

Davidson Training UK Limited

Safeguarding and Prevent Duty Policy

Safeguarding and PREVENT Policy Statement

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Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Policy Statement

Davidson Training has a statutory and moral duty to ensure that the business functions with a view to safeguarding of those receiving education and training through delivery of Apprenticeships.

The aims of the company safeguarding policy are to provide an environment where all can work safely. The Company will take every reasonable precaution to minimise risk while providing demanding, challenging and enjoyable training and development activities at our own premises and the premises of our employers and clients.

All our employees who work with learners have a crucial role to play in shaping their lives. They have a unique opportunity to interact in ways that are both affirming and inspiring. This policy has been produced (and is supported by Information, Advice and Guidance), to help them to establish safe and responsive environments which safeguard all and reduce the risk of them being unjustly accused of improper or unprofessional conduct.

We all have a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society.

Promoting the Safeguarding Policy

The policy applies to anyone with whom we are in contact in the course of our work, who is a child, a young person, or Adult at Risk.

By promoting our Safeguarding and PREVENT policy with employees, employers we work with, and learners (apprentices) allows us to:

- Promote an individual's rights and especially their right of choice. By supporting individuals to make their own decisions, we are encouraging independence, which will also have a positive effect on their confidence, self-esteem and general wellbeing.
- Encourage active participation, that promotes an individual's right to be involved in the activities and relationships of their everyday lives as independently as possible. It encourages individuals to be an active participant in their development planning and delivery. It gives them the opportunity to learn new skills, gain new knowledge and become more independent and confident, which will make them less likely to be exploited. The less dependent an individual is on others, the less likely it is that others will be able to take advantage of them.
- Promoting choice and rights – By working in a way that promotes the choice and rights of individuals, trainers focus on the unique needs of each individual rather than what they assume their needs are. This means providing information in a way that the individual can understand so that they are able to make informed choices about their lives. This empowers individuals to have control over their lives and supports them to be more confident and assertive.
- Supporting individuals with awareness of personal safety - The likelihood of abuse and neglect can also be reduced by supporting individuals with an awareness of their own personal safety. This can take the form of formal training, group discussions or one-to-one chats that educate the individual of their rights, ways to reduce their vulnerability and practical steps about what to do if they feel they may be a victim of abuse. Explaining and involving the individual can also help them to understand how to keep themselves safe.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Monitoring

This policy is reviewed, endorsed and approved by the board of Directors annually (January every year), or when legislation changes.

Objectives

The aim of the policy is to ensure all are aware of and understand their responsibilities, that of others, signs there might be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

Scope

This policy covers safeguarding of Children and Adults at Risk, both our learners and those persons in settings in where we practise which fall into the category of child or adult at risk.

It is inclusive of specific highlighted safeguarding agenda areas – as defined by law, and in the wider context all our learners. This policy also outlines our compliance with the Government Prevent strategy.

The aim of this policy is to ensure:

1. The safety of young people and young persons and vulnerable adults by outlining clear procedures
2. All staff members within Davidson Training UK Ltd that deliver Learning are clear about their responsibilities.
3. All staff members within the training and assessment process whether they are full time, part time, visit learners for feedback or are peripatetic assessors and/or volunteers.
4. That it links in and plays a part within Equality and Diversity at all times. Ensuring that when carrying out any form of training, initial assessment and/or induction that learners and employers are treated equally, and their diverse needs considered

Davidson Training UK Ltd operates a zero tolerance when it comes to safeguarding young people and vulnerable adults.

Davidson Training UK is committed to ensuring that all employees, learners and others associated with our services are treated fairly.

Davidson Training UK has a responsibility to protect children and vulnerable groups that staff and may have contact within the course of their duties. This policy details the arrangements that the Davidson Training UK Ltd has put in place to provide a safe environment for children and vulnerable groups. It applies to all staff, learners and employers.

This policy will be made available to all staff, learners and employers and they will be advised of the need to safeguard children and vulnerable groups.

Davidson Training UK Ltd supports the right of all to be protected from harm and recognises that safety and welfare are paramount.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

All employees, regardless of their position within Davidson Training UK Ltd, carry a responsibility to safeguard those who are vulnerable. Working with those that require safeguarding can be sensitive and difficult.

Good practice in these situations calls for:

- Effective cooperation between different agencies and professionals;
- Sensitivity between employers and assessors in the best interests of the learner
- Careful exercise of judgement, based on thorough assessment and analysis of available information
- Information sharing in the best interests of the learner.

Davidson Training UK Ltd.'s commitment to safeguarding

Davidson Training UK Ltd holds training sessions with staff to keep them up to date with legislation. As a part of all training programmes delivered, Davidson Training UK Ltd deliver training and awareness to learners (apprentices) on all aspects of safeguarding, including British Values, Radicalisation, Extremism, Health and Wellbeing, health and safety, keeping safe, equality and diversity, and e-safety.

The employers we work, learners (apprentices) and our staff are all issued with a copy of this policy, and it is discussed at induction as well as during formal reviews as they progress.

To demonstrate Davidson Training UK Ltd.'s commitment to safeguarding, this policy seeks to:

- Inform employees, employers and learners (apprentices) of the indicators of safeguarding issues;
- Provide procedures for staff and employers to identify and report issues of possible vulnerability;
- Promote collaborative working.

Staff are reminded that as in all areas of Work based assessment and the delivery of training programmes, record keeping is of paramount importance to support actions taken. Record keeping should be simultaneous and using Davidson Training UK Ltd documents.

Davidson Training UK Ltd recognises that robust recruitment and selection arrangements are crucial to the protection of our learners. Recruitment will at all times follow best practice guidance in this area.

The Safeguarding Manager should be informed of any complaints involving a safeguarding issue.

Protecting apprentices and preventing abuse towards apprentices

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. All staff have a personal responsibility for safeguarding the welfare and wellbeing of all children and adults at risk of harm by protecting them from abuse. (See Appendix 4 for full definitions and indicators of a Safeguarding concern).

Managers are responsible for ensuring employees, visitors, employers and apprentices and partner organisations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards those who complain about breaches in this policy.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm.

Abuse means a child's or at-risk adult rights and needs are not being met as defined in The Children's Act 2004 and the United Nations Convention on the Rights of the Child (1989). They may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger.

Abuse may occur through the actions of an adult or adults, or another child or children.

Where a child is disabled, injuries or behavioural symptoms may mistakenly be attributed to his/her disability rather than the abuse. Similarly, where they are from a minority ethnic group, aggressive behaviour, emotional and behavioural problems and educational difficulties may be wrongly attributed to racial stereotypes, rather than abuse.

Cultural and religious beliefs should not be used to justify hurting a child and/or at-risk adult.

Safeguards for all children and young people are the same regardless of disability or ethnicity.

All employers we work with, learners (apprentices) employees, sub-contractors and anyone else we may work with receive an appropriate induction on safeguarding as a key part of the process.

Employer and Apprentice Induction

At apprentice enrolment/induction both the employer and apprentice are made aware of the Safeguarding and PREVENT policy. The following are also covered during this process:

- APPENDIX 4 is discussed and referenced to with employers and learners (apprentices).
- Employers are made aware that we all share the duty of care for ensuring that our apprentices are safeguarded during their training and within the workplace. This means that employers need to take the necessary steps to ensure their apprentices are safe at all times while in their care. This is not restricted to the workplace but extends to any problems outside of work which may affect the apprentice.
- If a safeguarding issue is identified, it should be acted upon without delay. The law requires that you cannot ignore any activity or disclosure that highlights a safeguarding issue.
- There are many signs that may be indicators that an apprentice may be experiencing abuse. However, if a learner (apprentice) demonstrates more than one indicator, it in itself, is not evidence that an apprentice may be at risk, but a concern should be raised if any employer believes there is any potential situation.
- Procedures that are in place to report any concerns and issued with the details of the designated Safeguarding Officer.
- Advise apprentices and employers that they are able to safely voice any concerns.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Staff training

Staff training is carried out annually to disseminate and update staff on any changes the policy and any changes to legislation and on a quarterly basis to ensure that they are following the policy requirements and are aware of:

- Steps to be taken to educate both the apprentice and employer on indicators of abuse and how to report any areas for concern.
- Identify the indicators if abuse.
- Action to be taken and reporting procedures.
- Develop relationships that are built on equality, trust, respect and honesty.
- Place the safety and welfare of young people and vulnerable people above all other considerations
- Report any concerns they may have about the welfare of a young person or vulnerable person
- Report any concerns they may have about the behaviour of a Davidson Training UK Ltd representative in relation to safeguarding
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why.
- If possible, ensure another adult is in sight and that the child or young person knows another adult is around.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Definitions

Abuse

A violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts

Physical Abuse

Physical includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm.

Psychological abuse

Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Discriminatory abuse

Abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic. Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic. Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader. Harassment or deliberate exclusion on the grounds of a protected characteristic. Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic. Substandard service provision relating to a protected characteristic

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on them. It may involve causing them frequently to feel frightened or in danger, or the exploitation or corruption of children. Witnessing the harm of another person, such as in the case of domestic violence, is a form of emotional abuse. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Sexual Abuse & Sexual Exploitation

Involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Financial or material abuse

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect

Neglect is the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate caregivers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Financial Abuse

Including theft, fraud, exploitation, the misuse of possessions or benefits and pressure applied in relation to financial transaction.

Institutional abuse

This can sometimes happen in residential homes, nursing homes or hospitals when people are mistreated because of poor or inadequate care, neglect and poor practice that affects the whole of that service.

Child Sexual Exploitation (CSE)

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

Child criminal exploitation: County Lines

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns to make more money. This can have a big effect on the community who live there and bring with it serious criminal behaviour.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, without medical justification. It is also known as ‘female circumcision’ or ‘cutting’, and by other terms such as initiation, infibulation, sunna, gudniin, halalays, tahur, megrez and khitan.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health. UK communities most at risk of FGM include Kenyan, Somalian, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean. Non-African countries that practise FGM include Yemen, Afghanistan, Kurdistan, Indonesia, Malaysia, Turkey, Thailand (South) and Pakistan. FGM is a form of child abuse and is illegal in the UK.

Self-neglect

An individual being unable to see to their own basic needs, such as nutrition or hygiene

Bullying AND cyberbullying

Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable.

Bullying includes verbal abuse, such as name calling; non-verbal abuse, such as hand signs or glaring; emotional abuse, such as threatening, intimidating or humiliating someone; exclusion, such as ignoring or isolating someone; undermining, by constant criticism or spreading rumours; controlling or manipulating someone; racial, sexual or homophobic bullying; physical assaults, such as hitting and pushing; making silent, hoax or abusive calls.

Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying. Cyberbullying includes: sending threatening or abusive text messages; creating and sharing embarrassing images or videos; 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games; excluding children from online games, activities or friendship groups; setting up hate sites or groups about a particular child; encouraging young people to self-harm; voting for or against someone in an abusive poll; creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.

Domestic violence and abuse

Domestic violence and abuse are defined as any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality. It includes psychological, physical, sexual, financial and emotional abuse, as well as ‘honour’-based violence and forced marriage.

Substance misuse

Regular use of alcohol or drugs which may be causing issues in their life that may affect their job, personal life, or even their safety.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Faith abuse

Faith abuse is abuse of a child, linked to faith or belief. It is not about challenging people's beliefs, but where these beliefs lead to abuse. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray, the evil eye or djinns and dakini; ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

Forced marriage

Any person may be forced into marriage – this includes people of all ages, genders, ethnicities and religions. A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage.

Gang and youth violence

A gang is a relatively durable, predominantly street-based group of young people who see themselves as a discernible group, engage in a range of criminal activities, identify or lay claim over territory, have some form of identifying structural feature, and are in conflict with other, similar gangs. Youth violence is often synonymous with gangs.

Gender based violence

Gender-Based violence refers to harmful acts directed at an individual based on their gender. It is rooted in gender inequality, the abuse of power and harmful norms.

Gender-based violence (GBV) is a serious violation of human rights and a life-threatening health and protection issue. It is estimated that one in three women will experience sexual or physical violence in their lifetime. During displacement and times of crisis, the threat of GBV significantly increases for women and girls.

Sexting

Sexting is when people share a sexual message and/or a naked or semi-naked image, video or text message with another person. It's also known as nude image sharing. Children and young people may consent to sending a nude image of themselves. They can also be forced or coerced into sharing images by their peers or adults online.

Teenage relationship abuse

Teenage relationship abuse is when there is actual or threatened abuse within a romantic relationship or a previous relationship. One partner will try to maintain power and control over the other and this can have a significant impact on young people. Relationship abuse can take a number of forms including physical, sexual, financial, emotional or social. If your relationship leaves you feeling scared, intimidated or controlled, it is possible you are in an abusive relationship.

Trafficking and modern slavery

Individuals being forced into a life of slavery, human trafficking, domestic servitude or forced labour.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Radicalisation

Is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo.

The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Individuals can be drawn into the process of radicalisation in a number of ways. In this context, vulnerability means individuals who, because of their circumstance, experiences or state of mind can be led towards an extremist ideology.

Terrorism

Terrorism is an action or threat designed to influence the government or intimidate the public. Its purpose is to advance a political, religious or ideological cause. The current UK definition of terrorism is given in the Terrorism Act 2006.

In the UK we define terrorism as a violent action that:

- Endangers a person's life
- Involves serious violence against a person
- Causes serious damage to property
- Creates a serious risk to the public's health and safety
- Interferes with or seriously disrupts an electronic system

Extremism

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist."

It's important to remember that not all extremist groups, whether Islamist, far right or other, will commit terrorist or violent acts. However, some groups pose particular threats, both online and offline.

Child

A child is defined as anyone under the age of 18, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

An adult at risk (previously vulnerable adult)

Is defined as any person over the age of 18, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service in order to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home or sheltered accommodation

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service
- Detained in custody or under a probation order
- Receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions
- Has a physical or sensory disability.
- Has a severe physical illness.
- Is a substance misuser.
- Is homeless.

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill, or specific learning need
- Unsupportive home environment
- English not a first language
- Unsupportive employer
- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Roles and Responsibilities

The Directors – will have overall responsibility for ensuring that Davidson Training UK Ltd meets its obligations within this area. They will be responsible for the approval of relevant safeguarding policy.

The senior designated person – will be the Managing Director

They will be responsible for ensuring that the safeguarding processes and procedures are robust and consistently applied and that Davidson Training UK Ltd fulfils its legal duties.

They will be responsible for ensuring that Davidson Training UK Ltd is proactive in the promotion of safeguarding, the production and monitoring of a safeguarding development plan.

The Training Operations Manager – is responsible for ensuring that safe recruitment practice is embedded and implemented across Davidson Training UK Ltd, that the record is accurately maintained and that all staff have received appropriate training and development. They will be the first point of contact for complaints made against staff. The Training Operations Manager will be responsible for ensuring that all staff understand safeguarding and have received appropriate training and development and that the staff recruitment and selection procedure is followed at all times. They will ensure that safeguarding is given high priority within their teams.

All employees - will have a legal responsibility for completing their training, familiarising themselves with Keeping children safe in education: safeguarding information for all staff the Safeguarding Procedure, the Prevent Policy and any other related safeguarding policies and procedures. They are also responsible for ensuring they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns about a learner.

We have appointed a Safeguarding Officer (Designated person) who is responsible for maintaining their professional development in this area and overseeing and co-ordinating the company's approach to Safeguarding. The safeguarding officer holds all the key documents and is able to consult the police, CHANNEL and social services. The safeguarding officer is not entitled to give formal legal advice but is able to obtain such advice from experts. In the absence of the Safeguarding Officer- the Training Operations Manager takes on this function. The Safeguarding Officer will liaise closely with police, the local safeguarding children's boards and multi-agency safeguarding hubs where appropriate. All staff as stated above have a responsibility to work within the framework of this policy and to adhere to all relevant and current legislation.

Key Contact

Lead Designated Officer – Lorraine Bunyard

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Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Principles

Safeguarding has a meaning wider than child protection. The policy aims to ensure that all learners (including apprentices), staff, customers, linked employers, freelance trainers' stakeholders and visitors are safe from harm and abuse, harassment and bullying.

Safeguarding also includes all staff acting in a responsible way to avoid any false allegations of inappropriate behaviour being made about their conduct that would give cause for concern.

This policy is based on the law and statutory guidance applicable in England only. The Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012 deal with aspects of regulated activity (see below). The Equality Act 2010 and the Health & Safety at Work Act are also relevant to safeguarding. The Safeguarding officer (designated person) maintains a Safeguarding report.

This policy is directly linked to the company disciplinary procedures. All company personnel have a legal duty to report instances of harm and abuse in regulated activity to the Disclosure & Barring Service (DBS) following action in accordance with staff disciplinary procedures where appropriate. In addition to the legal aspects, it is our policy to ensure that all persons learning and working with us respect each other and strive to help each other in a professional and caring manner.

Davidson Training will operate within the following key principles when it relates to safeguarding:

- All people will be treated with respect and with courtesy by staff, learners, employers and colleagues in an environment that is free from harassment or discrimination.
- All training, facilities and equipment will comply with legislative health and safety standards.
- Davidson Training will work with apprentices, employers and other agencies to promote a safe and healthy culture.
- Davidson Training will develop partnerships to proactively protect learners at risk of abuse, neglect or at risk of radicalisation.
- Davidson Training will have procedures in place to identify and respond to those learners who might benefit from early help, recognising that the earlier help is in place the more effective it is for the individual.
- Staff will be trained and will have a clear understanding of personal safety and good safeguarding practices as well as what factors may make learners vulnerable to a range of safeguarding concerns.
- Davidson Training will work with learners to promote their own personal health, well-being and safety including their safety online.
- Davidson Training will work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism.
- Learners will receive confidential advice, guidance and support for a range of issues that they may face. They will be signposted to external agencies where specialist support is required.
- Davidson Training will support Learners to have personal resilience and be able to make informed and sensible decisions about their safety and wellbeing in an attempt to prevent them from being exploited and or abused.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Learners' Entitlement

In order to promote a healthy and a safe environment, our learners will be entitled to the following:

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively and appropriately.
- To learn in an environment free from bullying or harassment.
- To be made aware of strategies and actions that to keep themselves safe whether in employment, outside work or online.
- To be made aware of the basic principles of safe learning and safeguarding relevant to the programme that the learner is completing.
- To be made aware of how to access support on personal health and safety issues either with Davidson Training, their employer or from outside agencies.
- To be provided with up-to-date information around personal safety issues.
- The opportunity to comment and feedback on the extent to which Davidson Training and its training programmes promote and maintain well-being and personal safety.
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment.

Safe learning

- The principles of the 'Keeping children safe in education' and safeguarding agendas will be embedded within our teaching and learning practices and within our quality assurance and quality improvement frameworks.
- Safe recruitment practices will be implemented
- Physical health in order to improve their quality of life. The aim is to provide learners with the tools to make healthy and safe decisions.
- Our commitment to safe learning is enshrined within our policies and procedures as well as training materials issued to learners and learner and employer handbooks.

Safe environment

Davidson Training will ensure an environment that is safe and secure for all users. Robust systems and processes will be in place for staff and learners.

A culture of respect that is free from bullying and harassment will be engendered.

Health and safety are of paramount importance and must never be compromised or short cut as such all facilities and resources will comply with legislative requirements for health and safety

Davidson Training UK Ltd will comply with best practice in the recruitment and training of its staff, in line with legislative requirements.

Staff will undergo the appropriate pre-employment checks including DBS checks for their role where applicable and undertake mandatory safeguarding training appropriate to their role. For more information on this please see the section ***"Disclosure and Barring Service Checks"***

Staff will understand the principles of safe working practices and how not to put themselves in situations that compromise themselves or Learners.

All new starters will receive an appropriate induction, including safeguarding training.

Davidson Training UK Ltd Safeguarding and Prevent Duty Policy

Our responsibility

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against you.

All staff are expected to have a good understanding of what constitutes a safeguarding or welfare concern and how to provide support, guidance in such instances and the channels for escalating a concern. To assist you in this, on-going training and awareness, as well as continuous information, advice and guidance will help you to feel confident in proactively promoting safeguarding and understanding your individual responsibilities.

The responsibilities of particular individuals are detailed below:

- Our directors - to ensure we have effective policies.
- Our Designated Safeguarding Lead – to maintain links with Local Safeguarding Children’s Boards and Prevent Coordinators, plan and implement training for all employees. Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as safeguarding board where appropriate. Overall recording and management of safeguarding issues and report on any issues that arise. Review procedures and policies on a timely basis. Maintain own CPD to ensure their role can be fulfilled competently.
- Our Trainers/Assessors - to check safety and welfare with all learners at each visit/communication, ensuring learners complete all safety related learning activities within their programme. You must be mindful of indicators and that there may be a safeguarding issue and if required to follow the 5 R’s procedure – see Appendix 3.

The topic of Safeguarding can be very sensitive due to the content and may be difficult for you to discuss. If you have any concerns over issues raised, please contact the Designated Officer as quickly as possible.

Preventing people from being drawn into terrorism

Davidson Training UK Ltd has certain duties within the Counter Terrorism and Security Act 2015. All staff are aware of their Prevent duties and Davidson Training UK Ltd has robust processes in place to respond to concerns about Learners and staff members.

There is a proactive and positive tutorial programme that enables Learners to explore and discuss issues in a safe and open environment.

Davidson Training UK Ltd commitment to Prevent is summarised within the Prevent policy, risk assessment and action plan.

Davidson Training UK Ltd will work with Local Safeguarding Children Boards, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and other professions to ensure a comprehensive safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate.

Davidson Training UK Ltd will work proactively with Prevent coordinators and where appropriate the local Channel panel.

Davidson Training is committed to ensuring that it:

- Provides a safe environment for all of its learners to learn
- Identifies young or vulnerable people who are suffering, or likely to suffer, significant harm

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

- Takes appropriate action to help ensure that such young or vulnerable people are kept safe, both at home and within their workplace.
- Raises awareness of issues relating to the welfare of young or vulnerable people and the promotion of a safe environment for the young or vulnerable people learning within Davidson Training's delivery of Apprenticeships.
- Has clearly defined procedures for reporting and dealing with allegations of abuse including those made against members of staff
- Safeguarding is embedded within the organisation's ethos including the recruitment of new staff members.

We have a statutory duty to safeguard and promote young persons and young persons and vulnerable adult's welfare. We must ensure that we create and maintain a safe environment for them. Everyone within the education services shares an objective and is as follows:

- Providing a safe environment for young people and vulnerable adults to learn in including safe use of technology and the importance of keeping personal information safe.
- Identifying young people and young persons and vulnerable adults who are suffering or likely to suffer significant harm,
- Taking appropriate action with the aim of making sure they are kept safe both at home and at work.

Staff at Davidson Training UK Ltd shall acquire the skills, means and training necessary to ensure young people and young persons and vulnerable adults are protected from harm.

Davidson Training UK Ltd recognises that young people and young persons and vulnerable adults are entitled to the duty of confidence as adults.

Davidson Training UK Ltd staff may be the first port of call for those suffering any form of abuse due to the confidential relationships they build with their trainers. Advice and support should be sought where necessary, from the Safeguarding Manager

Davidson Training UK Ltd acknowledges that adults have the right to take risks as long as they have the capacity to make an informed decision. Davidson Training UK Ltd also acknowledges that it is every adult's right to live free from abuse in accordance with their human rights.

Davidson Training UK Ltd recognises that the law permits the disclosure of confidential information, in order to safeguard a vulnerable adult, in the public interest.

What is abuse?

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take a variety of forms and can be both overt and covert.

Examples of abuse that could occur in a learning environment include:

- physical abuse
- sexual abuse e.g., involvement in any sexual activity against his/her will, exposure to pornography, voyeurism and exhibition
- Emotional/psychological abuse e.g., intimidation or humiliation
- Discriminatory abuse e.g., racial, sexual or religious harassment, or due to age or ability/disability
- Personal exploitation
- Institutional abuse e.g., failure to ensure privacy or dignity

There are a number of ways staff may become aware that a vulnerable adult may need protection. Learners may disclose abuse to an assessor in these cases; the information must be taken seriously. Advice and support should be sought where necessary, from Safeguarding Manager.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Domestic Violence

Domestic violence is a serious crime that has a major impact on the primary victim as well as members of the family

The Home Office have defined domestic violence as 'Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality.'

Mental Health

Mental health may be defined as how we feel, behave and think. Mental health problems arise when there are difficulties with these areas that affect the way we live our daily lives, how we conduct relationships and our physical health.

Mental health problems are common, affecting one in four of us at some time in our lives; they cross all ages, genders, races and social backgrounds. The causes of mental health problems relate to individual responses to particular circumstances.

The circumstances that may trigger a mental health problem are common, such as house moves, loss of a job, a personal relationship difficulty or the death of a person close to you. Some people may be more vulnerable than others to developing a mental health problem, either due to their personality or due to their circumstances.

Risk factors for vulnerability to mental health problems:

- Poor living conditions
- Drug and alcohol addiction;
- Homelessness;
- Disability;
- Ethnicity;
- Previous life circumstances (such as abuse or neglect in childhood).
- Without treatment and support, mental health problems can become worse and longer lasting

Staff will also:

- Demonstrate respect for learners as individuals in all matters.
- Reflect on their own approach and style, recognising the inherent power their position bestows.
- Undertake relevant training in safeguarding, disclosure and diversity matters. Ask a senior member of staff if they have any uncertainties about how to deal with a specific learner.
- Ensure that all learners are aware of relevant policy on Disclosure and create a suitable and supportive environment to encourage learner disclosure of any issues which might affect the way in which they should be treated.
- Ensure all learners are aware of our Equality and Diversity policy and that they know how to complain if they become victims of harassment bullying, unfair treatment or harassment.
- Ensure diverse learning that is sensitive to difference.
- Invite and encourage constructive feedback from learners and employers about standards and styles of behaviour and promote an open and honest culture of respect for diversity.
- Deal with complaints of abuse, unfair treatment or harassment and bullying promptly, sensitively, confidentially and in accordance with procedures (see CE complaints procedure for formal complaints).

Staff must ensure that they are aware of what is and is not appropriate with regards to physical contact with learners. Any physical contact with young people or vulnerable adults should be avoided at all times.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Duty of care

Learners under 18 years of age

Davidson Training UK Ltd has a duty of care towards those learners who are defined as children. For these learners Davidson Training UK should have a list of the learners' emergency contact details, in particular those of parents and guardians.

Guidelines for reporting allegations/ incidents

- Record all incidents reported or observed on an Incident Form and inform safeguarding manager ASAP, giving them the incident form within 24 hours
- Ensure confidentiality - only "need to know basis"
- Inform parents, unless to do so may put the child/vulnerable adult at further risk
- The safeguarding manager will be responsible for storing reports in a safe and secure environment
- The Safeguarding Manager will be responsible for ensuring that where required the Local Safeguarding Children Boards are contacted
- In the event of allegations being made against a member of staff, this should be reported immediately to the Safeguarding Manager. Actions will then be taken to protect both the vulnerable adult or young person and the accused member of staff.
- The staff member will be suspended on full pay whilst allegations are investigated.
- In the event of allegations of abuse, these must be dealt with fairly, quickly and consistently. Dependent upon the scope of the allegation, the safeguarding manager shall inform the necessary authorities and a full investigation will be carried out.
- In the event of allegations about events outside of provision, it is important that these allegations are treated seriously. DAVIDSON TRAINING UK Ltd shall work in partnership with local safeguarding bodies in dealing with these situations.

Reporting a Concern - see Appendices D for Process Charts

If a learner raises a concern/allegation with you:

If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will only be recorded on the Training Assessment Plan if learner agrees and raised with the manager if learner agrees.

You must report the issue to the designated officer, regardless of whether the learner agrees. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate. (D1)

If a Trainer/Assessor has concerns over a learner:

This might be through observation, alleged by others of discussion. To follow procedure set out as above If a learner raises an issue/allegation with the Trainer/Assessor. (D1)

If a learner/ parent has a concern/ allegation about a member of Davidson Training staff:

All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their Trainer/Assessor about, they are to contact Davidson Training Designated Officer. Contact details for the designated person are available in this policy, and the Learner Handbook

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

If a parent contacts you to report a concern about their child.

Ensure you listen and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent.

You must report the issue to the designated officer. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults, and therefore no information should be passed to parents or carers without prior consent to do so from the learner.

If you observe a safeguarding issue taking place within the working practices of an employer's setting

An example would be a staff member hitting a child or observing inappropriate restraint techniques. Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager. Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform your designated safeguarding officer. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately. (D3)

If a learner reports unsafe practices or safeguarding issues to you within their working environment

Advise the learner to follow in house reporting or whistle blowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to your designated safeguarding officer who will offer additional guidance and signposting for the learner and will monitor.

It is important you do not pass any information to other parties or try to investigate the concern yourself.

If you require an immediate response, call your designated safeguarding officer immediately, it is noted that the designated officer may not be available out of normal working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999. The designated officer will endeavour to make initial contact with regards the concerns within 72 hours.

The designated officer will assess if the individual is at risk of significant harm and decide upon the next course of action, this can range from offering signposting to support agencies to referral to the police and local safeguarding authorities. This may also involve passing information to the DBS

Training and Educating Employees

Each member of staff undertakes regular CPD events in order to keep updated with legislation and refresh their knowledge.

All learner facing employees undertake a Safeguarding Induction and completion of an online course specifically for Safeguarding Young Vulnerable People. The training received is reviewed annually and refresher training delivered to ensure most appropriate and up to date training is given. Aligning with the mandatory duty surrounding the Governments Counter Terrorism and Security Act 2015 all staff undertake Prevent training aligning with their role within Davidson Training.

Periodic updates surrounding key safeguarding concepts are communicated monthly via staff training and also refresher training sessions are carried out as and when identified as well as annual refresher training. Monthly topics raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet, which will educate employees alongside giving greater knowledge to be passed onto learners.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Keeping Yourself Safe

Relationships and Socialising

All of the following applies to current learners. You are strongly advised to follow the same guidance with respect to previous learners.

To maintain yours and the learners' safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home or transporting learners to and from locations (this includes travelling in a car with a learner driving)
- Do not use sarcasm, insults or belittling comments towards learners
- Share personal information with learners through webcam, photographs, blogs etc.
- Think carefully about the times at which you email learners from your Davidson Training (i.e., 11pm on a Saturday night might give the wrong impression – even if it is to forward a revision tool).
- Contact learners outside of the remit of your direct role within the organisation.
- Give your home address to learners

Professional boundaries:

To maintain yours and the learners' safety, the following are strictly prohibited:

- Discuss inappropriate aspects of your personal life (e.g., 'I'm feeling really hung-over today' or 'my husband was really nasty to me last night') with learners. If you would like to share certain information with learners, (e.g., 'I realised that excessive gaming was ruining my career, decided to get professional help') but are unsure as to whether you should, contact a Safeguarding Officer for guidance.
- Socialise with or develop friendships with learners. If you unexpectedly see learners outside of working hours (e.g., at a football match or in a shopping centre) retain a professional distance after exchanging civilities. If in doubt, e.g., you have played rugby with someone for five years and then s/he starts as a learner at Davidson Training, contact your Safeguarding Officer.
- Initiate romantic, sexual or emotionally dependent relationships with learners.
- Do things of a personal nature for learners (e.g., ringing their doctor, accompanying them to buy clothing).

It also important to be mindful of the following when conducting yourself:

- You will naturally build a rapport with learners through the apprenticeship contact, and the learners may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on Davidson Training UK behalf.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We have the opportunity to listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice – as this is based on your opinion, focus support on information (facts) and guidance (signposting).
- If at any point you feel unsafe in a learner's company inform the site manager, your line manager, the designated safeguarding officer and leave the premises.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Also:

If you see learners who you know to be under the age of eighteen drinking alcohol in a bar/pub/club, explain to them that this puts you in a very uncomfortable position due to your duty of care; they could be harmed whilst drinking underage. Encourage them to leave (and notify staff in the establishment about your concerns if they do not).

If a young adult who is a friend or relative, or with whom you are in a romantic relationship, is due to become a Davidson Training learner, inform your Training Operations Manager or the Safeguarding Officer.

Be alert to the possibility of learners being romantically/sexually attracted to you, and to your words and actions being misinterpreted.

If a learner makes a comment about your being good-looking or seems to be expressing intent to initiate a relationship with you, immediately explain that this is an inappropriate conversation due to professional boundaries. Then inform your line Training Operations Manager /Safeguarding Officer.

Physical contact:

To maintain yours and the learners' safety, the following are strictly prohibited:

- Engage in physical contact with learners, except to administer first aid, to assist when someone is seriously injured, or to shake hands. Hugging, back slapping, ruffling hair etc. are not appropriate.
- Physically restrain learners, unless in self-defence.
- Encourage/allow learners to use sexual comments or to touch anyone else on the premises in a sexual manner.

Working environment:

To maintain yours and the learners' safety, the following are strictly prohibited:

- Swear in the presence of learners or use other unprofessional language (e.g., sexist, racist or homophobic terms).
- Allow learners to swear or use other unprofessional language (e.g., sexist, racist or homophobic terms).

Also:

- Ensure that you dress appropriately (i.e., no underwear is visible, and clothing covers the stomach, thighs, chest, back etc.)
- Ensure that learners dress appropriately, dress-down days included (see above).

Gifts/Favouritism:

To maintain yours and the learners' safety, the following are strictly prohibited:

- Accept 'personal gifts' from learners (e.g., a bottle of perfume from a learner on your birthday). Examples of gifts that are acceptable include a bunch of flowers from your learner when they achieve.
- Give 'personal gifts' to learners (i.e., giving a shirt to a learner for his/her birthday is not appropriate).
- Express favouritism (i.e., give one learner a verbal warning for swearing, whereas only ask another learner to stop swearing).

Photographing, Videoing and Filming

Written permission must be obtained from learners (or, if under 18, their parent/carer) if photographs, videos, films etc. are taken in the promotion of Davidson Training activities. Learners (or, if under 18, their parent/carer) should be comprehensively informed of how and why any images of them might/will be used.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Miscellaneous:

To maintain yours and the learners' safety, the following are strictly prohibited:

- Give learners lifts or allow them to sit in/on your vehicle.
- Lend money to (or borrow from) colleagues/learners, whether from petty cash or from your own personal funds.

In addition, carefully consider the following, in your capacity as role model:

The action of your friends/relatives/partners could have an impact on your reputation. Do not put yourself in a position where your professional integrity might be jeopardised by persons revealing personal information about you in a public forum (such as a newspaper column or blog).

Do not condone non-constructive negative comments made by learners about your colleagues. If comments seem constructive and justified, refer learners to the appropriate channels (grievance, complaints, whistle-blowing policy etc.). Alternatively, you might choose to speak to your Training Operations manager or a Safeguarding Officer yourself, or to use the whistle-blowing system.

Do not condone illegal activity (such as speeding) or dangerous activities (such as self-harm).

Keeping Learners Safe

Davidson Training offer an apprenticeship recruitment service, which places potential apprenticeship learners into employment.

It is recognised that this creates a greater duty of care, and in order for Davidson Training to ensure that employers are suitable to receive an apprentice, a service level agreement is undertaken prior to apprentice commencing employment in order to clarify expectation in relation to basic health and safety, and employment requirements for the learner.

Health and safety vetting and monitoring is carried out during learner induction, this involves a discussion between the Trainer, employer and learner and allows for the trainer to be confident in the employers' ability to keep the learner safe during their employment and also to help educate the learner in looking after their own welfare and that of others while at work.

Learners are made aware of all of Davidson Training relevant policies, who the designated persons are and how to report a concern during their induction to the programme. There is a direct email address to allow the learners to access support from the designated safeguarding officer confidentially.

Online learner activities to develop their knowledge and understanding of basic safeguarding, equality and diversity and health and safety legislation are in place as a compulsory part of each apprenticeship. Progress is discussed at each apprenticeship visit.

Monthly topics in relation to equality and diversity and safeguarding are discussed during each apprenticeship visit. Learning surrounding these activities is discussed and documented.

All safeguarding concerns are recorded by the Lead Designated Safeguarding Officer, appropriate action taken, and information, advice and guidance given.

Disclosure and Barring Service Checks

Safer Recruitment

Davidson Training carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements. See resourcing policy for further detail on recruitment procedures.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

DBS Checks

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office, and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiries about the applicant's criminal record and seek a disclosure through a DBS check. Davidson Training can undertake five types of criminal records checks depending on the role applied for (in most cases we use Option 2):

1. Standard DBS check

This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975. This type of check contains details of individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

2. Enhanced DBS check

This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for.

3. Enhanced DBS & barred list check (child)

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

4. Enhanced DBS & barred list check (adult)

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.

5. Enhanced DBS & barred list check (child and adult)

An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations.

When and What Type of DBS Check is Appropriate

Davidson Training Managing Director is responsible for deciding which level of check is appropriate for a particular role and whether barred list checks are necessary.

Where we are recruiting for a role that qualifies for a DBS disclosure, the advert and further information will confirm the type of DBS disclosure required. When the most suitable candidate for the position has been identified, the offer of appointment will be made subject to a satisfactory DBS, right to work, references and qualification checks. In the instance that the outcome of a DBS check has not been received from the appropriate authority prior to learner visits being carried out, all visits with learners will be supervised by a person whose DBS outcome has been received and approved. Quality assurance of this process will take place on a weekly basis.

Once an offer has been made, candidates should tell us of any further details of convictions, including those that normally would be considered as spent, cautions or reprimands. As part of our safeguarding obligations, we will re-apply for the appropriate types of DBS checks on a 3-year basis during employment with Davidson Training.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Confidentiality

Information provided in a DBS disclosure report must be kept confidential and only on a need-to-know basis. Such information will be handled in accordance with Davidson Training 'Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information', Appendix 1.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to colleagues unless there is a specific reason for doing so. Those involved in recruitment decisions should ensure that when appointing an individual with a conviction, they are advised as to whom within Davidson Training knows of their conviction and the reasons why the information has been disclosed.

If you would like further information on our disclosure process, please see Appendix 2.

Failure to Disclose Information Relevant to the Type of DBS Check Appropriate to Your Role

Having a criminal record does not necessarily preclude an individual from working at Davidson Training. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors.

We request all employees to tell us about any information relevant to the type of DBS check appropriate for their role. For example, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS check appropriate to your role would be seen by Davidson Training as a breach of trust and confidence. Such acts are considered as gross misconduct and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

Exploring the Relevance of Information Provided in the Disclosure Report

The Training Operations Manager alongside the Designated Safeguarding Officer will make an initial assessment of the content of the disclosure report. If the report provides no evidence of convictions or any other related information, no further action will be taken.

If the report confirms a conviction or any other related information, they will make an initial assessment of whether the information provided has any potential relevance to the post. If there is clearly no potential relevance, no further action will be taken.

If the report confirms a potentially relevant conviction or any other potentially relevant information further exploration will be required following the process outlined below.

Exploring a Conviction and its Relevance

All discussions relating to convictions must take place after the selection process has been completed and will involve the Training Operations Manager and, if appropriate, the company Designated Safeguarding Officer.

The suitability for employment of a person with a criminal record will clearly vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision will be made on the basis of a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out.

The assessment is likely to include consideration of the following factors relating to the individual's offence(s):

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

- The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc.
- The length of time since the offence(s) occurred.
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example the influence of domestic or financial difficulties.
- The degree of remorse, or otherwise, expressed by the person and their motivation to change.
- Whether the offence was a one-off, or part of a history of offending.
- Whether person's circumstances have changed since the offence(s) was committed, making re-offending less likely.
- Whether the offence has since been decriminalised.

Following careful and thorough consideration of all these matters and consultation with the Training Operations Manager and Designated Person, a decision will be made as to whether the individual should be appointed.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment.

COVID 19 - Addendum

During this unprecedented time, this policy statement outlines Davidson Training UK Ltd commitment to maintain clear and robust safeguarding arrangements across all elements of our operations.

Although the number of coronavirus cases has fallen across the country and restrictions continue to ease, there is ongoing spread of COVID-19 and new variants of concern have been identified. Safeguarding adults with care and support needs from abuse and neglect remains a priority. People may be more vulnerable to abuse and neglect as others may seek to exploit disadvantages due to age, disability, mental or physical impairment or illness.

These groups may be targeted because of a number of factors. Generally speaking, they may need assistance with some tasks, be less up to speed with technology, more welcoming of new contacts, more trusting and – for many older people – wealthier. There is evidence that social isolation increases the likelihood of abuse. Many older and disabled people spend long periods at home alone under normal circumstances.

At a time of international crisis, those who seek to exploit these vulnerabilities are quick to act. We will all have been warned of new scams offering help and advice on COVID-19 or with financial assistance. Many of us will have concerns for family members who may fall prey to fraudsters.

Scope

This applies to all employees, stakeholders, employers and relates to children, young people and adults at risk. It should be noted that the definition of vulnerable children extends to those children up to the age of 25 for those with social workers, looked after children or with education, health and care plans, assessed as being in need or who otherwise meet the definitions set out in the Children's Act.

Governance

Davidson Training UK Ltd are maintaining strategic and operational safeguarding arrangements during this time. The Safeguarding Manager continues to be fully accessible both during working and out of hours throughout this period.

COVID 19 Response

Continually identify any members of staff who may be displaying symptoms with a view to ensure that they are supported through any period of illness. Davidson Training UK Ltd have also been promoting positive mental health activities for staff during the prolonged period working from home. Regular welfare and well-being checks continue to be carried out with employees, employers and apprentices.

Social distancing

Davidson Training UK Ltd implemented an early policy of promoting social distancing by arranging for staff to work remotely at an early stage of the outbreak of COVID-19 prior to Government guidance. The decision to do this was to protect all participants on those programmes, as well as our staff to reduce any likely spread of the virus.

Good practice guidance

The issue of protecting children, young people and adults at risk during any online communications has been identified as an important issue by Davidson Training UK Ltd. Given the additional online interactions happening as the result of social distancing guidelines it is important that staff recognise and fulfil our duty to keep everyone safe online.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

The Safeguarding lead continues to work with trainers and employees who are undertaking ongoing engagement through video calling software.

Good practice guidance has been issued which includes materials and useful websites. Information has been issued to apprentices, employers and parents where required regarding online safety and trainers and employers have been reminded to report any concerns regarding online content or cyber bullying incidents by peers. The following guidance has been issued:

DO

Adhere to normal Davidson Training UK Ltd code of conduct.

Ensure that all conversations and content are appropriate and relative

Ensure parents are communicated with and invited to be present when appropriate

Ensure you are dressed appropriately

Be aware of your backgrounds

Record online meetings with our young people as good practice in-case we need to refer to them at a later date.

DO NOT

We should not be encouraging anyone under the age of 18 to register for a Zoom account

Give any personal details e.g.: using personal email addresses

Share details of other participants without consent

Share videos without the approval of the person who originally shared or made it

PREVENT

Our commitment

Davidson Training UK Ltd have a statutory duty when exercising our functions to, “to have due regard to the need to prevent people from being drawn into terrorism”.

Monitoring

The Safeguarding and PREVENT Policy are reviewed and updated on an annual basis in January of each year to take account of changing circumstances, updated legislation and emerging employee training and development needs.

Completing the review process will give a clear signal to employees and stakeholders that management is committed to improvement and that relevant actions are taken where necessary.

The Government Prevent Statutory Duty places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism.

The government Counter-Terrorism and Security Act 2015 also places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy. The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are, “to safeguard vulnerable people to stop those becoming terrorists or supporting terrorism”.

- Prevent terrorism – stop people becoming terrorists
- Pursue terrorism – disrupt and stop terror attacks
- Protect against terrorism – strengthen UK protection
- Prepare to deal with terrorism – mitigate impact of attacks that can’t be stopped.

As a nation we continue to prioritise according to the threat posed to our national security; the allocation of resources will be proportionate to the threats we face. The most significant of these threats is currently from terrorist organisations in Syria and Iraq, and Al Qaida associated groups. But terrorists associated with the extreme right also pose a continued threat to our safety and security. There has been an increase in lone acts of terror opposed to mass organised terror activities, the government strategy now includes ways in which to identify risk of these instances.

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives:

1. Respond to the ideological challenge of terrorism and the threat we face from those who promote it
2. Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
3. Work with sectors and institutions where there are risks of radicalisation that we need to address.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Objectives

Davidson Training UK Ltd as a training provider have a legal responsibility to ensure:

- We have undertaken training in the Prevent Duty as identified by their leaders and managers
- We are all aware of when it is appropriate to refer concerns about learners or colleagues to the provider's safeguarding officer
- To exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into our practice.
- That our apprentices are resilient to extreme narratives.

Scope

This policy relates to all staff, employers we work with and learners (apprentices) including subcontracted provision.

All Davidson Training UK Ltd staff and employers we work with will be made aware of the organisations commitment to the safeguarding/protection of at-risk groups and be directed to the Policy through induction processes and will know what to do if a concern arises.

Support and advice will be provided to all parties if/when such matters arise by the Designated Safeguarding Officer.

All learners (apprentices) will be made aware of Davidson Training UK Ltd commitment to the safeguarding/protection of at-risk individuals and the Safeguarding Code of Conduct and understand that any legitimate suspicions or concerns will be reported to appropriate agencies.

All learners (apprentices) under the age of 18 enrolling with Davidson Training UK Ltd will be given guidance and pastoral support.

Davidson Training UK Ltd will work in partnership with employers to promote the safeguarding and protection of at-risk groups. We will work closely with employers to ensure confidence that we are providing a safe environment for at-risk learners(apprentices).

This policy applies to all learners (apprentices) and staff employed by Davidson Training UK Ltd and sub-contractors

- children and young people aged under 18 years
- adults at risk (as defined by section 42 of the Care Act 2014)
- any persons who may be at risk of being radicalised by any extremist group or ideology under the terms of the Counter Terrorism and Security Act 2015 (Section 26(1)) and as defined in the Prevent Duty guidance, 2015

The policy has particular relevance to the following areas of activity where at-risk individuals may be engaged:

- Promotional activity
- Provision of advice and guidance
- Suitability of programme content
- Application and enrolment processes
- Additional requirement and special needs assessment processes
- Selection and recruitment of staff
- Trainer-learner interactions including face-to-face training
- Communications, including electronic communications
- Examination arrangements

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

- Learners (apprentices) who are under the age of 18 at the start of their apprenticeship or employment with Davidson Training UK Ltd
- Research involving sensitive materials or people who are under the age of 18 and for adults at risk

Key Contacts

Lead Designated Safeguarding Officer

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Definitions

Radicalisation - is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo.

Terrorism – an act of terror/ violence based on a political objective, whether that means the politics of nationalism, ethnicity, religion, ideology or social class.

Extremism - an ideology that is far outside the mainstream attitudes of society, including, 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. This also includes calls for the death of members of the British armed forces.

Leadership & governance

Prevent forms part of the safeguarding agenda which has a nominated Director leading the Prevent initiative, and the Training Operations Manager are actively engaged within the Safeguarding and Prevent Agenda. It has been well documented within current literature, namely the Prevent Strategy 2011 and Keeping Children Safe in Education, that protecting people from being drawn into radicalisation should align with the current safeguards in place to protect learners from the risks of safeguarding issues. Prevent duty is also embedded within IT, social media, Social Learning platform and Safeguarding policies.

Staff Training

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

All staff are trained on the Channel process and how the duty engages with requirements of their role, via face to face, distance and certificated learning. Identification of vulnerabilities and indicators training is provided face to face (see Appendix 6 and 7 for additional guidance document for vulnerabilities and identifying indicator). Identifying risk at an early stage allows early intervention and is crucial to the Prevent duty and Channel process being successful. At induction the learners are issued with, and training delivered with regards to the Prevent Duty, all legislative documents, policies, training materials, and additional resources to extend knowledge, challenge extremism and ideas to support promotion of British values.

The Prevent Duty Guidance makes it clear that frontline staff who engage with the public should:

- Understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it.
- Be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism.
- Know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it.
- Understand how to obtain support for people who may be being exploited by radicalising influences.

Engagement with External Partners

All employers will be made aware of Davidson Training UK Limited and their duty by means of Trainer communication. Channels are in place to assist with meeting the Prevent Duty and avenues for raising concerns are established with Prevent coordinators.

Learner Safety, Engagement & Curriculum

The duty encompasses building learner resilience to the threat of radicalisation, challenging extremism and raising awareness of and demonstrating British values:

- Democracy
- Rule of Law
- Tolerance and understanding of different faiths
- Challenging discrimination
- Individual liberty

Opportunities to promote all of the above values are currently facilitated within the apprenticeship, including current resources, E&D and Safeguarding learning resources, and the opportunity to partake in Learner Voice surveys. Further developments are planned to enhance this offering.:

- Ensuring our apprentices are resilient to extreme narratives
- Personal resilience including:
 - Ensuring our apprentices have the skills to control their own emotions and feelings, to engender feelings of positive well-being and to exercise control over their lives and the challenges with which they are presented.
 - Help apprentices deconstruct emotionally challenging situations by encouraging them to break down a problematic situation to reflect on thoughts and beliefs following an activating event (such as a terrorist attack or exposure to extreme

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

narratives) and examine how far it was grounded in real evidence vs. assumptions or faulty thinking.

- Educate against Hate
- To have a positive sense of identity and reflect on their identity:
 - what they think builds an identity for them as individuals
 - what they like about your local area: asking them to consider the local demographic profile, the extent to which the community is cohesive, and what changes they would make locally to help ensure that Britain is a more tolerant community?
 - what it means to be British and what makes diversity valuable and what it might feel like to be stereotyped

How we deal with any issues raised by apprentices and/or employers

Firstly, **safeguarding concerns should be paramount**. The person in question should always be the most important person. Prevent is about using your judgement and experience. Peoples' desire to understand more about different ideals should not automatically be misconstrued as radical tendencies. Young people will always be inquisitive, and you should not be afraid to talk to them about the Prevent Strategy.

If a member of staff has a concern about an individual, they must follow Davidson Training UK Ltd normal safeguarding procedures including discussing the concern with the Designated Safeguarding Lead. The Designated Safeguarding Lead will consider which further action to take such as:

- Listen to the apprentice/employer and acknowledge their concerns
- Communicate clearly with the apprentice/employer about those concerns

We will refer any concerns we may have regarding individuals or groups of individuals who have or demonstrate extremist views to the relevant outside agencies as we feel that we have a duty to intervene at the earliest opportunity and to protect those concerned.

Learner Journey

Recruitment – Safeguarding awareness implemented amongst those involved in the recruitment process. Training Needs Analysis to be completed to raise any early concerns with regards to safeguarding. Complete Due Diligence checks and standardised checks with employers. Ensure that employers are sufficiently well informed to understand their vital role within welfare and safeguarding. Issue handbook which will detail referral pathways.

Induction - Effective induction will cover course requirements and will also seek to confirm and identify the needs of learners including welfare and safeguarding issues such as keeping themselves safe from radicalisation and extremism at the outset of their learner journey. Inform the learner of the availability of mentoring, pastoral support and standards that they may be expected to meet. This includes attendance, study and engagement with assessors. Introduce learner to British Values and how these relate to their work and studies. Mandated follow up contacts with learners in first 6 weeks after their start date will include reminders of key welfare support opportunities, contacts and to explore identified welfare and safeguarding issues.

Ongoing assessment - Explore and embed the importance of British Values with learners. Exemplify and promote British Values to learners. Training sessions should be of sufficient length to allow time for exploration of safeguarding and welfare matters as well as British Values and should be in an environment/location conducive to this.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

At the end of training - Check the learner was well supported and safe. Complete Learner exit survey. Identify learners leaving or completing their programme to safeguarding staff which will allow the consideration of ongoing safeguarding implications and support to take place.

Safety online - The internet plays an increasingly dominant role in the process of radicalisation and is used extensively by extremist and terrorist groups. It is therefore vital that we protect learners and staff from such dangers. Ensure that all learners have been given training of how to use the internet safely, its inherent dangers and how they can protect themselves. This includes Social Media Platforms.

Referral Pathways

If a learner has concerns about themselves, or you have concerns about a learner being at risk of radicalisation, you should refer to The Safeguarding Policy for the process for escalating any safeguarding concerns. Appendices 6 and 7 will support with identifying vulnerabilities and indicators of someone being at risk of radicalisation.

NB – should you feel your learner, yourself or any members of the public are in immediate danger report to the police immediately.

Once the Designated Safeguarding team has been informed, they will decide on whether the issue needs to be escalated to the local police Prevent Officer. The designated safeguarding member that is involved with the referral will then support the Channel process as seen fit by the local Channel panel. See Appendix 3 for the referral pathways. It should be noted that referral to the channel process is not a criminal intervention.

Learners that are absent or avoiding interaction should be classed as vulnerable until the circumstances are clarified and all absence involving 16- to 18-year-olds should involve early intervention and reporting.

It should be noted that a learner displaying one or a few of vulnerabilities and indicators does not mean the learner will necessarily be at risk of radicalisation but it may do so. In all instances that concern you, you should report to the Designated Safeguarding Officer.

Safeguarding Staff Members as a Result of Referral

While it is unlikely that the referrer would then be targeted. If someone received threat or police felt someone was under threat without them knowing, there are risk assessment, warning and safeguarding processes local police departments will apply as a matter of routine. The outcome might involve an investigation and arrests being made etc, such as markers on people's mobile phone numbers or addresses, warnings to parties involved, or other measures.

Compliance with the Duty is monitored by Ofsted through their inspection regime and in accordance with the standards outlined in the Common Inspection Framework

APPENDIX

STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURES AND DISCLOSURE INFORMATION

General Principles

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, Davidson Training complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining with the safe handling, use, storage, retention and disposal of DBS disclosure information.

Storage and Access

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. The Training Operations Manager will be responsible for maintaining a record of all those to whom disclosures or disclosure information has been revealed. It is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it. Usage Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, Davidson Training does not keep disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, Davidson Training will consult the DBS about this before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, Davidson Training will ensure that any disclosure information is immediately destroyed by secure means, i.e., by shredding or confidential waste disposal. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g., waste bin or confidential waste sack). Davidson Training will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, Davidson Training will keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

APPENDIX

DBS DISCLOSURE PROCESS

Davidson Training uses Disclosure Services who is a registered body responsible for authorising and processing applications for DBS checks.

Successful candidates will be sent a DBS disclosure application form and guidance with the written offer of employment. The completed disclosure form and associated ID documentation must be verified in person. This can either be done by bringing the documents to their line manager, who will authenticate and scan the documents then forward to the Training Operations Manager; or the individual can bring the documents to the Training Operations Manager directly. The Training Operations Manager is responsible for checking the form is fully completed, confirm which type of disclosure is required and will forward to Disclosure Services.

Disclosure Services will then process the application and return a disclosure report to the Training Operations Manager, with a copy also sent to the individual. The published DBS turnaround time is for 95% of disclosures to be sent out within 4 weeks.

Wherever possible the DBS disclosure should be obtained prior to the individual commencing employment, but sometimes this may not be possible. In such cases the individual can commence employment but only on a supervised basis for those aspects of the job involving contact with children or adults at risk until such time as a satisfactory disclosure report is received.

In some cases, an applicant may already have received a satisfactory disclosure report for their current or a previous position at Davidson Training. It may be appropriate to use the existing report to assess suitability for the post, taking account of the date the report was produced and similarities between the two positions. The Training Operations Manager should be consulted in such cases.

Disclosure reports for applicants with a substantial record of overseas residence, including current UK residents and British nationals, may not include information on convictions from outside the UK. In most circumstances however, a disclosure report should still be sought. The DBS can also offer guidance on the availability of criminal record checks in a variety of foreign countries and the applicant can be requested to obtain the equivalent checks from the country in question, where available.

APPENDIX

DETAILED PROCEDURE FOR DEALING WITH SAFEGUARDING CONCERNS

RECOGNITION

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns in order to raise them, any concerns raised should be taken seriously. See Appendix 4 for indicators of abuse to help.

RESPONSE

No report or concerns about possible abuse should be ignored. Your main role here is to listen and record with no judgements or leading questions; use open question to gather factual details – when it took place, who said what, what happened. You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the designated person within Davidson Training, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e., have the police already been informed, is the person receiving local authority or medical support.

RECORD

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took. Use the disclosure form where possible, but any form of notes will be acceptable.

REPORT

Report the concerns to the designated person, ensuring you have recorded all details as above. This communication can be face to face, via email, or phone call followed up by email. All communication and documents will remain confidential between the designated person and individual that has reported it unless the designated person deems it appropriate to take further action and involve other agencies.

REFERRAL

The designated person will then take the decision of what course of action should be taken. Only the designated person should be taking the decision to make referrals outside of the organisation.

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

APPENDIX 4
INDICATORS OF ABUSE

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
Physical abuse	Deliberately causing physical harm	Cuts, bruises, burns, Wearing long sleeved clothes Pain Covering
Neglect	Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger	Withdrawn Weight loss Fear of going home Improper hygiene Confusion Inappropriate clothing
Self-Neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding	Poor diet and nutrition Poor personal hygiene Not taking prescribed medication Substance misuse Doesn't always encompass all aspects of life.
Psychological abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	Withdrawn Depression Lack of confidence Socially awkward Easily manipulated
Financial abuse	Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.	Change in appearance Having expensive gadgets Having no money Not eating properly
Sexual abuse	Sexual abuse involves forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	Spending a long time in the toilet Discomfort in sitting down Inappropriate behaviour

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
Organisational abuse	Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.	Setting Activity defined by a regime/task orientated Setting dismissive of complaints Learner may need to leave at certain times Ask permission to do everything Appear brainwashed
Discrimination	The unjust or prejudicial treatment of different categories of people, especially on the grounds of one of the protected characteristics	Fearful of certain people Avoiding certain situations Being asked to do more work than they should
Child sexual exploitation	Sexual abuse involves forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	Change in behaviour Change in appearance Increased sexualised behaviour/language Drug/alcohol abuse Suddenly Wearing expensive things Appear with unexplained gifts or new possessions Associate with other young people involved in exploitation who have older boyfriends or girlfriends Those who suffer from sexually transmitted infections or become pregnant Those who suffer from changes in emotional well-being Those who misuse drugs and alcohol Those who go missing for periods of time or regularly come home late Those who regularly miss training

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
Child criminal exploitation: County Lines	<p>Can affect any child or young person (male or female) under the age of 18 years.</p> <p>Can affect any vulnerable adult over the age of 18 years.</p> <p>Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.</p> <p>Can be carried out by individuals or groups, males or females and young people or adults.</p> <p>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.</p>	<p>A child or young person going missing from school or home or significant changes in emotional well-being</p> <p>A person meeting unfamiliar adults or a change to their behaviour</p> <p>The use of drugs and alcohol</p> <p>Acquiring money or expensive gifts they cannot account for</p> <p>Lone children from outside of the area</p> <p>Individuals with multiple mobile phones, tablets or 'SIM cards'</p> <p>Young people with more money, expensive clothing, or accessories than they can account for</p> <p>Unknown or suspicious looking characters coming and going from a neighbour's house</p> <p>Relationships with controlling or older individuals or associations with gangs</p> <p>Suspicion of self-harm, physical assault or unexplained injuries</p>
Bullying (Inc. cyberbullying)	<p>Behaviour by group of individual repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, social media exchanges)</p>	<p>Withdrawn/ nervous</p> <p>Signs of physical and emotional abuse</p> <p>Constant use of or fear of internet usage</p>
Domestic violence	<p>Incident of pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who have been intimate partners or family members, can also be honour based</p>	<p>Signs of physical or emotional abuse</p> <p>Show signs of being controlled</p> <p>Withdrawn</p> <p>Anxious around others</p> <p>Low self esteem</p>
Drugs	<p>Alcohol, tobacco, illegal drugs, medicines of psychoactive substances</p>	<p>Smelling of alcohol</p> <p>Regular hangover symptoms</p> <p>Inability to concentrate</p> <p>Lateness</p> <p>Change in commitment levels</p>

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
Fabricated or induced illness	Making up signs and symptoms of an illness, falsifying medical records or inducing an illness to someone by any means	Child could pretend ill, think ill, and talk about persons taking them to Drs or hospital. Parents could talk about child consistent illness.
Faith abuse	Child abuse related to faith or belief, include concepts of witchcraft and spirit possession, rituals and sacrificial murders	Talking about beliefs and faith related activities engaged or family engaged with
Forced marriage	One or both spouses do not or cannot due to vulnerabilities consent to marriage and duress is involved	Travel abroad recently Talking about getting married/meeting men through family connections Upholding religious duties
Gangs and youth violence	Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending	May have expensive items Change in behaviour Bruises/cuts Social activities change Gang tattoos Carrying weapons
Private fostering	Fostering arrangement without consent of local authority	Moving to different homes regularly Not discussing family life Abandonment characteristics
Female genital mutilation (FGM)	Partial or total removal of female external genitalia or injury to another part of the female genitalia for non - medical reason	Spending a long time in the toilet Uncomfortable sitting down Long trips away from home
Gender based violence	Violence (either physical or sexual) towards women/ men	Withdrawn, nervous Physical signs of abuse
Sexting	Exchange of self-generated sexually explicit images through mobile picture messages	Withdrawn Boasting Hiding mobile phones
Radicalisation Extremism	Process by which a person comes to support/ partake in terrorism and extremism (also includes – political/ animal rights and ecological extremist). Extremism is ideology that is considered to be far outside the acceptable mainstream attitudes of society. – include opposition to British values.	Long trips away from home Talking about being wronged by a state or political system/changing to a better life. Strong views about changing life Talk of harming others in plight for cause
Teenage relationship abuse	Abuse in a relationship – either physical, sexual, emotional or financial	Withdrawn Constantly responding to messages/ calls Detect a control aspect Physical signs of abuse

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
Trafficking and modern slavery	Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.	Talking about travelling abroad Talking about someone else having control over them Moving homes regularly Avoid eye contact and appear frightened No identification documents Physical or emotional abuse.
Mental health	Absence of psychological wellbeing and effective physical or psychological functioning	Becoming more withdrawn Changes in behaviour or personal appearance Less punctual than normal, less interest

Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

APPENDIX 5

DISCLOSURE RECORDING FORM

Learner Name	
Employer/Location	
Date of Birth	
Davidson Training Representative	
Date of disclosure	

Details of concern

Signature	
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Action – For Safeguarding Team only
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Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

APPENDIX 6

VULNERABILITIES & INDICATORS OF RADICALISATION

VULNERABILITIES	INDICATORS	
Peer pressure	Withdrawn	
Unsettled family life	Change in engagement levels	
Need to belong/fit	Using extremist language, passionate about extremist views	
Accessing extremist material	Preaching	
Isolation and social exclusion	Change in appearance - dress/ body art	
Bullied	Change in behaviour within work and learning environment (unwilling to engage with those that are different, become abusive to those that are different, embracing conspiracy theories, changes in appearance/friend, converting to new religion, being secretive, changes in online identity, spending a lot of time online, accessing extremist online content, becoming argumentative, refusing to listen to points of view, distancing themselves and no longer doing things they used to enjoy doing, feeling persecuted, sympathetic to extremist ideologists and groups, joining an extremist organisation)	
Media influence		
Seeking purpose of focus for life		
Seeking revenge		
Seeking acceptance/social standing		
Unexplained and lengthy absence from the workplace, study sessions or prearranged meetings with assessors		
Angry		
Exam work pressure		
		Change in social circles
		Bad language/Use of divisive language
	Graphic representations	
	Handing out leaflets	
	Attending meetings	
	Become withdrawn/isolated/excluded	
	Closed to debate	

APPENDIX 7

FACTORS OF VULNERABILITIES



Davidson Training UK Ltd
Safeguarding and Prevent Duty Policy

Davidson Training UK Ltd

Safeguarding and Prevent Policy

2024

Reviewed October 2022

Reviewed by: Lorraine Bunyard

Position: Managing Director

Date: 10/01/2024

Signature:

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