

## Child Protection and Safeguarding Policy

### 1.0 Business commitment to safeguarding

- 1.1 CMT is committed to creating a culture of vigilance and open communication in order to support every learner to thrive. CMT recognises its responsibility to uphold British values, safeguard the welfare of stakeholders, and create an environment that protects them from harm by reducing the risks of being exposed to violence, victimisation, extremism and exploitation. This policy is to provide information, advice and guidance to colleagues and learners about safeguarding matters. This policy also describes the process that will be followed by all colleagues in relation to any safeguarding concern or suspected abuse.

### 2.0 Managing the policy

- 2.1 The CEO will ensure that safeguarding young people or vulnerable adults is particularly considered by:
- 2.1.1 Monitoring the Child Protection and Safeguarding Policy and reviewing this annually, as per statutory requirements, or more frequently should legislation or national guidance change.
  - 2.1.2 Regular communication with the Designated Safeguarding Lead.

### 3.0 Role of the Designated Safeguarding Lead

- 3.1 CMT will ensure an appropriate senior member of staff, from the Senior Management Team, is appointed to the role of Designated Safeguarding Lead. This person is selected because they have the appropriate status and authority within CMT to carry out the duties of the post, as well as the relevant training and expertise.
- 3.1.1 **Designated person for the purposes of safeguarding**

The current Designated Safeguarding Lead is Head of Education and Learning Support, **Craig McNaughton**.
  - 3.1.2 **Deputy designated person for the purposes of safeguarding**

The Designated Safeguarding Lead is required to appoint a nominated person who fulfils the criteria above, regarding appropriateness of status and authority, to act as their deputy. The person currently nominated to carry out this role is, **Samantha Turner**.
- 3.2 The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection, including online safety and Prevent. CMT will ensure the Designated Safeguarding Lead is given the time, funding, training, resources and support required to fulfil the responsibilities of the post.
- 3.3 The Designated Safeguarding Lead will give training, advice and support to other staff on Prevent, British values, child protection and safeguarding matters.
- 3.4 The Designated Safeguarding Lead has overall responsibility for ensuring that training and support is provided to staff on reporting any suspicion, allegation or incident of abuse as set out below.
- 3.5 The Designated Safeguarding Lead will maintain the safeguarding tracker and monitor all safeguarding concerns once a referral has been made, keeping in contact with the relevant member of staff/learner while the concern remains live.
- 3.6 The Designated Safeguarding Lead is responsible for the continued awareness of safeguarding and Prevent matters within the whole team through monthly safeguarding bulletins.

3.7 These duties will be explicitly stated in the role holder's job description.

#### 4.0 Legal framework

4.1 CMT are not in a position to investigate any concerns. This function is carried out by the relevant agencies that are notified, e.g. Police, social services, LADO (Local Authority Designated Officer).

4.2 The Children Act 1989 and 2004 are concerned with the emotional, physical or sexual abuse or neglect of children, defined in England as anyone under the age of 18. However, it is recognised that children acquire degrees of legal capacity and maturity prior to their 18<sup>th</sup> birthday. It is also recognised that adults over the age of 18 can be vulnerable due to a disability, learning difficulty or circumstance.

4.3 Keeping Children Safe in Education 2021 provides statutory guidance from the Department for Education (DfE) issued under section 175 of the Education Act 2002. Schools and colleges, which CMT are referred to as in this document, must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This guidance uses the word 'children' to identify any learner under the age of 18.

4.4 Working Together to Safeguard Children 2018 covers the legislative requirements placed on services. The guidance applies to all organisations and agencies who have functions relating to children. Therefore, CMT must comply with the guidance put in place. The Referrals section of this guidance stipulates that:

4.4.1 anyone who has concerns about a child's welfare should make a referral to local authority children's social care and should do so immediately if there is a concern that the child is suffering significant harm or is likely to do so.

#### 5.0 Definitions

5.1 CMT adopts the definitions of safeguarding which Ofsted use. These have been informed by statutory guidance.

5.2 **Safeguarding children** is defined in Working Together to Safeguard Children as:

5.2.1 Protecting children from maltreatment.

5.2.2 Preventing impairment of children's health or development.

5.2.3 Ensuring that children are growing up in circumstances consistent with provision of safe and effective care.

5.2.4 Taking action to enable all children to have the best outcomes.

5.3 **Safeguarding vulnerable adults** is defined in the Care and Support statutory guidance issued under the Care Act 2014 as:

5.3.1 Protecting the rights of adults to live in safety, free from abuse and neglect.

5.3.2 People and organisations working together to prevent and stop both the risks and experience of abuse or neglect.

5.3.3 People and organisations making sure the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action.

5.3.4 Recognising that sometimes adults have complex interpersonal relationship and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

5.4 Types of abuse.

5.4.1 **Physical abuse** is the deliberate physical injury to a young person/vulnerable adult, or the wilful or neglectful failure to prevent physical injury or suffering. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, confinement to a room or inappropriately giving drugs to control behaviour.

- 5.4.2 **Emotional abuse** is the persistent emotional ill treatment of a young person/vulnerable adult such as to cause severe and persistent adverse effects on his or her emotional development. It may involve conveying to him or her that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve causing them frequently to feel frightened or in danger, or the exploitation or corruption of them. Some level of emotional abuse is involved in all types of ill treatment of a young person/vulnerable adult, though it may occur alone.
- 5.4.3 **Sexual abuse** involves forcing or enticing a young person/vulnerable adult to take part in sexual activities, whether he or she is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at or the production of pornographic material or watching sexual activities or encouraging them to behave in sexually inappropriate ways.
- 5.4.4 **Voyeurism, revenge pornography and sexting** can also be identified as forms of sexual abuse. The Voyeurism Act (2019) states that an offence has occurred if someone takes a photograph underneath the clothing of another, particularly if it is done with the intent to distribute the image. Revenge pornography is the circulating of sexually explicit images without consent, regardless of whether consent was given for the initial recording of the material. Sending images of this kind may, depending on the circumstances, be an offence under the Communications Act 2003 or the Malicious Communications Act 1988. Behaviour of this kind, if repeated, may also amount to an offence of harassment under the Protection from Harassment Act 1997.
- 5.4.5 **Child sexual exploitation** is a form of child sexual abuse in which a person or group abuse their position, taking advantage of an imbalance of power, to coerce or manipulate a young person into sexual activity.
- 5.4.6 **Grooming** happens when there is a power differential that is exploited by the abuser for their own gain and/or gratification. Grooming is the process by which the abuser desensitises the victim to make them less likely to report the abusive behaviour that they experience.
- 5.4.7 **Human trafficking and modern slavery** are defined as the moving of people, sometimes by organised criminal operations, to be forced into serving the group who trafficked them.
- 5.4.8 **Peer on peer abuse** is the assault or harassment of one learner by another conducted within the educational setting.
- 5.4.9 **Neglect** is the persistent failure to meet a young person's/vulnerable adult's physical, emotional and/or psychological needs, likely to result in serious impairment of their health or development. It may involve a parent or carer failing to provide adequate foods, shelter and clothing, failing to protect a young person/vulnerable adult from physical harm or danger, failing to ensure access to appropriate medical care or treatment, lack of stimulation or lack of supervision. It may also include non-organic failure to thrive (faltering growth).
- 5.4.10 **Self-neglect** is not acknowledged as a direct form of abuse but acts as an indicator that there may be reason for concern. Vulnerable learners require support if they are putting their own wellbeing at risk in this way.
- 5.4.11 **Organisational or institutional abuse** is the mistreatment of people brought about by repeated poor or inadequate care or support, or systematic poor practice that negatively affects the whole environment. It occurs when the individual's wishes, needs and requirements are sacrificed for the smooth running of a group, service or organisation.

- 5.4.12 **Financial or material abuse** is the exertion of control over a young person/vulnerable adult through financial means. This may be limiting access to money or other resources, or by forcing all financial responsibility onto their victim while limiting their ability to provide this. Financial abuse may include:
- 5.4.12.1 Taking money from them.
  - 5.4.12.2 Not allowing access to shared money.
  - 5.4.12.3 Making them account for everything that they spend.
  - 5.4.12.4 Taking out loans, credit cards or running up debt in the victim's name.
  - 5.4.12.5 Not allowing them to buy necessities.
  - 5.4.12.6 Preventing them from gaining employment.
  - 5.4.12.7 Causing them to lose, or forcing them to give up, employment.
- 5.4.13 **Female Genital Mutilation (FGM)** is the procedure in which the female genitals are deliberately cut, injured or changed, but when there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting".
- 5.4.14 **Honour-based violence** is a crime or incident which has or may have been committed to with the purpose of protecting or defending the honour of the family and/or community. It can be described as a collection of practices designed to control behaviour within families or other social groups to protect perceived cultural or religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.
- 5.4.15 **Forced marriage** is marriage conducted without the valid consent of one or both parties and where duress is a factor.
- 5.4.16 **Domestic abuse** is a broader term that can encompass many of the previous definitions, depending on the circumstances of each case. In addition to the earlier issues raised, domestic violence can also include coercive behaviours which were criminalised through a change in UK law in 2015.
- 5.4.17 **Criminal exploitation** is a form of child abuse, manipulating the child or group of children into committing crimes. This can include county lines, gang violence and sexual violence. This form of exploitation is often perpetrated by gangs.
- 5.4.18 **County lines** is a form of criminal activity in which groups involved in the selling of drugs use young and vulnerable people to extend their network beyond their primary location.
- 5.4.19 **Substance abuse** is the excessive consumption of legal substances, such as alcohol or prescription medications, or consumption of illegal substances in any quantity.
- 5.4.20 **Online abuse** is any abuse that takes place through the internet. Young people and/or vulnerable adults may experience cyberbullying, grooming, sexual abuse, sexual exploitation, blackmail or emotional abuse. This may be an extension of abuse that happens in person, or it may be abuse that only happens online.
- 5.4.21 **Radicalisation** is a specific form of grooming and references the process by which vulnerable adults are targeted and recruited by people to engage in extremist activity.
- 5.4.22 **Extremism** is an ideology that holds extremist views to which a person may be radicalised into following and/or supporting.
- 5.4.23 **Discrimination** refers to the mistreatment of another person based upon a particular characteristic. This often pertains to the nine characteristics identified in the Equality Act 2010. This includes, but is not limited to, sexism, racism, ageism, ableism, homophobia and transphobia.

## 6.0 Indicators of abuse

6.1 The following is a list of some indicators of abuse, but it is not exhaustive:

PHYSICAL INDICATORS	BEHAVIOURAL INDICATORS
<ul style="list-style-type: none"> <li>• Unexplained bruising in soft tissue areas</li> <li>• Repeated injuries</li> <li>• Black eyes</li> <li>• Injuries to the mouth</li> <li>• Torn or blood-stained clothing</li> <li>• Burns or scalds</li> <li>• Bites</li> <li>• Fractures</li> <li>• Marks from implements</li> <li>• Inconsistent stories/excuses relating to injuries</li> </ul>	<ul style="list-style-type: none"> <li>• Unexplained changes in behaviour - becoming withdrawn or aggressive</li> <li>• Difficulty in making friends</li> <li>• Distrustful of adults or excessive attachment to adults</li> <li>• Sudden drop in performance</li> <li>• Changes in attendance pattern</li> <li>• Inappropriate sexual awareness, behaviour or language</li> <li>• Reluctance to remove clothing</li> </ul>

## 7.0 Online safety

7.1 The increased use of online spaces means that learners are increasingly exposed to risks associated with online abuse and cyber bullying. CMT acknowledges its responsibility to ensure learners are aware of how to protect themselves online. This is in relation to risks associated with radicalisation, extremism, grooming and bullying. CMT identifies these risks at induction and provides learners with resources that they can refer to throughout their time on programme.

7.2 CMT works with employers who have their own internal policies that relate to online safety, security and conduct. CMT supports its learners and promotes online safety through the signposting of policies specific to each learner's business, as well as with CMT resources.

## 8.0 Guidelines for employees in relation to a disclosure of abuse

### 8.1 Always:

- 8.1.1 Record what has been said on the Safeguarding Disclosure Document, ensuring that this is verbatim and not paraphrased.
- 8.1.2 Let them talk, allowing them the time they need to say what they want.
- 8.1.3 Explain that you must tell the Designated Safeguarding Lead.
- 8.1.4 Remain sensitive and calm.
- 8.1.5 Use open questions (who, what, where, when, why, how), but only to clarify details.
- 8.1.6 Where appropriate, involve relevant experts/organisations immediately, using the Safeguarding Referral List to identify the most suitable support available.
- 8.1.7 Tell them what will happen next and reassure the person that:
  - 8.1.7.1 they were right to tell you.
  - 8.1.7.2 they are not to blame.
  - 8.1.7.3 they are being taken seriously.
  - 8.1.7.4 the appropriate support will be sought out.
  - 8.1.7.5 support will be ongoing.

### 8.2 Never

- 8.2.1 Promise confidentiality.
- 8.2.2 Question, unless for clarification.
- 8.2.3 Use leading or closed questions.
- 8.2.4 Make promises you cannot keep.
- 8.2.5 Rush into actions that may be inappropriate.
- 8.2.6 Make/pass judgment on the situation or anyone involved.
- 8.2.7 Take sole responsibility - consult the Designated Safeguarding Lead so you can begin to protect the young person/vulnerable adult and gain support for yourself.

## 9.0 Reporting of a concern or incident

- 9.1 It is imperative that all learners have a good understanding of how to raise concerns if they do not feel safe, and that they are confident that these concerns are taken seriously. All learners must be notified of the processes that CMT follow in the event of a learner disclosure. This must be done at the very beginning of their programme so that they are fully informed throughout the course. Learners must be aware of who their points of contact within the business are and the role they play in the handling of safeguarding concerns.
- 9.2 All matters relating to a safeguarding concern or incident must be reported to the Designated Safeguarding Lead. The following procedures will be followed by all employees in reporting such matters.
- 9.3 Any suspicion, allegation or incident of abuse in relation to learners must be reported to the Designated Safeguarding Lead as soon as possible, and in any event within two hours of becoming apparent.
- 9.4 The learner must be advised by the CMT colleague that, when receiving the report of a suspicion, allegation or incident of abuse, the business has a legal duty to inform an authorised agency if there is a real and/or immediate risk of harm.
- 9.5 In the event of a learner disclosure, the CMT colleague is required to notify the learner of the support services available within the business/community. All CMT colleagues have access the CMT Safeguarding Referral List that is stored on the CMT shared drive. The learner is not obliged to avail themselves of these services if they do not wish to do so.
- 9.6 All discussions with the learner must be documented. The documenting of all safeguarding concerns must be done on the Safeguarding Disclosure Document that can be found on the CMT shared drive. This document must be sent to the Designated Safeguarding Lead to be stored securely.
- 9.7 On receipt of a Safeguarding Disclosure Document, the Designated Safeguarding Lead must save this in the restricted access Safeguarding folder on the shared drive. The report will also be recorded on the safeguarding tracker. The Designated Safeguarding Lead is then responsible for maintaining weekly contact with the learner/CMT colleague to monitor the situation until it has been resolved.
- 9.8 A learner concern is considered resolved when:
- 9.8.1 In the event of the concern being raised by a CMT colleague without a disclosure from a learner or third party; the CMT colleague and Designated Safeguarding Lead agree that the situation has improved, and no intervention is required.
  - 9.8.2 In the event of a third-party disclosure; the CMT colleague, Designated Safeguarding Lead and third party all agree that the situation has improved, and no intervention is required.
  - 9.8.3 In the event of a learner disclosure, or whereby the situation prompting an 9.8.1 or 9.8.2 disclosure deteriorates to the stage where the learner has been directly involved in the conversation; the CMT colleague, Designated Safeguarding Lead and learner all agree that the situation has improved and that no further intervention is required.

## 10.0 Prevent duty

- 10.1 Prevent is part of the UK's Counter Terrorism Strategy, known as CONTEST. A key part of the Prevent strategy is Channel; the Police's work with public bodies, such as training providers, to identify those at risk of being drawn into terrorism, assess what the risk might be, and then develop tailored support for those referred to them. Channel focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. In 2015 the law was changed to oblige organisations to actively engage with the Channel programme and refer those people who are identified as being vulnerable. CMT recognises its responsibility in relation to the Prevent strategy and, more specifically, the Channel programme.



- CMT is aware that Channel assesses vulnerability using a consistently applied assessment framework built around three criteria. These three criteria are:
- 10.1.1 Engagement with a group, cause or ideology.
  - 10.1.2 Intent to cause harm.
  - 10.1.3 Capability to cause harm.
- 10.2 CMT acknowledges that we, as a training organisation, have a responsibility to ensure that this duty is followed. The implementation of the Prevent duty section of this policy is the responsibility of the CEO. The CEO has nominated the Designated Safeguarding Lead to co-ordinate a united approach across all colleagues to uphold this policy in line with government guidance.
- 10.3 The Designated Safeguarding Lead has a duty to ensure that all staff, including managers:
- 10.3.1 have undertaken Prevent training.
  - 10.3.2 are aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Lead.
  - 10.3.3 exemplify British values of democracy, rule of law, individual liberty, and mutual respect and tolerance for those with different faiths and beliefs into their practice.
- 10.4 CMT colleagues should refer a learner or colleague to the Designated Safeguarding Lead, with a view to referring them onto the Channel programme, if there is a concern that the learner fits one or multiple criteria listed below. These criteria have been developed because people that fit these are considered more vulnerable or susceptible to radicalisation.
- 10.4.1 They feel a sense of isolation or express an "us vs them" mentality, particularly when in reference to religion or race.
  - 10.4.2 They exhibit social isolation, e.g. losing interest in activities they used to enjoy, distancing themselves from friends, family or social groups.
  - 10.4.3 They have been isolated from social groups due to bullying or discrimination.
  - 10.4.4 They have low self-esteem.
  - 10.4.5 They are experiencing, or have recently experienced, a personal crisis.
  - 10.4.6 They are individuals with feelings of unmet aspirations or social injustice.
  - 10.4.7 They are being overly secretive about what they are viewing online.
  - 10.4.8 They are experiencing some form of social deprivation due to lack of resources, likely linked to poverty and/or unemployment.
  - 10.4.9 They are becoming more argumentative or domineering in their viewpoints, being quick to condemn those that disagree and ignoring views that contradict their own.
  - 10.4.10 They are downloading or promoting extremist content.
  - 10.4.11 They may be searching for answers to questions about identity, faith and belonging.
  - 10.4.12 They have a pre-existing conviction that their religion or culture is under threat.
  - 10.4.13 They have difficulty empathising with others and/or being able to understand the consequences of their actions.
  - 10.4.14 They are easily manipulated or persuaded to engage in activity through peer pressure.
  - 10.4.15 They have a history of criminal behaviour.
- 10.5 With regards to the reporting of a concern of radicalisation in line with the Prevent duty, CMT recognises that:
- 10.5.1 While it is imperative to have appropriate data protection policies in place, these are not barriers to justified information sharing and instead provide a framework within which personal information about individuals is only shared appropriately.
  - 10.5.2 There is a statutory and professional duty to share relevant information where children need to be safeguarded. The Designated Safeguarding Lead will review cases reported by CMT colleagues and refer to the Local Authority Adult Board, Social Care Team, police, or other professional organisation where appropriate.
  - 10.5.3 If there is a concern of an immediate and significant risk then this may be reported through the following channels:
    - 10.5.3.1 The Police on 999.

10.5.3.2 The Anti-Terrorist Hotline on 0800 789 321.



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