



2021/22

SAFEGUARDING POLICY

To be read in conjunction with this Policy -

Including Prevent Strategy

References:

[VTR Referral Process 2020](#)

VTR Referral Form

[VTR Quick Guide](#)

Prevent Duty Risk Assessment and Action Plan

Critical Incident Action Plan

1. POLICY STATEMENT

- 1.1 Lighthouse (Training & Development) Ltd has a statutory and moral duty to ensure that the company functions with a view to safeguarding and promoting the welfare of children/young people and vulnerable adults receiving education and training with the provider.
- 1.2 Throughout these policies and procedures, reference is made to “children and young people” or “child”. This term is used to mean “those under the age of 18”.
- 1.3 Throughout these policies and procedures reference is made to “All Staff”. This term is used to mean “All staff in direct contact with Apprentices or involved in recruitment”
- 1.4 It is also recognised that some adults are vulnerable to abuse. Accordingly, the procedures are also applied to allegations of abuse and the protection of vulnerable adults. Guidance on who is a vulnerable adult is taken from ‘Office of the Public Guardian – Safeguarding Policy’, which defines vulnerable adults as: ‘These people may be at risk of abuse or neglect due to the actions (or lack of action) of another person’.
- 1.5 The definition of vulnerable adults includes (but is not exclusive to) individuals with any of the following:
 - Learning Difficulties
 - Physical Impairments
 - Sensory Impairments
 - Mental Health Needs
 - Age Related frailty
 - Dementia
 - Brain Injuries
 - Drug or Alcohol Problems
- 1.6 The company will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to the County Council’s Department of Children and Young People’s Services, the County Council Adult Social Care Service, the police or in cases of radicalisation to the Channel Scheme through the appropriate reporting line - Vulnerable to Radicalisation (VTR) Referral Process.
- 1.7 The Directors and all staff working with children/young people and vulnerable adults will receive training adequate to familiarise them with child/vulnerable adults protection issues and their responsibilities and the company’s procedures and policies, with refresher training at least every three years.
- 1.8 The Head of Programmes is the member of the Senior Leadership Team with lead responsibility for protection issues. They shall be assisted by other members of staff with responsibility of child/vulnerable adult protection. These are known as the Designated Safeguarding Officers and their names and titles are set out in Annex 1 of this policy.
- 1.9 The Directors recognise the following as definitions of abuse:

- .1 **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, including a brother or sister, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as fabricated or induced illness by proxy, or Munchausen syndrome by proxy.

Bullying can also be a form of physical and emotional abuse. However, it is more often between peers and needs to be dealt with locally by tutors and through the complaints process.

- .2 **Psychological/Emotional abuse** is the persistent emotional ill-treatment of a person to cause severe and persistent adverse effects on his or her emotional development. It may involve conveying to that child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.

- .3 **Sexual abuse** involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images.

Reviewed Guidance - 2021 – Keeping Children Safe in Education 2021 September 2021 (Part 5). Responding to reports of sexual violence, Sexual Violence and sexual harassment between children in schools and colleges. Referral processes can include multi-agency safeguarding partners, Rape Crisis or The Survivors Trust.

- .4 **Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.

1.9 In respect to vulnerable adults, the local County Council Guidelines identify seven forms of abuse. In addition to the four above they also identify:

- .1 **Financial abuse** is defined as the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or

deception; or, the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and unreasonable restriction on a person's right to control over their lives to the best of their ability.

- .2 **Discriminatory abuse** is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation, etc.
- .3 **Institutional abuse** is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of the providers rather than the person requiring the service.

1.10 In respect of safeguarding individuals from radicalisation, the company works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for Apprentices through referrals to Multi Agency Safeguarding Hub (MASH) or to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

1.11 The company will ensure that all staff members are aware of the responsibilities of the organisation to promote understanding of Safeguarding, awareness of Safeguarding procedures and processes. This is completed through the induction process of staff and apprentices to programmes within handbooks and training.

1.12 The company will review this policy on an annual basis or when significant changes to the policy and process is required.

2. DESIGNATED STAFF WITH RESPONSIBILITY FOR CHILD PROTECTION/ VULNERABLE ADULTS

2.1 The Designated Lead Safeguarding Officer (DLSO) had lead responsibility for child/ vulnerable adult protection issues is the Head of Programmes.

2.2 This person is a senior member of the company. They have a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children, young people and vulnerable adults learning with the company.

2.3 The DLSO will provide an annual report to the board of directors setting out how the company has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the Local Safeguarding Children Board (LSCB) (or others) to the governing body at the earliest opportunity.

2.4 The DLSO is responsible for overseeing the operation of procedures. This involves:

- .1 Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the County Council's Department of Children and Young People's Services, or other agencies (such as the police, MASH, Channel) as appropriate.
- .2 Providing advice and support to other staff on issues relating to child/vulnerable adults protection
- .3 Maintaining a proper record of any child/vulnerable adults protection referral, complaint or concern (even where that concern does not lead to a referral)
- .4 Ensuring that parents/carers of children and young people/ vulnerable adults studying with the provider are aware of the company's Child/Vulnerable adults Protection Policy
- .5 Liaising with the Children and Young People's Services Department of the Local Authority, the Local Safeguarding Children Board and other appropriate agencies
- .6 Liaising with employers and training organisations that receive children or young people/vulnerable adults from the company on long term placements to ensure that appropriate safeguards are put in place
- .7 Ensuring that all staff receive basic training in child protection/ vulnerable adults issues and are aware of the company's Child/ Vulnerable adults Protection Procedures
- .8 Communicating all updates and changes to policy to the board of Directors.

Designated Safeguarding Officers

- 2.5 Designated Safeguarding Officers (DSO's) with particular responsibility for child protection / vulnerable adult issues are -
 - The Programme Manager
 - A nominated Tutor (as a secondary duty)
- 2.6 These designated staff members:
 - .1 Report to the DLSO on child/vulnerable adults protection issues
 - .2 Are trained and able to receive and make an appropriate child/vulnerable adults protection referral to external agencies
 - .3 Will be available to provide advice and support to other staff on issues relating to child/vulnerable adults protection
 - .4 Have particular responsibility to be available to listen to children, young people and vulnerable adults studying with the provider
 - .5 Will deal with individual cases, including attending case conferences and review meetings as appropriate

3. DEALING WITH DISCLOSURE OF ABUSE: THE COMPANY PROCEDURES FOR REPORTING CONCERNS

- 3.1 The company has published procedures for reporting cases of suspected abuse of young people or vulnerable adults.
- 3.2 These procedures are issued to all members of staff and all new recruits to the company during their induction. Further staff (mandatory) training is provided to all company staff and renewed every three years.

4. RECRUITMENT AND SELECTION PROCEDURES

4.1 Key aspects of the procedures and processes are as follows;

- Job descriptions are available for all roles.
- A person specification setting out the key selection criteria for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with children and young adults.
- A standard application form that provides for the collection of information on applicants that enables the company to recruit safely.

Lighthouse (Training and Development) Ltd are unable to request Standard or Enhanced DBS checks, as the organisation does not meet the criteria to apply. The Directors have taken the decision not to request Basic DBS checks, as they are satisfied that the recruitment process is sufficient to keep apprentices safe.

- Advertising of posts externally as appropriate.
- A requirement for those appointed to produce documentary evidence of academic/vocational qualifications.
- Standard interview questions for Trainer and Tutor appointments and other key staff who work with children and young adults exploring their suitability in this respect. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicants.
- Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be the applicant's existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no previous work experience e.g. young persons. Where appropriate referees are asked specific questions about an applicant and their role in safeguarding children &/or vulnerable adults.

5. ONLINE LEARNING AND REMOTE DELIVERY

Due to the challenges of delivering learning through remote methods in response to the COVID-19 Pandemic, Lighthouse (Training & Development) Ltd considered the following measures when moving to an online platform for learning and development:-

- Learner's access to online platforms required for learning and development processes
- Security of the platform to protect delegates in an online learning environment
- Use of data and information to deliver online learning to all
- Awareness of Safeguarding concerns and how to respond to this

In response to these key areas the following processes have been put into place;

- Communication with employers regarding the changes to delivery methods, and barriers to this, including:
 - access to equipment and online platforms
 - liaising with IT teams to ensure secure connections to sites
 - ensuring the employers are aware of the changes to learning activities and methods and their understanding of the requirements of Safeguarding and any risks to this process
- Testing online learning platforms with delegates for access to the relevant sites as well as risks involved in links within emails and phishing emails. Confirming email addresses that learners will be contacted by and what to do if receive a suspicious email.
- When using online platforms security measures are in place including:-
 - password entry to the platform
 - a member of the Lighthouse group allowing learners into the sessions
 - preventing access to individuals that are not required within the session
- Allowing access for delegates to mute or unmute, share video or screens as required throughout sessions
- Learners made aware of how to raise a concern
- Sign off of all materials shared in the online setting prior to sessions by Senior member of delivery team
- Promoting safe use of online learning and development activities through webinars and updates
- Monitoring attendance to sessions and completing follow up contact from sessions
- For staff training on the different safety concerns of moving to an online platform, reinforcing the signs of abuse and the process to follow internally.

APPENDIX 1

PROCEDURES FOR REPORTING CASES OF SUSPECTED ABUSE INVOLVING CHILDREN/YOUNG PEOPLE OR VULNERABLE ADULTS

1. THE DUTY TO REPORT

- 1.1 ***Lighthouse (Training & Development) Ltd and all its members of staff have a legal duty to report cases of suspected abuse/radicalisation. If you, as a member of staff, have concerns that a child/young person or vulnerable adult has been mistreated or abused/radicalised, or if you suspect from what you observe that they are being abused/radicalised, you MUST REPORT THIS.***

2. WHAT TO DO IF YOU NOTICE ABUSE

- 2.1 You may become aware of potential abuse in two main ways:

- .1 You may observe signs in an Apprentice that lead you to suspect that they have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition in the case of a vulnerable adult, they may be experiencing financial, discriminatory or institutional abuse.

The tables below gives examples that may indicate that an individual is being abused. In addition to these, a person may be being abused by virtue of their race, gender, age, disability or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.

- .2 The Apprentice themselves may disclose to you that they have been abused.

Possible signs of physical abuse include:

- | | |
|---|---|
| • Unexplained injuries or burns, particularly if they are recurrent | • Fear of medical help |
| • Refusal to discuss injuries | • Aggression/bullying |
| • Improbable explanations for injuries | • Over compliant behaviour or a 'watchful' attitude |
| • Untreated injuries or lingering illness not attended to | • Running away |
| • Admission of punishment which appears excessive | • Significant change in behaviour without explanation |
| • Shrinking from physical contact | • Deterioration of work |
| • Fear of returning home or of parents being contacted | • Unexplained pattern of absence which may service to hide bruises or other physical injuries |
| • Fear of Undressing | |

Possible signs of emotional abuse include:

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Self-harm or mutilation
- Compulsive stealing/scrounging
- Drug/solvent abuse
- ‘Neurotic’ behaviour – obsessive rocking, thumb-sucking, and so on
- Air of detachment – ‘don’t care’ attitude
- Social isolation – does not join in and has few friends
- Desperate attention-seeking behaviour
- Eating problems, including overeating and lack of appetite
- Depression, withdrawal

Possible signs of sexual abuse include:

- Bruises, scratches, burns or bite marks on the body
- Scratches, abrasions or persistent infections in the anal or genital regions
- Sexual awareness inappropriate to the person’s age – shown, for example, in drawings, vocabulary, games and so on
- Frequent public masturbation
- Attempts to teach others about sexual activity
- Refusing to stay with certain people or to go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends
- Changes in behaviour
- Promiscuity, prostitution, provocative sexual behaviour
- Self-injury, self-destructive behaviour, suicide attempts
- Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father
- Recoiling from physical contact
- Eating disorders
- Tiredness, lethargy, listlessness
- Over-compliant behaviour
- Genital discharge/irritation
- Sleep disturbance
- Unexplained gifts of money
- Depression

Possible signs of neglect include:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at classes/employment
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing or scrounging
- Constant tiredness

Possible signs of financial abuse include:

- Loss of jewellery and personal property
- A bill not being paid when money is entrusted to a third party
- Unexplained withdrawal of cash
- Lack of money to purchase basic items
- Misuse of benefits
- Inadequate clothing
- Theft of property
- Over protection of money or property
- Loss of money from a wallet or purse

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

2.2 If an Apprentice discloses to you that they (or indeed another child/young person or vulnerable adult) have been, or are being abused/radicalised

DO

- **Do** listen very carefully to what they tell you.
- **Do** take what is said seriously and accept what you are told.
- **Do** stay calm and reassure the apprentice that they have done the right thing in talking to you.
- **Do** write down as soon as you can exactly what you have been told.
- **Do** tell them that you must pass this information on but that only those that need to know will be told. Tell them to whom you will report the matter.

DO NOT

- **Do not** panic.
- **Do not** promise to keep things secret. You have a duty to refer a child/young person or vulnerable adult who is at risk.
- **Do not** lie or say that everything will be fine now that they have told.
- **Do not** criticise the abuser, especially if it is a parent/carer
- **Do not** ask lots of detailed or leading questions such as: 'What did he do next?' Instead, ask open questions such as: 'Anything else to tell me?', 'Yes', or 'And...?'. Do not press for answers the apprentice is unwilling to give.

It is important that the person to whom disclosure is made **does not investigate** or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.

2.3 It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse/radicalisation. Clearly all written records should be handled confidentially.

2.4 **You must inform any one of the Designated Staff Members immediately if you have concerns that a child/young person or vulnerable adult has been, or is, being abused/radicalised.** They should be informed in person, or by telephone or (in extreme

circumstances) by email in the first instance, however, you must also complete the Safeguarding Referral form (Appendix 3)

2.5 There are three routes to refer concern about abuse/radicalisation:

- .1 Contact the DSLO or one of the DSO's directly. A member of this team is always on duty between the hours of 08.00-17.00, Mon-Fri. These members of staff can be contacted by telephoning the main company phone number:

0333 323 9690

Alternatively, you can contact them via their work mobile phones (contact details in Appendix 2).

Should you not be able to contact either the DLSO or DSO's, you should contact one of the Directors, who will act as a deputy.

- .2 If, for any reason, you are unable to contact a member of the designated team (for example in the evening or on a residential trip) and the matter is urgent, then contact the Local Authority or the police directly and report the matter to the Designated Lead Staff Member.

The Duty Desk telephone number is 01473 265359

- .3 Contact the police on 111 – if risk of harm is imminent, call 999.

In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support, rather than to worry alone or to do nothing.

3. THE OPERATION OF THE DESIGNATED TEAM

- 3.1 When a member of staff refers a case of suspected abuse/radicalisation to a member of the Designated Team, the DLSO / DSO decides whether or not the situation should be referred to the Local Authority or the police, or whether some other course of action is more appropriate (Annex 2). In coming to a decision about what action to take, the member of the Designated Team may confer with other members of the team. They may also take advice from the company's contacts in the Local Authority. If they consider that abuse/radicalisation may have taken place, or that a child/young person or vulnerable adult is at risk of abuse/radicalisation, they will formally notify the Local Authority or police about this.
- 3.2 At this point the Local Authority take over responsibility for the issue. If the Local Authority decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the police.
- 3.3 Involvement in cases of suspected abuse can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone – a colleague, a friend, a partner – they should avoid this in order to respect

the confidentiality of the apprentice concerned. However, the individual is encouraged to talk to the DSLO or DSO, where suitable support can be explored.

- 3.4 Disclosure of, or being the subject of abuse is obviously a very difficult and distressing time for the Apprentice, who needs to be offered continuing support from the company. They should be made aware of the support available to them and helped to initiate contact with this support if so desired.
- 3.5 A confidential record will be kept of all cases referred to the Designated Team, including details of cases referred to the Local Authority or the police. These written records will be kept securely via a restricted site on the company’s file sharing system, with any paper information held securely by the Director.
- 3.6 The Director will be informed where a case has arisen which has been referred to the Local Authority or the police.

4. Staff Training Plan

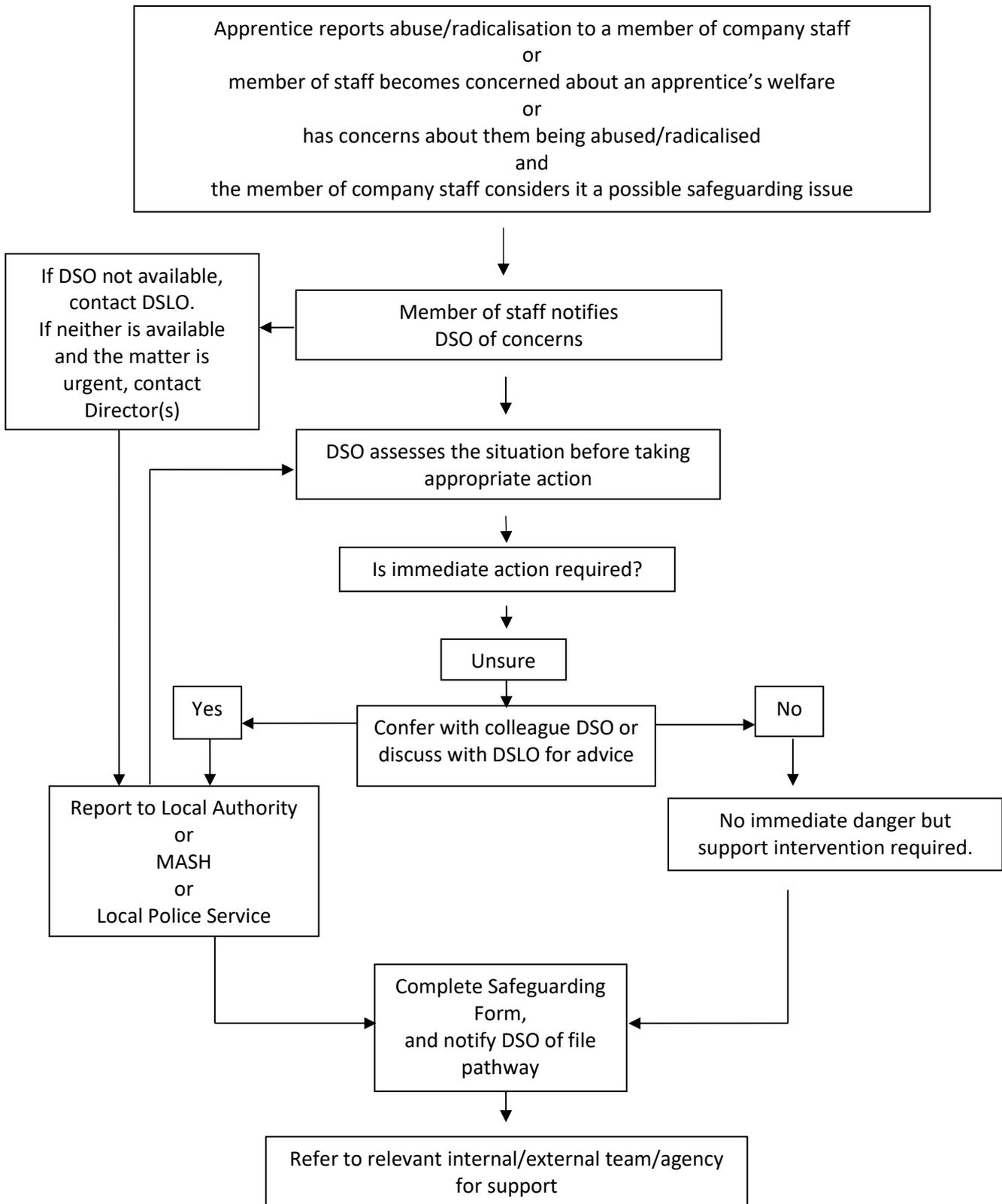
Training to be completed	Required
Prevent – Elearning Certificate	All
Channel General Awareness	All
Prevent for governors and board members	Designated Staff Members
Safeguarding in FE 2019	Designated Staff Members
eLearning, Wellbeing courses	All
Development training from feedback of monitoring visits	All

Appendix 1

Safeguarding Role	Company Title	Name	Contact Phone No	Contact Email
Designated Lead Safeguarding Officer (DLSO)	Head of Programmes	Harriet Blake	Work: 0333 323 9690 Mob: 07415 327 113	harriet@lighthouse-group.co.uk
Designated Safeguarding Officer (DSO)	Programme Manager	Sharon Ball	Work: 0333 323 9690 Mob: 07932 993 416	sharonb@lighthouse-group.co.uk
Designated Safeguarding Officer (DSO)	Tutor		Work: 0333 323 9690 Mob:	

Appendix 2

Child Protection/Vulnerable Adult Reporting Procedure



Appendix 3

Children / Vulnerable Adults Referral Form							
Referral Reference No							
Section 1 – Person at Risk							
Name				Home Address			
Phone No				Email Address <small>(Work or Personal)</small>			
Gender				DOB / Age			
Employer Name & Address				Line Manager or Commissioner			
1 st Referral		Yes / No		Reference of Previous Referrals			
Section 2 – Lighthouse Employee							
Employee Name				Job Title			
Phone No				Email Address			
Section 3 – Details of Referral							
Date of Disclosure				Time of Disclosure			
Method of Disclosure				Is Individual Aware of Referral?		Yes / No	
Section 4 – Disclosure							
Information Provided by Individual <small>(Include any direct statements, where possible)</small>							
Location of Risk <small>(ie: home, work, other location)</small>							
Is individual at immediate risk?		Yes / No		Medical Intervention Required		Yes / No	
If 'Yes' to either statement above, provide full details							
Section 5 – Type of Abuse (Tick all that apply)							
Physical				Psychological / Emotional			
				Neglect			
Financial				Discriminatory			
				Institutional			
				Sexual			
				Domestic Violence			

Forced Marriage		Honour-Based		FGM		Modern Day Slavery	
Other (Please state)							
Summary of Risk Identified							
Are any other persons at risk?	Yes / No			Details of Other Persons			
Section 5 – Actions							
Concerns Discussed with DLSO / DSO at the Time of Referral?	Yes / No			DLSO / DSO Name			
Contact Method <small>(ie; meeting, phone, email, etc)</small>				Date / Time of Contact			
Section 6 – DLSO / DSO Actions							
Decision: Further Investigation Required?	Yes / No			Rationale for Decision			
Matter Referred To <small>(Provide full details of authority / agency)</small>							