SAFEGUARDING CHILDREN & VULNERABLE ADULT PROTECTION POLICY

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Version	Change Detail	Latest Review Date	Date of Next Review	Updated By:
1.1	Annual Review & Policy amended	03/12/2019	03/12/2020	Shabir Siddiq
1.2	Annual Review & Policy amended	03/12/2020	03/12/2021	Shabir Siddiq
1.3	Policy amended	02/06/2021	03/12/2021	Shabir Siddiq
1.4	Annual Review & Policy amended	07/12/2021	07/12/2022	Shabir Siddiq
1.5	Policy amended	15/07/2021	07/12/2022	Shabir Siddiq
1.6	Annual Review & Policy amended	07/12/2022	07/12/2023	Shabir Siddiq
1.7	Annual Review Changed to Academic Year Start & Policy Amended	01/08/2023	31/07/2024	Shabir Siddiq
1.7	Annual Review	01/08/2024	31/07/2025	Shabir Siddiq
1.8	Annual Review included Martyns Law & header logos change	01/08/25	31/07/26	Shabir Siddiq
1.9	Annual Review & header logo change	01/08/2026	31/07/2027	Shabir Siddiq

This policy defines how Alphabet Training operates to safeguard children, young people and adults at risk of harm or neglect.

Alphabet Training is committed to providing an organisation and learning environment free from harassment, abuse, violence, bullying or any other form of anti-social behaviour for both Children (16 to 18) and Adults.

We have a duty of care and are committed to the protection and safety of everyone who comes in to contact with it including; children, young people and adults at risk involved as visitors and as participants in all of our activities both on and off site. We also have a duty to safeguard and support our staff, volunteers and work experience candidates.

Alphabet Training recognises that through its provision of post 16 training programmes that its staff and partner organisations will need to be mindful of 'safeguarding' those who may be Children or vulnerable adults.

For this policy children/young people are classed as those between the age of 16 to 18. For adults, Alphabet Training uses the official government definition of 'vulnerable adult' to set out parameters of this policy.

CHILD PROTECTION STATEMENT & SAFEGUARDING

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all young people. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse, neglect and people being drawn into terrorism and follow our procedures to ensure that young people receive effective support, protection, and justice. Where it is believed that a young person is at risk of or is suffering significant harm, Alphabet Training will follow the procedures set out in the Local Safeguarding Procedures. These procedures and statutory guidance apply to children and young people below the age of eighteen. However, Alphabet Training recognises its' responsibility to all its' learners and will consider this guidance, if there are concerns regarding any young person or vulnerable adult.

POLICY PRINCIPLES

- Welfare of the child/young person is paramount.
- All young people, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm, or at risk of becoming radicalised (our Prevent duty).
- Young people and staff involved in child protection issues will receive appropriate support.

Prevention: Alphabet Training is committed to early help and identification of unmet needs and vulnerabilities. Alphabet Training works in partnership with other agencies to promote the welfare of young people and keep young people safe.

Protection: All staff are trained to recognise and respond to abuse and neglect. All staff are expected to be vigilant and must act quickly when they suspect a young person is suffering, or is likely to suffer, harm. (In line with the Local Safeguarding Children's Board procedures).

Support: Alphabet Training acknowledges the sensitivity and complex nature of safeguarding and child protection and therefore ensures that young people, staff, and families are supported appropriately.

At Alphabet Training we recognise that effective safeguarding systems are those which:

- Put the young person's needs first.
- Provide young people with a voice.
- Promote identification of early help.
- Encourage multi-agency working and sharing of information.

POLICY AIMS

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate Alphabet Training's commitment regarding child protection, safeguarding and preventing radicalisation.
- To contribute to Alphabet Training's safeguarding procedures.

Statutory Guidance

- Education Act 2002: Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges and Training Providers to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- Working Together to Safeguard Children 2018: statutory guidance which sets out key roles for individual organisations and agencies to deliver effective arrangements for safeguarding.
- Children and Young Persons Act 2008: section 11.
- Keeping children safe in education (KCSIE) is the name of a document that contains statutory guidance that outlines the legal requirements (the 'must' actions) and best practices (the 'should' actions) for safeguarding in schools and colleges in England from the Department for Education (DfE). School management can decide which sections staff should read. However, they must ensure that **all staff understand their roles and responsibilities**.

- Keeping children safe in education: Statutory guidance for schools and colleges 2018. This contains information on what schools and colleges should do and sets out the legal duties with which schools must comply.
- What to do if you are worried a child is being abused.
- Guidance for Safer Working Practice.
- The Children Act 1989.
- The Children Act 2004: section 11.
- The Children and Families Act 2014.
- Counter-Terrorism and Security Act 2015 updated 2018) ("the CTSA 2015"): section 26.
- Apprenticeships, Skills, Children and Learning Act 2009: Part 9.
- Sexual Offences Act 2003.
- The Modern Slavery Act 2015.

Keeping children safe in education 2022/23: Statutory guidance for schools and colleges 2022/23. This contains information on what schools and colleges (including Training Providers) should do and sets out the legal duties with which schools must comply. Part 1: Safeguarding information for all staff. Part 2: The Management of Safeguarding in particular Governing

Bodies. KCSIE 23 contains minor changes related to: Filtering and Monitoring, Retention of Documents, Use of school premises by outside organisation.

KSCIE 24 Changes in the 2024 guidance Keeping children safe in education 2024 introduces changes to the guidance as set out below. Definition of safeguarding - The definition of 'safeguarding and promoting the welfare of children' has been updated to reflect the changes made in Working together to safeguard children (DfE, 2023a). The definition now includes the additional points of:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, inside or outside the home, including online.

Early help - The guidance on 'Early help' has also been amended in line with Working together. The update adds that professionals should be alert to the need for early help for a child who:

• is frequently missing/goes missing from education, home or care

• has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit

• has a parent or carer in custody or is affected by parental offending.

Abuse, neglect and exploitation - Where applicable, 'abuse and neglect' has been changed throughout the document to 'abuse, neglect and exploitation.' The definition of 'abuse' has also been changed to clarify that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

Children absent from education - In outlining the signs that children may be at risk of harm, the guidance updates 'deliberately missing education' to read 'unexplainable and/or persistent absences from education.'

A full list of changes can be found in Annex F of Keeping children safe in education 2024 (DfE, 2024a).

DEFINITIONS:

Children and young people are defined as those persons aged under 18 years old. This policy will apply to all staff, contractors and volunteers and will be used to support their work.

"Safeguarding and promoting the welfare of children" is defined in Working Together 2018 as:

- protecting children from maltreatment (abuse or neglect)
- preventing impairment of children's health and development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes and enter adulthood successfully

Child protection refers to the processes undertaken to protect young people who have been identified as suffering or being at risk of suffering significant harm. (Children's Act 2004).

Staff refers to all those working for or on behalf of Alphabet Training, full time or part time, in either a paid or voluntary capacity.

Vulnerable Adult (also referred to as an Adult at Risk) is a person who is 18 years or over and who is or may need, community care or health care services by reason of mental or other disability or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents or legal guardian.

DSL refers to the nominated Designated Safeguarding Lead who acts as a source of support and expertise to the Alphabet Training community for safeguarding and Prevent matters.

DSO refers to the appropriately trained Designated Safeguarding Officer and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of young peoples.
LSCB refers to the Local Safeguarding Children's Board(s).
LSAB refers to the Local Safeguarding Adult's Board(s).
LADO refers to the Local Authority Designated Officer.

Prevent is a government strategy aimed at stopping people being drawn into terrorism. The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, including Alphabet Training, to have due regard to the need to prevent people from being drawn into terrorism.

To make all members of staff aware of the issue and requirements for 'safeguarding' Alphabet Training senior management will:

- Identify responsibility and accountability for safeguarding arrangements clearly and at a senior level.
- Ensure that all staff receives training and information regarding the requirements for organisations who may be working with Children/Young People and vulnerable adults. This will result in a workforce that is confident and well equipped to promote safeguarding in a sensible and proportionate way.
- Where appropriate, include in our self-assessment procedures any potential for the requirement for 'safeguarding' measures and implement them based on a risk assessment of the potential requirement.
- Keep all staff abreast of changes to legal requirements and ensure that policies and procedures are revised accordingly.

Alphabet Training will collaborate with other agencies to effectively identify any learners that may be considered to be 'at risk' and put in place procedures, staff training and any legislative requirements to ensure that the learner is appropriately safeguarded.

The range of risks associated with using the internet has been recognised as a priority area.

Alphabet Training will use standard precautions such as having filtering and monitoring software in place. In addition, there will be a high level of vigilance by staff concerning learners' use of the internet in computer rooms and classrooms.
Any allegations (toward either Alphabet Training staff or other learners) of abuse or other behaviour considered to be within the national guidelines of 'safeguarding' will be acted upon immediately by senior management and the appropriate agencies contacted, and disciplinary procedures implemented.

CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

- Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.
- To ensure that all our learners receive equal protection, we will give special consideration to young people who are vulnerable to abuse because of their age, health, physical or mental abilities, race, ethnicity, religion or sexuality; those being bullied or those regularly absent from learning.

Alphabet Training is committed to keeping our children safe from specific forms of abuse. We therefore ensure that:

ALL staff understand that there are specific and emerging ways in which children can be abused, such as:

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism, there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

- ALL staff will have 'due regard to the need to prevent people from being drawn into terrorism', known as the **'Prevent Duty'.**
- ALL staff will have a general understanding of how to identify a child who may be at risk of radicalisation.
- ALL staff will use professional judgement in identifying learners who might be at risk of radicalisation and act proportionately.
- Alphabet Training will ensure the safety of learners online by preventing their access to terrorist and extremist material when using the internet and that suitable filtering software is in place.
- DSL/ DSO understand when it is appropriate to make a referral to the Channel Panel.
- Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels (this includes Alphabet Training).

The Department for Education has published advice for schools and additional guidance for FE on the Prevent duty.

- Prevent-duty-departmental-advice-v6.

- Prevent Duty Guidance FE.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN (YOUNG PEOPLE)

Peer on Peer Abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in peer-on-peer abuse is under the age of 18.

- ALL staff understand that children can abuse other children.
- ALL staff will inform the DSL of suspected peer abuse.
- Peer on peer abuse will be taken as seriously as any other form of abuse.
- Physical abuse between peers will be managed under Alphabet Training's Behaviour Policy.
- Emotional abuse between peers will be managed under the Alphabet Training's Behaviour Policy.
- Harmful sexual behaviour will be identified and managed with support and guidance from the DSL and LCSB (if required).
- Sexting will be managed on a case-by-case basis using national and local guidance and advice from LCSB.
- In cases of suspected or actual peer on peer abuse a risk assessment will be undertaken and appropriate and proportionate control measures put in place to manage and reduce risk. Seek advice from LCC Schools Safeguarding Officer.
- Referrals to Children's Social Care, Police and/or other appropriate agencies will be made where necessary.

Advice has been provided by the Department for Education, see link below.

https://consult.education.gov.uk/safeguarding-in-schools-team/keeping-children-safe-in-education/supporting_documents/Sexual%20Harassment%20and%20Sexual%20Violence%20%20Advice.pdf

Children Missing from Education (CME) can be a potential sign of abuse or neglect including sexual exploitation, undergoing female genital mutilation, forced marriage, or travelling to conflict zones.

- ALL staff must follow procedures when a child misses education particularly on repeat occasions to help identify the risk of abuse and neglect.
- **Learner Attendance and punctuality:** This monitored through registers and all concerns are discussed with the DSL.

For all specific safeguarding issues, the DSL will seek advice from the local safeguarding team and follow national guidance, as our head office is in Blackburn Lancashire below you will find pan Lancashire approach:

- Multi Agency Statutory Guidance on FGM: http://panlancashirescb.proceduresonline.com/chapters/p_female_mutilation.html
- Multi-agency Working.

New safeguarding partners and child death review partner arrangements came into place from September 2019. This has comprised of the local authority, a clinical commissioning group and the chief officer for police equally sharing responsibilities for working together to safeguard and promote the welfare of local children within each area. Safeguarding partners are expected to ensure that Alphabet Training are fully engaged, involved, and included in the new safeguarding arrangements.

- Forced marriage http://panlancashirescb.proceduresonline.com/chapters/p_forced_marriage.html
- What to do if you suspect a child is being sexually exploited http://panlancashirescb.proceduresonline.com/chapters/p_child_sex_exp.html
- Sexting in schools and colleges: responding to incidents and safeguarding young people https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

MODERN SLAVERY:

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including colleges, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery.

- The public authority (including colleges) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking.'
- Staff must be aware of the above and contact the DSL should they suspect or receive information that learners (or their families) may be victims of modern slavery. The DSL should then contact the NCA.

UPSKIRTING:

Definition: included which describes up-skirting as "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm". Whilst this is not expected to be a significant issue at Alphabet Training staff will be trained on the matter, incidents will be dealt with appropriately and

learners will be educated regarding the consequences of this criminal behaviour. **Up-skirting is now a criminal offence.**

SERIOUS CRIME:

"All Alphabet Training staff should be aware of indicators, which may signal that learners are at risk from, or are involved with serious violent crime. These could include increased absence from Alphabet Training, a change in relationships or friendships with older individuals or groups, significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that learners have been approached by, or are involved with individuals associated with criminal networks or gangs"

All staff should be aware of the associated risks and understand the measures in place to measure these – Link to county lines guidance –

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

ALLEGATIONS AGAINST STAFF:

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a young person to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

- A young person may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils, and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress.
- Where an allegation relates to an employer or sub-contractor the DSL must be notified immediately.

RECRUITMENT OF STAFF

It is the policy of Alphabet Training to recruit staff with integrity and that where staff may be in direct contact with learners that all regulator checks are carried out prior to engaging them. Where through

our risk assessment procedure the requirement for DBS checks is required then everyone will be obliged to have and maintain the relevant level of compliance. DBS checks will be conducted on a 3-year cycle, unless otherwise required.

Safer recruitment means that all applicants will:

- Complete an application form.
- Provide two referees, including at least one who can comment on the applicant's suitability to work with young people.
- Provide evidence of identity and qualifications.
- Be checked through the Disclosure and Barring Service (DBS) as appropriate to their role
- Be interviewed.
- Be subject to on-going vetting through the DBS.
- All new members of staff will undergo an induction that includes familiarisation with Alphabet Training's child protection and safeguarding policies and identification of their safeguarding training needs.

STAFF TRAINING:

- It is important that all staff have appropriate training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff will receive training during their induction. All staff, including the MD will receive training that is updated annually, and the DSL will receive training in inter-agency procedures.
- The DfE "Keeping Children Safe in Education: information for all school and college staff", part 1 September 2019 is given to every member of staff to assist with appropriate behaviour and minimise allegations of professional abuse; along with Guidance for Safer Working Practice.
- The MD must be satisfied that every member of staff has received, read, and understood the guidance.

CONFIDENTIALITY AND INFORMATION SHARING

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the young person and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL & MD (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act 2018 and GDPR principles. Information is:

- Processed for limited purposes.
- Adequate, relevant, and not excessive.
- Accurate.

- Kept no longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.

Child Protection Disclosure forms, Cause for Concern forms and other written information will be stored in a secure facility and any electronic information will be password protected and only made available to relevant individuals.

- Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will be kept in locked storage.
- Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the MD or DSL.
- The Data Protection Act does not prevent staff from sharing information with relevant agencies, where that information may help to protect a child. Alphabet Training Data Protection policy includes information on confidentiality and information-sharing and is available to parents and young learners on request.

INFORMATION SHARING:

It is necessary to show that a fair balance has been struck between the individual rights of the person and the relevant justification when information is shared.

Key questions to consider are:

- Is there a clear and legitimate purpose for sharing information?
- Do you have reasonable cause to suspect a child is suffering or likely to suffer significant harm?

Whilst it is good practice to share with families your intention to make a referral to Children's Services about their child's welfare, it is not a prerequisite.

Sharing confidential information without consent will normally be justified in the public interest:

- When there is evidence or reasonable cause to believe that a child or vulnerable adult is suffering or is at risk of suffering significant harm.
- To prevent significant harm to a child or serious harm to an adult, including through the prevention, detection, and prosecution of serious crime.

Staff must decide whether sharing information is a necessary and proportionate response to the need to protect the child in question. The decision-making process must weigh up what might happen if the information is shared against what might happen if it is not shared.

SECURITY OF PREMISES

Alphabet Training will endeavour to maintain a safe and secure environment for all its learners. Security of our training centres is a key element of our Health and Safety risk assessment strategy and is a continual process.

LEGISLATIVE GUIDANCE

All of our procedures and safeguards will take their lead from current government guidance as detailed in the Department of Health 'statement of government policy on adult safeguarding.

For Children: https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children
For Adults: https://www.gov.uk/government/publications/adult-safeguarding-statement-of-government-policy

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping_children_safe_in_education_2020_-_Update_-_January_2021.pdf

INFORMING EMPLOYEES OF THEIR ROLES AND RESPONSIBILITY

Alphabet Training will ensure that all members of staff in the organisation receive and are trained in the contents of our Safeguarding Vulnerable Adults Policy.

SAFEGUARDING VULNERABLE ADULTS - POLICY

AIM

The purpose of this policy is to outline the duty and responsibility of staff working on behalf of the organisation in relation to Safeguarding Vulnerable Adults. All adults have the right to be safe from harm and must be able to live free from fear of abuse, neglect, and exploitation.

OBJECTIVES

To explain the responsibilities, the organisation and its staff, volunteers and trustees have in respect of vulnerable adult protection. To provide staff with an overview of vulnerable adult protection and to provide a clear procedure that will be implemented where vulnerable adult protection issues arise.

CONTEXT

For the purpose of this policy ‘adult’ means a person aged 18 years or over.

WHAT DO WE MEAN BY ABUSE?

Abuse of a vulnerable adult may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.

Concerns about abuse may be raised and reported to the social services agency as a result of a single incident or repeated incidents of abuse. However, for some clients the issues of abuse relate to neglect and poor standards of care. They are ongoing and if ignored may result in a severe deterioration in both physical and mental health and even death.

Anyone who has concerns about poor care standards and neglect in a care setting may raise these within the service, with the regulatory body and/or with the social services agency.

Where these concerns relate to a vulnerable adult living in their own home, with family or with informal carers they must be reported to the social services agency. These reports must be addressed through the adult protection process and a risk assessment must be undertaken to determine an appropriate response to reduce or remove the risk.

WHO IS INCLUDED UNDER THE HEADING 'VULNERABLE ADULT?'

An Adult (a person aged 18 or over) who 'is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Definition from 'No Secrets' March 2000 Department of Health).

This could include people with learning disabilities, mental health problems, older people and people with a physical disability or impairment. It is important to include people whose condition and subsequent vulnerability fluctuates. It may include an individual who may be vulnerable because of their role as a carer in relation to any of the above.

It may also include victims of domestic abuse, hate crime and anti-social abuse behaviour. The person's need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug, or alcohol problems, social or emotional problems, poverty or homelessness.

Many vulnerable adults may not realise that they are being abused. For instance, an elderly person, accepting that they are dependent on their family, may feel that they must tolerate losing control of their finances or their physical environment. They may be reluctant to assert themselves for fear of upsetting their carers or making the situation worse.

It is important to consider the meaning of 'Significant Harm'. The Law Commission, in its consultation document 'Who Decides,' issued in Dec 1997 suggested that; 'harm' must be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also 'the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development'.

LEGAL FRAMEWORK

- Human Rights Act 1998, the Mental Capacity Act 2005, and Public Interest Disclosure Act 1998
- Data Protection Act 2018, GDPR 2018, Freedom of Information Act 2000, Safeguarding Vulnerable Groups Act 2006, Deprivation of Liberty Safeguards, Code of Practice 2008
- The Mental Capacity Act 2005, covering England and Wales, provides a statutory framework for people who lack capacity to make decisions for themselves, or who have capacity and want to prepare for a time when they may lack capacity in the future. It sets out who can take decisions, in which situations, and how they must go about this.
- The Human Rights Act 1998 gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR)
- The Public Interest Disclosure Act 1998 (PIDA) created a framework for whistle blowing across the private, public, and voluntary sectors. The Act provides almost every individual in the

workplace with protection from victimisation where they raise genuine concerns about malpractice in accordance with the Act's provisions.

THE ROLE OF STAFF

All staff working on behalf of the organisation have a duty to promote the welfare and safety of vulnerable adults.

Staff may receive disclosures of abuse and observe vulnerable adults who are at risk. This policy will enable staff/volunteers to make informed and confident responses to specific adult protection issues.

TYPES OF ABUSE

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent.

Abuse can occur in any relationship, and it may result in significant harm to, or exploitation of, the person subjected to it. The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:

- Physical abuse - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- Sexual abuse - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented or could not consent or was pressured into consenting.
- Psychological abuse - including 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.
- 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 and acts of omission - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.
- Discriminatory abuse - including race, sex, culture, religion, politics that is based on a person's disability, age or sexuality and other forms of harassment, slurs, or similar treatment, hate crime.
- Institutional abuse - Institutional abuse although not a separate category of abuse, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so

when care standards and practices fall below an acceptable level as detailed in the contract specification.

- Multiple forms of abuse - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important
- to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence, or ignorance.
- Domestic abuse:

➢ Home Office Definition 2004:

'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.'

➢ Women's Aid Definition:

'Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behaviour. This can also include forced marriage and so-called "honour crimes". Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently "violent."

➢ Most research suggests that domestic violence occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class or educational level.

➢ Both definitions would therefore also include incidents where extended family members may condone or share in the pattern of abuse e.g. forced marriage, female genital mutilation and crimes rationalised as punishing women for bringing 'dishonour' to the family.

➢ It is important to recognise that Vulnerable Adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

➢ Where Vulnerable Adults are victims of Domestic Abuse, they may need extra support to plan their future. The violence or threat of violence may continue after a victim has separated from the abuser. It is important to ensure that all the vulnerable people in this situation have appropriate support to enable them to maintain their personal safety.

➢ A separate Domestic Abuse Protocol is in place between Police, Social Services and Health. Incidents reported by the police through the domestic abuse protocols will be addressed under the adult protection processes if it is considered that a vulnerable adult may be at risk of abuse. (See Joint Police, Social Services and Health protocol for dealing with cases of domestic abuse where vulnerable adults are involved).

PROCEDURE IN THE EVENT OF A DISCLOSURE

It is important that vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously.

This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused.

Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.

A full record shall be made as soon as possible of the nature of the allegation and any other relevant information.

This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.

RESPONDING TO AN ALLEGATION

Any suspicion, allegation or incident of abuse must be reported to the Designated Adult Protection Lead or Senior Manager on that working day where possible.

The nominated member of staff shall telephone and report the matter to the appropriate local adult social services duty social worker. A written record of the date and time of the report shall be made, and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

RESPONDING APPROPRIATELY TO AN ALLEGATION OF ABUSE

In the event of an incident or disclosure:

DO

- Make sure the individual is safe.
- Assess whether emergency services are required and if needed call them.
- Listen.
- Offer support and reassurance.
- Ascertain and establish the basic facts.
- Make careful notes and obtain agreement on them.
- Ensure notation of dates, time and persons present are correct and agreed.
- Take all necessary precautions to preserve forensic evidence.
- Follow correct procedure.
- Explain areas of confidentiality; immediately speak to your manager for support and guidance.

- Explain the procedure to the individual making the allegation.
- Remember the need for ongoing support.

DON'T

- Confront the alleged abuser.
- Be judgmental or voice your own opinion.
- Be dismissive of the concern.
- Investigate or interview beyond that which is necessary to establish the basic facts.
- Disturb or destroy possible forensic evidence.
- Consult with persons not directly involved with the situation.
- Ask leading questions.
- Assume Information.
- Make promises.
- Ignore the allegation.
- Elaborate in your notes.
- Panic.

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the designated Vulnerable Adult Protection Officer.

Allegations Management: Allegations of abuse or malpractice against a member of staff (including volunteers and work experience personnel).

It is essential that any allegation of abuse made against a person who works with children and young people including those who work in a voluntary capacity are dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation. The framework for managing allegations is set out in *Working Together to Safeguard Children: 2015 ,* and *Safeguarding Children and Safer Recruitment in Education 2007.*
The framework for managing cases set out in this procedure applies to a wider range of allegations than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

It also caters for cases of allegations that might indicate that the alleged perpetrator is unsuitable to continue to work with children in their present position, or in any capacity. This may be due to concerns about the persons conduct in their personal or professional life that might indicate their unsuitability to work with children. It should be used in respect of all allegations that are consistent

with the guidance in Working Together i.e. cases in which it is alleged that a person who works with children has:

behaved in a way that has harmed, or may have harmed, a child possibly committed a criminal offence against, or related to, a child; or behaved in a way that indicates s/he is unsuitable to work with children.

In compliance with the Suffolk Safeguarding Partnership Allegations Management guidance, the following procedures will be followed;

Reporting procedure for Allegations

If the allegation is against a member of staff at Alphabet Training then the allegation must be reported immediately, at least within one working day, to the Safeguarding Lead. If the allegation is against the Safeguarding Lead, then the allegation must be reported to the Deputy Safeguarding Lead. The Safeguarding Lead/or Deputy must then report the allegation to the Local Area Designated Officer (LADO) on the same day.

If the investigation upholds the allegation then the Data Baring Service must be informed.

CONFIDENTIALITY

Vulnerable adult protection raises issues of confidentiality which must be clearly understood by all. Staff, volunteers, and trustees have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and adult social services.

Clear boundaries of confidentiality will be communicated to all.

All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.

If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.

Within that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.

Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.

Where a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result.
Staff must assure the adult that they will keep them informed of any action to be taken and why. The adult's involvement in the process of sharing information must be fully considered and their wishes and feelings considered.

This policy needs to be read in conjunction with other policies for the organisation including:

- Confidentiality.
- Data Protection.

THE ROLE OF KEY INDIVIDUAL AGENCIES

Adult Social Services

The Department of Health's recent 'No secrets' guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of vulnerable adults at risk of abuse.

All local authorities have a Safeguarding Adults Board, which oversees multi-agency work aimed at protecting and safeguarding vulnerable adults. It is normal practice for the board to comprise of people from partner organisations who can influence decision making and resource allocation within their organisation.

The Police

The Police play a vital role in Safeguarding Adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence.

Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

Role of Line Manager

The role of the line manager is to support the member of staff, trustee or volunteer involved with the incident and to ensure the correct procedures are followed.
The line manager could, if agreed with the staff member dealing with the incident, contact the designated Adult Protection Lead in the first instance.

The line manager must ensure that all staff within their team are familiar with the organisation's vulnerable adult protection procedures and ensure that all staff undertakes training, where appropriate.

Training

Training will be provided, as appropriate, to ensure that staff are aware of these procedures. Specialist training will be provided for the member of staff with vulnerable adult protection responsibilities.

Complaints procedure

The organisation has a complaints procedure available to all staff.

Whistle-Blowing Policy

The organisation has a Whistle-Blowing policy and staff can raise concerns following the guidance contained within.

Recruitment procedure

The organisation operates procedures that take account of the need to safeguard and promote the welfare of vulnerable adults, including arrangements for appropriate checks on new staff.

PREVENT STRATEGY

The Counter Terrorism and Security Act 2015 has introduced the Prevent Duty for various bodies including all FE colleges, adult education providers and independent learning providers with SFA funding or with over 250 students enrolled.

THE PREVENT DUTY

The duty to actively promote 'Fundamental British Values' has been live from 1st July 2015. This was first set out by the government in the 'Prevent' Strategy in 2011.

The Prevent Duty has "due regard to the need to prevent people from being drawn into terrorism" (Anti-Terrorism and Security Act 2015: Schedule 3, Section 21).

Prevent is a strand of the Government counter terrorism strategy. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet, and health.

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

Critical - an attack is expected imminently.

Severe – an attack is highly likely.

Substantial – an attack is a strong possibility.

Moderate – an attack is possible but not likely.

Low – an attack is unlikely.

The CONTEST strategy, which contains the Prevent Duty, was renewed in 2018 to meet the current risk and threat points and reflect on learning from the 2017 terrorist attacks.

The revised Prevent Duty has the following objectives:

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
- Safeguard and support Individuals most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to disengage and rehabilitate.

INTRODUCTION OF MARTYN'S LAW

On Monday 19 December 2022, the Government announced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017.

We have had 14 terrorist attacks since then that have caused deaths and casualties for people conducting their everyday lives. The attacks are multifaceted and hard to predict, therefore security needs to be improved to ensure robustness, proportionality and consistency especially at public places to ensure that we are better prepared for any future incidents.

It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

Proportionality is a fundamental consideration for Martyn's Law. It establishes a tiered model linked to activity that takes place at a location and its capacity. This will prevent undue burden on premises in scope.

A **standard tier** will apply to locations with a maximum capacity of between 100 and 799. The aim is to drive up use and engagement with existing resources that help teams undertake low-cost, simple yet effective activities to improve preparedness. This will include training, information sharing and completion of a preparedness plan to embed practices (such as locking doors to delay attackers progress, or knowledge on lifesaving treatments that can be administered by staff whilst awaiting emergency services).

An enhanced tier will focus on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with a capacity of over 800 people at any time, will additionally be required to undertake a risk assessment to inform the development and implementation of a thorough security plan. Subsequent measures could include developing a vigilance and security culture, implementation of physical measures like CCTV or new systems and processes to enable better consideration of security.

More information will be provided when available from the government.

WHAT IS OUR RESPONSIBILITY?

- Assess the risks of people being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- All staff to actively promote British values.
- Raise awareness of the Prevent duty and British values to all staff and learners.
- Establish a reporting procedure for all concerns relating to people being drawn into terrorism.

We have a part to play in fostering shared values and promoting cohesion. We should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within other training settings. This strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
2. To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
3. To ensure student safety and that Alphabet Training is free from bullying, harassment, and discrimination.
4. To provide support for students who may be at risk and appropriate sources of advice and guidance.
5. To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism.

To achieve these objectives, we will ensure:

LEADERSHIP AND VALUES

To provide an ethos which upholds core values of shared responsibility and wellbeing for all students, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff and student understanding of the issues and confidence to deal with them.
- Deepening engagement with local communities.
- Actively working with local authorities, police, and other agencies.

TEACHING AND LEARNING

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing, and community cohesion.
- Promoting wider skill development such as social and emotional aspects of learning.
- A provision adapted to recognise local needs, challenge extremist narratives, and promote universal rights.
- Teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro social values.
- Encouraging active citizenship and learner voice.

LEARNER SUPPORT

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families, and communities. This will be achieved through:

- Establishing strong and effective learner support services.
- Listening to what is happening in the community.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Helping learners and staff know how to access support.
- Supporting at risk learners through safeguarding and crime prevention processes.
- Focussing on narrowing the attainment gap for all learners.

MANAGING RISKS AND RESPONDING TO EVENTS

To ensure that we monitor risks and are ready to deal appropriately with issues which arise. We will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on Alphabet Training.
- Responding appropriately to events in local, national, or international news that may impact on learners and communities.
- Conduct a risk assessment related to Prevent.
- Ensuring measures are in place to minimise the potential for acts of violent extremist.
- Ensuring plans are in place to respond appropriately to a threat or incident.
- Developing effective ICT security and responsible user policies.

REPORTING 'SAFEGUARDING' CONCERNS

Initial cause for concern form which must be discussed with Line Manager / Safeguarding Lead or Member of the Senior Management Team within 24 – 48 hours.

Date:
Time:
Name of individual cause for concern is about:
Age (if known):
Address (if known):
Describe your concern and action taken:
Observations to support cause for concern:
Description and location of any visible marks, bruising, etc.:
Name of alleged abuser, relationship with learner (if known):
Name of person completing form:
Signature: Date:
Name of Line Manager:
Signature: Date:

Alphabet Training Designated Safeguarding Lead/Officer (DSO/L) and Prevent Lead:	Shabir Siddiq
Telephone:	07970347899
Email:	shabir@alphabet-training.co.uk

LADO contact details for Geographical areas:

Blackburn with Darwen Safeguarding Unit	Ground Floor, 10 Duke Street Blackburn BB2 1DH Tel: 01254 666400 out of hours: 01254 587547
Blackpool Safeguarding Children	LADO, PO Box 4 Blackpool FY1 1NA Tel: 01253 477541/01253 477299 Email: lado@blackpool.gov.uk Out of Hours (EDT) 01253 477600

Lancashire Local Contacts

Lancashire Safeguarding Children	Room CH3:37/ CH3:40, County Hall, Preston, PR1 0LD Tel: 01772 536 954 Email: children.cypsafeguarding@lancashire.gov.uk Website: Lancashire Safeguarding Children **LADO** Tel: 01772 536694 MASH: 0300 123 6720 – out of hours: 0300 123 6722

Greater Manchester

LADO Bolton	Paula Williams Telephone: 01204 337 474. E-mail: boltonsafeguardingchildren@bolton.gov.uk
LADO Bury	Mark Gay Telephone: 0161 253 5342. E-mail: m.gay@bury.gov.uk
LADO Manchester	Majella O'Hagan Telephone: 0161 234 1214. E-mail: quality.assurance@manchester.gov.uk
LADO Oldham	Colette Morris Telephone: 0161 770 8870. E-mail: colette.morris@oldham.gov.uk
LADO Rochdale	Louise Hurst Telephone: 0300 3030 350. E-mail: lado@rochdale.gov.uk
LADO Salford	Steve Westhead / Liz Peppiatt Telephone: 0161 603 4350. E-mail: stephen.westhead@salford.gov.uk/ elizabeth.peppiatt@salford.gov.uk
LADO Stockport	Gill Moore Safeguarding Children Unit 1st Floor Sanderling Building, Birdhall Lane, Cheadle Heath, Stockport. SK3 0RF Telephone: 0161 474 5657. Mobile: 07866999683. E-mail: gill.moore@stockport.gov.uk
LADO Tameside	Tania Brown Telephone: 0161 342 4398. E-mail: tania.brown@tameside.gov.uk
LADO Trafford	Anita Hopkins Telephone: 0161 912 5024.

	E-mail: anita.hopkins@trafford.gov.uk
LADO Wigan	Diane Kitcher Telephone: 01942 486 034. E-mail: lado@wigan.gov.uk

West Yorkshire

LADO Bradford	Dawn Holt and Alison Brooksbank Address: Margaret McMillan Tower Princes Way Bradford BD1 1NN Tel: 01274 435600 Email: lado@bradford.gov.uk
LADO Calderdale	Address: 2nd Floor Princess Buildings Halifax HX1 1TS Tel: 01422 394 086 Email: ladoadmin@calderdale.gov.uk
LADO Kirklees	Tel: 01484 226748

Leeds

Local Authority Children's Social Care	**LADO** Leeds City Council Address: 110 Merrion Centre, Leeds, LS2 8BB Tel: 0113 378 9649

Wakefield

Wakefield District Safeguarding Children Partnership	Marie Pettman Referrals to Lado.Referrals@wakefield.gov.uk Call for advice on: 01977 727 032

Signed by Managing Director

01/08/2026

External Support Organisations

For Help With…	Organisation	Website	Contact Details
Autism	National Autistic Society	www.autism.org.uk	020 7833 2299
Bereavement	Cruse Bereavement Care	www.cruse.org.uk	0808 808 1677*
Blind Support	Royal National Institute of Blind People	www.rnib.org.uk	0303 123 9999
Bullying	Bullying UK (Family Lives)	www.bullying.co.uk	0808 800 2222
	Kidscape	www.kidscape.co.uk	08451 205 204
Carers	Carers Trust	www.carers.org.uk	0300 772 9600
	Young Carers Trust	www.youngcarers.net	0844 800 4361
Child Exploitation	Child Exploitation & Online Protection Command	www.ceop.police.uk	https://www.ceop.police.uk/ceop-reporting
Deaf Support	British Deaf Association	www.bda.org.uk	020 7697 4140
Domestic Abuse	Refuge	www.refuge.org.uk	0808 2000 247*
Drugs	Talk To Frank	www.talktofrank.com	0300 123 6600
Employment	Job Centre Plus	www.gov.uk/jobsearch	0845 6060 234
	ACAS	www.acas.org.uk	0300 123 1100
FGM	Equality Now	www.equalitynow.org	07445 699 371
Financial Issues	The Money Advice Service	www.moneyadviceservice.org	0800 138 7777*
Forced Marriage	Plan International (UK)	www.plan-uk.org	0300 777 9777
Housing Issues	Shelter	www.england-shelter.org.uk	0808 800 4444*
Internet Safety	Think U Know?	www.thinkuknow.co.uk	0370 496 7622
Learning Difficulties	Respond	www.respond.org.uk	020 7383 0700
Legal Issues	Citizens Advice Bureau	www.citizensadvice.org.uk	0800 144 8848*
Mental Health	Mind	www.mind.org.uk	0300 123 3393
	Campaign Against Living Miserably	www.thecalmzone.net	0800 58 58 58*
	Give us a Shout	www.giveusashout.org	Text Shout to 85258
Parental Support	Family Lives	www.familylives.org.uk	0808 800 2222*
Personal Safety	The Suzy Lamplugh Trust	www.suzylamplugh.org	0808 802 0300*
Racism	Stand Against Racism & Inequality	www.sariweb.org.uk	0117 942 0060
Radicalisation	Prevent for Further Education & Training	www.preventfortraining.org.uk	020 3740 8280
Relationships	Relate	www.relate.org.uk	0300 0030 396
Self-Harm	Self-Harm UK	www.selfharm.co.uk	info@selfharm.co.uk
Sexual Abuse	The Survivors Trust	www.thesurvivorstrust.org	0808 801 0818*
	Rape Crisis	www.rapecrisis.org.uk	0808 802 9999*
Sexuality	Stonewall	www.stonewall.org.uk	0800 050 2020*
Victim Support	Victim Support UK	www.victimsupport.org.uk	0808 168 9111*

(* Free from landlines)