

## **Safeguarding Policy Statement**

AKR Growth Limited is committed to the safeguarding and well-being of all our learners and fully recognises its responsibilities for protecting vulnerable groups. Our policy applies to all staff, learners, contractors, visitors and volunteers working on behalf of or in conjunction with AKR Growth Limited. There are five main elements to our policy:

1. Ensuring we operate safer recruitment practices in accordance with the legislative document Safer Recruitment and Keeping Children Safe in Education 2023.
2. Raising awareness of safeguarding throughout the organisation and ensuring that staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.
3. Raising awareness of safeguarding to all of our learners and ensuring that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe.
4. Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse.
5. Establishing safe environments in which vulnerable groups can learn and develop.

We recognise that because of the regular contact with learners, our staff are well placed to observe the outward signs of abuse.

AKR Growth Limited will therefore;

- Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to
- Ensure learners know that they can approach any staff members if they are concerned or worried and that there are additionally trained Designated Safeguarding Leads available to offer support.
- Include opportunities within our ongoing assessment process and classroom delivery for learners to develop the skills they need to recognise and stay safe from abuse.
- We recognise and adhere to the statutory requirements within the following important and relevant pieces of safeguarding legislation;
  - Working Together to Safeguard Children (2023)
  - Childrens Act (1989, 2004)
  - Safeguarding Children and Safer Recruitment in Education (2007)
  - Safeguarding Vulnerable Groups Act (SVGA 2006 amended 2012)
  - Protection of Freedoms Act (2012)
  - Disclosure and Barring Service Code of Practice (2012)
  - Sexual Offences Act (2003)
  - Every Child Matters (2004)

- Equality Act (2010)
- Keeping Children Safe in Education (KCSiE 2023)
- Education and Training (Welfare of Children) Act 2021
- Preventing and Combating Violence Against Women and Domestic Violence (Ratification of Convention) Act 2017

### **Safeguarding Policy**

To support our commitment to the safeguarding and well-being of all of our learners and with regard to the above legislation we will:

- Ensure that we have a Designated Person for Safeguarding who has received appropriate training and support for this role. The Designated Person for Safeguarding is **Dayo Ogunjobie who can be contacted at Do@AKRGrowth.com**.
- Ensure that all staff and learners are aware of our Designated Persons for Safeguarding. This will be communicated via our staff and learner induction process, internal training and awareness sessions and via the learner handbook.
- Ensure that all staff are aware and understand their responsibilities in relation to Safeguarding and in being alert to the signs and indicators of abuse or other harms such as radicalisation, and for referring any concerns directly to the Designated Person for Safeguarding.
- Ensure that effective Safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of Recognition, Response, Record, Report, Refer.
- Ensure that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters
- Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Ensure robust and timely staff training and dissemination of information, including promoting awareness of the Prevent Duty and Fundamental British Values.
- Ensure all records are stored securely and in accordance with the Data Protection Act.
- To always ensure that we have a mix of female and male staff members in safeguarding roles should this be an applicable concern to the person reporting or needing support.
- To ensure that appropriate risk assessments are completed, including health and safety, Covid-19, Prevent and radicalisation, online safety and bullying, harassment, discrimination and victimisation, including sexual violence and harassment.
- To embed robust safeguarding and protection practices across all areas of the provision.
- To develop effective links with relevant statutory agencies. For example, Health, Police, other learning providers and networks, Local Authorities (MASH, LADO)

AKR Growth Limited recognises its responsibility with regard to the safeguarding of learners from abuse and from inappropriate and inadequate care, and is committed to responding in all cases where there is concern.

Due to the nature of our work AKR Growth Limited may be in the frontline of work with some children, young learners, vulnerable learners and vulnerable adults. This may mean that we are the first to know that a child, young or vulnerable learner or adult is being or has been abused or

that we are concerned about a person's well-being. Everyone has an equal responsibility to ensure that the individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests with the Directors, Senior Management and Designated Persons for Safeguarding but also with every individual member of staff employed or volunteering within our organisation whilst at work, at an employer's premises or at home.

We will ensure that our Safeguarding Policy and Procedures are reviewed at least annually to ensure that they are still relevant and effective.

## **Understanding Safeguarding**

### **What is Safeguarding?**

Safeguarding is a proactive process of protecting and ensuring the safety and well-being of all learners.

Safeguarding may involve instances in which a learner is suffering or likely to suffer from harm.

Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with our learners.

### **What are the benefits of effective safeguarding?**

When learners feel safe and secure they can concentrate on learning.

Learners can rely on those people in positions of trust.

Staff are protected from malicious and misplaced allegations.

Staff are clear about individual responsibilities, roles and boundaries.

Learners are appropriately protected and all issues are dealt with effectively.

### **How do we define Young / Vulnerable learners?**

Young learners are defined as any learner who has not yet reached their 18th birthday (Childrens Act 1989, 2004).

The Safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that particular time.

### **New definition of regulated activity relating to adults**

An adult is a person aged 18 years and over. There are six categories within the new definition of regulated activity. 1. Health care

2. Personal Care

3. Providing Social Work
4. Assistance with General Household Matters
5. Assistance in the Conduct of a Person's own Affairs
6. Conveying

### **Safer Recruitment**

AKR Growth Limited will take all possible steps to prevent unsuitable persons working with young or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007) and the Safer Practice, Safer Learning document produced by NIACE.

When interviewing potential staff we will ensure that:

- There is an open recruitment process
- There is a rigorous interview with specific questions relating to Safeguarding
- Applicants identity and claims to academic or vocational qualifications will be verified
- References will be taken up by direct contact with referees
- Evidence of the date of birth and address of the applicant will be obtained
- Where appropriate, an Enhanced Disclosure and Barring Service Check will be conducted

Where a position requires an Enhanced DBS check this will be made clear on the job advert and application form and a statement explaining AKRs commitment to safeguarding will be documented. All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

During interviews the interviewer(s) will explore:

- The applicants attitude and demeanour towards young or vulnerable learners
- The applicants ability to support our commitment to safeguarding and promoting the welfare of young or vulnerable learners
- Any gaps in the applicants employment history
- Any concerns or discrepancies arising from the information obtained

A Single Central Record will be held for all staff employed by AKR Growth Limited and this will be updated on an ongoing basis.

### **Post Appointment**

All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this will be to:

- Provide awareness and explanations of relevant policies and procedures
- Provide support for the role in which they have been engaged
- Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities

- Enable individual line managers and colleagues to recognise any concerns about the persons ability or suitability from the outset and address them if deemed appropriate
- Ensure that individuals are aware of reporting concerns and who the Designated Persons for Safeguarding are
- Ensure that individuals are aware of other relevant policies and procedures; i.e. disciplinary procedure, E&D Policy

### **Procedure to undertake following a young or vulnerable learner confiding about or suspecting a case of abuse or neglect**

Where a young or vulnerable learner seeks out a member of staff to confide in and share information about abuse or neglect or talks spontaneously individually or in groups, our staff will:

- Listen carefully to them, and not directly question him/her
- Give them time and attention
- Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events
- Make an accurate record of the information given taking care to record the timing, setting and people present, the person's presentation as well as what was said. Do not discard this as it may be later needed as evidence
- Use the persons own words where possible
- Explain that they cannot promise not to speak to others about the information they have shared.

#### **Reassure the person that:**

- You are glad that they have told them
- That he / she has not done anything wrong
- What you are going to do next
- Explain that help will need to be sought to keep them safe

The person should be asked NOT to repeat his / her accounts to anyone. **The Designated Person for Safeguarding must be informed immediately**, who will investigate the concern and take appropriate action, all records of the investigation, will be kept strictly confidential and stored in a secure place. Outside agencies and Resources on Child Protection can and will be used to assist the company.

### **Procedure for dealing with allegations against staff**

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:-

- Behaved inappropriately in a way that has harmed or may have harmed a learner
- Possibly committed a criminal offence against or related to learner
- Behaved towards a learner in a way that indicates he/she is unsuitable to work with them

The Designated Person for safeguarding should be informed of the matter immediately. (Where the Designated Person nominated for safeguarding is involved in the allegation, the most senior member of staff should be informed).

An investigation will take place which:

- Will determine if the police need to be involved immediately to protect the person further
- Will record all details received and secure them safely
- Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation
- Will determine whether suspension is appropriate whilst undertaking the investigation

All allegations will be acted upon, however due to the variance in the risk levels, all allegations will be treated individually and the appropriate actions assigned on a case by case basis.

### **Anonymous Allegations**

Concerns raised anonymously tend to be far less effective, and depending on the level of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

- The seriousness of the matter
- Whether the concern is believable
- Whether an investigation can be carried out on the information provided

### **Staff Code of Conduct**

The code of conduct should guide all actions taken by staff and anyone else working on behalf of AKR Growth Limited. If it is necessary to act contrary to it (for example visiting a learner in their home) you should only do so after discussion and approval with your line manager.

- Place the safety and well-being of learners first – before any organisational or personal goals and before any loyalty to colleagues and friends
- Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been, inappropriate
- Be committed to actively preventing the exploitation and abuse of young or vulnerable learners
- Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual learner with respect and dignity.
- Respect each learners boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem

The focus of your relationship with a learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Facebook or Twitter.

- Do not take illegal drugs whilst at work, do not drink alcohol prior to or during contact with learners and do not smoke with or in front of vulnerable learners.
- Do not give learners alcohol, tobacco products or any form of drug or medication. You should not assist learners in anyway, in obtaining these items.
- Do not engage in or tolerate the bullying or harassment of any person

- Never engage in or tolerate inappropriate physical activity such as 'horse play'
- Ensure all lone working with young or vulnerable learners is undertaken with caution and awareness in mind

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

- Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners
- Do not:
  - Make sexual or discriminatory comments of any kind
  - Engage in rough or sexually provocative games
  - Make sexual comments / innuendos
  - Lend or borrow money or property
  - Have exclusive or secretive relationships
  - Invite young or vulnerable learners into your home
  - Use inappropriate reading materials / internet use
  - Use unacceptable forms of restraint

All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or vulnerable learners.

If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or vulnerable learner who is upset and administering first-aid are examples of necessary and acceptable behaviour.

Employees should, however, endeavour to minimise any possible misunderstanding of their actions.

### **Definition and types of Abuse or Neglect**

This section closely reflects the procedures and guidance in the Home Office document *Working Together to Safeguard Children 2023*.

'Child abuse and neglect' is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the persons health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young or vulnerable learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

*Working Together to Safeguard Children* sets out definitions and examples of the four broad categories of abuse:

- Physical Abuse, □ Emotional Abuse, □ Sexual Abuse, □ Neglect

### **Physical Abuse**

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

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed in them. These may include interactions that are beyond the person's developmental capacity, as well as over-protection and limitation of exploration and learning, or preventing them participating in normal social interactions. It may involve serious bullying causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the person 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 in the production of, pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

### **Neglect**

Neglect involves the persistent failure to meet a persons basic or physical and/or psychological needs, likely to result in the serious impairment of the persons health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a persons basic emotional needs.

Additional types of abuse and unsafe activities which we recognise and which have become more prevalent in recent times are:

- Bullying and harassment including cyber bullying
- Discriminatory abuse
- Fabricated or induced illness
- Gangs and youth violence
- Private fostering
- Forced marriage
- Faith Abuse
- Child sexual exploitation
- Honour based violence
- Breast ironing, female genital mutilation and gender based violence
- Teenage relationship abuse
- Sexting
- Mental health



- Trafficking
- Radicalisation
- Financial abuse
- Domestic violence
- Alcohol and drugs
- Crime

### **Signs and Indicators of possible abuse**

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, there are a number of possible indicators. However there may also be a perfectly reasonable explanation so it is important to remain vigilant but not be over zealous nor jump to conclusions. There may also be no signs or indicators of abuse, however this does not necessarily mean that a report of abuse is false.

#### **Signs suggesting physical abuse**

- Any injuries not consistent with the explanation given for them
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because of playing a contact / rough sport etc
- Injuries that have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, unkempt appearance, dirty clothes etc
- Changes in routine

#### **Signs suggesting sexual abuse**

- Any allegation made by an individual
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Sexual activity through words, play or drawing
- Individuals who are sexually provocative or seductive
- Severe sleeping disorders
- Eating disorders

#### **Signs suggesting emotional abuse**

- Changes or regressions in mood or behaviour
- Nervousness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention seeking behaviour
- Persistent tiredness
- Running away

### **Additional Information**

### **Safeguarding Children and Safer Recruitment in Education**

<https://www.education.gov.uk/publications/eOrderingDownload/Final%206836-SafeGuard.Chd%20bkmk.pdf>

### **Kent Safeguarding Children Board (LCSB)**

Offers guidance, procedures and instructions in ensuring children's well-being and welfare.  
<http://www.kscb.org.uk/about-kscb/contact-us>

### **Safeguarding Vulnerable Groups Act**

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

### **Protection of Freedoms Act 2012**

<http://legislation.gov.uk/ukpga/2012/9/contents/enacted>

### **Kent and Medway Safeguarding Adults Board**

[www.kent.gov.uk/about-the-council/.../kent-and-medway-safeguarding-adults-board](http://www.kent.gov.uk/about-the-council/.../kent-and-medway-safeguarding-adults-board)

### **Safer Practice, Safer Learning**

[http://shop.niace.org.uk/media/catalog/product/S/a/SaferPractice\\_1.pdf](http://shop.niace.org.uk/media/catalog/product/S/a/SaferPractice_1.pdf)

### **OFSTED – FAQs on Safeguarding**

<http://www.ofsted.gov.uk/adult-learning-and-skills/for-adult-learning-and-skillsproviders/safeguarding-children-and-young-people>

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Keeping children safe in education - GOV.UK ([www.gov.uk](http://www.gov.uk))

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014224/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

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