



## **Children, Young People and Vulnerable Adults Safeguarding Policy and Procedures 2023-2024**

Effective From:	Date of Next Review	Responsibility/Ownership
12/12/2023	September 2024	Lee Nolan



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## **Section 1**

### **Purpose of the Policy**

NTG Training Ltd have devised this policy in line with Government Legislation and statutory guidance. We are committed to ensuring that all learners are kept safe so they can enjoy and achieve while participating in learning. We therefore adhere to the following legislation alongside our policy:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges on Safeguarding and Safer Recruitment September 2023
- The Children Act 2016.
- Un Convention on the Rights of the Child 1991
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Education Act 2005
- Human Rights Act 1998
- Health and Social Care Act 2008
- Domestic Violence, Crime and Victims Act 2012
- Statutory guidance Working Together to Safeguard Children 2018
- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2018.
- The Care Act 2014
- The Mental Capacity Act 2005
- The “No Secrets” guidance, which sets out a code of practice for the protection of vulnerable adults
- Counter Terrorism and Boarder security Act 2019
- Contest 2018
- Work Based learners and Prevent Statutory Duty guidance for providers 2018.
- Equality Act 2010
- Modern Slavery Act 2015
- Mandatory reporting of FGM (Nov 16)
- Prevent Duty 2019 update
- Coronavirus (COVID-19) – Safeguarding in schools, colleges and other providers 2020

We ensure all staff commitment to the policy by providing appropriate training on Safeguarding and Prevent, provision and implementation of this Safeguarding Policy during recruitment of staff and during the entire length of employment. We do this through our safer recruitment process prior to employment, through CPD training and update sessions and through operating a business culture that is focussed on ensuring our learning environment is a safer place for all learners, where abuse or mistreatment is not tolerated and individuals have the confidence to raise concerns should abuse occur, safe in the knowledge that those concerns will be dealt with appropriately and fairly.





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This policy is based on the following principles:

- Everybody has the right to live their life free from violence, fear and abuse.
- Everybody has the right to be protected from harm and exploitation.
- Everybody has the right to independence, which may involve a degree of risk.

We will review this policy at least annually but will update any legislative changes with immediate effect.

## **Section 2**

### **Designated Staff with Responsibility Safeguarding and Prevent:**

The designated member of staff with lead responsibility for children, young people and vulnerable adult's protection and safeguarding issues is:

**Lee Nolan - [lee.nolan@ntgtraining.co.uk](mailto:lee.nolan@ntgtraining.co.uk) - 01244678100 / 07385 704493**

The Designated Lead member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations
- Overall responsibility for the investigation of safeguarding concerns
- Providing advice and support to other staff on issues relating to children, young people and vulnerable adults protection.
- Maintaining a proper record of any child, young person and vulnerable adult protection referral, complaint or concern (even when that concern does not lead to a referral)
- Ensuring that parents of children, young people and vulnerable adults within the organisation are aware of our safeguarding policy.
- Liaising with other appropriate agencies
- Liaising with external partners who refer learners to the organisation to ensure that appropriate arrangements are in situ.
- Ensuring staff receive the required level of training dependent on their role in relation to Safeguarding and Prevent and the implementation of this company wide Safeguarding Policy

Designated staff have been granted key responsibility for child protection and safeguarding issues and therefore ***in the absence of the Lead Safeguarding Officer a designated second nominated person is:***

**Laurie Owens - [laurie.owens@ntgtraining.co.uk](mailto:laurie.owens@ntgtraining.co.uk) - 07518 765589**

In the absence of both the Lead and Designated officer, Safeguarding and Child Protection issues will be handled by the Company Director:

**Lee Morris - [lee.morris@ntgtraining.co.uk](mailto:lee.morris@ntgtraining.co.uk) - 01244678100 / 07883091616**



NTG Training Ltd. Offices 3 & 4, The Meadows, Church Rd, Dodleston, Chester CH4 9NG.

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The designated staff member will:

- Report to the member of staff with lead responsibility
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to child protection and safeguarding
- Will deal with individual cases, including (if applicable) attending case conferences and review meetings as appropriate.
- Have received Safeguarding training for Children, Young People and Vulnerable Adults and receive refresher training at least every 2 years.

### **Section 3**

#### **Pandemic Response**

We will abide by Government guidance relating to learners safety and measures that need to be taken to minimise the risk of infection during pandemics. We will be vigilant to the mental health and wellbeing of learners during the time of any isolation and provide a support plan for regular contact where attendance is not a normal indicator of engagement.

### **Section 4**

#### **General Policy Statement:**

NTG Training has a statutory and moral duty to ensure the organisation functions with a view to safeguarding and promoting the welfare of vulnerable adults, children and young people receiving training.

Throughout this policy and procedure reference is made to 'young people'. This term is used for 'those under the age of 18'. The procedures will be applied to allegations of abuse and the protection of children, young people and vulnerable adults.

The term 'vulnerable' is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness: and who is or may be unable to care for him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health 2000).

The term 'vulnerable' may also apply to those who are at risk of abuse due to the following:

- Lack of mental capacity
- Increasing age
- Being physically dependent on others
- Low self –esteem
- Previous history of abuse





- Negative experiences of disclosing abuse
- Social Isolation
- Lack of access to health and social services or high-quality information

When such issues arise NTG Training is committed to ensuring that we:

- Provide a safe environment for children, young people and /or vulnerable adults to learn in.
- Identify children, young people and/or vulnerable adults who are suffering, or likely to suffer significant harm.
- Take appropriate action to see that such children, young people and/or vulnerable adults are kept safe while undertaking training.

In pursuit of these aims we will approve and annually review policies and procedures with the aim of:

- Being alert to potential indicators of abuse
- Raising awareness of issues relating to the welfare of children, young people/vulnerable adults and the promotion of a safe environment in learning
- Aiding the identification of children, young people/vulnerable adults at risk of significant harm and providing procedures for reporting concerns.
- Understanding our responsibility to alert other agencies to individuals who we feel are at risk, or who are suffering abuse of any sort
- Contribute to whatever articles are needed to safeguard the person who is at risk
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- The safe recruitment of staff.

In ensuring learners are aware of Safeguarding, during the induction process and on programme, we will:

- Issue learners with a 'Learner Handbook' at the start of their course and refer to this throughout their induction process
- Discuss Safeguarding at each review stage within a learner's training course
- Ensure Safeguarding is included as part of the overall risk assessment process

## **Section 5**

### **Communication and Promotion of the Policy**

#### **Staff**





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The policy is communicated to staff as part of the recruitment process, during induction and throughout the course of the employee's employment with NTG. We have a full Safer Recruitment process in place which includes Enhanced DBS checks and right to work checks. Staff will require a new enhanced DBS check every 3 years. Safeguarding & Prevent is part of regular apprentice/learner review sessions and assessment planning sessions and hot topics on Safeguarding & Prevent are shared with staff on a regular basis by our Designated Safeguarding Lead. Staff are able to access the up to date Safeguarding and Prevent Policy through the staff handbook and via our Google Drive at all times. Staff are required to undertake mandatory CPD training on joining the organisation on Safeguarding, Prevent and Equality & Diversity and are required to take part in regular refresher sessions to keep their knowledge up to date. This is monitored by the Operations Manager/Safeguarding Lead and the Quality Manager/Deputy Safeguarding Lead.

### Governors

The policy is communicated to all board members and all board members have undertaken the appropriate level of safeguarding training which has equipped them with the knowledge to provide strategic challenge to test and assure themselves that the NTG Training Safeguarding policies and procedures are effective. Board members are also aware of their obligations under the Human Rights Act 1998, the Equality Act 2020 and their local multi-agency safeguarding arrangements.

### Apprentices/Learners

The policy is communicated to apprentices/learners as part of the enrolment/induction process and throughout the duration of their learning programme with us. The policy is shared with learners through the learner handbook which also sets out how learners can get additional support for safeguarding, prevent or general wellbeing issues. This is made available as part of the induction session and is available at all times through their e-portfolio on our Ecordia system. Safeguarding, Prevent and wellbeing is an integral part of the apprentice/learner review process where learner understanding is checked and reinforced regularly, this includes a check on learner understanding of how they can report concerns and who their designated safeguarding lead is. Safeguarding and Prevent are embedded into sessions via hot topics. Learners also sign up to a commitment on Safeguarding and Prevent as part of their commitment to the programme and learner code of conduct.

### Employers

The policy is communicated to employers through the due diligence/induction process and commitment to the programme. Employers are involved in the regular progress reviews with their apprentices/learners where safeguarding, prevent and wellbeing are reviewed.



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## **Section 6**

### **Reporting and Dealing with Allegations of Abuse against Members of Staff:**

We recognise that an allegation of abuse made against a member of staff may be made for a variety of reasons and the facts of the allegation may or may not be true. It is therefore imperative when dealing with an allegation that an open mind is maintained and the investigations are thorough and not subject to delay.

We recognise:

- The welfare of the individual is the paramount concern.
- Making hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the organisation will do so with sensitivity and will act in a careful, measured way.

If an allegation is made or there is a concern that a member of staff is abusing a learner or another adult, you must discuss this immediately with your line manager.

### **Receiving an allegation from a child, young person or vulnerable adult:**

A member of staff who receives an allegation about another member of staff should report the allegation immediately to their line manager, unless the line manager is the person to whom the allegation is made.

In this case the report should be made to SMT and/ or the Lead Designated Safeguarding Officer.

The Line Manager (or lead designated person) should obtain written details of the allegation from the person who received it; this must be signed and dated. Then written details should be countersigned and dated by the Line Manager (or designated person).

Information should be recorded on: times, dates, locations and names of potential witnesses.

### **Initial Assessment by the Line Manager (or lead designated person)**

The Line Manager (or lead designated person) should make an initial assessment of the allegation, consulting with the Safeguarding Officer with lead responsibility.

Where the allegation is considered to be either a potential criminal act or indicates that the young person/vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the police/social services. All allegations against people who work with children, young people and/or vulnerable adults which meet the





following specific criteria should be reported by the employer within one working day to the Local Authority Designated Officer (LADO) via the Local Safeguarding Children's Board.

- Staff who have behaved in a way that has harmed a child, young person or vulnerable adult
- Staff who have possibly committed a criminal offence related to a child, young person or vulnerable adult
- Staff who have behaved towards a child/children, young person/s and vulnerable adult/s in a way that indicates that he/she is unsuitable to work with children

It is important that the Line Manager (or lead designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

#### Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime or a cause of significant harm to the child, young person or vulnerable adult (low level concern). The matter therefore will be addressed in accordance with internal disciplinary procedures
  - **Low Level Concerns** - The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of NTG Training may have acted in a way that:
    - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
    - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LAD
 Examples of such behaviour could include, but are not limited to:
    - being over friendly with children;
    - having favourites;
    - taking photographs of children on their mobile phone;
    - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
    - using inappropriate sexualised, intimidating or offensive language.

#### **Dealing with Disclosure of Abuse and Procedure for Reporting Wider Safeguarding & Wellbeing Concerns**

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are



being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding lead if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

**If a child, young person or vulnerable adult tells you about possible abuse you must:**

- Listen carefully and stay calm, demonstrating concern and interest
- Do not interview the individual, **you must listen and carefully record what is said in their own words. Do not write your own interpretations down or make emotive comments.**
- Do not lead or probe with questions
- Do not put words into the mouth of the individual making the disclosure/ the reporting of possible abuse.
- Do not agree confidentiality
- Reassure the individual that by telling you they have done the right thing and everything possible will be done to help.
- Record the disclosure
- Make a detailed note of the date, time, place and what the individual said, keep copies of notes taken and sign and date accordingly
- Do not be judgemental
- Do not make promises that can't be kept (such as 'this won't happen to you again').
- Do not contact the alleged abuser
- Do not gossip about the incident

Inform the reporting individual that you must pass the information on to the Designated Safeguarding Officer who will investigate the concern. Inform the individual to whom you will report the incident

**Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Lead Safeguarding Officer using the Safeguarding Concerns form.**

**If there is a suspicion that abuse is taking place an individual MUST decide if there is an immediate risk and if so dial 999 for the Police or Ambulance as appropriate. If it is decided that the individual is not in any immediate danger then the incident MUST be reported to the Designated Safeguarding Lead or deputy.**

The incident and information of the person involved must not be discussed with the alleged perpetrator or provide any information about the person involved.

The Designated Safeguarding Lead will investigate the safeguarding concerns and will utilise their expertise to determine whether the concern requires external support and as such will liaise with the appropriate external agencies to provide additional support and will ensure that the person raising the concern is updated accordingly in line with their role.



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Where NTG Training refers a Safeguarding concern or allegation of abuse to the local authority, children's services / adult social care or the police, NTG Training will within 24 hours inform the department by either calling or emailing the helpdesk (08000 150600 or [helpdesk@manage-apprenticeships.service.gov.uk](mailto:helpdesk@manage-apprenticeships.service.gov.uk)). Where will provide a high-level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirm of whether it is, or is scheduled to be investigated by local authority and / or the police.

**To report abuse contact:**  
**Local Safeguarding Boards:**

*West Cheshire Local Safeguarding Children Board (covering Ellesmere Port) Office Hours:*  
**0300 123 7034:** Out of hours: **01244 977 277**

*West Cheshire Local Safeguarding Adults Board (covering Ellesmere Port): Gateway Team:*  
**0300 123 7034:** Out of hours: **01244 977 277:** General Adult Safeguarding Enquiries: **0300 123 8 123**

*East Cheshire Local Safeguarding Children Board Office Hours:* **01606 288931**

*East Cheshire Local Safeguarding Adults Board Office Hours:* **01625 663477**

**Or contact:**

- Careline: 0151 233 3800 (Adults)
- Careline: 0151 233 3700 (Children and Young People) or
- Merseyside Police on 0151 709 6010 or 101 or 999 in an emergency.

**Section 7**

**Enquiries and Investigations**

NTG Training shall hold its own internal enquiries while the formal police or social services investigations proceed. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example, the police, the Line Manager or lead designated person may be involved in and contribute to investigatory discussions. The Line Manager or lead designated person is responsible for ensuring that the organisation provides every assistance with the agency's enquiries. He/she will ensure that appropriate





confidentiality is maintained in connection with the enquiries in the interests of the member of staff about whom the allegation is made. The Line Manager or lead designated person shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the Line Manager or lead designated person shall:

- Inform the individual making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure the parents/carers of the child, young person/vulnerable adult making the allegation have been informed that an allegation has been made and inform of the process involved.
- Inform the member of staff against whom the allegation was made of the fact an investigation is taking place and advise what the likely process will involve.
- Inform SMT (if this has not been undertaken) of the allegation and the investigation.
- The Line Manager or lead designated person shall keep a written record of the action taken in connection with the allegation.

## **Section 8**

### **Suspensions of Staff:**

Suspensions should not be automatic. In respect of staff, suspension can only be carried out by the Senior Management Team.

Suspension may be considered at any stage of the investigation. It is a neutral not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of or withdrawal from specified duties.

Suspensions should only occur for a good reason: For example:

- Where a child, young person/vulnerable adult is at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of misconduct.
- Where necessary for the good and efficient conduct of the investigation

If suspension is being considered the member of staff should be encouraged to seek advice, for example a trade union.

Prior to making the decision to suspend, the Senior Management Team should interview the member of staff. This should occur with the approval of the appropriate agency, if the police are engaged in an investigation, the officer in charge of the case should be consulted.



The member of staff should be advised to seek advice and/or assistance from his/her trade union (if any) and should be informed that they have the right to be accompanied by a friend.

The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview the member of staff should be provided with as much information as possible, in particular the reasons for any proposed suspension, provided that in doing so it does not interfere with the investigation into the allegation.

The interview is not intended to establish the member of staff's innocence or guilt but to provide the opportunity for the member of staff to make representations about possible suspensions. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response

If the Senior Management Team considers that suspension is necessary the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension with reasons shall be despatched as soon as possible, ideally within one working day.

The parents/carers of the child, young person or vulnerable adult making the allegation should be informed of the suspension. They should be asked to treat the information as confidential

SMT are required to be informed for the reason for suspension and are to maintain confidentiality regarding the allegations.

The Line Manager shall consider carefully and review the decisions as to who is informed of the suspension and investigation. External investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension will remain under review in accordance with internal disciplinary procedures.

## **Section 9**

### **The Disciplinary Investigation**

The disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

The member of staff will be informed of:





- The disciplinary charge against him/her
- His/her entitlement to be accompanied or represented by a trade union or a friend.

Where the member of staff has been suspended and no disciplinary action is to be taken the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The individual making the allegation and /or their parents and carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return of the member of staff if suspension has occurred.

Consideration to what information should be made available to the general population of the centre should be made by SMT.

### **Allegations without foundation:**

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given for a referral to be made to external safeguarding authorities so they may act upon it.

Further to this:

- The member of staff against whom the allegation is made is to be informed orally and in writing that no further disciplinary or child protection action will be taken. It may be appropriate to offer counselling.
- The parents/carers of the alleged victim are to be informed that the allegation has no foundation and advise of the outcome.
- A report is to be prepared outlining the allegation and giving reasons for the conclusion that the allegation had no foundation and confirming the above action has been taken.

## **Section 10**

### **Recording, Sharing of Information and Consent Issues:**

- Documents relating to an investigation will be retained in a secure place, together with a written record of the outcomes and if disciplinary action is taken; details will be retained on members of staff and confidentially filed.
- If a member is dismissed or resigns before the disciplinary process is completed he/she will be informed about the organisation's statutory duty to inform the Disclosure and Barring Service (DBS).





- Records will be kept updated as and when information is received, including action taken, as a young person/vulnerable adult can request their records, until official consent has been sought we need to be sensitive as to what we record
- All written records which may need to be referred to at a later stage, or to be kept as evidence, are to be locked away in a secure designated location.
- Consent to share information should not be sought under the following specific circumstances: If this would put the child, young person or vulnerable adult at greater risk of significant harm, Interfere with criminal enquiries, raise concerns about the safety of staff
- In the event that a safeguarding concern or an allegation of abuse is referred to local authority children's social care / adult social care and / or the police, the DSL or member of the Safeguarding Team will, within 24 hours, inform the ESFA by contacting the Helpdesk:  
(08000150600 or [helpdesk@manage-apprenticeships.service.gov.uk](mailto:helpdesk@manage-apprenticeships.service.gov.uk)).

## **Section 11**

### **Monitoring Effectiveness:**

When an allegation has been made against a member of staff, at the conclusion of the investigation and any disciplinary procedures, consideration will be given to any improvements required in NTG Training, including the training needs of staff.

Safeguarding concerns and actions taken will be reviewed at monthly SMT meetings and bi-monthly Board Meetings

Safeguarding and Prevent forms part of our annual self assessment report and quality improvement plan to ensure that our safeguarding and prevent policies and procedures remain effective.

Once a Safeguarding concern or wellbeing concern has been closed down, the DSL will review the effectiveness of the case, reviewing the process, interaction and ensuring the appropriate action was taken within a timely manner.

Where any weakness are identified, the SMT team will review the issues identified and agree on the required action to resolve this.

## **Section 12**

### **DBS/RIGHT TO WORK Disclosure Policy and Procedure:**





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We adhere to strict government legislation following the procedures as outlined by the Disclosure and Barring Service (DBS) which states:

- Any person barred from working with children and vulnerable adults is breaking the law if they work or volunteer,,or try to work or volunteer with those groups. An organisation which knowingly employs someone who is barred to work with these groups will also be breaking the law.
- NTG Training abide by the legislative requirements (as stated by DBS) that if we (an organisation) work with children, young people or vulnerable adults and dismiss a member of staff because they have harmed a child, young person or vulnerable adult, or would have done so if they had not left, will by law inform the Disclosure and Barring Service.

In the instance of a disclosure that **does not involve a person barred** with said groups the following process will be adhered to:

- SMT will be notified immediately.
- SMT will liaise with the Managing Director, to confidentially discuss the issues raised
- The Managing Director /SMT will confidentially discuss with the individual the issues raised.
- A confidential record of discussion will be kept and held securely.
- The situation will be monitored on an on-going basis for a reasonable period of time as advised and arranged by SMT
- In the result of an incident in relation to the individual, the staff disciplinary procedure will be implemented by SMT to address the incident/issues.
- SMT and in consultation with the company Director will be responsible for all matters relating to disclosure issues and any subsequent suspension or termination of contract relating to the individuals(s) employment at NTG Training.

We carry out right to work checks as part of our overall safer recruitment process.

## **Section 13**

### **Acceptable Usage/E-Safety**

This policy is intended to reinforce the importance to all colleagues at NTG Training Ltd of being aware of the potential safeguarding issues and potential abuse and bullying surrounding learners and the use of ICT. In our policy we set out the principles we will follow to ensure that not only do we meet our obligations under the above legislation, but that we improve the outcomes for learners by the delivery of better care, services and education. This can only be achieved if learners are safe from harm; therefore safeguarding the welfare of learners is central to our business. In order to do this we will ensure that sufficiently experienced and







competent individuals are involved in all areas of the organisation where there is any contact with learners, and that there are a number of Designated Safeguarding Officers

The Designated Safeguarding Leads are responsible for E Safety education of all learners. Tutors and Assessors are responsible for monitoring, and E Safety education within their lessons and support sessions.

## E-safety

### Aim:

- To ensure all colleagues have a good understanding of e-safety, in particular the types of dangers learners may face
- To ensure all colleagues know what to do in the event of an e-safety incident
- To ensure we make our learners aware of the potential dangers they face and how they can protect themselves
- To ensure that all colleagues and learners use ICT systems, including accessing the internet and using mobile devices, in accordance with procedures. All colleagues agree to an internet usage policy during their induction before they are permitted to use any ICT systems at NTG Training Ltd

## Potential Dangers

The development and expansion of the use of ICT, particularly of the internet, social media sites and mobile devices, has transformed learning in recent years. Learners need to develop high level ICT skills, not only to maximise their potential use as a learning tool, but also to prepare themselves as lifelong learners and for future employment.

There is a large body of evidence that recognises the benefits that ICT can bring to teaching and learning. The benefits are perceived to “outweigh the risks.” However, through internal training and through our e-safety policy, we ensure that we meet the statutory obligations to ensure that learners are safe and are protected from potential harm.

However, the use of these new technologies can put learners at risk within and outside NTG Training Ltd centres. Some of the dangers they may face include:

- Access to illegal, harmful or inappropriate images or other content.
- Unauthorised access to/loss of/sharing of personal information.
- The risk of being subject to grooming by those with whom they make contact on the internet, through social media sites and on mobile devices.
- The sharing/distribution of personal images without an individual's consent or knowledge.
- Inappropriate communication/contact with others, including strangers.
- Cyber-bullying.





- Access to unsuitable video/internet games/films.
- An inability to evaluate the quality, accuracy and relevance of information on the internet.
- Plagiarism and copyright infringement.
- Illegal downloading of music or video files.
- The potential for excessive use, which may impact on the social and emotional development and learning of the individual.

As with all other risks, it is impossible to eliminate them completely. It is therefore essential, through good educational provision, to build apprentice and learner understanding of the risks to which they may be exposed, so that they have the confidence and skills to face and deal with these risks.

### To fulfil our aims we will:

#### 1. NTG Training will ensure that e-safety is adhered to and issues dealt with accordingly and will:

- take day to day responsibility for e-safety issues and has a leading role in establishing and reviewing e-safety policies / documents
- Monitor the usage of laptops, tablets, mobile phones, cameras and other hand held devices accessing material through NTG servers - our IT protocols have alerts set for inappropriate content being accessed: for example, websites relating to radicalisation, pornographic content, adult only content and alert our IT team to these sites.
- ensure that all colleagues are aware of the procedures that need to be followed in the event of an e-safety incident taking place
- provide training and advice for colleagues
- liaise with the Local Authority if required

#### 2. Ensure that teaching and support colleagues take responsibility for ensuring that:

- they have an up to date awareness of e-safety matters and of the current e-safety policy and practices
- they report any suspected misuse or problem to the Safeguarding Team for investigation digital communications with students / pupils (email / Virtual Learning Environment (VLE) / voice) should be on a professional level and only carried out using official systems
- e-safety issues are embedded in all programmes through Topic of the months.
- they are aware of e-safety issues related to the use of laptops, tablets, mobile phones, cameras and hand held devices and that they monitor their use and implement current policies with regard to these devices reporting any concerns of apprentices accessing inappropriate materials through their own devices to the Designated Safeguarding Lead or if accessing NTG laptops or devices or linking to NTG servers/WIFI our IT team have controls in place to identify and block any attempts to access inappropriate content through our firewall services



Education & Skills  
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European Union  
European  
Social Fund

**Ensure that apprentices and learners:**

- have a good understanding of research skills and the need to adhere to the Plagiarism Policy
- understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- understand the importance of adopting good e-safety practice when using digital technologies

**Ensure that all colleagues understand their responsibilities, as outlined in this policy.**

**Training will be offered as follows:**

- a planned programme of e-safety training will be made available to staff
- all new staff should receive e-safety training as part of their induction programme, ensuring that they fully understand NTG's e-safety policy
- this E-Safety policy and its updates will be presented to and discussed by staff in team meetings
- The designated Safeguarding Team will provide advice / guidance / training to individuals as required

**Cyber bullying is bullying through the use of communication technology e.g. mobile phone text messages, social media sites, twitter, e-mails or websites. This can take many forms for example:**

- Sending threatening or abusive text messages or emails, personally or anonymously
- Making insulting comments about someone on a website, social networking site (eg: Facebook, twitter etc.) or online diary (blog)
- Making or sharing offensive or embarrassing videos or photographs of someone via mobile phone or email
- It should be noted that the use of ICT to bully could be against the law.
- Abusive language or images, used to bully, harass or threaten another, whether spoken or written (through electronic means) may be libellous, may contravene the Harassment Act 1997 or the Telecommunications Act 1984.
- Bullying is based on unequal power relations, real or perceived. It will usually be repeated and be difficult to defend against. It is intended to hurt the bullied emotionally and/or physically.
- "Bullying can be done verbally, in writing or images, including through communication technology (cyber bullying) e.g.: graffiti, text messaging, e-mail or postings on websites. It can be done physically, financially (including damage to property) or through social isolation. Verbal bullying is the most common form.



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Approved by: Lee Morris

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Review Date: Dec 2024



**If a bullying incident directed at a learner occurs using email or mobile phone technology:**

1. Advise the learner not to respond to the message
2. Refer to relevant policies including e-safety/Safeguarding/Bullying and Harassment Policy
3. Report to Lead Designated Safeguarding Officer
4. Secure and preserve any evidence
5. Report to Local Authorities if required

**If malicious or threatening comments are posted on an Internet site about a learner or member of staff you need to:**

1. Inform and request the comments be removed if the site is administered externally
2. Secure and preserve any evidence
3. Send all the evidence to COPD (Child Exploitation and Online Protection Centre part of NCA national Crime Agency)
4. Endeavour to trace the origin and inform police as appropriate
5. Inform Designated Safeguarding Lead

Useful links

<http://www.ceop.gov.uk/> <http://www.childnet-int.org/>

## **Section 14**

### **Definitions**

***Safeguarding is a term used to denote the duties and responsibilities that those providing health, social care or education to carry out/perform in order to protect individuals from harm.***

Safeguarding children and young people and promoting their welfare means:

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

Child protection is part of safeguarding and the promotion of welfare. It is work/actions carried out to protect specific children who are suffering or are likely to suffer significant harm.

Working Together to Safeguard Children 2015 guidance states:





‘Children are best protected when professionals are clear about what is required of them individually and how they need to work together.’

The guidance continues with ‘effective safeguarding of children can only be achieved by putting children at the centre of the system and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children.’

### **Safeguarding adults means;**

- Protecting the rights of adults to live in safety, free from abuse and neglect
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- People and organisations making sure the adult’s wellbeing is promoted, including taking into account (where appropriate) their views, wishes, feelings and beliefs when making decisions on any actions to be undertaken
- Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore have the potential to pose risks to their safety and/or wellbeing

The promotion of adult wellbeing is paramount within safeguarding; however we understand and acknowledge the need to act in the best possible interests of an individual without compromising their human rights. We therefore ensure we adopt the local authority approach known as MSP – Making Safeguarding Personal, whereby we work with an adult to establish i) what they want to achieve i.e. what outcome is being sought, ii) what it means to ‘be safe’ to that individual and iii) how the outcomes can be best achieved.

NTG Training is committed to providing a safer learning environment based upon positive wellbeing, personal safety and security of all staff and learners. NTG Training will not tolerate the abuse of learners by other learners or staff members. This policy relates to all service users and partners.

### **Mental Capacity Act: Children and Young People**

This policy also adheres to the Mental Capacity Act 2005 (MCA) which provides a statutory framework for individuals who lack capacity to make decisions for themselves or who have the capacity and want to make preparations for the future, should they lack the capacity later in their life. The underpinning concept of the Act is to ensure individuals who lack capacity are the focus of any decisions made, or actions taken on their behalf. It requires an individualistic, person centred approach signifying the interests of the person, not the views or requirements of those caring for and supporting the individual.

The Act is supported by a Code of Practice; to be used as a guide for those working with and/or supporting Young People and Adults who may lack the capacity to make certain decisions. All involved within supporting individuals who may lack capacity are to follow the guidance within the Codes of Practice; if the Codes of Practice are not adhered to, staff will be expected to provide justifiable reasoning as to why. This can lead to staff being held accountable for





non-compliance in a court of law, tribunal or via an abuse investigation (the Codes of Practice can be located at [www.gov.uk/government/publications/mental-capacity-act-code-of-practice](http://www.gov.uk/government/publications/mental-capacity-act-code-of-practice) )

The Act implemented a new criminal offence of ill treatment or wilful neglect of a person who lacks capacity, in the result of a conviction; individuals may be served a custodial sentence or be fined.

## **Mental Capacity Act: Children and Young People**

### **I. Children- under the age of 16 years of age**

The Mental Capacity Act does not generally apply to people under the age of 16, however there are two exceptions:

- The court of Protection can make decisions about a child's property or finances if the child lacks capacity to make such decisions and is still likely to lack capacity to make financial decisions when they reach the age of 18
- Offences of ill treatment or wilful neglect of a person who lacks capacity can also apply to victims younger than 16

### **II. Young People – aged 16-17 years of age**

The majority of the Mental Capacity Act applies to young people aged 16-17 years of age; it can also overlap with The Children Act 1989. For MCA 2005 to apply to a young person they must lack the capacity to make specific decisions, there are three exceptions:

- Only people aged 18 and over can make a Lasting Power of Attorney
- Only people aged 18 and over can make an advance decision to refuse medical treatment
- The Court of Protection may only make a statutory will for a person aged 18 and over

People carrying out acts in connection with the care or treatment of a young person aged 16–17 who lacks capacity to consent will generally have protection from liability as long as the person carrying out the act:

- Has taken reasonable steps to establish that the young person lacks capacity
- Reasonably believes that the young person lacks capacity and that
- The act is in the young person's best interests, and follows the Act's principles.





The MCA 2005 applies to those 16-17 year olds who lack capacity because of an impairment of, or a disturbance in the functioning of the mind or brain. Any decision/ action taken must be in the best interests of the individual.

When assessing the young person's best interests, we will ensure;

- We consult with those involved in the young person's care, including anyone interested in their welfare, which may include the young person's parents.
- We will not unlawfully breach the young person's right to confidentiality.

If the young person has no friends or family who could be involved, we will refer for the support of an Independent Mental Capacity Advocate if required.

Guidance will be sought from the Local Children's Safeguarding Board and Social Services in all circumstances regarding Mental Capacity.

**The concept of 'significant harm' is a key feature when considering abuse and is defined as:**

### **Definition for Children and Young people**

The statutory definition in the Children Act 1989 states that 'harm' means ill-treatment or impairment of health and development. Ill-treatment includes sexual abuse and forms of ill-treatment which are not physical, thus including emotional abuse. Physical abuse itself is not explicitly included, but this is taken as read. 'Health' includes both physical and mental health, and 'development' includes physical, intellectual, emotional, social and behavioural development.

To assess whether health or development are being significantly impaired the Act tells us to compare the health or development of the child in question 'with that which could reasonably be expected of a similar child'.

The definition of harm also includes 'impairment suffered from seeing or hearing the ill-treatment of another'.

### **Definition for Adults:**

'not only ill treatment (including Sexual Abuse and forms of ill treatment which are not physical) but also the impairment of, or an avoidable deterioration of physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development' (Who Decides Enquiry, Lord Chancellor's Department 1997).

### **Definitions of Abuse**

***'Abuse is a violation of an individual's human civil rights by any other person/s'***





## Physical Abuse

Physical abuse causing harm to a person. This may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. In this situation it is commonly described using terms such as factitious illness by proxy or Munchausen's by proxy.

## Sign and Symptoms of Physical Abuse:

The signs of Physical abuse are often evident but can also be hidden by the abuser or the victim. Any unexplained injuries should always be fully investigated. Signs to be observant for are:

- Any injury not fully explained by the history given
- Injuries inconsistent with the lifestyle of the individual at Risk
- Bruises and/or welts on the face, lips, mouth, torso, arms, back, buttocks and thighs
- Clusters of injuries forming regular patterns or reflecting the shape of an article
- Burns, on the soles, palms or back, from immersion in hot water, friction burns, rope or electrical appliances
- Multiple fractures
- Lacerations or abrasions to mouth, lips, gums, eyes, external genitalia
- Marks on the body, including slap marks and/or finger marks
- Injuries at different stages of healing

## Neglect and acts of omission

Neglect and acts of omission is the persistent or severe failure to meet a child's, young person's/ vulnerable adults' basic physical and/or psychological needs. It will result in serious impairment of the Individual's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect the child or vulnerable adult from physical harm or danger, or failure to ensure access to medical care or treatment. Neglect can also occur when a parent or carer is unresponsive to a child's emotional needs. Passive neglect is a general failure to fulfil the above obligations. An act of omission can occur when a health or social care professional fails to meet the standards required of them by their professional code of conduct, for example the Nursing and Midwifery Council (NMC), General Medical Council (GMC) or Health and Care Professional Council (HCPC).

Under the Mental Capacity Act 2005 'wilful neglect' and ill treatment of a person lacking capacity is a criminal offence.

## Sign and Symptoms of Neglect and acts of omission







- Physical condition of the individual at Risk is poor, for example, unwashed, unkempt
- Clothing in poor condition e.g. unclean, wet, ragged
- Inadequate diet
- Untreated injuries or medical problems
- Inconsistent or reluctant contact with health or social care agencies
- Failure to engage in social interaction
- Malnutrition or rapid/ continuous weight loss or weight gain
- Poor personal hygiene
- Medical condition not treated due to failure to give prescribed medication
- Failure to engage in social interaction
- Administering too much, too little or the wrong type of medication
- Withholding necessities such as nutrition, heating or clothing
- Failure to intervene in situations assessed to be dangerous to the adult or others especially when the person lacks capacity to assess risk
- Missed medical appointments and a carers/care worker's reluctance to involve health and social care professionals in the person's care

### Self-Neglect

Self-neglect is different from other forms of abuse due to the fact it does not involve a perpetrator. Self-neglect can be life threatening to an individual. It is a behavioural condition whereby an individual neglects to attend to their basic needs, which includes personal hygiene, appropriate clothing, adequate food and medical care. Extreme self-neglect is known as Diogenes Syndrome (also known as senile squalor syndrome) which is a disorder characterised by extreme self-neglect, domestic squalor, apathy, compulsive hoarding of rubbish and lack of shame.

### Signs and symptoms of Self-Neglect:

- Dehydration, malnutrition, untreated or improperly attended medical conditions and poor personal hygiene
- Hazardous or unsafe living conditions/ arrangements for example, improper wiring, no indoor plumbing, no heating or running water
- Unsanitary or unclean living quarters for example animal/insect infestation, no functioning toilet, faecal or urine smell
- Inappropriate and/or inadequate clothing, lack of necessary medical aids such as glasses, hearing aids
- Grossly inadequate housing or homelessness
- Lacks mental capacity
- Evidence of physical, mental or learning disability or illness
- Substance misuse, heavy use of drugs or alcohol or both
- No support from family or others- very isolated
- Victim of crime or anti-social behaviour or abuse
- Perpetrator of crime or anti-social behaviour
- Risk of fatality or serious harm
- Fire Risk



## Sexual Abuse

Sexual abuse involves a child, young person/vulnerable adult being forced or coerced into participating in or watching sexual activity, including prostitution. It is not necessary for the child, young person/vulnerable adult to be aware that the activity is sexual and the apparent consent of the young person/vulnerable adult is irrelevant. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. It may involve non-contact activities such as involving children in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging children to act in sexually inappropriate ways.

### Signs and Symptoms of Sexual Abuse:

- Significant change in sexual behaviour or attitude
- Pregnancy in a woman who is unable to consent to sexual intercourse
- Wetting or soiling
- Poor concentration
- Withdrawn, depressed, stressed appearance
- Unusual difficulty or sensitivity in walking or sitting
- Stained or bloody underclothing
- Bruises, bleeding, pain or itching in genital area
- Sexually Transmitted Infections, urinary tract or vaginal infection
- Bruising to thighs or upper arms
- Self-harming behaviour

## Child Sexual Exploitation

Otherwise referred to as CSE – Child Sexual Exploitation is a type of sexual abuse where children are exploited sexually for money, power and/or status. The child, young person, vulnerable adult may be deceived into believing they are in a consensual relationship and they are loved. They may be invited to parties and given drugs and/or alcohol and are more than likely to be subject to online grooming. In some CSE situations a child or young person may have been trafficked into or within the UK for the sole purpose of sexual exploitation. Sexual exploitation can also occur to young people that are in gangs.

The official definition of CSE is 'Sexual exploitation of children and young people under 18 involved in exploitative situations, contexts and relationships where young people (or a third person or persons) receives 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or another or others performing on them, sexual activities. Child Sexual Exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.' (National Working Group for Sexually Exploited Children and Young People – NWG)



In line with DCSF (Department for Children, Schools and Families) and the Home Office we recognise that Child sexual exploitation is a hidden crime, whereby the individual at risk often trusts their abuser and does not understand they are being abused. In some situations the child or young person may have a dependency on their abuser or be too frightened to tell anyone they are being abused.

Child sexual exploitation can involve violent, humiliating and degrading sexual assaults. Young people and children may be persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Child exploitation does not always involve physical contact; it can also occur online.

### **Child Sexual Abuse online**

When online sexual abuse occurs, children, young people and vulnerable adults may be forced or persuaded to:

- Send or post sexually explicit images of themselves
- Take part in sexual activities via a webcam or Smartphone
- Have sexual conversations by text or online

The abuser may threaten to send images, video or copies of conversation to the individual's friends and family unless they take part in other sexual activity. The images or videos may also continue to be shared long after the sexual abuse has stopped.

### **Child Sexual Exploitation in Gangs**

Within gangs sexual exploitation is used to:

- Exert power and control over members
- Initiate young people into the gang
- Exchange sexual activity for status or protection
- Entrap rival gang members by exploiting girls and young women
- Inflict sexual assault as a weapon in conflict

Girls and young women are more frequently forced into sexual activity by gang members.

Abusers who sexually exploit children and young people are frequently described as 'highly manipulative individuals'. They are able to apply power over the individual/s through various means such as physical violence, emotional blackmail or financial pressure, such as holding the individual at risk in debt. Abusers are able to create or exploit weaknesses in children or young people where the child or young person presents as:

- Isolative and/or distant from family and friends
- Disengaged from services such as education and health
- Challenging and/or involved in criminal behaviour

### **Signs and Symptoms of Child Sexual Exploitation:**



CSE can be problematic to identify and therefore the warning signs can be easily mistaken for habitual teenage behaviour. Children and Young People who are being sexually exploited may:

- Be involved in abusive relationships or be intimidated and fearful of certain people and situations
- Socialise with older groups of people including antisocial groups or with other vulnerable peers
- Associate with other young people involved in sexual exploitation
- Be involved in gangs, gang fights and gang membership
- Have older boyfriends or girlfriends
- Spend time at a place of concern such as a hotel
- Go missing from home, education and care
- Not be known as they have been moved around the country
- Exhibit signs of sexual abuse or grooming
- Exhibit unusual behaviour
- Become withdrawn
- Present with anxiety
- Become aggressive
- Take drugs/alcohol
- Self-harm
- Express suicidal thoughts
- Develop an eating disorder
- Exhibit depression or mood swings
- Display obsessive behaviour
- Show sexual behaviour that is not appropriate for their age
- Display promiscuous behaviour
- Use sexual language or talk about sexual information that is not age appropriate
- Have physical symptoms, such as pregnancy, a sexually transmitted infection or genital soreness.
- Exhibit signs of grooming, such as being secretive, including secrecy about what activities they are undertaking online, have older girlfriends and boyfriends, start to go to unusual places to meet friends, have new possessions such as mobile phones or clothing but are unable to explain how these were obtained and/or have access to drugs and alcohol.

### **Emotional Abuse/ Psychological Abuse**

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's, young person's/vulnerable adults behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. It may involve conveying to the child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It can feature age or developmental inappropriate expectations being imposed on a child. This may include interactions that are beyond the child's development capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interactions. It may also involve seeing or hearing the ill treatment of another and may involve



severe bullying, causing children to feel frightened and/or in danger. Emotional abuses can also be the exploitation or corruption of an individual.

### **Signs and Symptoms of Emotional/Psychological Abuse:**

- Change in appetite
- Low self-esteem, deference, passivity and resignation
- Unexplained fear, defensiveness, ambivalence
- Emotional withdrawal
- Sleep disturbance
- Self-harming behaviour

### **Financial or Material Abuse**

Financial or material abuse includes theft, fraud, exploitation, pressure in connection with wills, property, inheritance, or financial transactions, misuse or misappropriation of property, possessions or benefits.

Young adults could also face financial abuse such as being manipulated for the financial gain of another or discrimination.

### **Signs and Symptoms of Financial Abuse:**

- Unexplained sudden inability to pay bills or maintain lifestyle
- Unusual or inappropriate bank account activity
- Withholding of money
- Recent change of deeds or title of property
- Unusual interest shown by family or others in the Adult at Risk assets
- Person managing financial affairs is evasive or uncooperative

### **Discriminatory Abuse**

The principles of Discriminatory Abuse are embodied in legislation including Race Relations Act 1976 (Amendments) Regulations 2003, Human Rights Act 1998 and the Disability Discrimination Act 1995. Discriminatory abuse occurs when values, beliefs or cultures result in a misuse of power that denies opportunity to some groups or individuals. It can be a feature of any form of abuse but can also be motivated because of age, gender, sexuality, disability, religion, class, culture, language and race or ethnic origin. It can result from situations that exploit a person's vulnerability by treating the person in a way that excludes them from opportunities they should have as equal citizens, for example, health, education, justice and access to services and protection.

### **Signs and Symptoms of Discriminatory Abuse:**

- Lack of respect shown to an individual
- Signs of a sub-standard service offered to an individual
- Repeated exclusion from rights afforded to citizens such as health, education, employment, criminal justice and civic status



- Failure to follow agreed care plans

## ICT Abuse

E-safety can be described as safeguarding all users of fixed and mobile devices that allow access to content and communications that could pose risks to personal safety and wellbeing. For example: PCs, Laptops, mobile phones including gaming consoles such as Xbox and PlayStation.

The risks associated with ICT abuse are:

### Content (vulnerable person as recipient)

- Commercial: adverts, spam, sponsorship, personal information
- Aggressive: violent and or/hateful content
- Sexual: pornographic or unwelcome sexual content
- Values: bias, racism, misleading information or advice

### Contact (vulnerable person as participant)

- Commercial: tracking, harvesting personal information
- Aggressive: being bullied, harassed or stalked
- Sexual: meeting strangers, being groomed
- Values: self-harm, unwelcome persuasions

### Conduct (vulnerable person as actor)

- Commercial: illegal downloading, hacking, gambling, financial scams, terrorism
- Aggressive: bullying or harassing another
- Sexual: creating and uploading inappropriate material
- Values: providing misleading information or advice

### Signs and Symptoms of ICT Abuse:

- Spending extended amounts of time online
- Secrecy over mobile phone and computer
- Withdrawal from social contact
- Depression
- Mood Swings
- Unexplained gifts
- Sleep disturbances
- Self-harming

## Institutional Abuse

Institutional Abuse arises from an unsatisfactory regime. It occurs when the routines, systems and norms of an institution override the needs of individuals they are there to support. Such regimes compel individuals to sacrifice their own preferred lifestyle and cultural diversity in







favour of the interests of those there to support them, and others. This can be the product of both ineffectual and punitive management styles, creating a climate where the abuse of individuals, intentional or otherwise, is perpetrated by individual staff and others. There is a lack of good leadership within the institution and members of staff are not equipped to carry out the care/support required.

Managers and staff of such services have a responsibility in ensuring the operation of the service is focused on the needs of the service users (Person Centred) not the institution. Managers must ensure they have mechanisms in place which maintain and review the appropriateness, quality and impact of the service for which they are responsible. The views of the service user, their carers and relatives must be at the centre and forefront of these mechanisms.

### Signs and Symptoms of Institutional Abuse:

- Inappropriate or poor care
- Misuse of medication
- Inappropriate restraint, sensory deprivation
- Lack of respect shown to the individual at Risk
- Denial of visitors or phone calls
- Restricted access to the toilet or bathing facilities
- Restricted access to appropriate medical or social care
- Failure to ensure appropriate privacy or personal dignity
- Lack of flexibility and choice
- Lack of personal clothing or possessions
- Lack of adequate procedures
- Controlling relationships between staff and service users
- Poor professional practice
- Lack of staff training

### Domestic Violence and Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well being, development and ability to learn.

Violence can be criminal and includes physical assault, such as hitting, pushing, shoving and sexual abuse, unwanted or forced sexual activity and stalking. Emotional, Psychological and financial abuse are not criminal behaviours but they are forms of abuse which can lead to



criminal violence. Violence can take many forms and be a regular pattern or sporadic acts. Victims of domestic abuse can be of any age, sex, race, culture, religion, education, employment or marital status. Both men and women can be abused. Children in homes where there is domestic violence are more likely to become victims of the abuser and suffer from neglect, the children will more than likely be aware of the violence. For those children who are not physically harmed, they may have emotional and/or behavioural problems.

### **Controlling Behaviour**

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

### **Coercive Behaviour**

Coercive behaviour is an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

### **Signs and Symptoms of Domestic Violence/ Abuse in children and Young People:**

- Presenting as withdrawn
- Sudden changes in behaviour
- Aggressive behaviour
- Anxiety
- Clingy
- Depressed
- Problems sleeping
- Eating disorders
- Bed Wetting
- Soiled clothes
- Takes risks
- Misses school
- Changes in eating habits
- Obsessive behaviours
- Nightmares

### **Signs and Symptoms of Domestic Violence/ Abuse Adults**

- Bruises or injuries that look like they may have been caused by choking, punching or being thrown
- Black eyes







- Red or purple marks at the neck
- Sprained wrists
- Attempting to hide bruises with clothing or makeup
- Excuses made for example being clumsy, tripping and/or being accident prone and where the seriousness of the injury does not tally with the explanation
- Social Isolation – having few close friends and being isolated from relatives and colleagues.
- Asking permission to: meet, talk and/or do things with other people
- Financial dependency – little money of their own and not able to have access to their own finances.

## Modern Slavery

In accordance with the Modern Slavery Act 2015 which states this is 'An act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-Slavery Commissioner; and connected purposes' (Modern Slavery Act 2015, 26<sup>th</sup> March 2015)

Modern slavery is an international crime, it is a global problem that transcends age, gender and ethnicity and is occurring not only on an international level but also within the UK. It can include those victims who have been brought from overseas (trafficking) and vulnerable people within the UK who are forced to illegally work against their will in places such as brothels, cannabis farms, nail bars and agriculture.

Modern Slavery victims found within the UK are from countries such as Romania, Albania, Nigeria, Vietnam and the UK. Some of the key factors that contribute to human trafficking are issues such as poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances and war. Victims can often face more than one type of abuse within slavery, for example a victim is sold to another trafficker and subsequently forced into another form of exploitation.

### There are various types of slavery which include:

**Child Trafficking:** Young people, under the age of 18 are moved either internationally or domestically so they can be exploited

**Forced Labour/Debt Bondage:** Victims are forced to work to pay off debts when in actual fact they will never be able to do so. Victims are paid low wages and the debts usually increase which means they are usually not able to repay the loan and in some situations the debts can be passed down to their children.

**Forced Labour:** Victims of forced labour are forced to work against their will, usually working long hours, in appalling conditions for little or no money. Victims of forced labour are usually subject to verbal and/or physical abuse to not only themselves but their families, this also



included threat of violence. Forced labour can occur in many sectors within the UK, such as hospitality, food packing and tarmacking.

**Sexual Exploitation:** Victims of sexual exploitation are forced to carry out non-consensual or abusive sexual acts against their will, for example, prostitution, escort work and pornography. The majority affected are women and children but men can also be victims. Adults are usually coerced under the threat of force and/or violence or another form of abuse.

**Criminal Exploitation:** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

**Domestic Servitude:** Victims of domestic servitude are forced to carry out housework and domestic chores within a private household with little or no pay. Victims have their movements restricted without any free time, or very little and have marginal privacy, victims will often sleep where they work.

There are no typical victims of slavery, victims can be men, women and children of all ages and intersect across the population and some victims do not understand they have been exploited and are entitled to help and support. It is however, characteristically the more vulnerable, minority and socially excluded groups that are targeted and at risk of becoming victims of modern slavery.

### Signs and Symptoms of Modern Slavery:

- **Physical Appearance:** Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn
- **Isolation:** Victims may rarely be allowed to travel on their own, seem under control or influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work



- Poor Living conditions: Victims may be living in dirty, cramped or overcrowded accommodation and/or living at the same address
- Few or no personal effects: Victims may have no identification documents, have few personal possessions and always wear the same clothes on a daily basis.
- Restricted Freedom of movement: Victims have little opportunity to move freely and may have had their travel documents retained, for example, passports.
- Unusual travel times: Victims may be dropped off and/or collected for work either very early or late at night
- Reluctant to seek help: Victims may avoid eye contact, appear frightened or hesitant in talking to strangers and/or fear the law such as the police for fear of knowing who to trust, where to get help, fear of deportation and fear of violence to them or their family

This list is not exhaustive; an individual may display a number of trafficking indicators but may not essentially be a victim of trafficking. A picture needs to be built regarding the victim's circumstances, which will indicate that something in the life of the individual is not correct.

Additional issue of concern which all staff members need to be aware of includes the following:

### **Female Genital Mutilation (FGM)**

Female genital mutilation (FGM), which is sometimes referred to as female circumcision refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM is illegal, even if it is carried out by a healthcare professional or if it takes place outside of the UK (on a UK national or UK resident).

Some of the reasons given for the practice of FGM are;

- Protecting family honour
- A passage into womanhood
- A condition of marriage
- Preserving tradition
- Cleanliness
- Ensuring a woman's chastity

FGM can lead to serious health problems and in some cases death, it can also cause:

- Psychological trauma/depression
- Problems with pregnancy and childbirth

FGM is illegal, under The Female Genital Mutilation Act 2003 it is an offence in England, Wales and Northern Island for anyone (regardless of their nationality and residence status) to;

- Perform FGM in the UK
- Assist in the carrying out of FGM in the UK



- Assist a girl to carry out FGM on herself in the UK and
- Assist from the UK a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean. Non-African communities that may also practice FGM include Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

### **Honour based abuse (HBA)**

HBA is a violent crime or incident that has occurred to protect or defend the honour of the family and/or community. It is often committed as a result of family members who mistakenly believe someone has brought shame to their family or community that is not keeping with their traditional beliefs of their culture.

#### **HBA might be committed against people who:**

- Have a boyfriend/ girlfriend who is from a different culture or religion
- Wear inappropriate make-up or dress
- Take part in activities that may not be considered traditional within a particular culture
- Marital infidelity
- Are gay
- Are misconstrued as flirting
- Refuse to agree to an arranged marriage
- Are raped

Common practices carried out in the name of honour include;

- Forced Marriage
- Child Marriage
- Honour Killings
- Female Genital Mutilation
- Domestic Abuse
- Child Abuse
- Vulnerable Adult Abuse
- Bride Price
- Dowry Abuse
- Suicide
- Self-harm
- Acid Attacks
- Rape
- Blood Feuds
- Male Child Preference



Acts carried out in the name of honour such as violence, forced marriage and female genital mutilation is illegal in the UK.

## Forced Marriage

Forced marriage is when someone is made to marry another person who they don't want to. Forced marriages can happen in secret and can also be planned by parents, family or religious leaders.

It may involve;

- physical abuse
- sexual abuse or
- emotional abuse

Forced marriage is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

A Forced Marriage Protection Order can be accessed if one of the following applies:

- the individual or someone else is being threatened with a forced marriage
- the individual is in a forced marriage

The order is designed to protect an individual according to individual circumstances, e.g. to stop someone taking an individual out of the UK.

## Hate Crime

A hate crime or incident is any incident that may or may not be a criminal offence which is perceived by the victim or any other person as being motivated by prejudice or hate.

The prejudice or hate can be based on a number of factors including:

- Disability (including learning disabilities)
- Race/ ethnicity
- Religion or belief (including no belief)
- Sexual orientation
- Gender identity.





Hate Crime can take many forms including:

- Verbal abuse or insults, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes and bullying in the school or workplace
- Threat of attack-including offensive letters, abusive obscene telephone calls and offensive comments on social networking sites
- Physical attack-such as physical assault, damage to property, offensive graffiti, neighbour disputes and arson
- So called 'mate crime' could also come under Hate Crime. 'Mate crime' is when somebody befriends a vulnerable person to take advantage of that vulnerability.

(Please refer to Appendix 1 Directory of Contact Details for additional information and advice regarding abuse and raising safeguarding concerns).

### **Radicalisation and Extremism and the PREVENT Duty.**

In accordance with the Government Prevent Strategy we use the following accepted Governmental definition of extremism which is:

'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; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

There is no place for extremist views of any kind within NTG Training, whether from internal sources; learners and/or staff, or external sources such as community, external agencies, partners or individuals. Our learners see NTG Training as a safe place where they can explore controversial issues safely and where our Learning Facilitators encourage and facilitate this, we have a duty to ensure this happens.

As a Training Provider we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our learners and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our learners.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people and vulnerable adults.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged.

As part of wider safeguarding responsibilities staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of their learning environment, such as in their homes or community groups, especially where learners have not actively sought these out.





- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equality policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

We fully acknowledge our legal duty in relation to PREVENT and ensure the following:

- All staff undertake PREVENT training
- All learners undertake PREVENT awareness training
- Staff know when it is appropriate to refer PREVENT related concerns regarding colleagues or learners to the Lead Safeguarding Officer.
- We demonstrate, embrace and evidence within our delivery British Values: Democracy, Rule of Law, Individual Liberty and Mutual Respect and tolerance for those with different faiths and beliefs.

All concerns should be reported immediately to the Lead Safeguarding Officer or to the Designated Officer in absence of the Lead. In absence of both the Lead and Designated Officer report directly to The Senior Management Team.

We will closely follow any locally agreed procedure as set out by the Local Authority and/or the Local Safeguarding Children Board's/ Local Adult Safeguarding Board for safeguarding individuals vulnerable to extremism and radicalisation. (Please refer to Appendix 1 Directory of Contact Details for additional information and advice regarding concerns of Radicalisation and Extremism).

### **Protection Procedures**

Alerting or raising a concern about abuse means;

- Recognising signs of abuse or ongoing bad practice.
- Responding to a disclosure.
- Reporting a concern, allegation or disclosure.
- Working strictly in accordance with anti-discriminatory practice.

If any of the above applies remember you are;

- Not being asked to prove or verify that information is true.
- Required to record your concerns and report them to your manager.

(\*Only the police have the responsibility to establish whether a criminal offence has been committed)



You will not be criticised at any point for following this procedure.

If you raise a concern about any organisation or individual and you are acting in good faith, you will be supported regardless of the outcome of the investigation.

**Failure to report a concern, allegation or disclosure** will be regarded as colluding with the abuse and may result in any or all of the following;

- Criticism of practice.
- Disciplinary action.
- Suspension.
- Dismissal.

Individuals will be expected to co-operate with any investigation and may be required to provide a statement, attend a strategy meeting or a police interview.

### **Reporting Modern Slavery: The Salvation Army and National Referral Mechanism (NRM) Process:**

Modern Slavery is a serious crime and includes slavery, servitude, forced or compulsory labour and human trafficking. The National Referral Mechanism (NRM) is the process by which an individual is identified as a victim of modern slavery. Referral to the NRM can only be made by authorised agencies known as First Responders. The Salvation Army is a First Responder and they have authority to make referrals to the NRM.

When seeking advice or to refer a potential victim of modern slavery contact:

- The Salvation Army 24/7 confidential referral helpline: 0300 303 8151 or
- The Home Office Helpline: 0800 0121 700 or
- Report online at: [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)
- If an individual is in immediate danger call 999

The Government's NRM team have five working days to respond from receiving a referral, to decide if there are reasonable grounds to believe an individual is a potential victim of modern slavery.

### **Process following NRM decision that an individual is a potential victim:**

- A place will be offered at a safehouse and the individual will be provided with a period of recovery and reflection of a minimum of 45 days
- During the 45 day recovery and reflection period care and support is provided by the Salvation Army
- The 45 day period can be extended if the individual requires the support of the safehouse for a longer period or if the decision making process takes longer





Education & Skills  
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- Additional information is obtained, during this time, relating to the referral from the First Responder and other agencies
- The NRM team will then decide if the individual is indeed a victim of modern slavery. The decision is targeted to be made within the 45 day recovery period

**For children and young people who are potential victims of trafficking, refer to Local Safeguarding Children's Boards and the NSPCC Child Trafficking Advice Centre on 0808 800 5000.**

It is important to note there may be instances where reporting a suspected trafficking/modern slavery case puts the potential victim at risk. Therefore it is highly critical The Salvation Army, as First Responder is contacted as a priority so they can evoke their legislative duty, reporting to the NRM team and ensures protection of an individual; this also includes children and young people who are potential victims of modern slavery (further information regarding First Responders and NRM processes can be found at

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>)

