

## SAFEGUARDING POLICY

### Statement

In relation to children and young people, safeguarding and promoting their welfare is defined in ['Working Together to Safeguard Children 2023'](#).

Safeguarding and promoting the welfare of children is defined within the guidance as:

- providing help and support to meet the needs of children as soon as problems emerge,
- protecting children from maltreatment, whether that is within or outside the home, including online,
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children,
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect. The Care Act 2014 sets out a clear legal framework for the protection of adults at risk of abuse and neglect. For additional support and information visit the [Social Care Institute for Excellence \(SCIE\)](#).

The aim of the company's safeguarding policy is to provide an environment where all can work safely; Pier Training will take every reasonable precaution to minimise risk whilst providing demanding, challenging, and enjoyable training and development activities at our own premises and the premises of our employers and clients.

Pier Training recognises and takes seriously its responsibilities for safeguarding and safeguarding young people. Pier Training is an active participant of [Birmingham Local Safeguarding Children Partnership](#) (BSCP) forum. BSCP is a central hub for all safeguarding support, training, and advice.

Our policy is to guide all apprentices, their employers, and our staff, including associates, to enable them to practice effective safeguarding for themselves and for those they are working with.

Throughout this policy and procedure, reference is made to apprentices, young people, and adults, this means those under the age of 18 years and those over 18 years of age who would be particularly vulnerable for valid reasons such as disability or learning difficulties.

## Contacts

### Pier Training Designated Safeguarding Officer (DSO)

**Name:** Marie Woodward

**Email ID:** [marie.woodward@piertraining.co.uk](mailto:marie.woodward@piertraining.co.uk)

**Mobile:** 07880 198003

### Pier Training Deputy Safeguarding Officer

**Name:** Debbie Whiston

**Email ID:** [debbie.whiston@piertraining.co.uk](mailto:debbie.whiston@piertraining.co.uk)

**Mobile:** 07469 855167

### West Midlands Regional Prevent Coordinator

**Contact:** Alamgir Sheriyar

**Email:** [alamgir.sheriyar@education.gov.uk](mailto:alamgir.sheriyar@education.gov.uk)



The company director and senior management team are accountable for the execution of this policy throughout the organisation. The Designated Safeguarding Officer, Marie Woodward and the Deputy Safeguarding Officer, Debbie Whiston have overall responsibility for safeguarding for Pier Training. They are required to provide the directors and senior management team (SMT) with information pertaining to safeguarding and such notifications will be addressed where required, under the safeguarding agenda item of SMT meetings. The Safeguarding Officer shall ensure active compliance with this policy by all staff, apprentices, stakeholders, freelance trainers, and linked employers. All staff will actively endeavour to implement this policy.

### **Commitment**

Pier Training is committed to supporting all stakeholders to understand and implement this policy. (KCSIE) is statutory guidance for schools and colleges. As an independent training provider, we use this as a benchmark of good practice in safeguarding. Employees are required to read this document during induction and at least annually as part of their ongoing refresher safeguarding training.

Child-on-child sexual violence and sexual harassment Part 5 in KCSIE guidance is also used by the DSO and senior management team to support their knowledge and understanding of what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred. Some main points from this guidance are used in this policy to support Pier Training employees to understand their role in safeguarding young people from sexual violence.

This policy, alongside the Prevent Policy, is included as part of the enrolment and induction process for new employees and apprentices. Employees sign and date documentation as confirmation that the policy has been read and understood.

The partnership manager provides new employers with an Employer Apprenticeship Agreement which includes reference to mandatory policies and procedures, including safeguarding and prevent.

The commitment statement that is signed by all stakeholders includes contact details for the Designated Safeguarding Officer.

The DSO is committed to ensuring ongoing information and guidance on safeguarding and prevent is provided to all stakeholders. This is promoted through the Pier Training safeguarding newsletter, news feed alerts on the employee SharePoint site, OneFile e-Portfolio announcements and via social media posts, including active engagement in annual safeguarding awareness events.

## **Prevent**

Pier Training addresses its legal duty in relation to 'prevent' within the context 'safeguarding' under the Counterterrorism and Security Act 2015. Pier Training's 'Prevent Policy' specifies its obligation to safeguard all stakeholders including apprentices from being drawn into terrorism.

Although our prevent strategy is set out in more detail as an additional policy, it is important to understand that prevent is part of the overarching safeguarding policy. *Refer to Pier Training Prevent Policy for details.*

The prevent policy describes our legal responsibility to fulfil the prevent duty by protecting employees and apprentices from radicalising influences, ensuring they are resilient to extreme narratives and can identify and deal with changes in behaviour which will need to be reported accordingly through the 'Channel' process.

In brief, the prevent policy sets out the responsibilities of the Designated Safeguarding Officer (DSO) to ensure that all staff:

- have undertaken training in the prevent duty
- can recognise changes in behaviour which may indicate radicalisation and extremism
- know how to protect apprentices and employers from radicalising influences
- know how to support apprentices and employers to develop resilience to extreme narratives
- know how to deal with any issues raised and are aware of when it is appropriate to refer concerns about apprentices or colleagues to the DSO
- exemplify the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs into their practice
- ensure that the prevent policy and procedures are implemented

## **Protecting apprentices and employees from radicalising influences**

Young people are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting young people from this risk is part of Pier Training's safeguarding approach. The company recognises the vulnerability of people under and over the age of 18yrs and the need to prevent them from becoming terrorists or supporting radicalisation. The prevent objective aims to safeguard apprentices and employees from any form of extremist activity and to challenge terrorism and terrorist activity.

'Extremism' is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. (DFE-00247-2018)

Our prevent policy is to guide all employees, apprentices, and their employers to enable them to practice effective safeguarding and prevent procedures for themselves and for those they are working with.

## **Due Diligence Checks for Outside Speakers**

Pier Training will meet the [Prevent Duty guidance](#) regarding external speakers. Pier Training will consider whether the views expressed by speakers, or the views likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. More information regarding due diligence checks can be found in the Prevent Policy. Pier Training will refer to '[Implementing the Prevent Duty in higher education \(HE\): chief security officers](#)' for further information and guidance.

## **Prevent duty self-assessment**

The [Prevent duty self-assessment tool](#) is completed annually by the designated safeguarding officer (DSO) to evaluate the impact and effectiveness of meeting the requirements of the Prevent duty, and the Education Inspection Framework. This assessment involves gathering evidence and consulting with learners, employers, and employees to strive for constant improvement. For more information and detail refer to the Prevent Policy.

## **Building resilience to radicalisation**

At Pier Training, we help employees and apprentices to build resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence, be influenced, and participate in decision-making.

The tutors use real stories from the media to teach apprentices about democracy, political and social issues, how to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. This is an effective way of illustrating how to resist external pressures, including knowing when, where and how to get help.

Young people are often searching for answers to questions about identity, faith and belonging, and we have a duty to support them. Tutors work hard with apprentices to encourage personal resilience and a positive sense of identity. Using real examples and asking apprentices to deconstruct emotionally challenging situations and proposing solutions using the ABC approach often helps to foster this:

- A – an Activating event, Action, or Adversity
- B – a Belief which either motivated the activating event or was formed as a result of the activating event
- C – Consequence

Apprentices are encouraged to reflect on thoughts and beliefs following an activating event (such as a terrorist attack or exposure to extreme narratives) and examine factual evidence as well as identify assumptions or faulty thinking. This supports critical thinking and encourages tolerance and understanding.

## **Identifying changes in behaviour**

When working closely with employees, apprentices, and young people, we recognise that we may observe the possible signs and symptoms of extremism, terrorism, and radicalisation.

**We therefore:**

- Establish and maintain environments where employees and apprentices can feel safe, secure; and encourage apprentices to talk and actively listen to their peers.
- Ensure employees, apprentices and young people know that there are adults whom they can approach if they are worried and feel the need to talk.

**Recognise changes in behaviour such as:**

- Outward appearance
- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups

**Online behaviour:**

- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Concerning factors or vulnerabilities that could make a person vulnerable to radicalisation or manipulation into terrorist activity, for e.g., it has been noted that acceptance of extremism and extremist activity is at a higher number in younger people and those of lower-income socioeconomic backgrounds.

Factors like the one above should be recognised as significant vulnerabilities that can be exploited in the name of terrorism and terrorist activities. Further factors can also be the reason for radicalisation. Staff are encouraged to read up on them more and to voice any concerns at an early stage.

**Procedure for dealing with a Prevent disclosure and reporting concerns**

If a staff member receives a disclosure or has a concern, they will explain clearly to the individual about what to expect next and how information could be shared with those that need to know. At this stage, they would seek permission to share this information, unless doing so would put the individual or others at increased risk of significant harm.

Any concerns regarding radicalisation will be referred to West Midlands Police via [CTU\\_Gateway@west-midlands.pnn.police.uk](mailto:CTU_Gateway@west-midlands.pnn.police.uk) and Birmingham MASH. (Multi agency safeguarding hub) for any young person under 18.

Information sharing will be based on the following: is it “...necessary, proportionate, relevant, adequate, accurate, timely and secure?” (HM Government: Information sharing. July 2018).

Refer to the **Prevent policy** for further details.

## **Implementing the Safeguarding Policy**

### **Preventing Abuse**

Prevention is a key principle in the safeguarding of children and adults. Prevention for adults needs to take place in the context of person-centred support, with individuals empowered to make choices and supported to manage risks. Pier Training employees are aware of their responsibilities to Safeguard adults under [The Care Act 2014](#).

Pier Training employees receive robust training in understanding safeguarding and the prevention of child abuse. This policy sets out what child abuse is, the signs to look out for, clear guidance on how to deal with a concern and how to report it. This gives Pier Training employees the knowledge and confidence to act quickly on a concern and therefore help to prevent abuse.

### **Apprentices**

Prior to enrolment, apprentices are invited to attend an information session to learn about an apprenticeship. During this session, safeguarding and prevent is introduced, including who an apprentice can contact if they have a safeguarding concern.

During enrolment, apprentices are taught about safeguarding and they are required to complete an induction workbook which includes the Safeguarding and Prevent policy or apprentices are asked to undertake an online safeguarding training module before beginning their apprenticeship. This is followed up again by the apprentice’s allocated tutor during a knowledge check session to ensure that the apprentice understands the information given, and the tutor will answer any questions to further promote the content of this policy.

Safeguarding and Prevent continue to be promoted throughout an apprentice’s journey with Pier Training through teaching and learning sessions and bimonthly reviews.

### **Safer Recruitment:**

Pier Training are committed to the practice of safer recruitment, ensuring checks are conducted of the suitability, identity, and validity of staff before commencing work with young and vulnerable people. The [Education and Training \(Welfare of Children\) Act 2021](#) extended safeguarding provisions to providers of post 16 Education. Pier Training are committed to meet these regulations to ensure all employees are vetted.

Pier Training will ensure all staff, including Governors undertake DBS criminal records check at an enhanced level including barring and police disclosure, where legal and appropriate (without breaching the Rehabilitation of Offenders Act) but complying with regulated activity safeguarding requirements. Offers of appointment are conditional until satisfactory completion of the mandatory

pre-employment checks. A candidate's identity is verified using their birth certificate and passport to be sure that the person is who they claim to be. [Good practice guidance](#) is used from GOV.UK to help decide how to check someone's identity.

In addition, references are sought and checked as nominated by the applicant. Such references must come from a person who is not related to the applicant and who preferably knows of the applicant's character, trustworthiness, any previous experience of working with/looking after children and young people.

For more detailed information refer to the **Safer Recruitment Policy**.

### **Training for Employees**

The DSO is responsible for managing and monitoring safeguarding and prevent training for all employees. A record of employee training is kept on file. It is a requirement that the DSO ensures all staff receive child protection and adult safeguarding training to equip them with the knowledge and skills to safeguard apprentices. This is reviewed and updated regularly. Safeguarding and Prevent training is provided by [Birmingham Safeguarding Children Partnership](#) and the [Education Training Foundation](#). (Click the links to find the latest courses).

The internal quality assurance team undertake regular observations of teaching and learning (OTLs). The implementation of safeguarding and prevent form part of the observational requirements and if tutors are observed not implementing this, then this is addressed as an OTL action until resolved.

The DSO provides effective regular and up-to-date training during standardisation meetings for the awareness of all aspects of safeguarding including, prevent, e-safety and the wider definitions of abuse, including knowing what to do if they have a concern about a child/young person and how to respond to a report of abuse.

All Staff must as a minimum complete Level 1 safeguarding training and prevent training every two years; however, as a minimum, all staff must also attend refresher training delivered by Pier Training DSO annually.

It is a requirement that the DSO completes Designated Safeguarding training and Level 2 Child Protection training at least every two years. In addition, it is a requirement that the DSO completes Safer Recruitment and Prevent Training. This training ensures the DSO has the required up-to-date knowledge and skills to support all stakeholders in the engagement and implementation of this policy, consequently allowing them to protect the apprentices and thus preventing abuse towards them.

Furthermore, in doing so we will:

- Support staff and young people to keep themselves and others safe.
- Promote the development, implementation and review of the policy and effective procedures for identifying and reporting disclosures or suspected concerns of abuse or neglect.
- Support young and vulnerable people who have made a disclosure of abuse or neglect.
- Ensure safe environments in which young people are employed or placed by conducting thorough regular health and safety checks to encompass the entire workplace including young person checks.
- Ensure, where appropriate, the safe use of Information and Communications Technology (ICT).

**Governors** will receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at Pier Training are effective and support the delivery of a robust whole business approach to safeguarding.

### **Management of Allegations - Allegations Against Staff**

As part of the safer recruitment process, checks are conducted of the suitability, identity, and validity of staff before commencing work; however, Pier Training recognises that there are adults who will deliberately seek out, create, or exploit opportunities to abuse children and young people.

Pier Training has a clear process for the investigation and resolution of allegations made against staff and volunteers. If the allegation or concern falls within one of the defined areas as detailed in the threshold list of harm, shown below, the DSO would make a referral immediately (within 24 hours) to the [Local Authority Designated Officer \(LADO\)](#) within the geographical location of where the employee/volunteer resides.

### **Allegations that may meet the harms threshold**

Where an allegation has been made whereby a person working (employed or volunteer) with children may have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed an offence against or related to a child OR
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm if they work regularly or close to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. **Keeping Children Safe in Education (2023)**

Birmingham Safeguarding Children Partnership LADO service provides guidance and support for professionals. A useful toolkit and contact details can be accessed at:

<https://www.lscpbirmingham.org.uk/lado>

Suspension of a Pier Training employee or volunteer would not be an automatic response when an allegation is reported. All options to avoid suspension would be considered prior to taking that step. The DSO would complete the referral paperwork and discuss the next steps with the LADO.

Suspension will only be considered in cases where there is cause to suspect a child or young person at Pier Training are at risk of harm, or the case is so serious that it might be grounds for dismissal.

### **Early Help**

Early help is the support given to a family when a problem first emerges. It can be provided at any stage in a child or young person's life. It is more effective to provide early help when problems first arise than to intervene later (DfE, 2018; EIF, 2021).

Identifying a child or young person who may benefit from early help is important. Signs that a young person may benefit from early help may include:

- Displaying disruptive or anti-social behaviour
- Being bullied or bullying others



- Having poor attendance
- Being involved in, or at risk of, offending
- Having poor general health
- Having anxiety, depression, or other mental health issues
- Misusing drugs or alcohol
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Having a particularly challenging relationship with parents or appearing to be unusually independent from their parents
- Experiencing difficulties at home, such as domestic abuse, parental substance abuse or parental mental health problems

If you have any concerns regarding a child or young person and feel that they would benefit from 'Early Help,' share your concerns with the Designated Safeguarding Officer. Visit Birmingham Safeguarding Children Partnership [Early Help](#) for more information and advice.

## **Technology**

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content' (KCSIE 2021).

## **What is Abuse?**

Abuse is a form of maltreatment of a child, young person, or adult. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

## **Types of abuse**

### **Physical abuse**

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

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or

‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### **Sexual abuse**

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

### **Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

### **Neglect**

The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. Working Together to Safeguard Children (2018)

### ***Types of abuse continued***

***Click the links for more information and advice.***

- Bullying, including online bullying and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- [Peer-on-peer abuse](#)
- [Gender-based violence/violence](#) / [‘Hidden traumas’ – when men are victims of gender-based and sexual violence](#)

- Radicalisation and/or extremist behaviour
- Child sexual exploitation and trafficking
- Child criminal exploitation and county lines
- The impact of technology on sexual behaviour, for example 'sexting' and accessing pornography
- Teenage relationship abuse
- Substance misuse
- Issues that may be specific to a local area or population, for example, gang activity and youth violence
- Domestic abuse
- [Female genital mutilation](#)
- [Forced marriage](#)
- Fabricated or induced illness
- Poor parenting
- Homelessness
- [Gaslighting](#) (*Gaslighting is a form of psychological abuse where a person manipulates information to make you question your own reality, thoughts, feelings, and memories. It is a way of control that can cause long-lasting harm*)
- [So-called honour-based violence](#) (*Abuse is often carried out to prevent or because of the victim bringing shame on their family or the wider community*)
- Other issues not listed here but that pose a risk to children, apprentices and vulnerable adults

For more information on these terms refer to the annex section in KCSIE 2023

### **Sexualised Violence and Sexual Harassment**

A young person's sexual behaviour may be developmental, problematic, or harmful (Hackett continuum 2014). This term is referred to as "harmful sexual behaviour" (**HSB**). HSB can occur online and/or face to face and can also occur simultaneously between the two.

The age and stage of the young person displaying HSB must be considered. For instance, HSB is deemed more harmful if one child is much older or a child is disabled.

The NSPCC provides information and advice about managing incidents of HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#). This information is used by Pier Training as supplementary guidance.

Sexual harassment can occur through a group of peers or young people sexually assaulting or sexually harassing a single individual or group. It can occur online and face to face (both physically and verbally) and are never acceptable. Pier Training are committed to addressing inappropriate behaviour and we know that intervention can help prevent problematic, abusive and/or harmful behaviour in the future.

### **Domestic Abuse**

There are some 2.3 million victims of domestic abuse a year aged 16 to 74 the majority of whom are female.

*"Domestic abuse is an abhorrent crime perpetrated on victims and their families by those who should love and care for them..."* **Victoria Atkins MP, Minister for Safeguarding**

Domestic abuse has a devastating impact on children and young people. Growing up in a household of fear and intimidation can impact health, wellbeing, and development, with lasting effects into adulthood. We all have a duty to build a society that has zero tolerance towards domestic abuse, and actively empowers victims, communities, and professionals to confront and challenge it, and provide victims of domestic abuse, including children, with the support they deserve.

The [Domestic Abuse Act 2021](#) became law in April 2021. The [Domestic Abuse Statutory Guidance](#) published in July 2022.

Domestic abuse can encompass a wide range of behaviours. It can but does not have to involve physical acts of violence and can include threatening behaviour, controlling or coercive behaviour, emotional, psychological, sexual and/or economic abuse. Domestic abuse can involve abuse facilitated and perpetrated online or offline.

Recognising Domestic Abuse: *For more information about the types of abuse below click [here](#) and refer to Chapter 3*

- Physical abuse, violent or threatening behaviour
- Sexual abuse
- Controlling or coercive behaviour
- Harassment or Stalking
- Economic abuse
- Emotional or psychological abuse
- Verbal abuse
- Technology-facilitated abuse
- Abuse relating to faith
- Religious marriage and divorce
- 'Honour'-based abuse
- Female Genital Mutilation (FGM)
- Perpetrator tactics

Pier Training Tutors are in a unique position to identify concerns early, provide help for apprentices and prevent concerns from escalating. Safeguarding relating to domestic abuse, including the dynamics of inequality, power, and control, which underpin domestic abuse; the different forms domestic abuse may take and the impact of domestic abuse on children and young people will be holistically embedded as part of the apprenticeship training.

**Sexual harassment can include:**

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes
- online sexual harassment, such as consensual and non-consensual sharing of nude and semi-nude images, upskirting, sexualised online bullying, unwanted sexual comments and messages, sexual exploitation

Sexting between adults is legal. However, it is against the law to send a nude or any kind of sexual image or video to someone under 18yrs.

When you are under 18yrs, it is against the law to send nudes or sexual videos of you to anyone else. It is also against the law for anyone to save or share a nude or sexual video of you.

#### **Harmful sexual behaviour is:**

- contact and non-contact behaviours
- online and offline behaviours including technology assisted behaviours
- group/gang and peer influenced behaviours

Harmful sexual behaviours are therefore defined as:

***“Sexual behaviours expressed by children and young people under the age of 18 that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult.”***

Pier Training employees working with young people up to the age of 18yrs are advised to maintain an attitude of **‘it could happen here’** and be aware of how to respond appropriately to all reports and concerns.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as listed below:

- Rape
- Assault by Penetration
- Sexual assault
- Causing someone to engage in sexual activity without consent

#### **Extra-familial harms and County Lines**

Safeguarding incidents and/or behaviours can be associated with factors outside the learning environment and/or between children. The DSO and tutors are mindful to be alert to young people who may be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms which make young people vulnerable to multiple harms, including, but not limited to, sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

#### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Further information about consent can be found here: [Rape Crisis England & Wales](#)

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape

#### **Dealing with an incident of HSB**

Pier Training employees should respond by following these safeguarding principles of practice:

- Victims will be reassured and taken seriously
- Abuse that is outside the training environment or online will be taken seriously
- Never give the individual the impression that they are creating a problem by reporting sexual violence or sexual harassment

- Regarding nudes or semi-nude images – staff will not view or forward any such image (for further advice on how to respond click [here: https://www.iwf.org.uk/](https://www.iwf.org.uk/) )
- Not promise confidentiality as it is likely that the concern will have to be shared further (e.g. Pier Training DSO)
- Provide support and be respectful
- Listen carefully and be non-judgemental
- Use the child's language, do not ask any leading questions
- Wait until the end of the reported disclosure and immediately write up a thorough summary using the Pier Training safeguarding incident record sheet. Only record the facts as the young person presented them. You MUST not write any personal opinions
- Inform the Pier Training DSO as soon as possible.

### **Raising, Recording and Investigating Concerns**

In working closely with apprentices and young people, we recognise that staff and employers can observe the possible signs and symptoms of abuse.

#### **We therefore:**

- Establish and maintain environments where apprentices can feel safe, secure, and encouraged to talk and to be listened to.
- Share all relevant up-to-date information with apprentices and tutors on how to get support and guidance when needed.
- Meet with apprentices on a one-to-one basis each month and inquire about their well-being, including safeguarding which gives the apprentice an opportunity to share any concerns.
- Ensure apprentices and young people know that there are adults to whom they can approach if they are worried and feel the need to talk.
- Record through a bimonthly review of progress and concerns around safeguarding and give apprentices the opportunity to disclose necessary information.
- Signpost apprentices with permission to seek guidance and support from other professionals.

Where an apprentice or young person discloses an incident of abuse or neglect to a staff member or in a situation where the staff member suspects a young person is being abused or is at risk, staff should respond accordingly to the following:

#### **Receiving the disclosure:**

- Stay calm.
- Listen.
- Do not act shocked.
- Try and find a quiet, comfortable, and suitable place to talk.
- Acknowledge and accept what they are disclosing.

#### **Reassure:**

- Stay calm.

- Explain they have done the right thing by telling you and how difficult it is to disclose such information.
- Be honest and explain you will have to share the information they give you to be able to help (never promise to keep a secret).
- Explain who you need to share the information with and why you are legally required to do so.
- Alleviate any feelings of guilt.
- Treat disclosed information seriously.

#### **React:**

- Do not ask leading questions.
- Do not criticise or make comments on the perpetrator.
- Do not ask the young person to repeat the disclosure to someone else.
- Explain what “you” need to do next and who you need to contact.
- If the disclosure is about immediate abuse, do not offer a shower, bath, or change of clothes.
- Contact Pier Training designated officers.
- Immediately make the person’s wishes known throughout.
- Maintain confidentiality (*This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children’s social care*).

#### **Record:**

- Write things down at the time.
- Record the actual words used by the young person word for word.
- Keep original notes regardless of where they are written.
- Transfer your notes to the cause of concern/safeguarding log form.
- Use a body map if appropriate.
- Do not place your own interpretation or assumptions.
- Ensure Pier Training **Safeguarding Incident Report** form is completed and emailed to the DSO. These can be downloaded from SharePoint- Safeguarding & Prevent- Admin and Compliance.

#### **Information Sharing, Confidentiality and GDPR**

If a child or young person discloses that they are being abused, Pier Training employees understand they must maintain an appropriate level of confidentiality. This is likely to only include those who need to be involved, such as the designated safeguarding lead (or deputy) and children’s social care.

Pier Training recognises the importance of information sharing between practitioners and local agencies whilst also adhering to the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) about processing personal information fairly, lawfully whilst keeping information held safe and secure. Despite these regulations, we understand our GDPR processing duty in ensuring we safely store and share ‘special category personal data’ on safeguarding to the relevant authorities. This may include a tutor sharing information without consent where there is a good reason to do so as it will safeguard the child/young person in a timely manner.

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing on a Safeguarding Incident Report Form. This is kept confidential and stored securely in a locked file on SharePoint. Concerns and referrals raised are kept in a separate file for each child or young person.

***The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2023).***

### **Designated Safeguarding Officer's Responsibilities**

- Seeking 'Early Help' from the Local Safeguarding Children Partnership.
- Overseeing the referral of any case of suspected abuse or allegations.
- Providing advice and support to staff on safeguarding issues.
- Maintenance of records on safeguarding referrals, complaints or concerns raised.
- Liaising and advising employers that recruit apprentices or young people to ensure appropriate safeguards are put in place.
- Ensuring that staff receive training in safeguarding issues and are aware of the company's policies and procedures.
- Ensuring appropriate continuous professional development training and awareness for all staff.
- Liaising with the Director responsible for addressing all safeguarding issues that arise and ensuring all safeguarding decisions are shared.
- Ensure any child protection and/or safeguarding concerns are shared immediately with the relevant local authority. Where the concern is about suspected harm or risk of harm to a child or vulnerable adult, the referral would be made to the local area Safeguarding Children Board/Safeguarding Children Partnership or Safeguarding Adult's Board/Safeguarding Adult's Partnership.

### **Whistleblowing**

A whistle-blower is a worker who reports certain types of wrongdoing. This will usually be something they have seen at work - though not always. A whistle-blower is protected by law and Pier Training will treat any employee fairly if they 'blow the whistle.' A concern can be raised at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Where an employee feels unable to raise an issue or feels that their genuine concerns are not being addressed by the DSO or deputy DSO, the individual can escalate their concern to the Managing Director.

Click the link ['whistleblowing for employees'](#) for further guidance and support.

#### **Managing Director**

**Name:** Mohammed Syed

**Mobile:** 07879 253527

**Email:** [mohammed.syed@piertraining.co.uk](mailto:mohammed.syed@piertraining.co.uk)

The [NSPCC's](#) what you can do to report abuse dedicated helpline is available as an alternative route for employees who do not feel able to raise concerns internally. Refer to Pier Training **Whistleblowing Policy** for more information.

### **IT Usage for the Protection of Apprentices**

Pier Training is committed to online safety. Refer to Pier Training **IT Use Protection Policy and Procedures**. This policy includes the auditing, monitoring, and logging of networks, computers,



internet usage and email usage by employees and for apprentices using OneFile and instant messaging platforms such as WhatsApp.

Pier Training do not currently have an IT facility that apprentices can use. However, if this were in place, we would commit to seeking advice on installing software to mitigate apprentices having access to inappropriate internet content. The following would be considered as best practice:

- Closely monitoring IT usage in real time to identify and address inappropriate use of IT, at which computer and by whom
- Tracking IT use on guest logins
- Risk-rating apprentices and sampling IT access
- Daily reports to senior leaders of attempts to access inappropriate websites
- Developing stringent firewalls with external providers
- Sharing data regarding 'popular' contentious and blocked websites that apprentices had attempted to access with police 'Prevent' teams as part of local intelligence gathering

Pier Training's tutors teach internet safety during their sessions. This includes:

- Keeping personal information professional and limited
- Understanding privacy settings
- How to practice safe browsing
- Secure internet connection – using public and private networks
- Downloading safely
- Using strong passwords
- Using secure sites
- Posting online
- Engaging with strangers online
- Importance of antivirus
- Instant messaging in groups via WhatsApp or Facebook Messenger– do and don'ts

## POLICY REVIEW

### How will this policy be reviewed?

The DSO is responsible for the implementation and review of the Safeguarding and Prevent policy and procedures. This review is completed annually or when considered necessary to ensure they remain effective and legally compliant. The date of review is recorded within the footer of the document and includes the date of the next required review. This enables the DSO to easily track when the last review was completed ensuring the policy is relevant and up to date.

Following a review by the DSO, it is then shared with the Quality Assurance Manager and Directors (SMT). The senior management team (SMT) read the policy, make any suggestions for amendments and it is finally approved by the Managing Director.

<b>Document Title:</b>	Safeguarding Policy
<b>First Created:</b>	March 2018
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<b>Final Approval by Managing Director:</b>	May 2024
<b>Signed by Managing Director:</b>	<i>Mohammed Syed</i>
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