



SAFEGUARDING & CHILD PROTECTION POLICY

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Mission

'Through our Study Programmes and Apprenticeships, we will increase skills through the attainment of vocational and fundamental English and maths qualifications whilst improving learners' employability skills and life chances. We aim to increase employment levels, decrease NEET and meet the skills demands of the learners, Local Authorities, employers and LEP's that we serve.

Values

Maximising learner / customer success and achievement through innovative delivery to improve individual's life chances and / or employment opportunities, in a safe, secure and nurturing environment underpinned by our specific values of:

Respect, Honesty, Trust, Openness, Equality of Opportunity for all.

Vision

Through a socially inclusive approach, we will provide high quality learning and training support, to equip individuals with the skills for future employment, further development and or Further Education.

Nova Training are committed to delivering excellence, providing the best possible experience and effective IAG for all of our learners and staff alike; with a strong emphasis on Equality and Diversity and a commitment to Safeguarding all of our learners / customers to ensure they feel safe, and are safe. We aim to be a high-performing organisation with a passion for learning and a dedication to become the training provider of choice.

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PART ONE: SAFEGUARDING POLICY

1. INTRODUCTION

Nova Safeguarding Policy has been developed in line with statutory guidance provided in Keeping Children Safe in Education – 2021 and Working together to Safeguard Children. This Safeguarding Policy applies to all learners and all staff (including agency and hourly paid staff) irrespective of anyone's position or role within Nova Training, together with senior staff and any workers who are at Nova Training on a voluntary/placement/other professional basis Nova and the board facilitate a whole provider approach to safeguarding.

In this document all references to child/children/young people/learners refers to any young person or vulnerable adult on a full or part time education programme or apprenticeship age 14-24. Nova Training is a Data Processor, any transfer of information appertaining to a safeguarding issue will be as per the guidance and precautions contained within the GDRP.

COMMUNICATING, PROMOTING THE POLICY AND GETTING COMMITMENT

This policy is available on our website and in each of our centres. All new employees and learners will receive a full safeguarding induction and training session where the policy details will be explained along with the company's high policy compliance expectations and culture of vigilance. The level of staff training is determined by an employee's job role and involvement with learners. Safeguarding will be further promoted and discussed at learner's progress reviews and during employee appraisal meetings. The safeguarding team work throughout the centres and alongside employers to ensure continual buy in and compliance with the policy to ensure our learners are protected and feel comfortable to report any issue. Periodic training is delivered to employees through the monthly, 'Big Company Update' by the Senior Designated Safeguarding Lead. Training for learners on safeguarding is embedded throughout the curriculum plans. All learners and employees must sign a document to confirm that they have received safeguarding training and are committed to the full adherence and implementation of the policy.

EMPLOYEE TRAINING – IMPLEMENTING THE POLICY

As a minimum all employees will receive;

- a detailed safeguarding induction and training session
- a comprehensive overview of the policy
- the company's expectations over adherence to the policy
- a period of work shadowing where they will be trained on how to implement the policy within their day to day job and activities

Where employees take on additional safeguarding responsibilities it is likely that they will receive further external accredited training. This will usually include a Designated Safeguarding Lead training course. Throughout the policy we detail additional training modules that employees undertake.

The above are examples of some of the qualifications offered. The list is not exhaustive.

ARRANGEMENTS FOR LEARNERS AND APPRENTICES

All learners will have a full induction and ongoing training in safeguarding. Safeguarding will be discussed at every progress review where learners and employers will be continually encouraged to report concerns. Safeguarding is embedded and threaded throughout our curriculum plans.

Prior to any work experience or apprenticeship starting a trained Nova employee will carry out a full vetting on the employer to ensure the placement is safe for a learner to enter and that the employer has the correct insurances. These will be updated at least annually. During this visit we will explicitly detail our arrangements for safeguarding and the need for all concerns to be reported immediately. The Apprenticeship Coach or Induction and Placement Officer will undertake periodic checks when they visit learners in companies. Additionally, Nova will ensure that every learner is fully inducted into the workplace.

Nova's safeguarding expectations will be fully discussed with the employer and all employers will be given a key contact to report any safeguarding incidents or concerns they have or have had with the learner. Our employees will make it explicitly clear that any incident as mentioned above must be reported immediately to Nova. In the event that their key contact is uncontactable employers are advised to email safeguardingteam@novatraining.co.uk or contact either 01902 716100 / 366278 and speak to any member of the senior management team.

Where it is identified that the employers' commitment to safeguarding standards and procedures have deteriorated and no longer meet an acceptable standard we will immediately seek to remove any learners.

1.1 Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children/young people from maltreatment;
- Preventing impairment of children's/young people's health and physical health or development;
- Ensuring that children/young people are grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children/young people to have the best outcomes.

1.2 Nova Training is committed to safeguarding and promoting the welfare of all its learners. We believe that:

- All children/young people have the right to be protected from harm, abuse and neglect;
- That every child/young person has the right to an education and children/young people need to be safe and to feel safe in the education setting.
- Children/young people need support that matches their individual needs, including those who may have experienced abuse;
- All children/young people have the right to express their views, feelings and wishes and voice their own values and beliefs;
- All children/young people must be encouraged to respect each other's values and support each other;
- All children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy, healthy, sociable child/young person will achieve better educationally;
- Nova Training will contribute to the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyber-bullying), exploitation, extreme behaviours, discriminatory views and risk-taking behaviours; and
- All staff have a responsibility to provide a safe environment in which Children / young people can learn.

1.3 Nova Training will fulfil its local and national responsibilities as laid out in the following documents:-

- The most recent version of **Working Together to Safeguard Children** (DfE September 2018)
- The most recent version of **Keeping Children Safe in Education: Statutory guidance for schools and colleges** (DfE Sept 2021)
- **West Midlands Safeguarding Children Procedures**
- **Norfolk Safeguarding Children Board Policies & Procedures**
- **Essex Safeguarding Children Board**
- **Luton Safeguarding Children Board**
- **Cambridgeshire Local Safeguarding Children Board**
- **The Education Act 2002** s175
- **The Education Act 2011**
- **Mental Health and Behaviour in Schools: Departmental Advice (DfE 2014)**
- **Sexting in Schools & Colleges – responding to incidents and safeguarding young people (UKCCIS) 2016**
- **GDPR ACT (May 2018)**

- <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

2. OVERALL AIMS

2.1 This policy will contribute to the protection and safeguarding of our learners, staff and stakeholders and promote their welfare by:

- Clarifying standards of behaviour for staff and learners;
- Contributing to the establishment of a safe, resilient and robust ethos in all of our centres, built on mutual respect and shared values;
- Introducing appropriate work within the curriculum;
- Encouraging learners and parents to participate;
- Alerting staff to the signs and indicators that all might not be well;
- Developing staff awareness of the causes of abuse;
- Developing staff awareness of the risks and vulnerabilities their learners face;
- Addressing concerns at the earliest possible stage; and
- Reducing the potential risks learners face of being exposed to violence, extremism, exploitation, discrimination or victimisation.

2.2 This policy will contribute to supporting our learners by:

- Identifying and protecting the vulnerable;
- Identifying individual needs as early as possible; and
- Designing plans to address those needs.

2.3 This policy will contribute to the protection of our learners by:

- Including appropriate work within the curriculum;
- Implementing child/young people protection policies and procedures; and
- Working in partnership with learners, parents/carers and other agencies.

3. KEY PRINCIPLES

3.1 These are the key principles of safeguarding, as stated by local Safeguarding Partnerships -

- Always see the child/young person first.
- Never do nothing.
- Do **with**, not **to**, others.
- Do the simple things better.
- Have conversations, build relationships.
- Outcomes not outputs.

3.2 In addition safeguarding partnerships have identified the following key safeguarding messages for educational establishments -

- Every child/young person is entitled to a rich and rounded curriculum.
- Training programmes operate with public money: this should be spent wisely, targeting resources on the evidenced needs of learners. Assurance and audit are important aspects of this.
- Governance is corporate and decisions are collective, but individual managers can and should take the lead on specific aspects of training centre life such as safeguarding.
- When issues arise, the Managing Director should speak out, addressing them internally where possible and escalating when this is unsuccessful.

4. KEY PROCESSES

4.1 All staff should be aware of the guidance issued by their local Safeguarding partnerships.

5. EXPECTATIONS

5.1 All staff and visitors will:

- Be familiar with this Child Protection & Safeguarding Policy;
- Understand their role in relation to safeguarding;
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.;
- Be involved, where appropriate, in the implementation of individual education programmes, support plans, child/young person in need plans and interagency child protection plans;
- Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators);

- Record concerns and give the record to the centre manager, Programme Deputy Safeguarding Lead or DSL to update Cpoms and when needed inform external agencies such as MASH, LADO, LA, Police or other.
- Deal with a disclosure of abuse from a child/young person in line with the guidance in Appendix 2 - you must inform the Programme Designated Safeguarding Lead immediately, and provide a written account as soon as possible.

5.2 All staff will receive annual safeguarding and child protection training and update briefings as appropriate. Key staff will undertake more specialist child protection training as agreed by the SDSL.

6. THE SENIOR DESIGNATED SAFEGUARDING LEAD

6.1 Our Senior Designated Safeguarding Lead (SDSL) on the Safeguarding Leadership Team is **Phil Lythgoe** who has lead responsibility and management oversight and accountability for child protection and, with the Managing Director, will be responsible for coordinating all safeguarding and child protection activity.

6.1.1 The Deputy Designated Safeguarding Leads will support the SDSL within the role and deputise when the SDSL is not on-site. They are:

Deepa Freebury (Study Programme), Charlotte Fox (Study Programme), Emma Denton (Study Programme), Bonita Law (H&S Manager), Nigel Mellor (WBL), Lois Nott (WBL). These staff are identified within each centre on notice boards and Nova's website under the IAG section.

6.2 The Senior Designated Safeguarding Lead, when so required (see paragraph 7.4), will lead regular case monitoring reviews of vulnerable learners identified within Centres. These reviews will be evidenced by minutes and recorded in case files.

6.3 When the company has concerns about a learner, the Deputy Designated Safeguarding Lead will decide, in consultation with the Centre Manager, what steps should be taken and should advise the Senior Designated Safeguarding Lead.

6.4 Child specific safeguarding information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Senior or Deputy Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual learner and/or family. A written record will be made of what information has been shared, with whom, and when.

- 6.5 Safeguarding records will be stored securely on CPOMS separate from academic records. Individual files will be kept for each child: the centre will not keep family files. Files will be kept for at least the period during which the learner is attending the centre, and beyond that in line with current data legislation and guidance.
- 6.5.1 Where records are stored electronically e.g. on CPOMS there is no reason to maintain paper files.
- 6.6 Access to CPOMS by staff other than by the Designated Safeguarding Leads will be restricted, and a record will be kept of who has had access to them and when.
- 6.7 Parents/carers will be aware of information held on their children/young person and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents/carers will be in line with policies and give due regard to which adults have parental responsibility.
- 6.8 Do not disclose to a parent/carer any information held on a child if this would put the child at risk of significant harm.**
- 6.9 If a learner moves from our centres to another education setting, child protection records may be forwarded on to the Designated Safeguarding Lead at the location, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Ongoing direct contact between the two providers may be necessary at certain times. We will record where and to whom the records have been passed and the date.
- 6.10 If sending by post, learner records will be sent by “Special/Recorded Delivery”. For audit purposes a note of all learner records transferred or received will be kept in electronic format on the company’s confidential intranet. This will include the learner’s name, date of birth, where and to whom the records have been sent and the date sent and the date of acknowledgement of safe receipt received.
- 6.11 Should a learner be permanently excluded, if necessary child protection records will be forwarded on to the relevant organisation.
- 6.12 Where a vulnerable young person is moving to another education establishment, consideration will be given to the learner’s wishes and feelings regarding their child protection information being passed on in order that the FE establishment can provide appropriate support.

- 6.13 When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder.
- 6.14 In exceptional circumstances when a face to face handover is unfeasible, the Senior Designated Safeguarding Lead or Managing Director will ensure that the new post holder is fully conversant with all procedures and case files.
- 6.15 The DSL will report Safeguarding concerns or an allegations of abuse to local authority children’s social care / adult social care and / or the Police, the Training Provider will within 24 hours, inform the ESFA by contacting the Helpdesk (08000 150600 or helpdesk@manage-apprenticeships.service.gov.uk). Such notification will include the name of the Training Provider, a high-level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be investigated by the Local Authority and / or the Police.

7. THE SENIOR MANAGEMENT TEAM

- 7.1 The Senior Management Team (SMT) is the body accountable for ensuring the safety of the company and learners.
- 7.2 The SMT will ensure that:
- The company has a combined safeguarding and child protection policy in accordance with the procedures of Local Safeguarding partnerships;
 - The company operates “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers;
 - At least one senior member of the company’s SMT acts as a Senior Designated Safeguarding Lead, and at least a further deputy SDSL is appointed;
 - All Designated Safeguarding Leads attend appropriate refresher training at least every two years;
 - That appropriate time is made available to the DSLs to allow them to fully undertake their duties;
 - The SMT and all other staff who work with learners undertake training on an annual basis with additional updates as necessary for SDSLs within a 2-year framework;

- Temporary staff and volunteers are made aware of the company's arrangements for safeguarding & child protection and their responsibilities;
- The company remedies any deficiencies or weaknesses brought to its attention without delay; and
- The company has procedures for dealing with allegations of abuse against staff/volunteers.

7.3 The SMT will review all policies/procedures that relate to safeguarding and child protection annually or sooner if required.

7.4 The nominated SDSL for safeguarding at the company is **Phil Lythgoe**. The Nominated SDSL is responsible for liaising with the Managing Director and the Board over all matters regarding safeguarding and child protection issues. The SDSL role is strategic rather than operational – there will be no direct involvement in concerns about individual learners except in an advisory capacity to the DDSLs.

7.4.1 The Nominated SDSL will receive safeguarding training relevant to the governance role and this will be updated every 2 years.

7.5 The Nominated SDSL will liaise with the Managing Director and the Deputy Designated Safeguarding Leads (DDSLs) to produce regular reports for the Board.

7.6 The Nominated SDSL will liaise with the Managing Director and the Deputy Designated Safeguarding Leads to produce the annual Section 175 safeguarding self-assessments and ensure this is submitted on time to the Local Safeguarding Partnerships.

7.7 The SDSL is nominated to be responsible for liaising with the local authority in the event of allegations of abuse being made against the Managing Director.

8. A SAFER COMPANY CULTURE

Safer Recruitment and Selection (see also NTS850 Safer Recruitment Policy)

8.1 The company pays full regard to 'Keeping Children Safe in Education; Sept 2021 and any new updates. Safer Recruitment practice includes scrutinising applicants via the interview process, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS). All appointments made will be risk

assessed in line with the role and responsibilities, regulated activity and information gained from the DBS check. A central register is held within head office which identifies all DBS checks conducted. Where a DBS identifies recordings, a risk assessment will be conducted to determine suitability for the role. The risk assessments will be conducted by HR and the DSL.

8.1.1 An “Interview Panel” will consist of a minimum of 2 persons of management grade, including the applicant’s potential line manager, and a second person relevant to the job position being filled i.e. an IQA. Where considered necessary a third person may be included in the interview panel such as the Programme Operations Manager and/or their deputy. An additional final member may be drawn from the centre where the candidate will work. These additional panel members may also be included to give them experience of the interview process. The company’s official interview scoring sheets will be completed in assessing the candidate’s potential.

- 8.2 All recruitment materials will include reference to the company’s commitment to safeguarding and promoting the wellbeing of learners.
- 8.3 The HR Managers have also undertaken appropriate training in Safer Recruitment. HR Managers will be involved in all staff / volunteer recruitment processes and will be available to sit on any recruitment panel as may be required from time to time.
 - 8.3.1 All participants in an interview panel will have received current Safer Recruitment Training.
 - 8.3.2 Learners are placed with employers for the purpose of various educational provisions such as Apprenticeships, WEX, Traineeships or Kickstart programmes. When these learners are placed Nova Training will conduct the appropriate Health & Safety checks including vettings, gather and review a H&S policy where there is a requirement for a company to have such policy and review their safer recruitment practices when placing such learner. We will always ensure there is a single point of contact in place for safeguarding concerns and issues should they arise. All employers and learners will be aware of the reporting procedure to Nova Training.

Staff Support

- 8.4 We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the Senior Designated Safeguarding Lead and to seek further support as appropriate.
- 8.5 Regular counselling will be offered to the DSL’s and may be extended to other members of staff as deemed appropriate by the company.

9. OUR ROLE IN THE PREVENTION OF ABUSE

- 9.1 We will provide opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their own safety and well-being and also the wellbeing and safety of other learners. All staff should be able to reassure victims that they are being taken seriously and that's they will be supported and kept safe. Reports are always taken seriously and a victim should never feel ashamed for making a report.

The Curriculum

- 9.2 Safeguarding issues will be addressed through the course curriculums, for example self-esteem, emotional literacy, assertiveness, power, healthy relationship education (previously known as sex and relationship education SRE), online safety (formally known as e-safety), sexting, bullying (including cyber bullying) peer on peer abuse and sexual harassment and violence, Prevent and other emerging concerns.
- 9.3 Relevant issues will be addressed through all areas of the curriculum.

Other Areas of Work

- 9.4 All of our policies which address issues of power and potential harm, for example bullying, discrimination, equal opportunities, safer handling, positive behaviour, will be inter-linked to ensure whole company awareness.
- 9.5 Our safeguarding policy cannot be separated from the general ethos of the company, which should ensure that learners are treated with respect and dignity, taught to treat each other with respect, to feel safe, to have a voice, and that they are listened to.

9.6 Procedures to minimise the risk of peer on peer / child on child abuse;

- allegations of peer on peer / child on child abuse will be recorded, investigated and dealt with by the immediate manager
- clear processes are in place as to how victims, perpetrators and any other learner affected by peer on peer abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”;

- staff also need to understand that even if there are no reports of abuse in their centre it does not mean it isn't happening. It may just mean that cases are not being reported and vigilance is needed.
- recognition of the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators), but that all peer on peer and child on child abuse is unacceptable and will be taken seriously; and
- the different forms peer on peer abuse can take, such as:
 - sexual violence and sexual harassment.
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - the practice of "up skirting", which typically involves taking a picture under a person's clothing without them being aware, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or harm
 - sexting (also known as youth produced sexual imagery): will not be tolerated (Appendix 6 identifies the role of staff)
 - initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

10. SAFEGUARDING LEARNERS WHO ARE VULNERABLE TO RADICALISATION

- 10.1 Since 2010, when the Government published the first version of the **Prevent Strategy**, there has been an awareness of the specific need to safeguard children, young people and families from extremist ideologies. There have been multiple occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 10.2 Nova Training values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both learners and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

- 10.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Nova Training is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.
- 10.4 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.
- 10.5 Nova Training seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Safeguarding Risk Reduction

- 10.6 The SMT, the Board, the Managing Director and the Senior Designated Safeguarding Lead will assess the level of safeguarding risk within the Company and put actions in place to reduce that risk. Safeguarding Risk Assessment may include consideration of the various curriculums delivered, SEND policy, the use of company premises by external agencies, integration of learners by gender and SEN, anti-bullying policy and other issues specific to the company's profile, community and philosophy. To this end open source due diligence checks will be undertaken on all external speakers invited to our school as per instructions contained in Appendix 10 Events and External Speakers.
- 10.7 Any Safeguarding Risk Assessment will be reviewed as part of the safety checks monitored by the Regional managers / Performance Managers and SDSL.

Response

- 10.8 With effect from 1st July 2015 all further educational establishments are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

- 10.9 There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people. (More information on these factors is in Appendix 4)
- 10.10 Our company, like all others, is required to identify a Single Prevent Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead. **The SPOC for our company is Phil Lythgoe.** The responsibilities of the SPOC are described in Appendix 5.
- 10.11 Staff of Nova Training will be alert to changes in a learner's behaviour or attitude which could indicate that they need help or protection.
- 10.12 Nova Training will monitor online activity to ensure that inappropriate sites are not accessed by learners or staff. This is best done by the use of specialist online monitoring software, which in Nova Training is provided and operated by OGL Ltd.
- 10.12 When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Deputy Designated Safeguarding Lead if this is not the same person.
- 10.13 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

Channel

- 10.14 Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands/Essex/Cambridgeshire/Norfolk Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

10.15 The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

10.16 Providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

ACT

10.17 All staff are required to undertake awareness e-learning on Action Counters Terrorism (ACT). This training is provided by NACTSO (National Counter Terrorism Security Office) via the ACT Action Counters Terrorism training package.

This training package consisting of 7 modules can be accessed via: <https://ct.highfieldlearning.com/org/Novatraining>

11. SAFEGUARDING LEARNERS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION OR TRAFFICKING

11.1 Our safeguarding policy and the company's values, ethos and behaviour policies, provide the basic platform to ensure our young people are given the support to respect themselves and others, stand up for themselves and protect each other.

- 11.2 Nova keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- 11.3 Our staff are supported to recognise warning signs and symptoms in relation to specific issues, and include such issues, in an age appropriate way, in their lesson plans.
- 11.4 Nova works with and engages with families and the local communities to talk about such issues.
- 11.5 Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- 11.6 Our Designated Safeguarding Leads know where to seek and get advice as necessary.
- 11.7 Our company brings in experts and uses specialist material to support the work we do.

Reporting of Female Genital Mutilation

- 11.8 With effect from September 18 all providers are subject to a mandatory reporting requirement in respect of female genital mutilation. When a staff member discovers that an act of FGM appears to have been carried out on a girl aged under 18, the staff member has a statutory duty to report it to the Designated Safeguarding Lead/Safeguarding Team who will report this to the police. If a teacher in the course of their work discovers that an act of FGM appears to have been carried out to a girl under 18 the teacher must report this to the Police immediately as well as reporting the incident to the DSL.
- 11.9 Irrespective of to whom the first call was made the person reporting their suspicions will also discuss the situation with the Deputy Designated Safeguarding Lead who will consult LADO. Failure to immediately report such cases will result in disciplinary sanctions.
- 11.10 All staff as part of their induction process must complete the mandatory course on “Recognising and Preventing Female Genital Mutilation” provided free of charge by the Virtual College via this link: <https://www.virtual-college.co.uk/resources/free-courses/recognising-and->

preventing-fgm . Certificates evidencing an individual having successfully completed the course must be scanned to the individual's personal Cascade file.

12 SPECIFIC SAFEGUARDING ISSUES

12.1 All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- upskirting; the taking of images under a person's clothing for sexual gratification without them being aware
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

12.2. All staff must be clear in their understanding as to Nova's policy and procedures with regards to peer on peer / child on child abuse.

12.3 Serious Violence. All staff should be aware of indicators, which may signal that children are at risk from or involved in serious violent crime. These may include increased absence from centre, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that the learner has been approached by, or they are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice is provided in the Home Office's publications; "Preventing youth violence and gang involvement" and Criminal exploitation of children and vulnerable adults: county lines violence

12.4 Safeguarding incidents and/or behaviours can be associated with factors outside Nova and/or can occur between children outside Nova. All staff, but especially any of the designated safeguarding leads (or deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of learners should consider whether wider environmental factors are present in a learner's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that Nova provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

13. CHILDREN/YOUNG PEOPLE WHO GO MISSING FROM EDUCATION

- 13.1 A child/young person going missing from education is a potential indicator of abuse or neglect, including sexual exploitation, FGM, forced marriage or travelling to conflict zones. Company staff will be alert to these safeguarding concerns when a learner goes missing for an extended period, or on repeat occasions.
- 13.2 The company must notify the ESFA of any learner under 18 years of age who fails to attend class regularly after making reasonable enquiries as to the reason for absence, or has been absent without the company's permission for a continuous period of 5 days or more. The centre attended (regardless of designation) must also notify the safeguarding team of any learner who:
- Has ceased to attend and no longer lives within a reasonable distance of the company location at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the company of the change);
 - Displaced as a result of a crisis e.g. domestic violence or homelessness;
 - Has been certified by their doctor as unlikely to be in a fit state of health to attend centre/workplace before ceasing to be of compulsory school age, and neither s/he nor his/her parent/carer has indicated the intention to continue to attend Nova after ceasing to be of compulsory school age;
 - Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to Nova at the end of that period; or
 - Has been permanently excluded.

13.3 Our company will demonstrate that it has made reasonable enquiries to ascertain the whereabouts of children/young people that would be considered 'missing'.

14 LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

14.1. The most common reason for children becoming looked after is as a result of abuse and/or neglect. Nova Training will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

14.2 In particular, Nova Training will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Nova Training will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated programme safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

14.3 A previously looked after child potentially remains vulnerable and all staff will have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

WHAT WE DO WHEN WE ARE CONCERNED

Where unmet needs have been identified for a young person utilising the Right Services Right Time (RSRT) model but where there is no evidence of a significant risk, the SDSL will add the young person to the company's vulnerable child list and support staff to deliver an appropriate Early Help response.

15.1 In the first instance the young person will be enabled through the Signs of Safety and Wellbeing practice framework to express their lived experience. This will be documented in the '3 houses format' and added to the learner's file. At this stage simple reasonable adjustments within the educational setting may be all that is needed to address the unmet needs and after review the young person may then be removed from the vulnerable children list.

15.2 Should the life experience of the young person and professional opinion of the SDSL indicate that a wider response is required in order

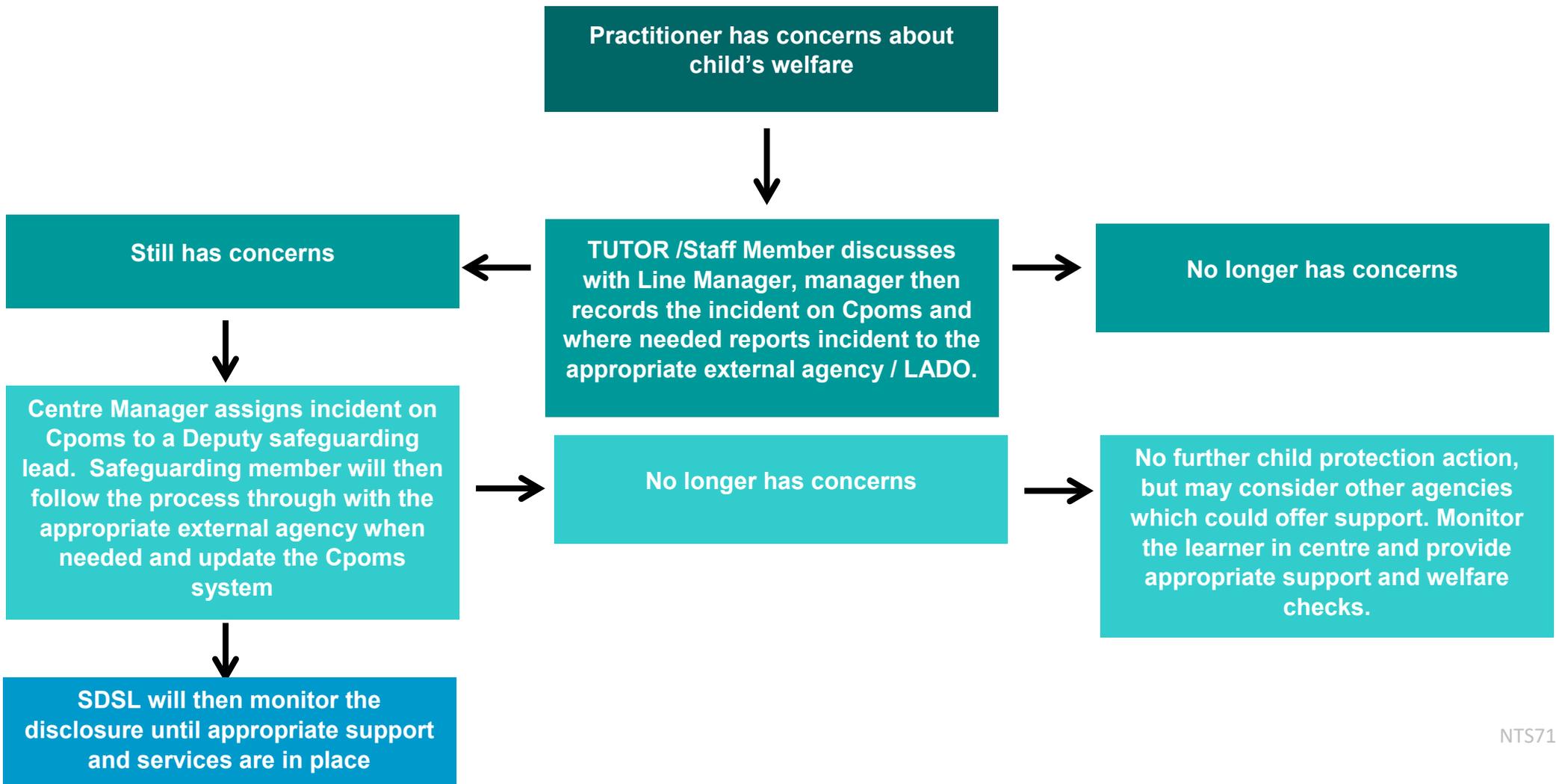
to meet the unmet safeguarding need, the DDSL will develop a company focused action plan with the young person and parent/carer as appropriate. This company focused plan will then be regularly reviewed and updated to record progress towards the goals until the unmet safeguarding needs have been addressed. Once all unmet safeguarding needs have been addressed the child/your person can then be removed from the vulnerable learner list.

15.3 Should the professional opinion of the DDSL indicate that a multiagency response is required in order to meet the unmet safeguarding need the SDSL will initiate a meeting with all key partners and register the outcomes with the local safeguarding board. This multi-agency plan, will then be reviewed regularly and progress updated towards the goals until the unmet safeguarding needs have been addressed.

15.4 Should the DDSL feel that a Social care response is needed to meet the unmet safeguarding need; the SDSL will initiate a Request for Support, seeking advice from Children's Advice and Support Service (CASS) as required. The SDSL will then oversee the agreed intervention from the company as part of the multiagency safeguarding response and ongoing school focused support.

PART TWO – THE KEY PROCEDURES

RESPONDING TO CONCERNS ABOUT A CHILD/YOUNG PERSON



** where Cpoms is not available staff can use NTS732 which is a safeguarding report form. This would then be reviewed by a member of the safeguarding team and at the earliest time be added to the Cpoms system once available.

16. INVOLVING PARENTS/CARERS

- 16.1 In general, Nova Training will discuss any child protection concerns with parents/carers before approaching other agencies, and will seek parents/carers consent in making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the Designated Safeguarding Lead. However, there may be occasions when Nova Training will contact another agency **before** informing parents/carers because it considers that contacting them prior to informing an agency may increase the risk of significant harm to the child.
- 16.2 Parents/carers will be informed about our safeguarding policy through: *our web site, open days and home communications.*

17. MULTI-AGENCY WORK

- 17.1 In the September 2020 issue of KCSiE it outlines the formation of new safeguarding partner arrangements. Every local Authority will have 3 “safeguarding partners”, the LA, an area clinical commissioning group and the chief officer of police of the police area within or encompassing the LA. The partners will make arrangements to work together with appropriate relevant agencies to promote the welfare of local children, including identifying and responding to their needs. We will always work in partnership with all agencies to promote the best interests of our learners as a top priority in all decisions and actions that affect them. Nova Training will, where necessary, liaise with these agencies and make requests for support from children’s social care. These requests will be made by the Designated Safeguarding Lead to the local Children’s Advice Support Service (CASS). Where the learner already has a safeguarding social worker or family support worker, the request for support should go immediately to the team involved, or in their absence to their team manager.
- 17.2 When so invited the SDSL will participate in a MASH strategy meeting’s, usually by conference phone, adding company held data and intelligence to the discussion so that the best interests of the child are met.
- 17.3 We will co-operate with any child protection enquiries conducted by children’s social care: Nova Training will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings initial and review child protection conferences, and core group meetings.

17.4 We will provide reports as required for these meetings. If Nova Training is unable to attend, a written report will be sent. The report will, wherever possible, be shared by Social Care with parents/carers at least 24 hours prior to the meeting.

17.5 Where a learner is subject to an inter-agency child protection plan or a multi-agency risk assessment conference (MARAC) meeting, the company will contribute to the preparation, implementation and review of the plan as appropriate.

18. OUR ROLE IN SUPPORTING CHILDREN/YOUNG PEOPLE

18.1 We will offer appropriate support to individual young people who have experienced abuse, who have abused others (child on child abuse) or who act as Young Carers in their home situation.

18.2 A safeguarding action plan will be devised, implemented and reviewed regularly for these learners. This plan will detail areas of support, who will be involved, and the learners' wishes and feelings. A copy of the plan will be kept in the child/young person's safeguarding record.

18.3 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the centre and community through a multi-agency risk assessment. Within our centres/WBL we will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

18.4 We will ensure Nova Training works in partnership with parents / carers and other agencies as appropriate.

19. RESPONDING TO AN ALLEGATION ABOUT A MEMBER OF STAFF

19.1 This procedure will be used in any case in which it is alleged that a member of staff, centre manager, senior manager, visiting professional or volunteer has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved in a way that indicates s/he is unsuitable to work with children/young people.

- 19.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in centres/WBL to abuse children/young people.
- 19.3 All staff working within Nova Training must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.
- 19.3.1 Allegations or concerns about staff, colleagues and visitors must be reported direct to the Deputy Designated Safeguarding Lead for the region/programme who will liaise with the Senior Designated Safeguarding Lead, Local Authority Designated Officer Team in children's social care who will decide on any action required.
- 19.3.2 If the concern relates to a member of the SMT, it must be reported immediately to the Managing Director, who will liaise with the Local Authority Designated Officer Team in children's social care and they will decide on any action required.
- 19.3.3 If the safeguarding concern relates to the Managing Director then the concern must be made directly, by the SDSL, to the Local Authority LADO team who will decide on any action required.

20. CHILDREN/YOUNG PEOPLE WITH ADDITIONAL NEEDS

- 21.1 Nova Training recognises that all children/young people have a right to be safe, some children/young people may be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.
- 21.2 When Nova Training is considering excluding, either fixed term or permanently, a vulnerable learner or one who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Safeguarding Team.

21. CHILDREN IN SPECIFIC CIRCUMSTANCES **Private Fostering**

- 21.1 Many people find themselves looking after someone else's child/young person without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child

under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

21.2 The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

21.3 People become involved in private fostering for all kinds of reasons. Examples of private fostering include –

- Children/young people who need alternative care because of parental illness;
- Children/young people whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children/young people sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Children/young people staying with families while attending a school away from their home area.

21.4 There is a mandatory duty on Nova Training to inform the local authority of a private fostering arrangement - this is done by contacting the local MASH (See Appendix 11). The local authority then has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Other Specific Circumstances

21.5 Guidance on children in specific circumstances can be found in one or more of the procedures as listed below:

NTS470 Behaviour Management Policy

NTS521 Parental Involvement Strategy

NTS611a Disability Statement

NTS624 ALS Policy

NTS1091	RSE Policy
NTS657	Anti-Bullying Policy
NTS675	Learner Disciplinary Policy
NTS735	Alcohol and Substance Misuse Policy
NTS815	Attendance Policy and Inclement Weather Guidance
NTS838	Learner Voice Strategy
NTS846	Work Experience Policy
NTS850	Safer Recruitment Policy
NTS887	CCTV Policy and Code of Practice
NTS904	E-Safety Policy
NTS932	Administration of Medicines Policy
NTS933	Admission Policy for Learners with High Needs
NTS934	Learner Health and Wellbeing Policy
NTS950	PREVENT Policy

PART 3: NOVA TRAINING STAFF

22 Staff dealing with abusive telephone calls

22.1 Sometimes staff may have to deal with challenging, abusive, aggressive or threatening telephone calls. It is unacceptable for any member of staff to be subjected to such abuse, additionally staff may not know how to handle such a telephone call. This guidance has been produced to assist staff if they are faced with such a situation.

22.2 To reduce the likelihood of callers becoming abusive staff should always conduct themselves in a courteous and professional manner and make every attempt to meet the needs of the caller. Staff should also have the confidence that it is acceptable and necessary to end an abusive telephone call.

22.3 **Never;**

- respond in the same manner as an abusive caller
- take what is said personally
- allow yourself to be bullied by the caller
- slam the phone down.

Further actions:

Make a written note of the telephone call using the incident report form (The incident report form is filed in the learner file with the contact log) and report the incident to your line manager.

24 Threats and Violence against learners and staff

24.1 Nova strictly prohibits use of violence or threats of violence and views such actions very seriously. The possession of weapons, threatening or menacing behaviour, stalking, or acts of violence against learners, employees, visitors, guests, or other individuals by anyone on Nova Training property or on the telephone will not be tolerated.

24.2 Any person who makes substantial threats, exhibits threatening behaviour, or engages in violent acts on Nova Training premises shall be removed from the property as quickly as safety permits and appropriate action will be taken, including reporting the incident to the police when needed.

Any person who makes substantial threats or who is aggressive on the telephone will be reported to the police.

25 Whistleblowing. (See also Policy NTS733 Whistleblowing Policy)

25.1 All staff and volunteers should feel able to raise concerns about poor or unsafe practice or failures in our safeguarding regime and know that such concerns will be taken seriously by the Safeguarding Team and Senior Management Team.

25.2 NTS733 Whistleblowing Policy contains advice and guidance on how one can raise concerns.

25.3 Where a staff member feels unable to raise an issue within the guidelines of our policy, or feels that their genuine concerns are not being addressed other whistleblowing channels may be available to them;

- General guidance on whistleblowing can be found by vis “Advice on Whistleblowing”, and
- The NSPCC’s guide “what you can do to report abuse dedicated helpline” is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about how a safeguarding issue is being handled by the Safeguarding Team. Staff can call 0800 028 0285. This line is available from 8.00 am to 8.00 pm Monday to Friday and email; help@nspcc.org.uk

26 Staff Training

26.1 All staff will undertake safeguarding and child protection training as part of their induction.

26.2 All safeguarding training given to staff, whether part of their induction, refresher training or additional training will be in line with advice from the three safeguarding partners in the LA areas within which the company centre is located.

26.3 All staff will receive regular safeguarding and child protection updates as required and at least annually.

26.4 Safeguarding Team members, Senior Management Team members, regional and centre managers and all WBL managers will receive refresher training on an annual basis as a minimum.

26.5 In deciding training requirements in respect of safeguarding and child protection the company acknowledges that staff and safeguarding team members will continually build on their knowledge and expertise by undertaking training and dealing regularly with safeguarding issues. In planning training the company will provide staff the opportunity to contribute their own knowledge and expertise to the training to make it as effective as possible.

27 Opportunities to teach safeguarding

27.1 Nova Training will ensure all learners are taught about safeguarding, including on-line safety and PREVENT and it will be considered a part of a broad and balanced curriculum.

27.2 Part of this curriculum will be delivered through the medium of Personal, Social, Health and Economic (PSHE) education.

27.3 Whilst the company will seek to protect learners from dangers on-line it will do so in a way that does not lead to unreasonable restrictions as to what learners can be taught with regard to on-line teaching and safeguarding.

APPENDICES

APPENDIX 1

DEFINITIONS AND INDICATORS OF ABUSE

1. NEGLECT

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child/young person from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's/young person's basic emotional needs.

The following list may identify indicators of neglect (this is not an exhaustive list nor is it designed to be used as a checklist):

- Constant hunger;

- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor centre/WBL attendance or often late for class;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child/young person is regularly not collected or received from school; or
- The child/young person is left at home alone or with inappropriate carers.

2. PHYSICAL ABUSE

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

The following may be indicators of physical abuse (this is not an exhaustive list nor is it designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;

- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing in company;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. SEXUAL ABUSE

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

The following may be indicators of sexual abuse (this is not an exhaustive list nor is it designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;

- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to change in front of peers for sports or other activities requiring a change of attire; or
- Bruises or scratches in the genital area.

4. SEXUAL EXPLOITATION

The sexual exploitation of a child/young person may occur when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.

5. EMOTIONAL ABUSE

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

limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children/young people. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not an exhaustive list nor is it designed to be used as a checklist):

- The child/young person consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children/young people stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. RESPONSES FROM PARENTS/CARERS

Research and experience indicate that the following responses from parents/carers may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child/young person is said to have acted in a way that is inappropriate to her/his age and development;

- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation with minor injuries to parts of the body that one would not expect to be constantly injured such as the face;
- A persistently negative attitude towards the child/young person;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child/young person from home; or
- Violence between adults in the household;
- Evidence of coercion and control.

7. DISABLED CHILDREN/YOUNG PEOPLE

When working with children/young people with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child/young person such as the shin, might be of concern on a non-mobile child/young person;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child's/young person's means of communication;
- Ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's/young person's finances; or
- Inappropriate invasive procedures.

APPENDIX 2

DEALING WITH A DISCLOSURE OF ABUSE

When a child/young person tells a teacher or other responsible adult about abuse s/he has suffered, what must they remember to do?

- Always stay calm and be objective
- Do not communicate shock, anger or embarrassment.
- Reassure the child/young person.
- Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child/young person know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children/young people very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child/young person that it is not her/his fault.
- Encourage the child/young person to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child/young person for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child/young person that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child/young person may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child/young person again who you are going to tell and why that person or those people will need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's/young person's own language. Include any questions you may have asked. Be objective in reporting the disclosure do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Managing Director or the Designated Safeguarding Lead.

Children/young people making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Senior Designated Safeguarding Lead or Managing Director.

APPENDIX 3

ALLEGATIONS ABOUT A MEMBER OF STAFF, SMT MEMBER OR VOLUNTEER

1. Inappropriate behaviour by staff/volunteers may take the following forms:
 - **Physical**
For example the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
 - **Emotional**
For example intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
 - **Sexual**
For example sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls, and texts, images via social media, sexual assault and rape.
 - **Neglect**
For example failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
 - **Spiritual Abuse**
For example using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.
2. If a child/young person makes an allegation about a member of staff, governor, visitor or volunteer, the Managing Director should be informed immediately. The Managing Director should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Managing Director will not carry out any investigation him/herself or interview learners.
3. The Managing Director must exercise, and be accountable for, their professional judgement on the action to be taken, as follows;

- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Managing Director will notify the Local Authority Designated Officer (LADO) Team or Position of Trust Team as appropriate in the region in which the centre is situated. The LADO/POT Team will liaise with the SMT and advise about action to be taken, and may initiate internal referrals within children's social care to address the needs of children/young people likely to have been affected.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns (Low level concern), but do raise other issues in relation to the conduct of the member of staff or the learner(s), these should be addressed through the company's own internal procedures. See below

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern – no matter how small, and even if no more than a “nagging doubt” – that an adult may have acted in a manner which,

- Is not consistent with an organisation's Code of Conduct, and / or
- Relates to their conduct outside or work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Staff DO NOT need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by HR and the DSL.

Spectrum of behaviour Appropriate

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

If a member of staff has what they believe to be a low-level concern – they should take the below action.

If a member of staff has an allegation – they should follow the procedure in the organisation’s policy.

Share with HR / Designated safeguarding lead as reasonably practicable and within 24 hours

Where LLC is initially shared with HR they must immediately inform the DSL

In the absence of HR / DSL the Managing Director can be informed.

HR will speak to person who raised LLC, review information and determine whether behaviour:

- (a) is entirely consistent with the organisation's Code of Conduct, and the law
- (b) constitutes a LLC
- (c) is serious enough to consider a referral to LADO
- (d) when considered with any other LLCs that may have previously been raised about the same individual, should be reclassified as an allegation, and referred to LADO/ other relevant external agencies

DSL to seek advice from LADO, if in any doubt – on a no-names basis if necessary

HR / DSL to speak to the individual about whom concern has been raised (unless advised not to do so by LADO/other relevant external agencies, where contacted)

HR / DSL to also consider whether LLC also raises misconduct or capability issues – taking into account any advice from LADO and consulting HR on a no-names basis where necessary – and, if so, to refer matter to HR

HR / DSL to make appropriate records of all internal and external conversations, their determination, the rationale for their decision, and details of any action taken, and to retain records in accordance with LLCs policy

APPENDIX 4

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
“Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”
3. Extremism is defined by the Crown Prosecution Service as:
“The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;*
 - *Seek to provoke others to terrorist acts;*
 - *Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or*
 - *Foster hatred which might lead to inter-community violence in the UK.”*
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Learners may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - **Identity Crisis** – the learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society;

- **Personal Crisis** – the learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - **Personal Circumstances** – migration; local community tensions; and events affecting the learner/'s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - **Unmet Aspirations** – the learner may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
 - **Special Educational Need** – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
- Being in contact with extremist recruiters;
 - Family members convicted of a terrorism act or subject to a Channel intervention;
 - Accessing violent extremist websites, especially those with a social networking element;
 - Possessing or accessing violent extremist literature;
 - Using extremist narratives and a global ideology to explain personal disadvantage;
 - Justifying the use of violence to solve societal issues;
 - Joining or seeking to join extremist organisations;
 - Significant changes to appearance and/or behaviour; and
 - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

APPENDIX 5

PREVENTING VIOLENT EXTREMISM - ROLES AND RESPONSIBILITIES OF THE SINGLE POINT OF CONTACT (SPOC)

The SPOC for Nova Training is **Phil Lythgoe**, who is responsible for:

- Ensuring that staff of the company are aware that he is the SPOC in relation to protecting learners from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing learners from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism; Raising awareness about the role and responsibilities of Nova Training in relation to protecting learners from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the company's curriculums to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the company about the safeguarding processes relating to protecting learners from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the company for case discussions relating to learners who may be at risk of radicalisation or involved in terrorism;

- Collating relevant information from in relation to referrals of vulnerable learners into the Channel*¹ process;
- Attending Channel* meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel Co-ordinator; and sharing any relevant additional information in a timely manner.

* Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability

Prevent duty

Section 26(1) of the Counter-Terrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for further education institutions, including sixth form colleges and independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

Our key aim is to protect our learners from the risk of radicalisation and ensure that we have the appropriate support mechanisms in place in order to protect learners from this risk. As a training provider, Nova Training will:

- Ensure staff are able to identify learners who may be vulnerable to radicalisation
- Ensure staff know what to do if learners have been identified as vulnerable to radicalisation
- Protect learners from the risk of radicalisation as part of Nova Training’s safeguarding duties, whether these risks come from within Nova Training or are the product of outside influences.
- Build learners’ resilience to radicalisation by promoting Fundamental British Values and enabling learners to challenge extremist views. (Nova Training will be a safe space where learners can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments).
- Nova Training will assess the risk of its learners being drawn into terrorism.
- Nova Training staff will have a general understanding of the risks affecting the learners within our community. This would include the increased risk of online radicalisation.
- Nova Training staff will have a specific understanding of how to identify individual learners who may be at risk of radicalisation and what to do to support them.
- In line with Nova Training safeguarding policy, staff will be alert to any changes in learner’s behaviour which could indicate that they may need help or protection against radicalisation.
- Staff will exercise their professional judgement in identifying learners who may be at risk of radicalisation and act promptly and with due proportionality.
- In line with Nova Training Safeguarding Policy, action will be taken if staff observe any behaviours that may cause them concern.

- If it was felt a learner might be vulnerable to being drawn into terrorism Nova Training will always make a referral to the Channel programme.

APPENDIX 6

Peer on Peer / Child on Child Abuse (including bullying, cyber-bullying and sexting)

1. Purpose and content

The purpose of this appendix of the Nova Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of harassment and abuse from peers including through bullying, cyber-bullying and sexting.

2. Definitions

The key terms in this section are defined as:

- **Child/Children:** Being that or those persons under the age of eighteen
- **Vulnerable Adult:** For the purpose of safeguarding, and our duty of care, a vulnerable adult is defined as any adult considered to be at risk
- **Education and Health Care Plan (EHCP):** From September 2014 EHCPs began to replace Statements of Special Educational Needs and Learning Difficulty Assessments from those under the age of 25. An EHCP outlines information about the person including how they communicate, what support they need and what they would like to achieve
- **Bullying:** Behaviour by an individual or group repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes any repeated words or actions, which are aimed at causing someone to feel frightened, miserable and helpless. Bullying can take many forms, including:
 1. Verbal: e.g. name calling, sarcasm, threatening & teasing
 2. Physical: e.g. pushing, hitting, kicking, punching or any use of physical aggressive contact
 3. Social: e.g. ignoring, spreading rumours or treating someone like an outsider

4. Psychological: e.g. stalking & intimidation

- **Cyber-bullying:** 'Virtual' bullying using technology (e.g. chat rooms, instant messaging, email & mobile phone) which can occur in or outside Nova Training Centre. Cyber-bullying can happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily
- **Sexting:** Whilst professionals refer to the issue as 'sexting' there is no clear definition. Many professionals consider sexting to be sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet but learners may be more likely to interpret sexting as writing and sharing explicit messages with people they know. Creating and sharing sexual photos and videos of under 18s, including selfies, is illegal
- **Harassment:** Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the centre. Harassment may be repetitive or an isolated occurrence against one or more learners

3. External guidance

Peer on peer abuse can take many forms including physical, sexual (e.g. inappropriate touching) and emotional abuse (including bullying).

Department for Education (DfE) September 2021 Sexual harassment and sexual violence between children in schools and colleges, Keeping children safe in education 2021 statutory guidance for schools and colleges, statutory guidance on RSE and Ofsted recent report 2021 makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up.' All reports will be taken seriously whilst we ensure the

The Equality Act 2010 replaced previous anti-discrimination laws with a single Act. A key provision was a new public sector Equality Duty, which came into force on 5 April 2011. This requires Nova Training to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

Peer on peer / child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest

itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities). Bullying (including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are lesbian, gay, bisexual or transgender (LGBTQ), those from minority ethnic groups, or those with disabilities and/or learning difficulties can be more vulnerable to this form of abuse and Nova Training takes its duty to protect more vulnerable learners very seriously.

Peer on peer / child on child abuse will be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Sexting involving those under the age of 18 must always be referred to the Senior Designated Safeguarding Lead or a member of the Safeguarding team

4. Actions

The following actions must be taken by all staff:

- All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken
- Staff must ensure ground rules are set in induction and that learners are made aware of the importance of adhering to fundamental British values, what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed.
- Staff who work with learners under 18, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe from abuse through the tutorial programme
- Staff receiving reports of abuse, including incidents that take place off Nova premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which will be managed in line with the Behavioural Procedure. Sanctions against perpetrators may include suspension whilst an investigation takes place and permanent exclusion
- Staff must ensure appropriate managers are notified. This includes the safeguarding team.
- All staff involved must carefully consider the potential impact of the abuse on both the perpetrator/s and the victim/s and refer those involved for additional support from the welfare team as appropriate. Significant concerns must be referred to a Designated Person for safeguarding following the referral routes outlined in PART TWO – THE KEY PROCEDURES RESPONDING TO CONCERNS ABOUT A CHILD/YOUNG PERSON.

- The Designated Person will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral for counselling and to the police as although some types of abuse (e.g. bullying) may not be a specific criminal offence in the UK, some types of harassing or threatening behaviour could be a criminal offence (e.g. under the Protection from Harassment Act 1997)
- All allegations/incidents must be recorded and learners involved told what is being recorded, in what context, and why
- Any incident of abuse must be discussed with the learners' parents/carers for under 18s and those under the age of 25 in receipt of an EHCP and/or high needs funding. An agreement must be reached as to what action should be taken subject to compliance with the Behavioural Procedure

5. Useful contacts

- NSPCC Helpline 0808 800 5000
- ChildLine 0800 500 / www.childline.org.uk
- Kidscape www.kidscape.org.uk
- Anti-Bullying Alliance www.antibullyingalliance.org
- Bullying UK www.bullyinguk.org.uk

APPENDIX 7

Gang Initiation and Hazing

Gang Initiation is a rite of passage marking entrance or acceptance into a group or society. It could also be a formal admission to adulthood in a community or one of its formal components. In an extended sense it can also signify a transformation in which the initiate is 'reborn' into a new role. Examples of initiation ceremonies might include Hindu diksha, Christian baptism or confirmation, Jewish bar or bat mitzvah, acceptance into

a fraternal organization, secret society or religious order, or graduation from school or completion of recruit training. A person taking the initiation ceremony in traditional rites, such as those depicted in these pictures, is called an initiate.

Gangs often require new members to commit crimes before accepting them as part of the gang. New members may be physically beaten by fellow gang members to demonstrate their courage, also known as "beat in" or "jump in", which occasionally results in a fatality. One study indicates that young people are more likely to be hurt in gang initiation than they are by refusing to join. Female members may be required to have sex with male members as a form of initiation, also known as "sex in", though they may also be "jumped-in" like their male counterparts. Another study shows that female members who were "sexed-in" as part of gang initiation were thereafter viewed with lower respect than those that were "jumped-in", even when promised they would become full-fledged members. Sexed-in members face greater risks of sexual exploitation and [abuse](#) by fellow male members.

Hazing

Hazing is any action taken or any situation created intentionally that causes embarrassment, harassment or ridicule and risks emotional and/or physical harm to members of a group or team, whether new or not, regardless of the person's willingness to participate.

Some definitions of hazing vary but all have common factors:

- Power differential between those in a group and those who want to join a group, or between senior and junior members of a group
- Intentional initiation rite, practice or 'tradition' involved
- Willingness to participate does not absolve responsibility for either party

Below are just some examples of hazing practices that occur:

- Forced activities for new recruits to 'prove' their worth to join
- Forced or required consumption of alcohol
- Requirement to eat extremely spicy foods, or other unpalatable substances
- Requirement to endure hardships such as staying awake, menial tasks, physical labour, running while blindfolded, etc.
- Humiliation of new or potential members
- Isolation of new or potential members
- Beatings, paddling, or other physical acts against new or potential members
- Requirements for new or potential members to do things established members are not required to do

- Illegal activities such as requirement to steal local items as part of a scavenger hunt

Preventing Violence

In order to tackle violence affecting learning providers and the community, it is important to:

- understand the problems that young people are facing both in Nova Training and in their local community;
- consider possible avenues of support; and
- work with local partners (who may have valuable information, resources or expertise).

Staff should also recognise that ‘early intervention’ includes anti-bullying and a curriculum that ensures that young people develop the social and emotional skills they need in order to meet their full potential. For example, the curriculum should include teaching conflict resolution skills, understanding risky situations, and violence and abuse should be clearly defined so that young people know when to seek help.

Understanding the issue

It is important to understand fully the issue or issues that affect the local area. In-depth analysis of the issues should highlight areas for action by bringing together information about:

- the scale and nature of youth violence;
- who is involved;
- what may already be in place to help young people;
- and where there may be gaps.
- Engaging with the local community safety partnership, the youth offending team, neighbourhood police team can assist if there is a gang or youth violence problem in their area

APPENDIX 8

Criminal exploitation: County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of “*county lines criminal activity*”: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Key to identifying potential involvement in county lines are learners missing learning sessions and excessive irregular absence, when the victim may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, County Lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Information and guidance on the National Guidance Mechanism can be found on: <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>

APPENDIX 9

'Honour-Based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). The SDSL will, as appropriate, activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

APPENDIX 10

External Speakers

- An external speaker is used to describe any individual or organisation who is not a learner or staff member of Nova Training.

We welcome the events that centres and WBL host from time to time (face to face or online) and we are fortunate that many of these events have external speakers attending. Nova Training has a responsibility to make sure that everyone attending an event feels safe. Our Visitors Policy makes sure that we are protecting both learners and the reputation of Nova whilst following legislation that we are responsible for upholding by law.

Learner safety and welfare is at the heart of Nova policies and practices. Nova wants all of our activities to be:

- safe (complying with the safeguarding policy and Policy to Support the Prevention of Extremism and Radicalisation (*PREVENT*))
- without risk to the reputation of Nova Training

- within the law as defined in our statutory guidance.

Sometimes an external speaker or their topic of discussion has the potential to go against our conditions for a safe event. We're committed in working together with event organisers and in some cases the external speakers themselves to make sure that we reach a judgement that is reasonable, informed and within the law.

The person organising any event is responsible for the activities that take place online or within their centre or WBL area. All speakers will be made aware of their responsibility to abide by the law and Nova Training policies, they:

- must conduct themselves in an appropriate manner at all times
- must not incite hatred, violence or call for the breaking of the law
- are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts
- must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony
- must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge
- are not permitted to raise or gather funds for any external organisation or cause
- must be issued the external speaker policy and agree to the policy before any activity is undertaken.

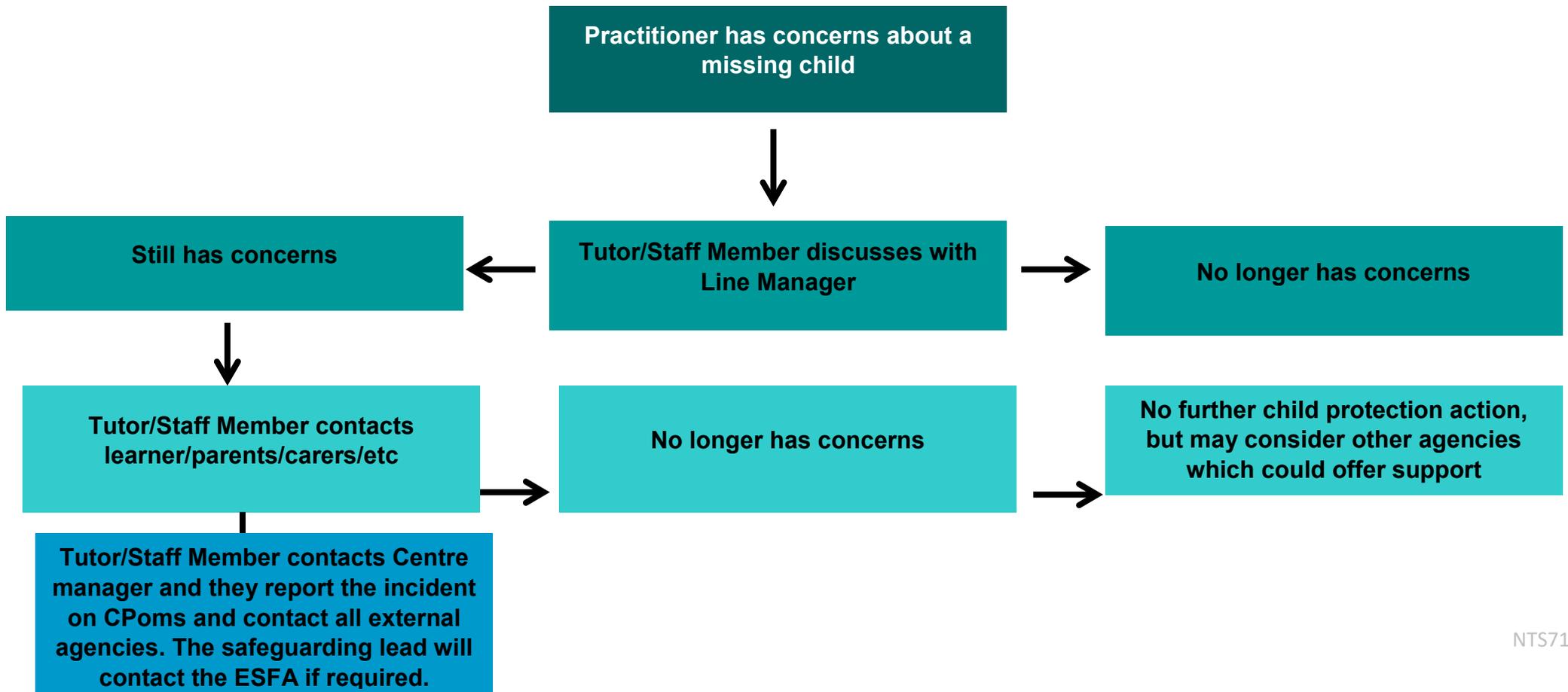
REGULATORY STEPS MAY INCLUDE REQUIRING THAT:

- a copy of any presentation to be delivered by the speaker is submitted to the organising centre or WBL manager to be risk assessed as to the suitability of the content.
- If any doubt exists over the appropriateness of the content it must be approved by the Managing Director and/or the Safeguarding DSL prior to the event taking place.

- any event where concerns exist concerning the speaker for whatever reason the engagement of the speaker must be personally approved by the Managing Director or in his absence the Safeguarding DSL. An appropriate staff member must be able to challenge the speaker when needed regarding content being discussed to offer another view point. If needed the event will be stopped immediately.

• APPENDIX 11

**THE KEY PROCEDURES FOR LEARNERS WHO ARE MISSING
 RESPONDING TO CONCERNS ABOUT A CHILD/YOUNG PERSON SAFETY**



**THE KEY PROCEDURES FOR LEARNERS WHO ARE MISSING
RESPONDING TO CONCERNS ABOUT A CHILD/YOUNG PERSON SAFETY**

The centre identifies that the learner is not in the centre. A staff member telephones the learner's home to seek reasons for the absence and reassurance from a parent/care that the learner is safe at home.

Result of call	Action
There is no answer at the home or on mobile phone numbers	Call back. Risk assess after 2 hours
The parent/carer answered the call, the learner is safe with them	Ask for reasons for absence and document in the learner contact log/ learner compliance file
The person answering the call is not the parent/carer and the centre is not reassured that the learner is at home safe	The centre safeguarding champion/Nova safeguarding lead should be consulted on a risk assessment and the degree of vulnerability of the learner
The parent/carer answered the call, the learner is not with them or safe the parent/carer is concerned	Centre to advise parent/carer that they will: <ul style="list-style-type: none"> • Contact the local police to inform them that the learner is missing • Parent/carer to contact the centre if the learner returns unharmed

If there is reason to believe that the learner is at risk of harm, the centre manager must contact the Police and Social Services immediately (MASH)

RISK ASSESSMENT FOR A MISSING LEARNER

Assessing vulnerability requires a combination of professional knowledge and knowledge of the individual learner and local circumstances. Considering the following questions could assist the process. If in doubt always consult with the safeguarding team.

Criteria (i)	Risk	Action
Is there a good reason to believe that the learner maybe the victim of crime?		Immediately report to the designated safeguarding lead who will advise of the next steps e.g. Inform Police and Social services immediately
Does the learner have formal child protection plan?		
Is the learner a looked after child (LAC)		
Is the learner involved with social services, adult social care, CAMHS?		
Is the criminal justice involved with the learner (YOT)?		
Is there a person in the home or visiting the home who poses an ongoing risk, or who has previously harmed the learner?		
Is the learner at risk of sexual exploitation?		
Is the learner at risk of radicalisation?		
Is the learner at risk of significant harm?		

Are there religious or cultural reasons to believe that the learner is at risk? (FGM or forced marriage)		
Is the learner involved in County Line (drugs/gangs)?		
Has there been a change in the learners/ families financial circumstances?		<p>Firstly inform the Deputy Designated Safeguarding Lead for advice.</p> <p>Who will give consideration to the vulnerability of the learner and following risk assessment, you will need to inform one or all of the following:</p> <ul style="list-style-type: none"> • Police • Social services • MASH • LEA • Etc
Is there a known history of domestic violence?		
Is there any concern about the parent/carer ability to protect the learner from harm?		
Was there any incident prior to the learner's unexplained absence?		
Has the learner been a victim of bullying? (including peer on peer/ hazing etc)		
Does the learner need essential medical or health care?		
Was the learner noted to be depressed prior to the absence?		
Has the learner gone missing with the whole family?		
Is there a history of poor attendance?		
Are there any family issues, neighbourhood issues?		

Appendix 12

Seven golden rules when sharing information.

- 1. Remember that the Data Protection Act is not a barrier to sharing information for any safeguarding issue** but provides a framework to ensure that personal information about learners is shared appropriately.
- 2. Be open and honest** with the learner (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 3. Seek advice** if you are in any doubt, without disclosing the identity of the learner where possible.
- 4. Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the staff/external agencies interest. You will need to base your judgement on the facts of the case.
- 5. Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the learner and others who may be affected by their actions.
- 6. Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those staff /external agencies who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 13

MASH Contacts List for all centres and WBL

The following link can be pasted into your browser and will give up to date information per local authority (West Midlands only) regarding who to contact to raise a concern - <https://westmidlands.procedures.org.uk/local-content/ygjN/lado-contacts-allegations-about-a-colleague-professional/?b>. For additional information and centres outside the West Midlands please see contact list below.

Names	Mash Contacts
WILLENHALL	<p>Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri) call 01902 555392</p> <p>You get put through to a duty social worker who will then tell you what you need to do next.</p> <p>If you are concerned about an adult, please contact the MASH using the phone number below.</p> <p>Daytime 8.30am -5.00pm (Mon-Thurs) and 4.30pm (Fri) 01902 551199</p> <p>Out of hours please call Emergency Duty Team on 01902 552999</p> <p>For further information on Safeguarding in Wolverhampton is available on the Safeguarding Boards website:- http://www.wolverhamptonsafeguarding.org.uk/</p> <p>All MASH referrals are now completed online and there are no specific personnel that can be contacted. These details will also cover Bushbury and Bilston.</p>

<p>BILSTON</p>	<p>Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri) call 01902 555392</p> <p>If you are concerned about an adult, please contact the MASH using the phone number below.</p> <p>Daytime 8.30am -5.00pm (Mon-Thurs) and 4.30pm (Fri) 01902 551199</p> <p>Out of hours please call Emergency Duty Team on 01902 552999</p> <p>For further information on Safeguarding in Wolverhampton is available on the Safeguarding Boards website:- http://www.wolverhamptonsafeguarding.org.uk/</p> <p>All MASH referrals are now completed online and there are no specific personnel that can be contacted. These details will also cover Bushbury and Willenhall.</p>
<p>PRIMROSE HILL/NETHERTON, HALESOWEN ROAD</p>	<p>http://safeguarding.dudley.gov.uk/child/work-with-children-young-people/multi-agency-safeguarding-hub/ Safeguarding Lead for Education (SLE) / Duty LADO 01384 816822</p>
<p>BROWNHILLS</p>	<p>Michelle Pinnock-Ouma LADO 01922 654 040</p>
<p>BUSHBURY STUDY PROG</p>	<p>Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri) call 01902 555392</p> <p>You get put through to a duty social worker who will then tell you what you need to do next.</p> <p>If you are concerned about an adult, please contact the MASH using the phone number below.</p> <p>Daytime 8.30am -5.00pm (Mon-Thurs) and 4.30pm (Fri) 01902 551199</p> <p>Out of hours please call Emergency Duty Team on 01902 552999</p>

	<p>For further information on Safeguarding in Wolverhampton is available on the Safeguarding Boards website:- http://www.wolverhamptonsafeguarding.org.uk/</p> <p>All MASH referrals are now completed online and there are no specific personnel that can be contacted. These details will also cover Bilston and Willenhall.</p> <p>The website is: https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/i-work-with-children-young-people-families/multi-agency-safeguarding-hub-mash (Copy and paste this link into your browser) Wolves LA for High Needs Learners that are on programme with ourselves Contact: Michelle McManus</p>
<p>BUSHBURY SCHOOLS</p>	<p>Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri) call 01902 555392 You get put through to a duty social worker who will then tell you what you need to do next.</p> <p>The website is: https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/i-work-with-children-young-people-families/multi-agency-safeguarding-hub-mash (Copy and paste this link into your browser)</p>
<p>WBL</p>	<p>Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri) call 01902 555392 You get put through to a duty social worker who will then tell you what you need to do next.</p> <p>The website is: https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/i-work-with-children-young-people-families/multi-agency-safeguarding-hub-mash (Copy and paste this link into your browser)</p>

	<p>If you are concerned about an adult, please contact the MASH using the phone number below.</p> <p>Daytime 8.30am -5.00pm (Mon-Thurs) and 4.30pm (Fri) 01902 551199 Out of hours please call Emergency Duty Team on 01902 552999</p>
CANNOCK	<p>First response 08001313126 option 2</p>
REDDITCH	<p>There is no direct contact only a website to refer to:</p> <p>http://www.worcestershire.gov.uk/childrenyoungpeopleandfamilies (Copy and paste this link into your browser)</p>
WELLINGTON	<p>Family Connect Team Derby House 4th Floor B/C Wing Lawn Central Telford TF3 4JA Email Address: familyconnect@telford.co.uk Telephone: 01952 385 385</p>
BIRMINGHAM, STETCHFORD	<p>Only one point of contact. If there is a concern ring the below number who will advise you on what to do. 0121 303 1888</p>
OLDBURY	<p>Paste the link given below into your browser:</p> <p>https://sandwellscb.org.uk/wp-content/uploads/2018/01/MASH-Leaflet-Final.pdf The link gives you a leaflet with a lot of information about safeguarding and MASH and what to do next. You can contact the Multi-Agency Safeguarding Hub (MASH) on: Access_Team@sandwell.gcsx.gov.uk or 0121 569 3100</p> <p>Please find below the Multi-Agency Referral Form (MARF) and Multi-Agency Referral Form (MARF) Guidance for Sandwell.</p>

	<p>This form should be used to refer children to Sandwell Children’s Trust where there are concerns about a child’s safety and/or wellbeing.</p> <p>The form and guidance will be available on the Sandwell Safeguarding Children Board’s website from 1st March 2019 and should be used from that date.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  Sandwell MARF 2019.docx </div> <div style="text-align: center;">  Sandwell MARF Guidance 2019.docx </div> </div> <p>The MASH team in Sandwell are based at: METSEC House, Broadwell Rd, Oldbury, West Mids B69 4HE Telephone: 0121 569 4770.</p>
STAFFORD	<p>Staffordshire First Response Team (Children) 0800 1313126</p> <p>Staffordshire Adults Team (contact centre) 0845 6042719</p> <p>Stoke-on-Trent Safeguarding Referral Team (Children) 01782 235100</p> <p>Stoke-on-Trent Adults Referrals (contact centre) 0800 5610015</p> <p>Staffordshire Police MASH Team (Professionals only) 01785 235350</p> <p>Staffordshire and Stoke-on-Trent NHS Partnership Trust 01785 895630</p>
HEREFORD	<p>https://herefordshiresafeguardingboards.org.uk/herefordshire-safeguarding-children-board/for-professionals/</p> <p>(Paste this link into your browser for guidance)</p>
WALSALL,GOSCOTE	<p>The Civic Centre, 2nd floor Darwall Street Walsall WS1 1TP</p> <p>Telephone: 0300 555 2866</p>

WEST BROMWICH	<p>The MASH team in Sandwell are based at: METSEC House, Broadwell Rd, Oldbury, West Mids B69 4HE Telephone: 0121 569 4770.</p>
KIDDERMINSTER	<p>Worcestershire Safeguarding Children Board http://www.worcestershire.gov.uk/safeguardingchildren/ The Family Front Door: 01905 822666 Single point Access team 19 +: 01905 681477 Single point access team CAMHS: 01905 768300</p>
LYE	<p>http://safeguarding.dudley.gov.uk/child/work-with-children-young-people/multi-agency-safeguarding-hub/ (Paste this link into your browser for guidance)</p>
BRIDGNORTH	<p>First Point of Contact (FPOC): 0345 678 9021 Out of hours Emergency Duty Team: 0345 678 9040</p>
KINGS LYNN	<p>Norfolk MASH Team https://csapps.norfolk.gov.uk/csshared/ecourier2/fileoutput.asp?id=14224 Telephone 0344 800 8020 If completing a NSCB1 –referral form please return to: Email: mash@norfolk.gcsx.gov.uk Fax: 01603 762445 Address: The MASH Team Manager, Floor 5, Vantage House, Fisher’s Lane, Norwich NR2 1ET PSB out contacts: https://www.norfolklscb.org/ Norfolk Safeguarding Children Board</p>

	<p>01603 223409</p> <p>For specialist Police Advice you can contact the Duty Detective Sergeant within the MASH Team.</p> <p>Email : MASHSupervisors@norfolk.pnn.police.uk</p> <p>Call :- Direct dial 01603 2716151</p>
THETFORD	<p>Norfolk MASH Team https://csapps.norfolk.gov.uk/csshared/ecourier2/fileoutput.asp?id=14224</p> <p>Telephone 0344 800 8020</p> <p>If completing a NSCB1 –referral form please return to: Email: mash@norfolk.gcsx.gov.uk Fax: 01603 762445</p> <p>Address: The MASH Team Manager, Floor 5, Vantage House, Fisher’s Lane, Norwich NR2 1ET</p> <p>PSB out contacts: https://www.norfolkscb.org/</p> <p>Norfolk Safeguarding Children Board 01603 223409</p> <p>For specialist Police Advice you can contact the Duty Detective Sergeant within the MASH Team.</p> <p>Email : MASHSupervisors@norfolk.pnn.police.uk</p> <p>Call :- Direct dial 01603 2716151</p>
DEREHAM	<p>Norfolk MASH Team https://csapps.norfolk.gov.uk/csshared/ecourier2/fileoutput.asp?id=14224</p>

Telephone 0344 800 8020

If completing a NSCB1 –referral form please return to:

Email: mash@norfolk.gcsx.gov.uk

Fax: 01603 762445

Address: The MASH Team Manager, Floor 5, Vantage House, Fisher's Lane, Norwich NR2 1ET

PSB out contacts:

<https://www.norfolkscb.org/>

Norfolk Safeguarding Children Board
01603 223409

For specialist Police Advice you can contact the Duty Detective Sergeant within the MASH Team.

Email :

MASHSupervisors@norfolk.pnn.police.uk

Call :- Direct dial 01603 2716151

GREAT YARMOUTH

Norfolk MASH Team

<https://csapps.norfolk.gov.uk/csshared/ecourier2/fileoutput.asp?id=14224>

Telephone 0344 800 8020

If completing a NSCB1 –referral form please return to:

Email: mash@norfolk.gcsx.gov.uk

Fax: 01603 762445

Address: The MASH Team Manager, Floor 5, Vantage House, Fisher's Lane, Norwich NR2 1ET

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	<p>https://www.norfolkscb.org/</p> <p>Norfolk Safeguarding Children Board 01603 223409</p> <p>For specialist Police Advice you can contact the Duty Detective Sergeant within the MASH Team.</p> <p>Email : MASHSupervisors@norfolk.pnn.police.uk</p> <p>Call :- Direct dial 01603 2716151</p>
CLACTON ON SEA	<p>Day-time help Monday to Thursday 8.45am - 5.00pm Telephone: 0345 606 1212 Friday and bank holidays 8.45am - 4:30am Telephone: 0345 603 7634</p> <p>Emergency contact details:</p> <p>Where a situation is urgent and cannot wait until the next working day:</p> <p>Monday to Thursday 5.30pm - 9am Friday and bank holidays 4.30pm – 9am Telephone: 0345 606 1212</p>
COLCHESTER	<p>No Colchester specific MASH team at the moment. Essex Safeguarding children board: http://www.escb.co.uk/ 24 hour protection line for children and vulnerable adults : 0345 603 7634 or 0345 603 7627 (helpline) Essex Social Care Direct : 0845 603 7630</p>
LUTON	<p>Luton MASH directory: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSqZfQ&amp%3B&amp%3Bfamilychannel=11_6 Telephone: 01582 547653 Out of hours: 0300 300 8123 Email: mash@luton.qcsx.gov.uk</p>

Luton Safeguarding Children Website

https://www.luton.gov.uk/health_and_social_care/safeguarding/safeguarding_children/Pages/default.aspx