



Safeguarding Policy





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1. Policy intent:

The key strategic aim of this policy is to safeguard the welfare of Aspiration Training stakeholders by taking all reasonable steps to protect them from harm. Aspiration Training is fully committed to this policy and accepts its corporate responsibility for the safety and wellbeing of its stakeholders, including children, young adults and adults at-risk.

2. Scope of policy:

This policy applies to all activities undertaken by Aspiration Training. This policy and procedure cannot be viewed in isolation and must be read in conjunction with the following documents and policies:

- [Keeping Children Safe in Education \(DfE, 2021\)](#)
- [Ofsted Review of Sexual Abuse in Schools and Colleges \(Ofsted, 2021\)](#)
- [Sexual Violence and Sexual Harassment between Children in Schools and Colleges \(DfE, 2021\)](#)
- [Ofsted Education Inspection Framework \(2020\)](#)
- [Care and Support Statutory Guidance \(DHSC, 2020\)](#)
- [Working Together to Safeguard Children \(DfE and Hawkins A, 2018\)](#)
- [Working Together to Safeguard Children: Statutory Framework \(DfE, 2018\)](#)
- [Prevent Duty \(2015\)](#)
- [Safeguarding Children and Safer Recruitment in Education \(DfE, 2012\)](#)
- [Equality Act \(2010\)](#)
- [The Children Act \(2004\)](#)
- Data Protection Act (1998)
- ATL Prevent Action Plan
- ATL Acceptable Use of IT and e-Safety policy
- ATL Anti-Bullying and Anti-Harassment policy
- ATL At-Risk Learner policy
- ATL Code of Conduct
- ATL Complaints, Compliments and Comments policy
- ATL Critical Incident Management policy and procedure
- ATL Health and Safety policy
- ATL IT Security policy
- ATL Prevent Risk Register
- ATL Privacy policy
- ATL Recruitment policy
- ATL Teaching, Learning and Assessment policy
- ATL Whistleblowing policy

3. Impact on the learner:

The implementation of this policy will ensure the safety and wellbeing of learners is put at the forefront of all Aspiration Training's undertakings, ensuring that all staff are enabled to support learners where safeguarding concerns arise whether it be in person, in the employment setting or online. This policy will also help to ensure learners are protected from extremist views, the risk of radicalisation and being drawn into terrorism during participation in Aspiration Training programmes and events.

4. Definitions:

4.1 Abuse:

Abuse, including neglect, is a form of maltreatment of a child or adult at risk. In relation to adults, 'serious harm' is more frequently used in place of 'significant harm' which is a term from the Children Act (1989). Abuse may take place if harm is inflicted or through failing to act to prevent harm occurring. Abuse may be perpetrated by friends, family, colleagues or strangers, and also by other children and young people as well as adults.

[Keeping Children Safe in Education \(2021 – DfE\)](#) identifies four types of abuse:

- Emotional abuse
- Neglect
- Physical abuse
- Sexual abuse

In addition to these four, the [Care and Support Statutory Guidance \(DHSC, 2020\)](#) identifies a further seven categories of abuse which affect adults:

- Discriminatory abuse
- Domestic violence
- Financial / material abuse
- Modern slavery
- Organisational abuse
- Psychological abuse

- Self-neglect

More detail on the types and signs of abuse can be found in [Appendix 1](#).

4.2 Adult At-Risk:

An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' ([Care Act 2014 – England](#)). An adult at risk may be a person who:

- has a physical or sensory disability
- is physically frail or has a chronic illness
- has a mental illness or dementia
- has a learning difficulty
- misuses drugs and or alcohol
- has social and or emotional issues
- exhibits challenging behaviours

4.3 Child:

A child is a person who is below the age of 18 years.

4.3 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into committing illegal or sexual activity. The victim may have been criminally exploited even if the activity appears consensual. Child criminal and sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

4.3 Contextual Safeguarding:

Recognition that the causes and effects of harm can extend beyond an individual's home and family. Effective safeguarding systems ensure that contextual safeguarding is embedded in within policies and procedures.

4.4 County Lines:

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

The UK Government defines county lines as follows:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

4.5 Designated Safeguarding Officer (DSO):

Members of Aspiration Training staff that have undertaken additional training in safeguarding for children and adults at risk. The DSO is responsible for acting as a source of information and guidance in relation to issues of child or adult at risk protection, coordinating action within Aspiration Training and liaising with health, children's and adult services and agencies about suspected or actual cases of abuse.

The Lead DSO has governance over safeguarding matters across Aspiration Training, and the Chief Executive Officer (CEO) has overall responsibility for safeguarding at Board level and supporting the DSO team to meet their responsibilities. The Lead DSO will ensure that resources, support and relevant training are available and in place for all employees, as well as reviewing the ATL Safeguarding and associated policies on an annual basis.

If the Lead DSO is absent from the business, the Deputy Lead DSO will be responsible for undertaking Lead DSO duties.

4.6 Digital Risk:

- Content: Digital content that might be unsuitable or illegal, eg pirated content or offensive language and behaviour
- Contact: Unwanted or inappropriate contact, eg grooming or unsolicited sexual contact
- Conduct: Inappropriate or offensive ways of behaving, as a recipient or active participant, eg oversharing personal information or bullying

It must be assumed that digital risk is likely to be taking place regardless of whether there are any reports available. As such, everyone should be alert to this risk and ensure all learners are aware of how they might report any concerns they have.

4.7 Digital Safeguarding:

The prevention and protection from harm in the online environment through the implementation of effective policies, procedures, technical solutions, advice and support for managing incidents. This is covered in more detail in the ATL Acceptable Use of IT and e-Safety policy.

4.8 Event:

An event is defined as any meeting, formal or informal gathering or other activity due to take place at, on behalf of or in association with Aspiration Training which may be for staff, learners or visitors. Events may include but not be limited to:

- Open days
- Charitable fundraising events
- Externally run training events
- Presentations by external speakers
- Awards events
- Workshops

4.9 Extremism:

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.

4.10 Female Genital Mutilation (FGM):

Female Genital Mutilation relates to procedures involving the partial or total removal of the external female genitalia or any non-medical injury to the female genital organs. FGM is illegal in the UK and any suspected actual or intended cases must be reported to the Lead DSO for referral to the police.

4.11 Missing from Education or Training:

A child or young person going missing from education, training or the workplace, particularly on repeat occasions, is a potential indicator of abuse or neglect, including sexual exploitation, radicalisation, Female Genital Mutilation and so called 'honour-based' violence. They are also at a greater risk of physical harm, self-inflicted or inflicted by others, being sexually exploited and becoming involved in crime and anti-social behaviour, being employed illegally or abusing drugs and alcohol.

A learner may be deemed missing if any of the below are applicable and relate to a learner who is under 19 years of age:

- Learner has not been in work and there has been no contact from learner or their parent / carer or next of kin
- Learner has not attended scheduled training sessions and there has been no contact from learner or their parent / carer or next of kin
- Learner has not returned from lunch / break
- Vulnerable child / adult-at risk has gone missing
- Poor or irregular attendance

4.12 Peer-on-Peer Abuse:

It is a common misconception that abuse is usually perpetrated by an adult. This is not always the case and peer-on-peer abuse is when harm is caused between two or more people, within a similar age group, and may take place online and / or in person. Peer-on-peer abuse is most likely to include, but not be limited to:

- Abusive personal relationships
- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Non-consensual sexual activity
- Physical abuse
- Sexual violence
- Sharing of nude or semi-nude imagery (consensual and non-consensual)
- Up-skirting
- Initiation / 'hazing' violence and rituals

Further information / definitions of these terms may be found in the [Keeping Children Safe in Education \(2021\)](#) document.

Peer-on-peer abuse will not be tolerated and will be dealt with as swiftly and as seriously as all other types of abuse.

4.13 Prevent Duty:

In 2015, the Counter-Terrorism and Security Act placed a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'. To ensure this was effective, the government needed to 'work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including education, criminal justice, faith, charities, the internet and health.'

4.14 Radicalisation:

The process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups.

4.15 Risk to Self / Others:

This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children or adults at-risk. This may be because of an individual experiencing a significant level of personal, emotional trauma and / or stress.

4.16 SEND (Special Educational Needs or Disabilities) Learners:

Learners with Special Educational Needs or Disabilities or certain other health conditions can face additional safeguarding challenges due to lack of knowledge of their condition and how it might affect their behaviour as well as potential communication barriers and difficulties. Staff working with these learners should be particularly sensitive to any signs that these learners might be at risk.

4.17 Visiting Speaker:

A visiting speaker is a person who has been invited to present a speech, training or extra-curricular activities and who is not employed by Aspiration Training.

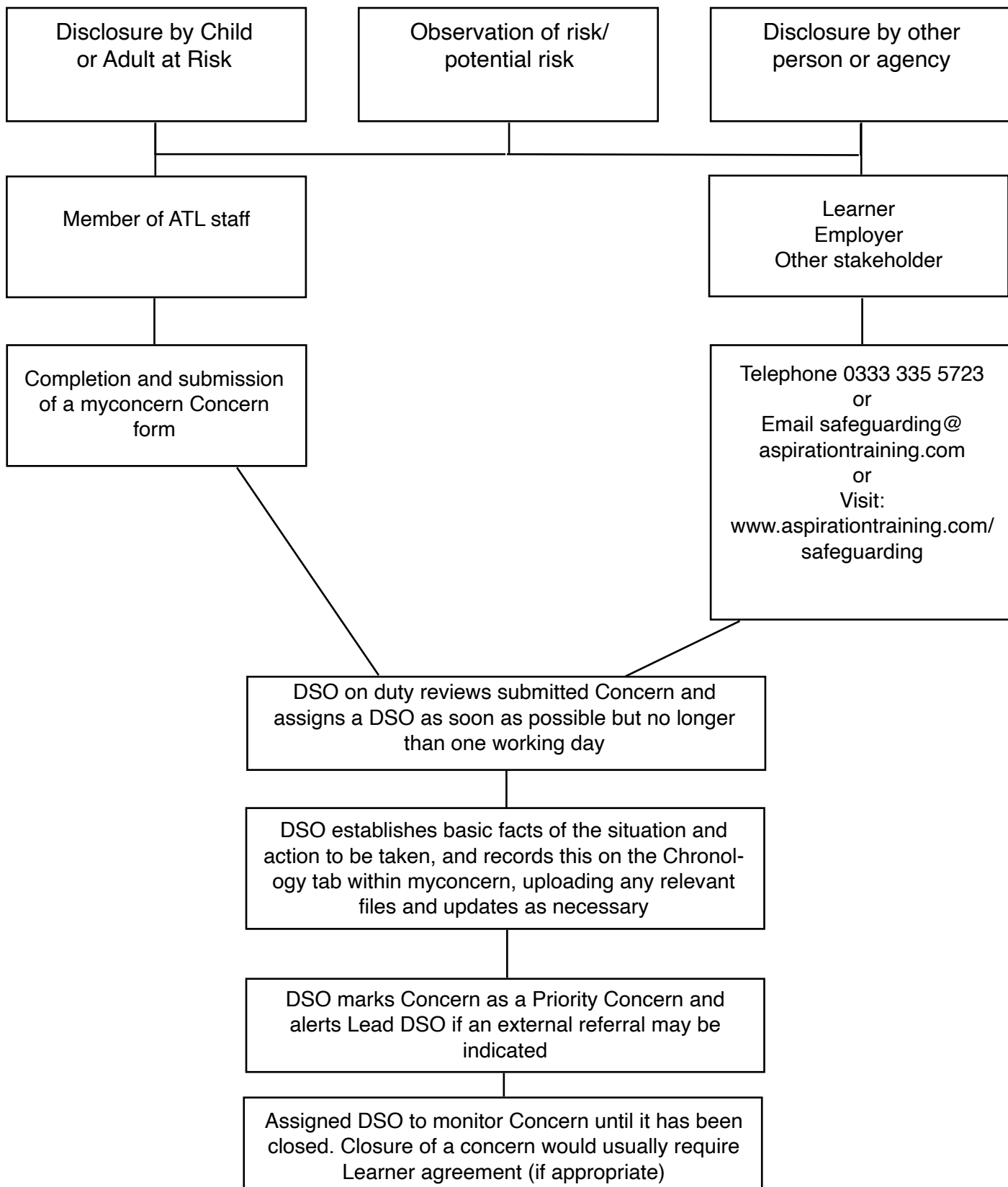
5. Procedure:

5.1 Safeguarding – Reporting procedure:

Aspiration Training operates a culture of openness and transparency, embeds the principles of ‘The 5 R’s’ across all our services and ensures all employees, learners and employers understand their responsibilities with regard to Safeguarding:

Recognise	the signs and indicators of abuse (Appendix 1), radicalisation and extremism (Appendix 2)
Respond	as soon as possible
Record	everything that has been heard, was said or any actions seen
Refer	to the Designated Safeguarding Officer (DSO)
Resolve	if you are still concerned, consider re-referral or escalation

If a member of staff, employer, learner or any other stakeholder has a concern that a child, young adult or adult at risk is at risk of harm, they have a duty to report their concern to a member of the Designated Safeguarding Officer Team within one working day, following the process on the following page:



A concern does not have to be as a direct result of being told about someone at risk. A concern could be as a result of overhearing a conversation or reading something which highlights a risk. These concerns must always be referred to the Safeguarding team using the process above.

If there is a concern that anyone may be at risk of immediate harm then it is every individual's responsibility to report this to the emergency services by dialling 999. The DSO team must be informed without delay.

If a concern about a child or young person is raised, the member of staff receiving the concern has a duty of care to act on the disclosure or observation made and must inform the relevant person(s) of this limit to confidentiality. Consent should be obtained from the relevant person(s) to report the concern where possible, but the safety of the person at risk takes priority and information may be provided to external parties if required. The provision of information to external agencies must only be made under the guidance of the Aspiration Training Lead DSO.

When an allegation of abuse is made to a member of staff, the member of staff who receives it should:

- reassure the individual making the allegation that they have done the right thing
- listen and not interrupt
- not promise that the matter will be kept confidential. Explain that the matter must be reported, as a legal duty, to a member of Aspiration Training's designated safeguarding team. If it is not clear whether the matter is a safeguarding issue, a member of the designated safeguarding team should be consulted
- let the individual finish speaking and then only ask questions if it is still unclear whether this is a safeguarding issue
- understand this is not an investigation, simply a conversation to establish the key facts. Be guided by the acronym 'TED' – Tell, Explain, Describe
- only ask simple, open, non-leading questions, e.g. if a child or adult at risk tells you they have been hurt, ask "Can you describe how that happened?" rather than "did someone hit you?"
- accept what the individual is saying and do not offer an alternative interpretation of the alleged events
- write down what has been said immediately afterwards, as accurately as possible, in the words used by the individual and ensure it is clear what is fact and what is opinion or hearsay in any given piece of information
- not ask the individual to sign anything at this stage
- note anything about the individual which may be connected e.g. any visible injuries including the position and description
- ensure you tell the individual what will happen next
- complete and submit the myconcern Concern form as soon as possible, but no longer than one working day. The myconcern system is a secure, browser-based system which can be accessed at any time through a web-enabled device and use of an authenticated username and password.

If a child or adult at risk discloses abuse that happened a long time ago, or some time has lapsed since it last occurred, it doesn't make it any less real and distressing for the child or adult at risk. This disclosure must still be referred on to the DSO as per this procedure.

Staff should be mindful that an allegation may involve another learner / child / children / young person(s) and, if a child has been involved, the Lead DSO should be contacted immediately as equally the welfare of the child being accused is paramount at this time.

The DSO will ensure that the member of staff reporting the incident/concern is reassured that their referral is being appropriately addressed and that they have access to staff support if needed.

If a child or adult at risk chooses to disclose, the member of staff who receives the disclosure should never:

- take photographs of injuries
- examine marks or injuries solely to assess whether they may have been caused by abuse (however, there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse
- make promises to the individual about confidentiality or keeping secrets
- assume that someone else will take the necessary action
- jump to conclusions or react in any way to what the individual is disclosing
- speculate or accuse anybody

- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told – what may seem insignificant could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur.
- fail to pass the information on the designated safeguarding team
- ask the individual to sign a written copy of the disclosure or a statement

IF ANY STEP IN THE PROCESS IS NOT RECORDED THEN IT IS ASSUMED THAT IT DID NOT HAPPEN

Where a child or adult at risk has communication difficulties, or use alternative / augmented communication systems, extra care may be needed to ensure that signs of abuse and neglect are identified and interpreted correctly. However, concerns should be reported in exactly the same manner as for other children or adults at risk.

The DSO is responsible for following up any referrals made to social care to ensure that action has been taken. This should be undertaken within 3 working days of having made the referral if there has not been any communication from social care to confirm their actions. A record of actions being taken must be made by the DSO.

Where there is any doubt about the safety of a child or adult at risk if they were to return home to a potentially abusive situation, the Lead DSO must inform the relevant Social Care agency and / or the police of these concerns. If, after 40 hours, there has been no action taken, the Lead DSO should use the relevant safeguarding escalation process.

If any employee considers that a safeguarding referral has not been dealt with, or that Aspiration Training is trying to disregard the referral, they should follow the procedure laid out in the ATL Whistleblowing policy.

Under no circumstances should an employee undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSO team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

5.2 Radicalisation and extremism – Reporting procedure

Aspiration Training is committed to ensuring that staff, learners and employers are aware of what constitutes radicalisation and extremism, what the potential risk factors and indicators might be (see Appendix 3) and what processes are in place to address these.

Concerns regarding radicalisation and / or extremism must be reported using the myconcern Concern form and ATL Safeguarding procedure. When this referral is received by a member of the DSO team, the Lead DSO must be informed as soon as possible and will coordinate any future action relating to the referral.

Incidents in relation to extremism are expected to be very rare but emergency procedures will be adopted when there is information that a violent act is imminent, or where weapons or other materials may be in the possession of a learner or a community member. In this situation, a 999 call should be made and a member of Aspiration Training's Executive Leadership team informed as soon as possible. The Executive Team will determine whether the Critical Incident Management policy should be implemented at this time.

To ensure that Aspiration Training meets its legal obligation with regard to The Prevent Duty, understands the threat and manages the risks posed by radicalisation and extremism, a Prevent Action Plan is in place and is reviewed and updated by senior managers on a regular basis.

5.3 Allegations against Aspiration Training employees:

All allegations of abuse made against a member or members of staff will be managed in line with Aspiration Training's Safeguarding and employment policies and procedures. These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or adults at risk in their present position or in any capacity. It is essential that any concerns for the welfare of a child or adult at risk arising from abuse or harassment by a member of staff, volunteer, delivery partner or contractor should be reported immediately to the Lead DSO who will contact the Designated Local Authority Person (formerly known as LADO).

If there are concerns about a colleague, these should be reported to one of the DSO Team immediately, detailing the concerns on the myconcern Concern form. Under no circumstances should these concerns be reported to anyone else, including members of the management team. The DSO on duty will alert the Lead DSO as soon as possible and mark the Concern as a Priority Concern.

The Lead DSO will discuss allegations against an employee with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action is necessary, including notifying the parents / carers and communicating with other relevant organisations.

The employee(s) the allegation has been made against will be suspended immediately. This is to protect them during any investigation, as well as reducing risk of harm to other children and adults at risk. This employee(s) will be treated fairly and impartially, as detailed in Aspiration Training's Disciplinary policy, and will be given access to support agencies including managing media interest if appropriate. Disciplinary or Capability procedures will not be implemented until any investigation by the police or social care has been concluded. Aspiration Training will take the lead from these organisations at all stages of the process.

If the concern raised relates to a DSO then the Lead DSO, in conjunction with the executive team, will follow the safeguarding process. If the concern relates to the Lead DSO, the Deputy DSO will work with the executive team to follow the safeguarding process. If the concern raised relates to a member of the Board of Directors, the Lead DSO would work with the other members of the Board of Directors to follow the safeguarding process.

As with all safeguarding records, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up, resolution to the allegation, notes of action taken and any decisions reached is kept on the confidential HR file of the accused employee, and a copy provided to the person concerned. The purpose of this record is to enable accurate information to be given in response to any future requests for a reference. It will also provide clarification in cases where future DBS checks reveal information from the Police about an allegation that did not result in a criminal conviction, and it will help to prevent unnecessary re-investigation if an allegation resurfaces at a later date. In respect of safeguarding allegations against an adult the record should be retained at least until the accused employee has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Records in respect of a safeguarding concern about a child should be kept for 7 years. The Director of People and Culture and the Lead DSO have the responsibility of alerting the DBS where an employee has been dismissed or has left employment due to risk or harm to a child or adult at risk.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken, the individual the allegation was made against will be supported back into work and their team environment by the Director of People and Culture, with an agreed support plan put in place.

Support for the Referrer:

ATL will fully support and protect employees who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or adult at risk and reports this concern in line with this Safeguarding policy.

This support may take the form of counselling or moving the person reporting the concern to another workplace temporarily whilst the incident is investigated. Aspiration Training's Whistleblowing policy and procedure can be followed if the referring member of staff considers that their concerns are not being acted upon appropriately.

Every attempt will be made to keep the identity of the referring member of staff anonymous, but this may not be possible in all circumstances. When it is not possible to do so, the referring member of staff will be given access to support agencies as required.

Following a referral, employees may be involved in any investigation led by one of the Safeguarding Partners. In these circumstances they will be offered sufficient time to prepare and attend meetings with the support of their line manager and Aspiration Training DSO Team.

5.4 Visitors, Events and Guest Speakers:

Any event involving staff or learners will be agreed in advance with a member of senior management. A member of staff will be assigned the responsibility of organising the event which will involve the following considerations:

- Determination of the format and content of the event
- Health and safety
- Risk assessments
- Safeguarding
- Consideration given to providing a balance of views
- Promotion of British values
- Review of any speakers scheduled to participate to ensure suitable safeguards are in place to balance freedom of expression with the need to protect staff and learners from extremist views and promotion of the support of terrorism or incitement to commit a criminal act

The following questions will be considered when determining the suitability of visiting speakers:

- Has the speaker been refused permission to speak publicly at other educational establishments or organisations?
- Is the subject matter, topic or title controversial or likely to cause offense?
- Is it likely that people may experience harassment, intimidation, verbal abuse or violence, damage to person or property as a result of the content to be delivered?
- Is the speaker unlikely to be able to confirm that they would be able to adhere to the relevant Aspiration Training policies and procedures?

Requests for events or visiting speakers may be refused where there is a significant risk of:

- The rights of groups or individuals being breached under the Human Rights Act 1998, including the incitement of hatred on the grounds of the 'protected characteristics' in the Equality Act (2010)
- Force, violence or endangerment to life of an individual or group
- The speaker or attendees support of an organisation whose aims and objectives are illegal

Visitors:

Visitors to any of Aspiration Training's premises must sign in at Reception on arrival and identify who they have arranged to meet – this includes Learners. They will then be given a Visitor ID Card and lanyard which must be visibly worn at all times whilst on Aspiration Training premises. This helps to ensure that only authorised people are on site. The Visitor ID card and lanyard must be returned to Reception at the end of the visit.

5.5 Safer Recruitment and Training

Safer Recruitment:

When recruiting new employees Aspiration Training follows the government guidance contained in the Safeguarding Children and Safer Recruitment in Education (DfE, 2012) principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. Aspiration Training adapts the guidelines within the Baseline Security Standard (BSS) for all appointments and ensures that the DBS checking service is used to assess applicants' suitability for positions of trust, as well as obtaining two appropriate references and verifying stated qualifications. An enhanced DBS check is secured for all employees and this is renewed at least every three years.

Where this is an employment gap of more than one month prior to starting with Aspiration Training, new employees are asked to supply an additional suitable reference to cover this period. Where a new employee has spent more than one month abroad, an international reference check is conducted for the countries visited to rule out any international charges or convictions.

On the occasion that a new employee starts employment prior to the receipt of two satisfactory references and a satisfactory DBS check, the following must be in place prior to employment commencing:

- One satisfactory reference must have been received and a copy held on file
- A comprehensive risk assessment has been undertaken, signed by the line manager, ensuring that the new member of staff will not have time alone with learners, clients or documentation referring to learners or clients
- A satisfactory Children's Barred List (previously List 99) check has been conducted

Newly appointed employees will have a job role induction over a 3-month period, in line with their probation period. Probation is a period of both professional development and review and provides a fair opportunity for an employee to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role. Probation allows the manager of the newly-appointed employee to assess objectively whether the new recruit is suitable for the role, taking into account the individual's overall capability, skills, performance and general conduct in relation to the job in question. Furthermore, probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan. Aspiration Training shall ensure that all employees are made aware of the standards expected of them through the Code of Conduct, and will put in place the appropriate support, training and feedback to achieve these standards.

Training:

A robust Safeguarding and Prevent training programme will be provided to new employees as part of their induction process. This will include information and guidance relating to safeguarding procedures, including the secure online myconcern Safeguarding referral management system. All staff will provide confirmation that they have read and accepted this Safeguarding policy.

Safeguarding and Prevent refresher training, along with Equality, Diversity and Inclusion, Health and Safety and GDPR training, are a mandatory requirement for all staff and should be undertaken on an annual basis.

Safer Recruitment training will be undertaken by employees who conduct recruitment activities as part of their role, in accordance with statutory guidance.

Individual/ Group	Training	Frequency
All new employees	Safeguarding Prevent Equality, Diversity and Inclusion Health and Safety GDPR e-Safety	During probation period - – Safeguarding and Prevent modules to be undertaken within the first 2 weeks of em- ployment
All staff	Safeguarding Prevent Equality, Diversity and Inclusion Health and Safety GDPR	Annually
Designated Safeguarding Officers	DSO Training CPC Introduction to Adult and Child Protection CPC Further Child Protection CPC Further Adult and Child Protection	Every 2 years
Hiring managers	Safer Recruitment	Annually
Board members	Safeguarding Prevent Equality, Diversity and Inclusion Health and Safety GDPR Safeguarding responsibilities as a Board member	Annually

5.6 Record Keeping and Information Security:

Well-kept records are essential in situations where it is suspected or believed that a child or adult at risk may be at risk from harm. Records of meetings should state who was present, and the time, date and place of the meeting. The record should be factual, state exactly what was said, observed or alleged and be signed, physically or electronically, by the recorder. Records must also be stored, retrieved and destroyed within current Data Protection laws.

Records of meetings relating to safeguarding concerns may be shared with others at some stage and, in exceptional circumstances, there is the possibility that they may become evidence in court proceedings. It is also important to note that any documents regarding an individual may be subject to a Freedom of Information request under the Freedom of Information Act (2000). Under the Act, individuals have the right to access their own records unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender
- Information held for the purposes of social work, where disclosure would be likely to prejudice the work by causing serious harm to the physical or mental health or condition of the data subject or another person

Where a request for information sharing is made, the Lead DSO and Data Protection Officer will make a decision as to whether they are able to share the information and, if necessary, seek relevant legal advice and / or advice from other bodies such as the NPCC and Childline.

All decisions related to information sharing must be made with the safety of the child or adult at risk as the central most important factor. Once the decision has been made, regardless of whether it is to share information or not, this decision must still be recorded, clearly identifying the reasons for the decision. If the request has come from any of the three Safeguarding Partners (Local Authority, the police, Clinical Commissioning Group), they will provide Aspiration Training with a clear rationale as to why the information is needed and the request should be proportionate to the reason. Aspiration Training follow the 7 Golden Rules to Information Sharing as per the guidance document Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (HM Government, 2018).

Aspiration Training takes the issues of safeguarding and confidentiality very seriously. All safeguarding documentation is stored securely electronically, and can only be accessed by members of the DSO team.

6. Responsibilities:

6.1 The Board of Directors:

- Ensuring Aspiration Training is fully compliant with legal requirements
- Ensuring effective implementation of this policy
- Ensuring this policy is reviewed on a regular basis
- Ensuring all new members of staff are advised read section one of Keeping Children Safe in Education (2021 – DfE)
- Wearing an Aspiration photographic ID badge at all times whilst on Aspiration Training premises and whilst conducting Aspiration Training business on other premises
- Contributing to an effective safeguarding culture

6.2 Lead Designated Safeguarding Officer

- Leading Aspiration Training with regard to effective safeguarding practices
- Supporting and leading the Designated Safeguarding Officer team to ensure knowledge, practice and procedures are current
- Ensuring safeguarding systems are fit for purpose
- Managing referrals and recording information appropriately and securely
- Ensuring all new members of staff have access to most current version of section one of Keeping Children Safe in Education (2021 – DfE)
- Wearing an Aspiration photographic ID badge at all times whilst on Aspiration Training premises and whilst conducting Aspiration Training business on other premises
- Contributing to an effective safeguarding culture

6.3 Managers:

- Ensuring this policy is fully supported by their team
- Ensuring that all employees are aware of this policy and receive adequate training to ensure its implementation
- Ensuring all new members of staff are advised to read section one of Keeping Children Safe in Education (2021 – DfE)
- Wearing an Aspiration photographic ID badge at all times whilst on Aspiration Training premises and whilst conducting Aspiration Training business on other premises
- Contributing to an effective safeguarding culture

6.4 All Staff:

- Ensuring this policy and procedure are read, understood and followed
- Promoting respect, equality, diversity and inclusion
- Recognising and responding to signs or reports of harm in a timely and responsible manner
- Ensuring learners have cameras on for at least the start of a remote online session to enable delivery staff to have a visual check of a learner and their wellbeing
- Reporting any concerns around extremism or radicalisation using the safeguarding reporting channels
- Reporting and removing any literature displayed within company premises that could cause offence or promote extremist views
- Reporting any literature seen in employment / work placement settings, using safeguarding reporting channels, that could cause offence or promote extremist views
- Wearing an Aspiration photographic ID badge at all times whilst on Aspiration Training premises and whilst conducting Aspiration Training business on other premises
- Supporting the development of all stakeholder understanding of the issues related to extremism and radicalisation
- Ensuring the visiting speaker process is discussed with potential guests prior to attendance at an Aspiration Training event
- Ensuring they have read and understand section one of Keeping Children Safe in Education (2021 – DfE)
- Contributing to an effective safeguarding culture

6.5 Employers

- Ensuring there is an organisational safeguarding policy and procedure in place
- Ensuring they are aware of their safeguarding reporting responsibilities to Aspiration Training, eg; concerning or unreported absenteeism
- Contributing to an effective safeguarding culture

6.6 Learners

- Ensuring they are aware of how and when to report any safeguarding concerns
- Ensuring their camera is on for at least the start of a remote online session to enable delivery staff to have a visual check of their wellbeing. The camera may then be turned off for the duration of the session.
- Contributing to an effective safeguarding culture

7. Communication:

This policy is available on the Aspiration Training website and may be provided in hard copy upon request. This policy is available in Welsh on the Aspiration Training (Wales) website.

8. Monitoring and review processes:

This policy will be reviewed on an annual basis, or when statutory guidance changes, to ensure it continues to meet the needs of the organisation and its stakeholders. The review will be conducted by the Aspiration Training Board of Directors.

9. Contact details:

If you would like to discuss this policy further, please contact:

Wales	England
Neil Tamplin Managing Director, Aspiration Training Wales First Floor, Building Two, Eastern Business Park, St Mellons, Cardiff CF3 5EA Email: ntamplin@aspirationtraining.com Tel: 02921 175352	Mike Jones Managing Director, Aspiration Training England Fourth Floor, Grosvenor House, Prospect Hill, Redditch, B97 4DL Email: mjones@aspirationtraining.com Tel: 01527 359646

The Aspiration Training Designated Safeguarding Officer Team:

Name	Role	Location	Contact Telephone
Iain Salisbury	CEO and Board Sponsor	Central	07973 847144
Antony Weber-Wright	Lead DSO	England	07837 316875
Melanie Barratt	Deputy Lead DSO	Central	07977 014134
Charlotte Angel	DSO	England	07583 114992
Emma Court	DSO	England	07867 451409
Becky Harvey	DSO	England	07879 554932
Cheryl Pearcey	Deputy Lead DSO	Wales	07790 838976
Bernie Stone	DSO	England	07937 847115

Organisations related to Safeguarding, Radicalisation and Extremism:

Organisation	Telephone/ Website/ Email
Emergency Services	999
Anti-Terrorism Hotline	0800 789 321
Child and Family Consultation Service	020 8430 9000
Child Exploitation and Online Protection Centre (CEOP)	https://www.ceop.police.uk/Safety-Centre http://www.thinkuknow.co.uk
Childline	0800 1111
Crime Stoppers	0800 555 111
Internet Watch Foundation	https://www.iwf.org.uk
NSPCC Helpline	0808 800 5000 https://www.nspcc.org.uk
Police non-emergency	101
Social Care link for safeguarding concerns	https://www.gov.uk/report-child-abuse-to-local-council

Appendix 1. Types and Potential Signs of Abuse

Definition	Potential signs	Find out more	Contacts
<p>Neglect is the ongoing failure to meet someone's basic needs. i.e. may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care.</p> <p>Neglect is dangerous and can cause serious, long-term damage - even death.</p>	<ul style="list-style-type: none"> • Becoming quiet and withdrawn. • Being aggressive or angry for no obvious reason. • Looking unkempt, dirty or thinner than usual. • Sudden changes in their normal character, such as appearing helpless, depressed or tearful. • Physical signs of abuse, such as bruises, wounds, fractures and other untreated injuries. • The same injuries happening more than once. • Not wanting to be left on their own or alone with particular people. • Being unusually light-hearted and insisting there's nothing wrong. 	<p>NSPCC - Neglect</p>	<p>Police: 999 or local team</p> <p>NSPCC: 0808 8005000 help@nspcc.org.uk</p> <p>Safeguarding Board: 01922 652559 wsab@walsall.gov.uk</p> <p>Childline 0800 1111</p>
<p>Physical abuse is deliberately hurting someone causing injury such as bruises, broken bones, burns or cuts.</p> <p>It isn't accidental – people who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. There's no excuse for physical abuse. It causes serious, and often long-lasting, harm – and in severe cases, death.</p>	<ul style="list-style-type: none"> • Physical signs of abuse, such as bruises, wounds, fractures and other untreated injuries. • The same injuries happening more than once. • Not wanting to be left on their own or alone with particular people. • Being unusually light-hearted and insisting there's nothing wrong. 	<p>NSPCC - Physical Abuse</p>	
<p>Sexual abuse is forcing or persuading someone to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the person won't understand that what's happening to them is abuse. They may not even understand that it's wrong. Sexual abuse also includes Upskirting and is now a criminal offence.</p>	<ul style="list-style-type: none"> • Physical signs of abuse, such as bruises, wounds, fractures and other untreated injuries. • The same injuries happening more than once. • Not wanting to be left on their own or alone with particular people. • Being unusually light-hearted and insisting there's nothing wrong. 	<p>NSPCC - Sexual Abuse</p>	

Definition	Potential signs	Find out more	Contacts
<p>Emotional abuse is ongoing emotional maltreatment or emotional neglect. It's sometimes called psychological abuse and can seriously damage to emotional health and development. Emotional abuse can involve deliberately trying to scare or humiliate a person or isolating or ignoring them. People who are emotionally abused sometimes also suffer another type of abuse or neglect at the same time.</p>		NSPCC - Emotional Abuse	
<p>Bullying and harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful.</p>		gov.uk- bullying-and-harassment	Police: 999 or local team Equality and Human rights Commission: 0808 8000082 Galop: 0800 9995428 (For LGBT+) Childline 0800 1111
<p>Examples of bullying or harassing behaviour include:</p> <ul style="list-style-type: none"> • spreading malicious rumours • unfair treatment • picking on someone • regularly undermining a competent worker • denying someone's training or promotion opportunities <p>Bullying and harassment can happen:</p> <ul style="list-style-type: none"> • face-to-face • by letter • by email • by phone <p>Bullying itself isn't against the law, but harassment is. This is when the unwanted behaviour is related to one of the following:</p> <ul style="list-style-type: none"> • age • sex • disability • gender (including gender reassignment) • marriage and civil partnership • pregnancy and maternity • race • religion or belief • sexual orientation 			

Definition	Potential signs	Find out more	Contacts
<p>Racist, disability, homophobic, transphobic abuse - any incident which the victim, or anyone else, thinks is based on someone's prejudice towards them because of their race, religion, sexual orientation, disability or because they are transgender. Such incidents are particularly hurtful as victims are targeted solely because of their personal identity, their actual or perceived racial or ethnic origin, belief or faith.</p>		CPS - hate	
<p>Gender based violence/violence against women and girls - any act or threat of violence that results in, or is likely to result in, physical, sexual, or psychological harm or suffering whether occurring in public or private. It encompasses, but is not limited to, violence occurring in the family, battering, dowry related violence, marital rape, non-spousal violence.</p>		<p>WHO - Gender Violence</p> <p>Gov.UK - Gender Violence</p>	<p>Police: 999 or local team</p> <p>National Domestic Abuse Violence Helpline: 0808 2000247</p>
<p>Relationship abuse - is a pattern of abusive and coercive behaviours used to maintain power and control over a former or current partner. Abuse can be emotional, financial, sexual or physical and can include threats, isolation, and intimidation. Abuse tends to escalate over time. When someone uses abuse and violence against a partner, it is often part of a larger pattern of control.</p>		<p>StopRelationshipAbuse.Org</p> <p>Gov.UK - Violence against women</p>	<p>Police: 999 or local team</p> <p>National Domestic Abuse Violence Helpline: 0808 2000247</p>
<p>Poor parenting – examples:</p> <ul style="list-style-type: none"> • Parents who are too busy to spend time with their kids. (sticking their child in front of a t.v. or computer screen rather than spending time with them). • Parents who engage in the use of social media or other social activities instead of caring for their children's needs • Parents who hit, scream or humiliate their kids in an effort to get them to behave. • Parents who react to their kids and believe that their kids make them behave in ways that are harsh or cruel. 		NSPCC	<p>Police: 999 or local team</p> <p>NSPCC: 0808 8005000</p> <p>help@nspcc.org.uk</p>

Definition	Potential signs	Find out more	Contacts
<p>Trafficking and modern slavery are forms of abuse. People are recruited, moved or transported and then exploited, forced to work or sold.</p> <p>Reasons for trafficking:</p> <ul style="list-style-type: none"> • sexual exploitation • benefit fraud • forced marriage • domestic servitude such as cleaning, childcare, cooking • forced labour in factories or agriculture • criminal activity <p>Trafficking can be into the UK from abroad, but can also be from one part of the UK to another.</p>	<ul style="list-style-type: none"> • Spends a lot of time doing household chores. • Rarely leaves their house, has no freedom of movement. • Lives in poor accommodation. • Isn't sure which country, city or town they're in. • Is unable to give personal details. • Not registered with a GP practice. • Has no personal identity documents. • Has no access to their parents or guardians. • Seen in "inappropriate" locations. • Has no money of their own. 	<p>UN - Human Trafficking</p> <p>NSPCC - Child Trafficking</p>	<p>Police: 999 or local team</p> <p>Modern Slavery Helpline: 0800 1217000</p> <p>Safeguarding Board: 01922 652559</p> <p>wscb@walsall.gov.uk</p>
<p>Substance abuse - the harmful or hazardous use of illicit drugs and alcohol.</p> <p>Use of these substances can lead to dependency i.e. a strong desire to take the drug, difficulties in controlling its use, persisting in its use despite harmful consequences, a higher priority given to drug use than to other activities and obligations, increased tolerance, a physical withdrawal state.</p> <p>The user can become seriously ill; may develop long term health effects or in extreme cases die.</p>	<ul style="list-style-type: none"> • Temporary blackouts or memory loss. • Withdrawal i.e. spending less time on activities with family and friends, exercising, pursuing hobbies or other interests. • Drop in work attendance and performance. • Relationship Issues. • Complaints from co-workers, supervisors. • Secretive behaviour. • Changing appearance. • Family History of misuse. • Health Signs - shakiness or trembling; sweating, nausea and vomiting, insomnia, depression, irritability, fatigue or loss of appetite and headaches 	<p>NHS - Drug addiction</p>	<p>0300 123 6600</p>

Definition	Potential signs	Find out more	Contacts
<p>Domestic violence – violence and emotional abuse used by one person in a relationship to control the other. Partners may be married or not married; heterosexual, gay, or lesbian; living together, separated or dating.</p> <p>Examples:</p> <ul style="list-style-type: none"> • name-calling or putdowns • keeping a partner from contacting their family or friends • withholding money • stopping a partner from getting or keeping a job • actual or threatened physical harm • sexual assault • stalking • intimidation <p>Violence can be criminal and includes physical assault (hitting, pushing, shoving, etc.), sexual abuse (unwanted or forced sexual activity), and stalking. Although emotional, psychological and financial abuse are not criminal behaviours, they are forms of abuse and can lead to criminal violence.</p>	<ul style="list-style-type: none"> • Afraid of their partner. • Signs of isolation - cut off from family and friends. • Jealous and possessive partner. • Signs of partner humiliating/Insulting. • Indications of abuse. • No control on money. 	<p>Domestic Violence. Gov.UK - Domestic Violence</p> <p>Refuge - Recognising Abuse</p>	<p>Police: 999 or local team</p> <p>National Domestic Abuse Violence Helpline: 0808 2000247</p>
<p>Female genital mutilation (FGM - also known as female genital cutting' or female circumcision) is illegal in the UK. It covers procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons. It is a practice that takes place worldwide in at least 28 African countries and in parts of the Middle and Far East. It also takes place within parts of Western Europe and other developed countries, primarily among migrant and refugee communities. UK communities that are at risk of FGM include Somali, Kenyan, Ethiopian, Sierra Leonean, Sudanese, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian women and girls.</p>	<p>Signs may have occurred:</p> <ul style="list-style-type: none"> • Prolonged absence • Noticeable behaviour change • Bladder or menstrual problems • Difficulty sitting still and looking uncomfortable/ pain between their legs • Talking that somebody did something to them they are not allowed to talk about. 	<p>Gov.UK - FGM</p>	<p>999 or local team</p> <p>Safeguarding Board: 01922 652559 wscb@walsall.gov.uk</p> <p>NSPCC 0800 028 3550 fgmhelp@nspcc.org.uk</p>

Definition	Potential signs	Find out more	Contacts
<p>Fabricated or induced illness – where a Parent or Carer makes up or causes the symptoms of an illness in a person, perhaps giving them medicine they don't need and making them sick. It is also known as 'Munchausen's syndrome by proxy.'</p>	<ul style="list-style-type: none"> • Symptoms only appear when the parent or carer is present. • Only person claiming to notice symptoms is the parent or carer. • Affected person has an inexplicably poor response to treatment. • If one health problem is resolved, other symptoms are reported. • Symptoms don't seem plausible. • Parent or carer has a history of frequently changing GPs or visiting different hospitals for treatment. • Child's daily activities are limited unnecessarily. • Parent or carer has good medical knowledge/medical background. • Parent or carer doesn't seem too worried about the child's health. • Parent or carer develops close relationships with healthcare staff. • Parent or carer becomes abusive if views are challenged. • One parent (commonly the father) has little or no 	<p>NHS - Fabricated- or induced-illness</p>	<p>Police: 999 or local team Safeguarding Board: 01922 652559 wscb@walsall.gov.uk</p> <p>NSPCC: 0808 8005000 help@nspcc.org.uk</p>

Appendix 2. ATL Safeguarding Referral Form

Safeguarding Concern Form

If you have a safeguarding or wellbeing concern regarding a learner, please contact the appropriate DSO for advice:

SafeguardingEngland@aspirationtraining.com

Antony Weber Wright- 07837 316875

Mel Barratt – 07977 014134

Emma Court – 07867 451409

Bernie Stone – 07973 847115

Charlotte Angel – 07583 114 992

Becky Harvey – 07879 554932

SafeguardingWales@aspirationtraining.com

Cheryl Pearcey - 07790 838976

Julie Shutler – 07964 886894

Following your conversation, you may be asked to complete the referral form below. Please complete with as much detail as possible and send to the relevant safeguarding email address for the country you are working in (above).

In an emergency, always dial 999 for the police.

Please identify the most main category of concern:

- Abuse
- Bullying
- Cyber-bullying
- Emotional abuse
- Exploitation / Slavery
- Financial abuse
- Forced marriage
- Neglect
- Physical abuse
- Radicalisation / Extremism
- Risk of self-harm
- Unsafe working practices

Referee details	
Your name	
Date form completed	
How do you know the learner/what is your involvement with them?	

Learner details	
Name	
Placement/Manager name	
Gender	
Preferred pronoun	
Date of birth	
ULN (from Smart Assessor)	
Contact details	
Any language or communication difficulties? (if yes, what are they?)	Yes / No
Do they know they are being referred?	Yes ? No

Details of concern

Please give details about your concerns:

POINTS TO CONSIDER:

- What has happened to make you concerned about them?
- Were there any witnesses?
- Do you have any immediate concerns for their safety?
- Has any external action been taken to report this concern?
- Is there anyone else who could be at risk due to your current concerns, such as a child or another adult at risk/vulnerable person?
- Is the person named in this referral accessing professional / medical help already?
- Is the person aware that a referral is being made to the safeguarding team?

DSO USE ONLY

What follow up action has been taken?

Outcome:

Name of DSO:	Date:

Appendix 3. Radicalisation and Extremism Risk Indicators

The information below is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that adults at risk and young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest an adult / young person or their family may be vulnerable or involved with extremism:

Vulnerability	Potential Risk Indicators
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 extremist influences:

- Reason to believe that the young person associates with those known to be involved in extremism
- Possession or distribution of extremist literature / other media material likely to incite racial / religious hatred or acts of violence, including tattoos depicting certain symbols or numbers
- Use of closed network groups via electronic media for the purpose of extremist activity

Experiences, behaviours and influences:

- Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest having a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity / use of documents to support this
- Experience of disadvantage, discrimination or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status

More critical risk factors 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
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance / behaviour