentices.
- Ensuring safe recruitment of staff.
- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding and Prevent.
- In developing policies and procedures, Lavender International will take account of guidance issued by the Department for Education, Ofsted and other relevant bodies and groups including Bristol Local Safeguarding Children Board.

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



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discussion that makes an employee feel anxious about the safety or wellbeing of an apprentice.

It is important to note that, should an individual disclose information of abuse about themselves, 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 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 cause for concern must be recorded and passed to the DSL and 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 Operations Manager.

Once a referral is made to the Designated Safeguarding Lead

The Designated Safeguarding Lead will make an initial assessment of the allegation; and consult with the staff involved and other designated staff as appropriate. This will usually involve speaking to the learner at the earliest opportunity. The priority is to ensure that the apprentice is not in any immediate danger. Designated staff will seek medical attention if the Apprentice is suffering from a serious injury.

The Apprentice may be asked to repeat the disclosure they have made. Every effort will be made to communicate with the apprentice in a way that is appropriate to their age, understanding, and preference. This is especially important for learners with a disability or those whose preferred language is not English.

The apprentice will be asked if there are younger children or any other adults who might also be at risk. however, the Designated Safeguarding Lead will avoid asking leading questions and will not attempt to investigate the allegations. A written account will be made of the disclosure and the context, and the apprentice may be asked to sign it.

If the apprentice wishes to take the allegation forward, the DSL should support the apprentice in contacting Social Services, the Police, or the NSPCC. When an apprentice is not sure about taking the allegation forward, the Designated Safeguarding Lead can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.



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Following consultation, the will Designated Safeguarding Lead asks for the apprentice's views, if they can understand the significance and consequences of a referral to Social Services or the Police (or Forced Marriage Unit or Counter-Terrorism Team).

It remains the responsibility of the Safeguarding Team to take whatever action is necessary to ensure the apprentice's safety and that of any other children or adults who may be at risk. This may on occasion involve a referral against the wishes of the apprentice involved.

Where practicable, concerns will be discussed with a parent or guardian unless this may, either by delay or the behavioural response it may prompt, place the apprentice at risk of harm. The apprentice's view will also be considered in deciding whether to contact their parent/guardian. A written record will be made of any discussion with parents/carers or guardians.

In the event of a decision to report, a member of the Safeguarding Team should inform the apprentice of the proposed action and the reasons for the decision. Ideally, this should happen before the appropriate agency is informed unless doing so would place the young person/adult at greater risk.

The Designated Safeguarding Lead should contact the Social Services Department of the appropriate local authority by telephone in the first instance and record the date and time that this took place. The Designated Safeguarding Lead will agree with the recipient of the referral on what the apprentice and parents/carers will be told, by whom, and when. The Designated Safeguarding Lead will make a confirmation of the referral in writing within 48 hours.

All concerns, discussions, decisions made and reasons for those decisions will be recorded. Written records will be kept confidential in a securely locked location and in accordance with the Data Protection Act/GDPR. However, where the police are involved then such records may need to be disclosed.

There may be instances where more than one member of the designated staff will be involved in a particular disclosure. On occasion, they may work collaboratively to deal with a case.

Confidentiality

The legal principle that the "welfare of the child is paramount" means that taking action to safeguard the child, or young person is most important. Privacy and confidentiality should be respected, but if doing nothing leaves a child at risk of harm, the child's safety must come first. So legally, it is fine to share information if someone is worried about the safety of a child/adult.

When a concern or worry is raised, not everyone needs to know about it.

This respects the child/adult's, family, and or staff's rights to privacy.

The Safeguarding Lead:

- Will be a member of the senior management team.



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- Will deal with any concerns raised against the Designated Safeguarding Lead.
- Will ensure the organisation's safeguarding policy is implemented, and monitored and that safeguarding practices are regularly reviewed and evaluated.

Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, and tutors whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm.
- Possibly committed a criminal offence against or related to a child, young person or adult at risk of harm.
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm.

Following an allegation of abuse against a member of staff, or tutor, the Designated Safeguarding Lead would inform the appropriate authority (LADO, Police, etc). The member of staff, or tutor would either be suspended or not offered any further work until the outcome of the allegation is confirmed.

Tutors must inform a DSL if an apprentice does not show up to a: session, 1-2-1 or review that they have booked, immediately. The DSL will then contact the apprentice and obtain reasoning for their absence. The DSL will make contact within 30 minutes of the report – if unsuccessful in contacting the apprentice, their emergency contact will be contacted to ensure the safety and wellbeing of the apprentice.

Ref: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Designated Roles and Responsibilities

Our Designated Safeguarding Lead on the Senior Management Team has lead responsibility and management oversight and accountability for children/adults at risk protection and, together with the Senior Management Team, will be responsible for coordinating all Apprentice protection activity. In the absence of the DSL, the Designated Student Welfare Officer and DDSL will pick up these actions.

The Designated Safeguarding Lead will lead (where applicable) regular case monitoring reviews of vulnerable children/adults at risk.

These reviews must be evidenced by minutes and recorded in case files.

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It is the responsibility of all employees and apprentices to report anything safeguarding risks that they may have witnessed, or been told, to the Designated Student Welfare Officer or 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.



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- 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.

Recruitment

To ensure that 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'. 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 before offering employment.
- Previous employment history will be examined, and any gaps accounted for.
- Appropriate Enhanced Disclosure and Barring Service checks are completed.

SAFER RECRUITMENT

Recruitment and Selection

Lavender International aims to recruit and develop skilled and motivated staff who will deliver outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. Lavender International is committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects its staff to share this commitment.

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults. All members of staff, and Tutors working with children, young people, or vulnerable adults, present on site, must have a current Enhanced DBS (within 3 years) and submit a copy to the Designated administrator coordinator and be authorised and checked by two directors. All members of staff, consultants, and trainers working in settings with children, young adults, or vulnerable adults, present on site, must have completed PREVENT and safeguarding in the last year. This will be checked as part of occupational competency.

The Safeguarding Children and Safer Recruitment in Education guidance which came into force on 1st January 2011, recommends that in addition to the various staff records that are kept as part of normal business, Lavender International will keep and maintain a single central record of recruitment and vetting checks. (Lavender International will apply principles of Safer Recruitment to staff working with children, young adults, and adults at risk of harm as part of their apprenticeships. It will be the employer/ workplace's



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responsibility to ensure that their staff and volunteers have the relevant DBS disclosures. Lavender International will not undertake DBS checks for apprentices.

Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place. The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made by the Directors of Lavender International. Lavender International reserves the right to take up references for all members of staff, or tutors. All members of staff and tutors working in settings with children, young people, or vulnerable adults, present on site, must have two references.

DISCLOSURE AND BARRING SERVICE CHECKS

All our staff receive an Enhanced DBS Check

Induction, Training, and Teaching

All members of staff who will encounter or who will be working with apprentices have completed online safeguarding awareness training by the 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 sessions 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, on:

- Safeguarding
- Health and Safety
- Equality and Diversity
- Health relationships
- Prevent and Radicalisation
- 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 all apprentices.

Conduct of Company Employees

The Company must ensure that high standards of professional behaviour exist among all employees who encounter students and that all employees are clear about what constitutes appropriate behaviour and professional boundaries. At all times, employees are required to work professionally with apprentices.

All employees should be aware of the dangers inherent in:

- Working alone with an apprentice
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to and receiving gifts from students
- Contacting students through private telephones (including texting), e-mail, or social networking websites
- Disclosing personal details inappropriately
- Meeting students 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 from others within the workplace and classroom.
- Choose words or actions carefully so they may not be misconstrued.
- Encourage good communication between students.
- Make sure that all student interaction is in an open space with others present.

It is unacceptable to:

- Use bullying or humiliation against an 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 Apprentices 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.

Allegations Against Company Employees

If anyone alleges that any Company employee may have:

- Possibly committed an offense against or related to an apprentice.
- Behaved in a way that has harmed or may have harmed an apprentice.
- Behaved towards a student in a way that indicates s/he would pose a risk of harm.
- Endangered or is suspected of attempting to endanger an 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



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- Involved an apprentice or child in a sexual relationship.
- Groomed an 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 and the Student Welfare Officer will handle such allegations.

External Speakers

Any external speakers introduced within the apprenticeship 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.

Photographing Students

We will not allow images of Apprentices to be used on Company websites, publicity, or press releases, without express permission from the Apprentice (or their parent if the Apprentice is under 18). From March 2019, Apprentices will be asked to sign a written consent form (QD 740). If the Company does obtain such permission, we will not identify individual students by name without gaining further permission to do so.

Confidentiality and Sharing Information

The Company, and all employees, will ensure that all data about students is handled under 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 an 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 may be suffering harm, or be at risk of harm, they must forward this information without delay to the Designated Safeguarding Lead.

What Happens if the Safeguarding Policy is not adhered to?

We will not tolerate behaviour that 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 AQD 93, Equality and Diversity Policy QD 998 and IT acceptable use policy QD 992.



Policy Review Log

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

Issued by: *Julie Goodfellow*

Title: QUALITY MANAGER

Date: 09/04/2024

Authorised/Approved by:

Nicola Dodsley

Title: OPERATIONS DIRECTOR

Date: 09/04/2024