



act.

Safeguarding Handbook



Contents

Commitment to safeguarding and acting in the best interests of the learner	2
Key definitions	3
Procedures for dealing with and referring concerns	5
What staff need to know and look out for	6
What staff should do if they have a concern	Error! Bookmark not defined.
Individual staff/volunteers/other adults - main procedural steps	7
On site provision for listening to learners	8
Definitions of abuse	9
A learner missing from education (school's provision and jgw+)	10
Female genital mutilation (fgm)	11
7: prevent duty and referral to channel	13
Child sexual exploitation (cse)	15
Forced marriage	16
Arrangements for dealing with peer-on-peer abuse, including sexting and any other relevant issues, and how victims are supported	16
Support to learners and staff	17
Referral to the disclosure and barring service (dbs/ewc)	19
E-safety	20
Roles and responsibilities	0
Procedures for dealing with inappropriate/illegal internet access or material	0
Safeguarding procedures for learners on trips and visits away from act sites	0
Records and monitoring	1
Confidentiality	1
Appendix 1 - indicators of radicalisation	2
Appendix 2 - contact details for local services	5
Appendix 3 – suicidal thoughts/behaviour	6
Appendix 4 – self-harm	7
Appendix 5 – homelessness	8
Appendix 6 – covid 19	9



Commitment to Safeguarding, and acting in the best interests of the learner

ACT are committed to ensuring the safety and welfare of all learners. ACT recognises that Safeguarding and promoting the welfare of our learners is everyone's responsibility and we are committed to acting in the best interest of our learners at all times.

All staff have a duty to recognise, react, respond and report disclosures or concerns and work collaboratively in a multi-agency approach. All colleagues should make sure that their approach is at all times learner centred to address risks and prevent situations from escalating. This means that staff should consider at all times, what is in the best interest of the learner.

This policy and these procedures will have priority over all other policies and procedures. Our policy should be read in conjunction with Welsh Government guidance document no: 283/2022 [Keeping Learners Safe](#).

The key principles which underpin this document are contained in the:

- The Equality Act (2010)
- The Counter-Terrorism Act (2015)
- Section 175 of the Education Act (2002)
- The Protection of Freedom Acts (2012)
- Human Rights Act (1998)
- The Children's Act (1989)
- The Prevent Strategy (2011)
- In safe hand: Implementing Adult protection procedures in Wales
- Prevent Duty Guidance for Further Education (2015)
- Wales Safeguarding Procedures
- Regional Safeguarding Board
- Keeping Learners Safe (2022) Circular No: 283/2022
- Safeguarding Children: Working together under the Children Act Circular No:12/2007
- Complaints Procedures for School Governing Bodies in Wales 2012
- Safeguarding Vulnerable Groups Act 2006
- Respecting others: anti-bullying guidance 2003
- Safeguarding Children in Education: handling allegations of abuse against teachers and other staff Circular no:009/2014
- Social Services and Well-being (Wales) Act 2014 (Part 7 of the Act relates to safeguarding)



- Education Safeguarding Guidance Coronavirus (2020)
- Keeping Children Safe in Education (2021)
- Common law duty of care
- The Children’s Rights Framework
- The United Nations Convention on the Rights of the Child (UNCRC)
- The Rights of Children and Young Persons (Wales) Measure 2011
- The Violence Against Woman, Domestic Abuse and SEXUAL Violence (Wales) Act 2015
- Child Practice Reviews: multi-agency professional forums
- Female Genital Mutilation Act 2003

Key Definitions

Child or Children: The Children Act 1989 defines a child as a person under eighteen for most purposes.

Adult at Risk: The new Social Services and Well-being Act introduces the concept of ‘adults at risk’, which is an adult who: “(a) is experiencing or is at risk of abuse or neglect (b) has needs for care and support (whether or not the authority is meeting any of those needs) (c) is unable to protect himself or herself against the abuse or neglect or the risk of it.”

Section 31(9) of the Children Act 1989 states

- **‘harm’** means ill-treatment or the impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another;
- **‘development’** means physical, intellectual, emotional, social or behavioural development
- **‘health’** means physical or mental health
- **‘ill treatment’** includes sexual abuse and forms of ill treatment which are not physical



Significant Harm

Section 31(10) of the Children Act 1989 states that: ‘Where the question of whether harm suffered by a child is significant turns on the child’s health and development, his health and development shall be compared with that which could reasonably be expected of a similar child.

LSO: Lead Safeguarding Officer

DLSO: Deputy Lead Safeguarding Officer

DSP: Designated Safeguarding person

ACT adopts an open and accepting attitude towards our learners as part of its responsibility for pastoral care. Staff encourage learners to feel free to talk about any concerns and to see ACT as a safe place when there are difficulties. Learners worries and fears will be taken seriously and learners are encouraged to seek help from members of staff.

ACT will therefore:

- Ensure that all members of staff are aware of the signs of abuse, neglect and specific safeguarding issues, so that they are able to identify learners who may be in need of help, to report concerns to DSP’s;
- Ensure that staff members always act in the best interests of the learner;
- Ensure that all staff members are aware of the Safeguarding Policy as part of staff induction and revisited regularly, through making the policy accessible on IRIS.
- Provide a safe environment in which learners can learn;
- Establish and maintain an ethos where learners feel secure and are encouraged to talk, and are listened to;
- Ensure that all learners know that there are staff members with whom they can approach if they are worried or are in difficulty;
- Include in the curriculum activities and opportunities for learners to develop the skills they need to stay safe from abuse (including online), and understanding of relationships and sexuality education and to know to whom they can turn for help;
- Have designated safeguarding people (DSP) across all sites to provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services;
- Have a designated safeguarding lead and deputy who will be responsible for safeguarding overall;
- Recognise its duties to learners in need, providing early help and intervention, while also providing support for learners at risk. Early help means providing support as soon as a problem emerges at any point in a learner’s life, from adolescents into adulthood.



In the first instance, staff should discuss early help requirements with a designated safeguarding person (DSP);

- Ensure that when anyone raises a concern about a learner's welfare that a referral (if necessary) is made to the appropriate referral agency; Staff should discuss any potential referral with the designated safeguarding person, who in most instances would make the referral;
- Ensure every effort is made to establish effective working relationships with parents/carers/guardians and colleagues from other agencies where appropriate;
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with learners, including references and appropriate disclosure and barring checks (DBS);
- Ensure that all safeguarding records are kept securely on the approved safeguarding platform, My Concern;
- Adhere to the procedures set out in the Welsh Governments Disciplinary Dismissal Procedure for school staff as appropriate;
- Keep up-to-date records.
- Ensure staff are aware of and follow the School/Provisions Behaviour policy which is aimed at supporting vulnerable learners within the school/provision. All staff will agree on a consistent approach which focuses on needs of the child/young person. The school/provision will endeavour to ensure that the learner knows that some behaviour is unacceptable, but that they are valued and not be blamed for any abuse that has occurred;
- The Behaviour Policy and Safe Touch and Positive Handling Policy (schools provision) also outlines approach to physical intervention and this is reviewed on an annual basis.

Procedures for dealing with and referring concerns

What follows below is ACT's procedure, which should be followed in most instances. However, in an emergency anyone can make a referral where there are serious concerns about a child or adult at risk to the Multi Agency Safeguarding Hub (MASH)

Telephone: **02920 536490 (Cardiff)**

Allegations against a teacher or other adult must be passed on to the Local Authority Designated Officer (LADO).

Telephone: **02922 330900**

Further contact details for other local authorities can be found in **Appendix 2**



What staff need to know and look out for

- All staff must be aware of the systems within ACT which support safeguarding, which are explained to them as part of their induction training, including the Safeguarding Policy and Learner Behaviour Policy (and Safe Touch and Positive Handling Policy within the School).
- All staff must know that the Lead Safeguarding Officer (LSO) for ACT is Charlotte Dando and if the LSO is absent, the Deputy Lead Safeguarding Officer (DLSO) is Adelle Taylor.
- All staff must be aware of the Designated Safeguarding People (DSPs) across ACT:

<p>ACT Schools:</p> <p>Kelly Rowlands (Strategic SG Lead – supports LSO)</p> <p>Amanda Bishop Anthony Leach Kie Baldwin</p>	<p>JGW+:</p> <p>Neil Evans Bethany-Kate Clapp (Provision Leads)</p> <p>Lewis Bowden Hollie Keepings Jonathan Ridout</p>	<p>Apprenticeships:</p> <p>Kate Haines (Provision Lead)</p> <p>Helen Clark Ros Smith</p> <p>CSG Team: Cate Harding-Jones Debra Jones Rosalyn Lovatt</p>	<p>Partners:</p> <p>Melanie Mills Nathan Blackwell</p> <p>Operations: Rob Haines Rebecca Cooper</p> <p>Learning for Work: Lisa Rodrigues Lucy Clark</p>
---	---	---	---

- All staff must be aware of the signs of abuse and neglect to identify those who may be in need (see Definitions of abuse);
- Staff are advised to maintain an attitude of ‘see something, say something’ where safeguarding is concerned.
- All members of staff who are Education Workforce Council of Wales registrants are aware of the Code of Practice for Registrants with the Education Workforce Council and the expectations within the Code that registrant has regard to the safety and well-being of learners in their care and related content.



What staff should do if they have a concern

1. If staff members have any concerns (as opposed to a learner being in immediate danger - see point 5) about a learner, they should raise these concerns via the My Concern system.
2. The concern will be allocated by a provision lead/L(D)SO to a DSP, who will decide on the most appropriate course of action to take and will provide ongoing support and advice to the member of staff who made the referral.
3. If a referral is appropriate, the DSP should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made they can and should consider making a referral themselves, or contact the Lead Safeguarding Officer.
4. If after a referral the learner's situation does not appear to be improving, the DSP (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the learner's situation improves.
5. **If a learner is in immediate danger or is at risk of harm, a referral should be made to children/adult services and/or the police immediately.** Anybody can make a referral.
6. It is important that all parties act swiftly and avoid delays.
7. Detailed records, including times and dates must be provided. The My Concern system will prompt you for this information, which must be completed the same day.
8. In all cases, the best interest of the learner is the primary consideration.
9. A referral to statutory agencies does not require parental consent for children, if there are reasonable grounds to believe that a child is at risk of significant harm.
 - **When is it suitable to inform parents/guardians of an allegation or concern of abuse?** The DSP will use professional judgement regarding the suitability and timing of informing parents and/or guardians.

Individual Staff/Volunteers/Other Adults - main procedural steps

When a learner makes a disclosure, or when concerns are received from other sources:

- Take what the learner says seriously;
- Do not investigate, ask leading questions, examine learner's, **or promise confidentiality;**
- Learner's making disclosures should be reassured and if possible at this stage should be informed what action will be taken next;
- Listen carefully without interrupting;
- Remain calm and do not rush into action that may be inappropriate;



- Reassure the learner that he/she is not to blame;
- If you are in a group situation with a learner, arrange to see him/her on his/her own at the earliest possible opportunity;
- If the learner is in immediate danger or in need of emergency medical care, make sure the relevant emergency service is contacted;
- Let the learner know what you are going to do to help;
- Report what you have been told, it is advisable to do this via the My Concern system, however, you can also speak to a DSP if the concern requires immediate attention. This must always be done on the same day;
- Use the learner's exact words wherever possible. Concerns about abuse must always be recorded;
- Keep the matter confidential to as few people who need to know;
- **If the allegation is about the LSO, the information should be passed to the Strategic Safeguarding Lead (Kelly Rowlands, Head of 11-16 Education);**
- If this has not already been done, inform the learner (or other party who has raised the concern) what action you have taken;
- **If a crime may have been committed, the matter should be reported to the Police.**

On site provision for listening to learners

Learners are able to speak with any member of staff about a concern they may have. Specially trained Designated safeguarding people are located across all sites to provide further advice and guidance when needed.



Definitions of abuse

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse

Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Children/Young people/Adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse

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

Emotional abuse

Persistent emotional maltreatment of a person causes severe and adverse effects on emotional development. It may involve conveying to a person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the person the 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 on a person. These may include interactions that are beyond a person's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the person 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 the person to frequently feel frightened or in danger, or the exploitation or corruption of a person. Some level of emotional abuse is involved in all types of maltreatment of people, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the person is 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 the individual in looking at, or in the production of, sexual images,



watching sexual activities, encouraging children, young person or adult at risk to behave in sexually inappropriate ways, or grooming a person 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.

Neglect

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of the person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a person 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, a person's basic emotional needs.

Potential abuse

Situations where individuals might not have been abused but where social and medical assessments indicate a high degree of risk that they might be abused in the future, including situations where another child/person in the household has been abused, or where there is a known abuser.

Bullying

Any persistent and uninvited behaviour which insults, hurts or intimidates someone (includes cyber-bullying)

Students with ALN

Students with additional learning needs and/or disabilities may be particularly vulnerable to forms of abuse and all staff should be aware of this when they are working alongside ALN learners.

A Learner Missing from Education (School's Provision and JGW+)

Learners absent from compulsory education (schools) are managed in line with the ACT Schools Attendance, and Exclusion policies, however, the information contained within those policies is superseded when a child is on the child protection register.

Notify the local authority's social services team if:



- A learner on the child protection register is excluded, either for a fixed term or a permanently
 - Or
- There is an unexplained absence of a learner on the child protection register of more than two days duration from school (or on day following the weekend)

Although post 16 education is not compulsory, ACT takes learner attendance seriously and staff have a moral responsibility to ensure that learners whereabouts is known at all times. Within the ACT JGW+ provision, lower attendance rates are expected in areas where learners are working on addressing barriers to education.

All staff must follow the ACT attendance policy for unauthorised absence and for dealing with attendance in general. Learners that go missing from education, particularly on repeat occasions should be highlighted to the Learning Coaches.

Female Genital Mutilation (FGM)

This policy has been written with respect to the Government's Multi-Agency Practice Guidelines: Female Genital Mutilation, 1st April 2016, in particular Chapter 9, guidelines for school, colleges and universities.

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for nonmedical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child.
- FGM is illegal in the UK. For the purpose of the criminal law in England, Wales and Northern Ireland, FGM is mutilation of the labia majora, labia minora or clitoris. FGM is prevalent in 28 African countries as well as in parts of the Middle East and Asia.
- FGM constitutes a form of child abuse and violence against women and girls, and has severe short-term and long-term physical and psychological consequences

Possible indicators to be aware that FGM may take place or has already taken place:

The procedure may be carried out when a girl is new born, during childhood or adolescence, just before marriage or during a first pregnancy. The majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls of this age are at higher risk.



It may be possible that FGM will take place when a family elder is visiting from overseas. A professional may hear reference to FGM in conversation, for example a girl may tell other children about it or make reference to a 'special procedure' or attend a 'special occasion to become a woman'.

- A learner may request help from a staff member;
- Parents/guardians/carers may state that they or a relative who will take the child out of the country for a long holiday;
- A girl may have difficulty walking, sitting or standing;
- A girl may spend longer than normal in the bathroom due to difficulties urinating or with menstrual problems;
- There may be repeated absence from training with noticeable behaviour changes (e.g. withdrawal or depression) on their return to learning;
- A girl may be reluctant to undergo normal medical examinations;
- A girl may talk about pain and seek help;
- What to do when you are concerned that a student may be at risk of, or has undergone, FGM;
- If staff have a concern regarding a girl that might be at risk of FGM they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Since 31st October 2015, there has been a mandatory reporting duty placed on teachers that requires a different approach where FGM has taken place (see following section).

Mandatory Reporting Duty

- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining learners, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies;
- Delivery staff must **personally** report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the staff member has a good reason not to, they should still consider and discuss any such case with the designated safeguarding person and involve children's/adult social care as appropriate;



Prevent duty and referral to channel

ACT's SPOC (Single Point of Contact for Prevent) is Adelle Taylor. We consider the risk of radicalisation as a wider part of our safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and forces of extremism. From 1 July 2015 all Education providers are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

Extremism

The Government's Prevent Strategy defines extremism as: "Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces".

To fulfil the Prevent duty at ACT, it is essential that all staff are able to identify learners who may be vulnerable to radicalisation, and know what to do when they are identified. Staff will receive training to ensure they have the ability to understand what may make individuals susceptible to radicalisation, as well as the confidence and ability to raise their concern when someone may be at risk.

At ACT staff are expected to be vigilant in assessing the risk of individual learners or groups of learners being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Through staff training they are made aware of risks affecting children and young people in our area and understand how to identify individual learners who may be at risk of radicalisation and what to do to support them in an appropriate and proportionate way. At the same we are aware through liaison with the local authority and the local police of the increased risk of online radicalisation, as terrorist organisations such as ISIL seek to radicalise young people through the use of social media and the internet in our area.

The Prevent duty does not require teaching and assessing staff to carry out unnecessary intrusion into family life but as with any other safeguarding risk, at ACT, staff must act when they observe behaviour of concern and follow our existing safeguarding procedures.



Procedures for protecting learners at risk of radicalisation

- The Designated Safeguarding People, Including the Lead and Deputy Safeguarding officer at ACT undertake Prevent awareness training and are able to provide advice and support to other members of staff on protecting learners from the risk of radicalisation;
- ACT, in particular the LSO and SPOC, is aware when it is appropriate to make a referral to the Channel programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism;
- Where ACT invites external speakers in to speak to the learners, they are closely supervised throughout their visit. External speakers are risk assessed prior to the visit in compliance with the guest speaker and event guidance;
- At ACT we ensure that learners are safe from terrorist and extremist material when accessing the internet with suitable filtering in place.

Reporting Concerns

Should concerns require support from other agencies there are a number of ways that issues relating to terrorism and extremism can be reported. These include the following:

- Anti-Terrorist Hotline: **0800 789 321**
- Crime stoppers: **0800 555 111**
- Relevant Police force: **101**
- Home Office co-ordinator for Wales
- Prevent Team, Cardiff Bay Police Station: **02920 222111**
- Department for Education dedicated telephone helpline - **020 7340 7264**
www.gov.uk/report-suspicious-activity-to-mi5
www.gov.uk/report-terrorism

Further reading is available in Annex 1



Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or don't take part in education.

Specific Safeguarding Issues (*Keeping Learners Safe - March, 2022*)

- Bullying, including cyber-bullying;
- Child neglect;
- e-Safety;
- Fabricated or induced illness;
- Female Genital Mutilation (FGM);
- Forced Marriage/honoured based violence;
- Gender-based violence/violence against women and girls (VWAG);
- Mental Health;
- Radicalisation;
- Sexting;
- Teenage Relationship Abuse;
- Trafficking;
- Further issues and information on the above can be found [here](#).



Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Education Providers can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role on education providers. Staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk

Arrangements for dealing with peer-on-peer abuse, including sexting and any other relevant issues, and how victims are supported

We recognise that abuse can take many forms including abuse by one or more learner against another learner. This may be an isolated incident or indeed a series of incidents over a period of time.

Colleagues are requested that where there is ‘reasonable cause to suspect that a learner is suffering, or *likely* to suffer, significant harm’, that any such abuse will be reported. In the event of disclosures about learner-on-learner abuse, colleagues are expected to treat all learners involved, whether perpetrator or victim, as being “at risk”. Staff are requested to treat such incidents in the same way as any other safeguarding or bullying matter and follow the procedures set out in this policy.

Bullying

A bullying incident should be treated as a safeguarding concern when there is ‘reasonable cause to suspect that a learner is suffering, or likely to suffer, significant harm.’ Please also see the Anti-Bullying Policy.



The DSP should carry out an investigation into the concern and assess all information available to ACT. The DSP needs to decide the appropriate course of action, including making any multi-agency referrals if necessary. If the DSP, or staff member fear that a learner is in any immediate danger of significant harm arising, then the police should be contacted.

Sexting

"Sexting" is the act of sending, receiving, or forwarding sexually explicit messages, photos, or images via cell phone, computer, or other digital device. These messages, photos, and images are then often being further disseminated through email and internet-based social networking websites well beyond their original intended recipients.

- Sending or receiving a sexually suggestive image or text under the age of 18 is a crime and is considered child pornography and can result in criminal charges.
- Sexting is not acceptable under any circumstances, including 'banter' between learners or between adults.
- Learners who are found to have engaged in sexting must expect to receive a serious ACT sanction, the severity of which will depend upon the specific nature of the incident.
- Those who have been the victim of sexting will be given appropriate support following discussions with their parent/guardian/carer and, where appropriate, relevant external organisations.

Support to learners and staff

Support to Learners

ACT recognises that learners who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such learners' ACT may be one of the few stable, secure and predictable components of their lives. Other learners may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. We will seek to provide such learners with the necessary support and to build their self-esteem and confidence.

ACT recognises that learners sometimes display abusive behaviour and that such incidents must be referred on for appropriate support and intervention.

Complaints or concerns raised by learners will be taken seriously and followed up in accordance with the ACT complaints process.



Learners have access to external helpline numbers via the well-being teams. They can also, in addition to speaking to any member of staff with whom they feel comfortable talking to.

Support for Staff

As part of their duty to safeguard and promote the welfare of learner's staff may hear information, either from the learner as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a safeguarding concern, he/she should in the first instance speak to the Lead Safeguarding Officer about the support he/she requires. The LSO should seek to arrange the necessary support. Staff who are the subject of an allegation of abuse will also receive appropriate support to minimise the stress inherent in the allegations process.

Arrangements for handling allegations of abuse against members of staff

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children, young person or adults at risk has:

- behaved in a way that has harmed a child, young person or adult at risk, or might have harmed a child, young person or adult at risk;
- possibly committed a criminal offence against or related to a child, young person or adult at risk; or
- behaved towards a child, young person or adult at risk in a way that indicates that he or she would pose a risk of harm if they work regularly or closely with that client group.

In the event of the allegation being against a DSP or DSL, the Managing Director will seek professional advice.

Individual Staff/Volunteers/Other Adults who receive the allegation:

1. Write a dated and timed note of what has been disclosed or noticed, said or done;
2. Report immediately to the Lead Safeguarding Officer and/or Strategic Safeguarding Lead. In the absence of the Lead Safeguarding Officer and Strategic Safeguarding Lead, report to the Managing Director.
3. Pass on the written record;
4. The LSO, Strategic Safeguarding Lead or Managing Director will take all necessary steps in reporting and recording of the allegation.



Referral to the disclosure and barring service (DBS/EWC)

ACT will report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a learner. The Head of People and Development will make this report on behalf of ACT.

The criteria used to assess whether ACT should cease using a person's services is set out in full in the ACT Recruitment Policy. Failure to make a report when required constitutes an offence. 'Compromise agreements cannot be used to prevent a referral from being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation.

When a case is concluded, if the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Managing Director, Head of People and Development, Strategic Safeguarding Lead and LSO will decide if a referral to the DBS is required; and in the case of a member of teaching staff whether to refer the matter to the Education Workforce Council (EWC) to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

If ACT is made aware that the Secretary of State has made an interim prohibition order in respect of an individual we will immediately suspend that person from teaching pending the findings of the EWC's investigation. Further details can be found in 'Keeping Learners Safe'.

Website: www.gov.uk/dbs

Barring,

Helpline: 01325 953 795

Email: dbsdispatch@dbs.gsi.gov.uk

Disclosure

Helpline: 0870 9090 811

Email: customerservices@dbs.gsi.gov.uk



E-Safety

ACT acknowledges that new technologies, while enhancing learning opportunities, can provide ways of exposing young people to potentially harmful experiences. All staff must take such abuse seriously. Procedures for E-Safety for staff are outlined below, but all ACT Policies in relation to e-safety are stored via its HR system, IRIS HR.

Guidelines for staff regarding electronic communication

- Only ACT cameras/phones/ipads can be used to take photographs of learners, it is not acceptable that staff use personal mobile phones or personal cameras to take images of learners at any time
- Staff **MUST NOT** accept current learners as friends or request current learners as friends on **personal** social networking sites such as Facebook
- Staff who use social networking sites must ensure that they protect themselves from potential harm by deploying the necessary level of security on their page. Colleagues are reminded of the potentially serious consequences for inappropriate use of mobile and online technologies and the ease in which inappropriate material can be passed on to a very wide audience of people including learners and parents
- Staff should not share their personal mobile telephone number with learners or parents except in an emergency. For trips and visits, sports fixtures and day events, staff are asked under normal circumstances to use an ACT mobile phone for all communication with learners
- Staff may, if appropriate, contact learners using ACT social media accounts regarding academic or pastoral matters only. Colleagues **MUST NOT** contact learners via their personal e-mail address. If a member of staff decides to e-mail a learner using the ACT e-mail system, the following simple guidelines **MUST** be followed:
 - i) All correspondence should, under normal circumstances, be written in a formal style beginning with 'Dear' and ending with 'Yours sincerely' or 'Kind regards'. The e-mail must always be signed using your full name;
 - ii) E-mails sent to learners should under normal circumstances be sent during normal ACT hours (8.30am-5pm);
 - iii) Colleagues **MUST NOT** refer to any other learner or member of staff within the e-mail unless those individuals have given their permission and are copied into the e-mail.
- Colleagues should only e-mail learners about routine matters. E-mails to learners **MUST NOT** display emotion such as displeasure or anger which could unnecessarily



upset a learner or indeed any level of affection that could be misunderstood or misinterpreted by a learner

- Staff may contact parents/guardians/carers using the ACT e-mail system but are **STRONGLY ADVISED** not to contact parents/guardians/carers regarding ACT business from their personal e-mail account:



Roles and Responsibilities

Responsibilities						
Lead Safeguarding Officer (LSO)	Deputy Lead Safeguarding Officer (DLSO)	Strategic Safeguarding Lead (SSL)	Safeguarding Manager (SM)	Head of Continuous Improvement (HCI)	Tier 1 DSP (Lead for provision)	Tier 2 DSP
<ul style="list-style-type: none"> • Chair Strategic Safeguarding Board • Chair School Disciplinary Board • Advise on complex safeguarding cases and take responsibility for determining threshold for referral to statutory agency. • Ensure policies and procedures are up to date and comply with statutory guidance and legislation. • Ensure policies and procedures are communicated effectively. • Manage safeguarding action plan – working with SG Manager and DLSO • Attend CAVC group Safeguarding Meetings. • Contribute to development of CAVC 	<ul style="list-style-type: none"> • Deputise in the absence of the LSO • Chair Operational Safeguarding Board • Lead on the development of Safeguarding supervision. • Sign off on all guest speaker prevent risk assessments. • Prevent lead – lead on all Channel referrals • Ensure the Prevent Risk Assessment is regularly reviewed and updated. • Call emergency Operational Safeguarding Board meetings to review all ‘high risk’ new starts with criminal convictions/any significant incidents. • Support LSO with safeguarding Annual report. • Support the achievement of the SG Action Plan • Quarterly case management – cases 	<ul style="list-style-type: none"> • Escalate issues to critical incident team and chair any critical incident meetings • Ensure ACT has a medium and long-term strategic action plan and vision for safeguarding. • Support LSO with policy development to ensure compliance with statutory guidance and legislation. • Be the Senior Source of professional advice for safeguarding – updating SMT with key information. • Deal with any concerns about the conduct of the LSO. • Effective supervision/mentoring support to the LSO. • Quarterly case management – cases presented by SG Manager 	<ul style="list-style-type: none"> • Work with LSO and DLSO to identify staff training needs. • Develop monthly staff CPD resources. • Develop monthly learner resources for all programmes. • Manage the My Concern system day to day – triaging cases and being first point of contact for Tier 1 DSPs. • Audit the system and hold monthly case reviews with Tier 1 DSP team. • Quarterly safeguarding reports. • Support provided to network DSPs and Partner Manager to ensure consistent approaches to record keeping, policy, CPD etc. • Attend contextualised safeguarding meetings - CAVC. 	<ul style="list-style-type: none"> • Quality assurance of policies, processes and procedures across the ACT network. • Management of any complaints linked to safeguarding concerns, policies, procedures etc. • Support independent investigation of any staff malpractice. • Monitor progress towards the SG Action Plan. • Quarterly case management – cases presented by SG Manager • Line Management of LSO and DLSO • Support and guide LSO, DLSO and SM re: Estyn requirements and preparation for Estyn visits/thematic activities 	<ul style="list-style-type: none"> • Oversight of case management of concerns for the provision. • Working closely with the Safeguarding Manager to ensure all concerns are managed effectively and audit trails accurately reflect action taken. • Attend Operational safeguarding board. • Support the achievement of the SG action plan within own provision area. • Attend relevant case management meetings. • Work with SG Manager to ensure information for statutory referral is submitted in line with statutory guidance timescales. 	<ul style="list-style-type: none"> • Case management of concerns for the provision, and cover during holiday periods or busy times. • Supporting tier 1 DSP and Safeguarding Manager as required with case management. • Attend relevant case management meetings.



Responsibilities						
Lead Safeguarding Officer (LSO)	Deputy Lead Safeguarding Officer (DLSO)	Strategic Safeguarding Lead (SSL)	Safeguarding Manager (SM)	Head of Continuous Improvement (HCI)	Tier 1 DSP (Lead for provision)	Tier 2 DSP
<p>group safeguarding policy.</p> <ul style="list-style-type: none"> • Work with SSO to complete DBS risk assessments – staff • Work with SSO re: case Management of staff safeguarding concerns • Sign off (high risk) risk assessments for new learner starts with criminal convictions. • Support DLSO with prevent risk assessment • Safeguarding Annual Report • Quarterly case management – cases presented by SG Manager • Lead on work towards adherence with Estyn Inspection Framework, and participate in meetings with Estyn for thematic projects, link visits and inspections 	<p>presented by SG Manager</p> <ul style="list-style-type: none"> • Work with the LSO towards adherence with Estyn Inspection Framework, and participate in meetings with Estyn for thematic projects, link visits and inspections 	<ul style="list-style-type: none"> • Advise on complex safeguarding cases in the absence of LSO • Work with LSO to complete DBS risk assessments - staff • Work with LSO in the case Management of staff safeguarding concerns 	<ul style="list-style-type: none"> • Main contact with local safeguarding teams. • Complete risk assessments for new starts with criminal convictions. • Lead on Network DSP events and CSG newsletter. • Ensure DSP refresher training is completed. • Support the achievement of the SG Action Plan • Present cases from across the network at a quarterly case management meeting. • Produce minutes – Strategic Safeguarding Board, Operational Safeguarding Board and case management panels. • Escalate complex cases to LSO • Oversee/support Tier 1 DSP with statutory referral process and outcomes. • Triage and manage all counselling referrals triangulating safeguarding risks 			



Responsibilities						
Lead Safeguarding Officer (LSO)	Deputy Lead Safeguarding Officer (DLSO)	Strategic Safeguarding Lead (SSL)	Safeguarding Manager (SM)	Head of Continuous Improvement (HCI)	Tier 1 DSP (Lead for provision)	Tier 2 DSP
			<p>alongside wellbeing support</p> <ul style="list-style-type: none">• Support LSO/DLSO towards adherence with Estyn Inspection Framework, and participate in meetings with Estyn for thematic projects, link visits and inspections			



Procedures for dealing with inappropriate/illegal internet access or material

ACT has installed web filtering software to ensure the protection of its learners whilst accessing the Internet. It is recognised that no software is infallible and the following procedures will be abided by where necessary. Filtering systems are monitored by iteach on behalf of ACT, however, staff have a responsibility to monitor learner's IT use at all times:

- Discovery of inappropriate websites, by staff or learners, should be reported immediately via the My Concern System. The allocated DSP, in liaison with the Lead Safeguarding Officer will decide on the appropriate course of action;
- Illegal material within the ACT network must always be reported to the Police. Any incident that involves inappropriate adult access to legal material on ACT premises will be dealt with by the ACT disciplinary policy in conjunction with the Police.

Safeguarding procedures for learners on trips and visits away from act sites

ACT recognises the importance of utilising trips and outings to further enhance a learner's learning experience. The safety and wellbeing of learners whilst on these outings are paramount and the staff member arranging the trip/outings needs to ensure the following take place:

- Appropriate risk assessment and authorisation documentation is to be completed and authorised prior to the day of the trip
- Parental consent must be obtained prior to the trip taking place
- The staff member leading the trip must take an ACT phone with them on the trip
- Emergency contact details must be checked and taken on the trip.



Records and monitoring

- Well-kept records are essential to good safeguarding practice. All staff are clear about the need to record and report concerns. The Lead Safeguarding Officer is responsible for such records and for deciding at what point these records should be passed over to other agencies;
- Safeguarding records are stored on the My Concern system and should not be stored anywhere else;
- Open cases on the My Concern system are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon;

Confidentiality

Members of staff have access to confidential information about learners in order to undertake their everyday responsibilities.

- Staff are expected to treat information they receive about learners in a discreet and confidential manner;
- Staff in any doubt about sharing information they hold or which has been requested of them should seek advice from the LSO;
- Staff need to be cautious when passing information to others about a learner.



Appendix 1 - Indicators of Radicalisation

Vulnerability:

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis - Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances - Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations - Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

Access to extremism / extremist influences:

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?



Experiences, Behaviours and Influences:

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/ young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?
- Social Factors
- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?



- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

More critical risk factors could include:-

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

If you have any concerns discuss them with your Safeguarding Lead



Appendix 2 - Contact Details for Local Services

- **Cardiff Children's Services:**
 - Multi Agency Safeguarding Hub (MASH) - 02920 536 490
 - Local Authority Designated Officer (LADO) - 02922 330900
 - Cardiff Adult Services – 02920 234234

- Vale of Glamorgan, Children's Services - 01446 725202

- Vale of Glamorgan Adult Services: 01446 700111

- Caerphilly Children's Services - 0808 1001727

- Caerphilly Adult Services – 0808 1002500

- Newport Children's Services - 01633 851448

- Newport Adult services – 01633 656656

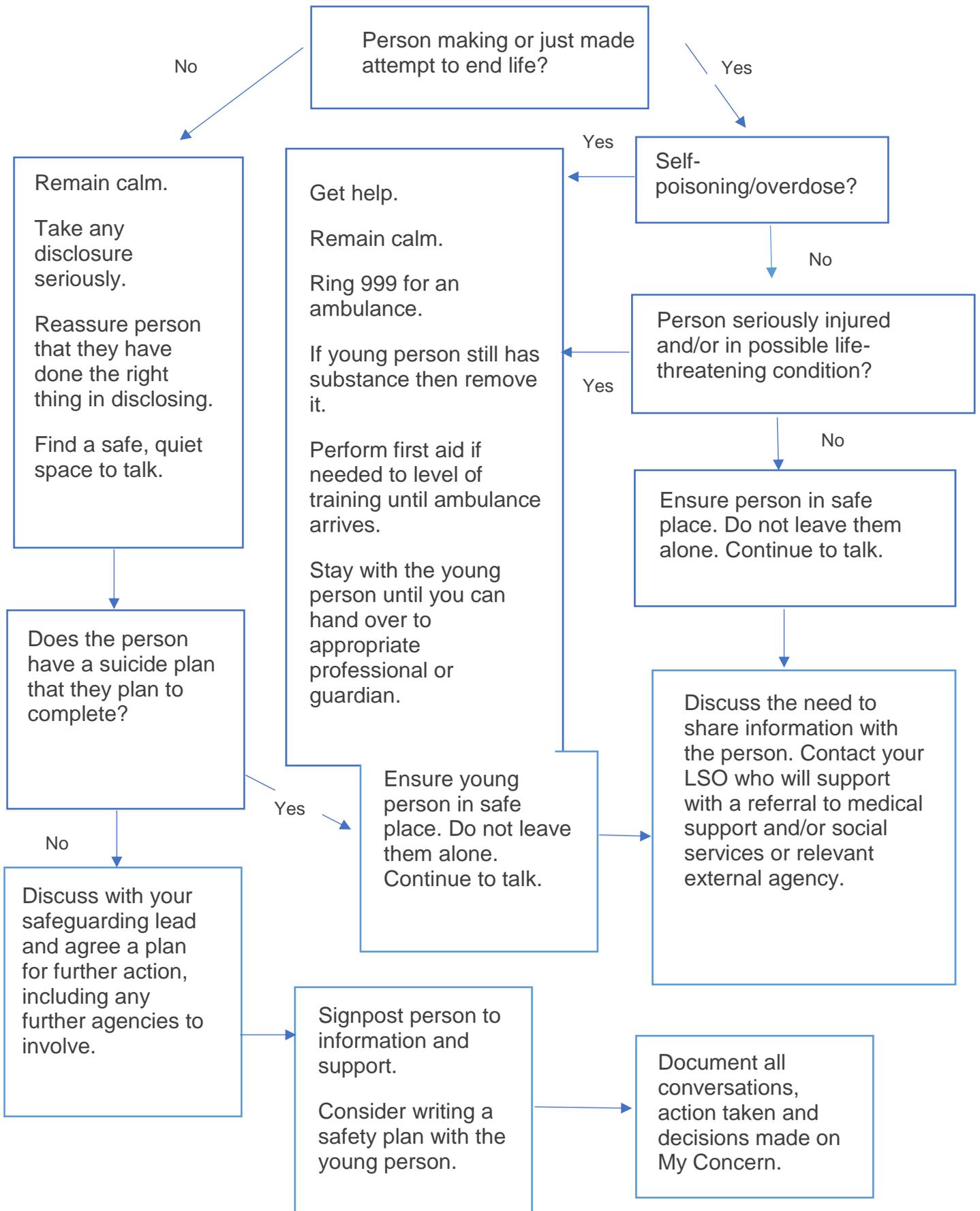
- Rhondda Cynon Taf, Children's Services - 01443 851448

- Rhondda Cynon Taff Adult Services – 01443 742940

- Merthyr Tydfil Adult Services - 01443 742942

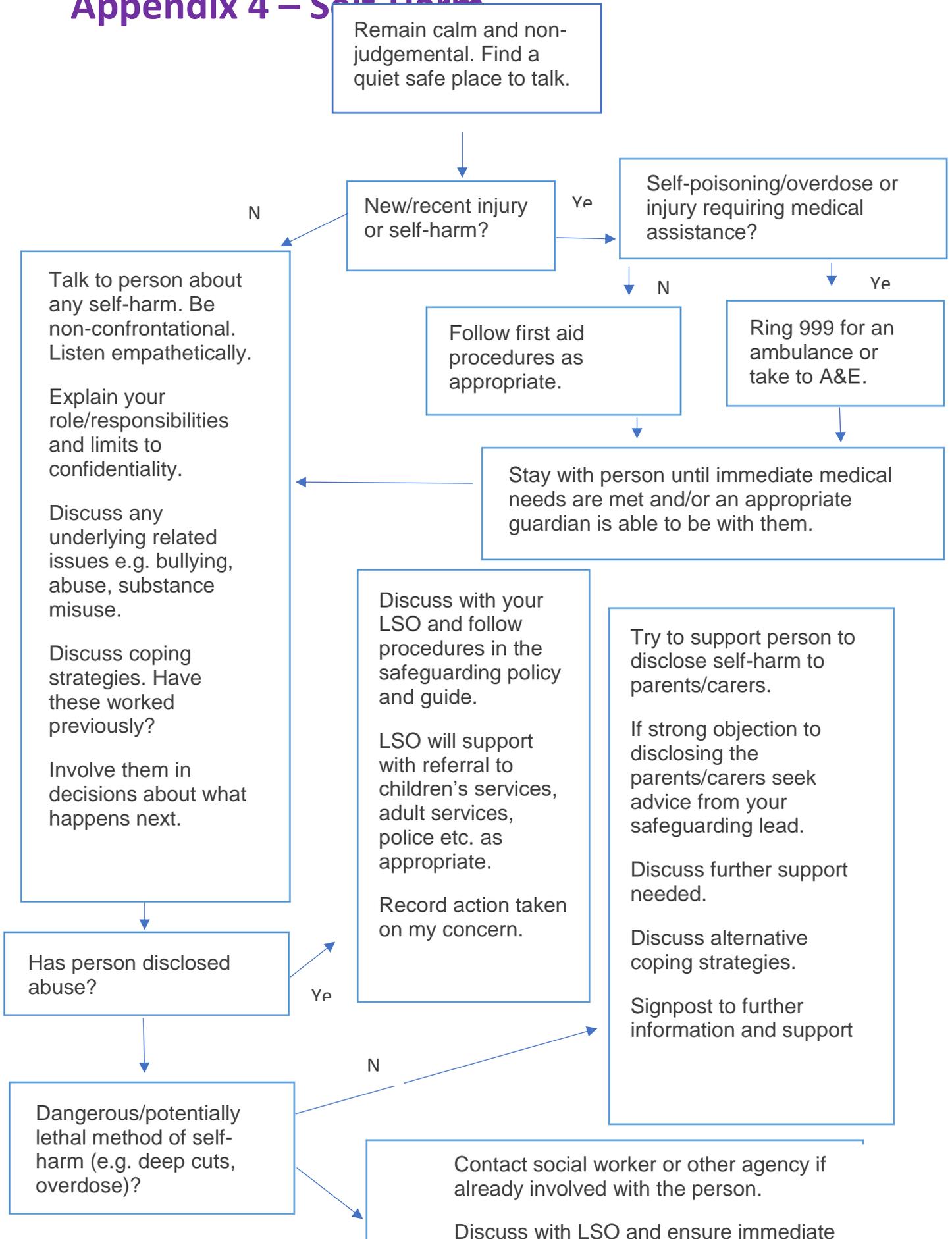


Appendix 3 – Suicidal Thoughts/Behaviour



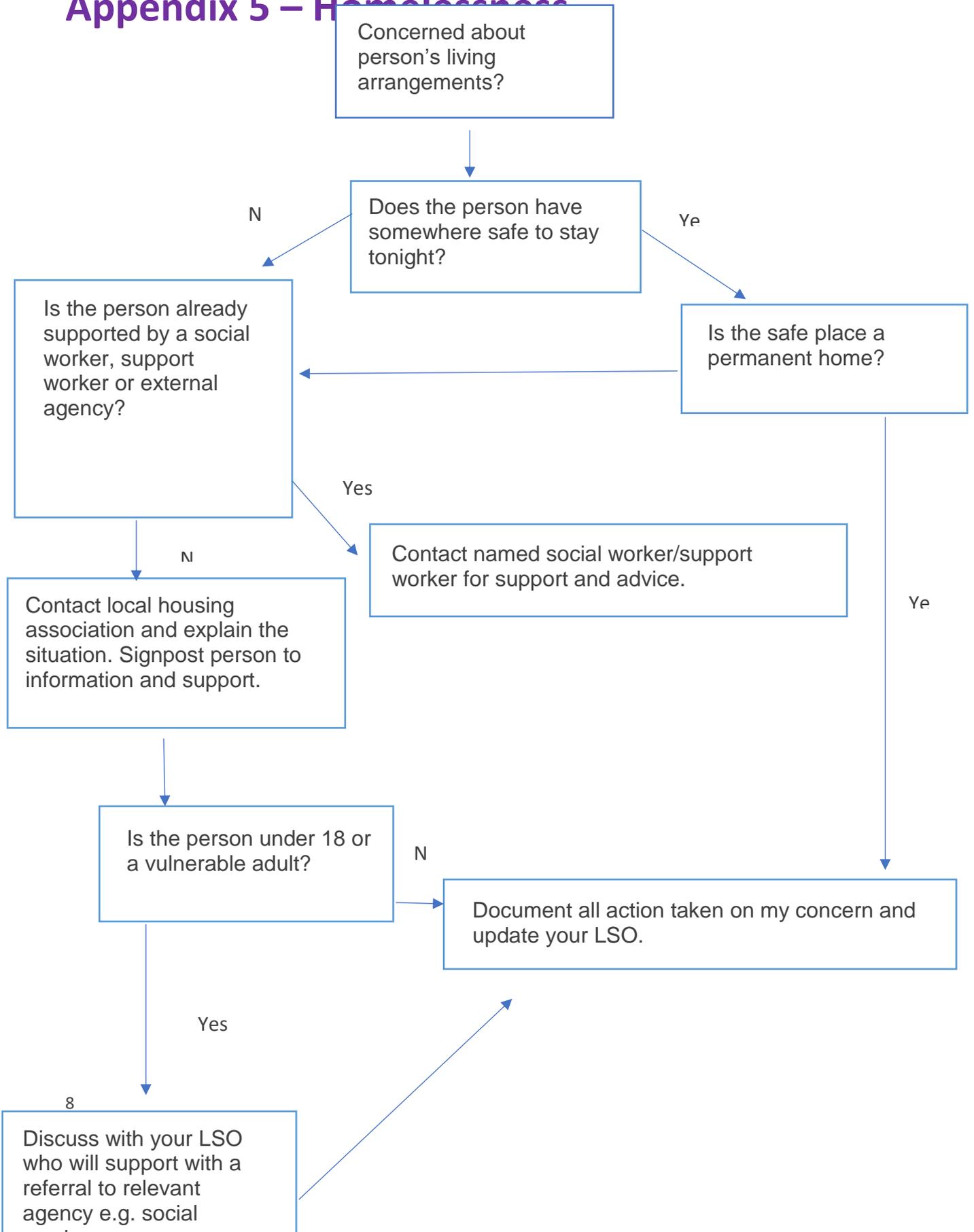


Appendix 4 – Self-Harm





Appendix 5 – Homelessness





Appendix 6 – Covid 19

Safeguarding Guidance during COVID-19

During this time, it is important for us to ensure that we maintain our safeguarding responsibilities (where possible) and continue to provide support to our learners who are most at risk.

Vulnerable Young People and Adults:

The impact of closures will perhaps be felt greatest by the most vulnerable learners. There are probably two key aspects to consider, food and child protection/safeguarding vulnerable adults. Risk assessing individual Learners who are vulnerable should be rated as red, amber and blue. The suggested categories being: Red - most risk of harm or neglect and fewest protective factors (would include those with a child protection plan or a care order) Amber - a moderate risk of harm, but with some protective factors (would include those identified as 'Child in Need' (ALN or disability); and those with a social worker) Blue - some concerns escalating or unmet needs; or have been red or amber and need monitoring.

For adult learners, these risks might include financial issues, domestic abuse, lack of care/support and concerns about mental health and well-being due to self-isolating. Providers need to identify what learners at each level are offered, as an 'intervention' or support. Regular contact by key staff such as Safeguarding Officers, Tutors/Assessors and Attendance and Well-being Officers should be maintained where possible.

- Where phone calls to learners are made, these should be done using company phones where possible.
- All contact or support with vulnerable learners and families should be recorded during closures on My Concern or vision.
- Remember, if your My Concern screen is visible in a non-secure area, it is a data breach, so staff need to ensure the information remains confidential.
- Social workers and other professional support staff who are working with red and amber learners should be kept informed of any concerns or issues. This is especially important, since for many learners, education is a protective factor and when it is missing, the risk may increase and children's services may need to reassess the case.
- For some learners and their families, coronavirus may lead to unemployment or redundancy and Providers should be alert to the potential stress and loss of income. For these parents and learners, it may be important to understand where to signpost them to get support, including from third-sector organisations.



- Providers should ensure that confidentiality is maintained, particularly when supporting learners online and via phone. It is important to ensure that all staff have the correct DBS checks in place particularly where there are staff shortages and changes to typical role.
- DSP's should be providing remote help and support to staff dealing with learner concerns at all times.
- Safeguarding concerns and processes remain the same during this time.

Live Webcams in teaching and learning - safeguarding issues to consider:

Where teaching and learning needs to take place electronically a webinar or pre-recorded video is a safer option. We advise against the use of webcams with learners where possible as this poses potential safeguarding issues. Where this cannot be avoided the following guidance should be followed:

- No 1:1s, groups only – for traineeship learners and schools.
- Staff and learners must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background.
- The live class/session/review should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed.
- Live classes/session/review should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Providers should risk assess the use of live learning using webcams.

Apprenticeship learners:

- If a web cam meeting or review is essential, the staff member needs to follow the above guidance, with the exception of the first bullet point.

For any questions or concerns please contact:

Charlotte Dando, Lead Safeguarding Officer - 07921821365



act.