



Safeguarding Children, Young People and Adults at Risk, Policy and Procedure Guidelines

September 2022 – Rev 10c

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1. Policy Statement

The Governors (Officers) of Simian Risk Management Limited (SIMIAN) fully recognises its responsibilities for protecting young people and adults at risk and will commit to fully supporting those with safeguarding responsibility in the discharging of this policy and associated procedures. It also applies to any individual, regardless of sexual orientation or gender, and therefore, it applies equally to any individual of LGBTQ+ status, and therefore any form of discrimination, including homophobia or sexism, will not be tolerated.

This policy applies to all staff and contractors working at SIMIAN. We have developed this policy in consultation with the Local Safeguarding Children Board and the Adult Social Care Team. There are six main elements to our policy: -

- Ensuring we practice safe recruitment in checking the suitability of staff and contractors to work with young people and adults at risk
- Raising the awareness of young people and adults at risk on safeguarding and associated protection arrangements. Equipping young people and adults at risk with the knowledge needed to help keep them safe
- The training and development of staff to recognise issues relating to safeguarding of young persons and adults that may be at risk
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse and radicalisation
- Supporting apprentices and other learners who have been abused in accordance with his/her agreed protection plan
- Establishing a safe environment in which young people and adults at risk can learn and develop

We recognise that because of the day-to-day contact with apprentices and other learners, staff are well placed to observe the outwards signs of abuse and radicalisation. SIMIAN will therefore: -

- Establish and maintain an environment where apprentices and other learners feel secure, are encouraged to talk, and are listened to
- Ensure apprentices and other learners know that there are those within SIMIAN whom they can approach if they have a concern. We will follow the procedures set out by the Local Safeguarding Children Board or Adult Social Team and take account of guidance issued by H.M. Government to:
-
- Ensure we have a designated senior person for the protection of young people and adults at risk who has received appropriate training and support for this role

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- Ensure we have a nominated Senior Manager responsible for the protection of young people and adults at risk
- Ensure every member of staff (including temporary and supply contractor staff and volunteers) know the name of the designated senior person responsible for the protection of young people and adults at risk and their role
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for the protection of young people and adults at risk
- Notify social services if there is an unexplained absence of more than two days of an apprentice or other learner who is subject to a protection plan
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding protection matters including attendance at case conferences
- Retain written records of concerns about young people and adults at risk, even where there is no need to refer the matter immediately
- Ensure all records are kept securely; separate from the main apprentice or learner file, and in locked locations
- Develop and then follow procedures where an allegation or safeguarding concern is made against a member of staff or volunteer
- Ensure safe recruitment practices are always followed

We recognise that apprentices or other learners who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. SIMIAN may be the only stable, secure and predictable element in the lives of apprentices or other learners at risk. When in learning their behaviour may be challenging and defiant or they may be withdrawn. SIMIAN will endeavour to support the apprentice or learner through: -

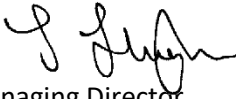
The content of the training and apprenticeship programme.

- SIMIAN's ethos which promotes a positive, supportive and secure environment and gives apprentices and other learners a sense of being valued
- SIMIAN's behaviour expectations which includes supporting young people and adults at risk and advising them of local risks.
- SIMIAN will ensure that apprentices and other learners know that some behaviour is unacceptable, but that they are valued and not to be blamed for any abuse which has occurred
- Liaison with other agencies that support learners such as Social Services, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology Service

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- Ensuring that where an apprentice or other learner who is subject to a protection plan, leaves their training programme, that the relevant social worker is informed immediately. We will review our Safeguarding Children, Young People and Adults at Risk Policy and procedures at least once every year to make sure they are still relevant and effective.

Signed



Managing Director
September 2022

2. Overview

- 2.1. SIMIAN acknowledges its responsibilities in relation to safeguarding and promoting the welfare of young people (anyone under the age of 18) and adults at risk (formerly vulnerable adults). SIMIAN recognises its responsibility to safeguard the welfare of all young people and adults at risk by protecting them from physical, emotional or sexual harm and from neglect or bullying, or from any form of radicalisation.
- 2.2. SIMIAN will comply with current safeguarding legislation, regulations and guidelines and will take additional reasonable steps to safeguard and minimise the risk of harm to everyone accessing its training programmes and services.
- 2.3. Our Health and Safety Policy, the Prevent Strategy, the Safeguarding Children, Young People and Adults at Risk, Policy and Procedure Guidelines and related procedures are designed to ensure the safeguarding of all apprentices and learners who access our programmes and services in regulated activities. SIMIAN takes seriously any allegation, safeguarding concern or information concerning abuse or neglect and, where deemed necessary within the legislation, will make a referral to the appropriate agency. In addition, our safeguarding procedures also help protect our staff from potential harm or damage and can help avoid any false allegations.
- 2.4. Safeguarding is everybody's responsibility and, as such these procedures apply to all SIMIAN's members of staff who work in direct contact with apprentices and learners. Abuse may take place both outside and inside the SIMIAN setting. Everyone who is part of SIMIAN is responsible for safeguarding, promoting and protecting the welfare of young people and adults at risk. Members of staff will be provided with appropriate training and support to ensure that they are able to implement this policy.

SIMIAN will: -

- Ensure it practices safe recruitment in checking the suitability of members of staff to work with young people and adults at risk
- Implement processes for identifying and reporting cases, or suspected cases, of abuse
- Support apprentices and other learners who have been abused in accordance with their agreed protection plan

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- Establish a safe environment in which young people and adults at risk can learn and develop, feel secure, are encouraged to talk and are listened to
- Ensure apprentices and other learners know the identity of the Designated Safeguarding Officer whom they can approach if they have a concern
- Will take account of guidance issued by the Department of Education, the Warrington and Waltham Forest Safeguarding Children Boards and the Warrington and Waltham Forest Safeguarding Adult Social Care Teams and Children's and Adult's Safeguarding Boards from other local areas, as required
- Will take seriously and respond swiftly and appropriately to all incidents, allegations, safeguarding concerns or suspicions of poor practice or abuse

3. Legislation

3.1. Legislation and a range of statutory guidelines relating to the safeguarding of children and adults at risk are in place and applicable to SIMIAN. They include the following: -

- Children Act 2014
- The Protection of Children Act 1999
- Education Act (2002)
- Keeping Children Safe in Education (2022)
- What to do if You are Worried a Child is being Abused (March 2015)
- No Secrets (2015)
- Sexual Violence and Sexual Harassment (2021)
- The Sexual Offences Act 2003
- Education and Training (Welfare of Children) Act 2021
- Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013
- Children and Social Work Act 2017
- GDPR 2018 and the Data Protection Act 2018
- Modern Slavery Act 2015
- Safeguarding Children and Young People from Knife Crime 2019
- UK Council for Internet Safety (UKCIS) 2020.
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- The Counter Terrorism and Security Act 2015
- The Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006 (Controlled Activity and Prescribed Criteria) Regulations and Amendments 2012
- The Human Rights Act 1998
- The Equality Act 2010
- The Public Sector Quality Duty

4. Management Responsibility

4.1. The Managing Director has overall responsibility for the implementation of this process.

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- 4.2. The SIMIAN Designated Safeguarding Officer manages the day-to-day implementation, related policies and procedures, training requirements and maintains and monitors all reports for satisfactory closure.
- 4.3. Cases of reported allegations, safeguarding concerns or risks and outcomes will be reviewed as part of the monthly Senior Leadership Team Meeting review process.
- 4.4. SIMIAN is committed to promoting a positive, supportive and secure environment where apprentices and other learners feel valued and safe.
- 4.5. SIMIAN is committed to working with local safeguarding organisations, such as the Safeguarding Children Boards, the police, Health Authority and Social Care Partnership, Channel, the Education and Skills Funding Agency and other community and referral groups to ensure the safeguarding of all apprentices and other learners.

5. Designated Safeguarding Officer

- 5.1. It is the responsibility of the Designated Safeguarding Officer to: -
- Investigate, improve, monitor and review SIMIAN's safeguarding processes
 - Take action on referrals from both internal and external sources
 - Make decisions about referrals to the Social Services Child Protection Team, Safeguarding Boards and the police
 - Endeavour to keep up to date with all relevant legislation, regulations and guidelines
 - Collect all necessary data and ensure it is kept strictly confidential and protected by password access and stored under lock and key
 - Determine if an internal investigation is required and liaise with Social Services and the police to avoid compromising any official investigation
 - Identify and signpost to organisations for support where characteristics of exploitation, extremism, bullying, abuse or grooming has been recognised
 - Liaise with the Managing Director to ensure all necessary support and guidance is available as appropriate.

6. Responsibilities of SIMIAN Members of Staff

- 6.1. It is the responsibility of the Designated Safeguarding Officer to:
- Attend safeguarding training as required
 - Familiarise themselves with this policy and associated procedures

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- Safeguard and promote the welfare of young people and adults at risk
- Alert the Designated Safeguarding Officer if they have concerns about a young person or adult at risk
- Seek urgent medical or police assistance if needed
- Understand the risks of bullying, grooming, abuse, exploitation, extremism and on-line safety and how to support apprentices and other learners in keeping themselves safe.

7. Definitions

This policy recognises and builds on the legal and statutory definitions of a **young person**, the distinction between ages of consent, civil and criminal liability are recognised but in the pursuit of good practice for SIMIAN, a young person is recognised as being under the age of 18 years.

The term **Adult at Risk** refers to all those adults (aged over 18) who have care and support needs, are experiencing or are at risk of abuse or neglect and as a result of those care and support needs are unable or less able to protect themselves from experiencing abuse or neglect or the risk of it (Care Act 2014).

Physical Abuse is 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 is 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 in so 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 or not 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 on-line, and technology can be used to facilitate off-line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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Child-on Child-abuse includes all types of bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, hair pulling or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals; child sexual exploitation; gang activity and youth violence. Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. Sexual violence and sexual harassment can occur between two children of any sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children.

Child-on-child abuse requires a specific focus within SIMIAN as it is recognised that it is a particularly sensitive and complex area of safeguarding learners. All staff should recognise that learners are capable of abusing their peers and that inappropriate behaviour should never be tolerated or passed off as 'banter' or 'part of growing up'.

Child-on-child abuse is often gender specific, such as girls being inappropriately touched or sexually abused by boys; boys may be more vulnerable to initiation or hazing type violence and rituals. It is important to deal with a situation of peer abuse immediately and sensitively. As with any safeguarding concern, it is important to gather the information as soon as possible to ascertain the true facts. This should be done objectively, with consideration of intent. Where it is deemed that any party involved in the child-on-child abuse is at risk, then a safeguarding referral should be made. Where there is a potential criminal act, the police should also be informed.

Bullying is persistent behaviour directed against an individual, which is intimidating, offensive or malicious and undermines the confidence and self-esteem of the recipient which may cause him or her to suffer stress. Bullying can take place by direct personal contact, or through digital communication such as mobile phones, social networking sites, email or gaming consoles.

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 through the use of technology. A significant number of children who are victims of sexual exploitation go missing from home, care or education at some point. Some of the following signs may be indicators of sexual exploitation: -

- Young people who appear with unexplained gifts or new possessions
- Young people who associate with other young people involved in exploitation
- Young people who have older boyfriends or girlfriends
- Young people who suffer from sexually transmitted infections or become pregnant
- Young people who suffer from changes in emotional wellbeing
- Young people who misuse drugs and alcohol

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- Young people who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or do not take part in education.

Sexual Violence and Sexual Harassment is unwanted conduct of a sexual nature, and this can occur between two or more children of any age and sex. Staff should be aware that this sort of behaviour is not limited to adults.

Female Genital Mutilation is a procedure where the female genitals are deliberately cut, injured or changed, but where there is no medical reason for this to be done. FGM is most commonly carried out on girls between infancy and the age of 15, most often before puberty starts. It is illegal in the UK. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Neglect is 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 as a result of maternal substance abuse. Once a child is born, neglect may involve their parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a young person from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- Neglect may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some children are in need because they are suffering or likely to suffer **significant harm**. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist. See the SIMIAN Prevent Strategy Policy.

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Psychological Abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion or harassment. It also includes verbal abuse, cyber bullying and isolation or an unreasonable and unjustified withdrawal from services or supportive networks.

Financial Abuse includes theft of money or valuables, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

Neglect and Acts of Omission includes not being provided with enough food or the right kind of food, or not being taken proper care of. Leaving the person without help to wash or change dirty or wet clothes, not getting them to a doctor when one is needed or not making sure that they have the right medicines.

Discriminatory Abuse includes some forms of harassment, slurs or similar unfair treatment relating to race, gender, gender identity, age, disability, sexual orientation or religion.

Self-Neglect is not a direct form of abuse, but employees need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Self-Harm is defined as self-poisoning or injury, irrespective of the apparent purpose of the act. Self-harm is an expression of personal distress, not an illness, and there are many varied reasons for a person to harm him or herself. Most cases of self-harm do not result in suicide; however, self-harm is known to be a risk factor in suicidal behaviour.

Suicide is the intentional and deliberate act of taking one's own life; youth suicide is a major global public health issue. While suicide rates are higher among 20-24 year olds, suicidal behaviour that may precede suicide is established in the earlier years. Suicide consistently ranks as one of the leading causes of death for adolescents between 15 and 19 years of age. Research suggests that certain situations put children and young people at more risk of suicide, including suffering loss or bereavement, relationship issues, experiencing bullying and/or racism, living in isolated areas and living in unhappy circumstances.

The term **Looked After Children** in the Children Act 1989 refers to all children and young people being looked after by a local authority, namely: - those subject to care orders or interim care orders (under sections 31 and 38 of the 1989 Act); those children who have been placed, or are authorised to be placed, with prospective adopters by a local authority (section 18(3) of the Adoption and Children Act 2002); those who are voluntarily accommodated under section 20 of the 1989 Act, including unaccompanied asylum-seeking children (where children are accommodated under this provision, parental responsibility remains with the parents); and those who are subject to court orders with residence requirements (e.g. secure remand or remand to local authority accommodation), in accordance with section 21 of the 1989 Act.

So-called 'honour-based' violence (HBV) and abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

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Forced Marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of adults at risk who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced. The Forced Marriage (Civil Protection) Act was enacted in 2007 and came into force on 25 November 2008. The Act forms part of the Family Law Act 1996 and makes provision for protecting children, young people and adults from being forced into marriage without their free and full consent.

Domestic abuse can have both short and long-term detrimental impacts on children's health, wellbeing and within their own relationships.

This includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: - psychological, physical, sexual, financial and emotional.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Eating Disorders include anorexia nervosa, bulimia nervosa, or other related (or 'atypical') eating disorders (mainly binge eating disorder). In general, eating disorders develop over time, sometimes over years, and often at a point when life brings fear and insecurity.

Homelessness - or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Child Criminal Exploitation (County Lines) is a geographically widespread form of harm, that is a typical feature of county lines criminal activity: drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas. This also involves enticing or grooming young people into crime or gang activity for illicit gains.

Prevent is about safeguarding students to keep them safe from being radicalised and/or exploited by extremists. The Prevent Duty is not about discouraging students from having political views and concerns and should balance its legal duties in terms of both ensuring freedom of speech but also of protecting students and staff welfare. Please refer to the SIMIAN Prevent Strategy Policy.

7.1. Adults at Risk

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Physical Abuse can include being assaulted, hit, slapped, pushed, restrained, being denied food or water, not being helped to go to the bathroom and misuse of medication.

Sexual Abuse includes indecent exposure, sexual harassment, inappropriate looking or touching, as well as rape. Sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, and sexual acts that the person does not agree to or were pressured into consenting to.

Psychological Abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion or harassment. It also includes verbal abuse, cyber bullying and isolation or an unreasonable and unjustified withdrawal from services or supportive networks.

Financial Abuse includes theft of money or valuables, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

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Other Safeguarding Issues. The following list identifies other potential types of safeguarding issues: -

- Young people missing from training, home or care
- Substance misuse
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Hate crime
- Mental health
- Human trafficking and modern slavery

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8. Signs of Possible Abuse

8.1. When considering whether there is evidence to suggest a young person or an adult at risk has been abused, there are a number of possible indicators. However, there may be other explanations, so it is important not to jump to conclusions. There may also be no signs or symptoms, this does not mean that a report of abuse is false. Employees should seek advice from the Designated Safeguarding Officer or the relevant local Safeguarding Board.

8.2. Physical Abuse

- Any injuries not consistent with the explanation given for them
- Injuries that occur to the body in places, which are not normally exposed to falls, rough games etc
- Injuries that have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures etc that do not have an accidental explanation
- Cuts/scratches/substance abuse
- Changes in routine

8.3. Sexual Abuse

- Any allegations or safeguarding concerns made by a person concerning sexual abuse
- Person with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Young persons or adults at risk who is sexually provocative or seductive with adults
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders – anorexia or bulimia.

8.4. Emotional Abuse

- Changes or regression in mood or behaviour, particularly where a child, young person or adult at risk withdraws or becomes clingy – also depression/aggression and/or extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults, carers or family
- Attention-seeking behaviour
- Persistent tiredness
- Running away, stealing or lying
- These signs may also indicate the possibility that a child, young person or vulnerable adult is self-harming.

9. Recruitment of Members of Staff

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- 9.1. The Police Act 1997 (enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2013 requires employers to carry out Disclosure and Barring Service (DBS) checks before members of staff are allowed to come into contact with adults at risk. The DBS make barring decisions as legislated by the Safeguarding Vulnerable Groups Act 2006 which sets out the scope and operation of the vetting and barring scheme.
- 9.2. All SIMIAN's employees will be DBS checked and those engaged directly in regulated activities are subject to an enhanced DBS check, renewed every 3 years. A central register is maintained by the SIMIAN Support Services Manager.
- 9.3. SIMIAN has a statutory duty to make reports and provide relevant information to the DBS where there are grounds for believing, following an investigation, that a member of staff is unsuitable to work with children or adults at risk, or may have committed misconduct.
- 9.4. The responsibility for reporting cases to the DBS lies with the Managing Director.
- 9.5. When recruiting and selecting members of staff, SIMIAN will ensure that there is a rigorous interview, applicants' identity and claims to any vocational or other qualifications will be checked and verified, references will be taken up by direct contact with referees, evidence of the identity, date of birth and address of the potential member of staff will be sought and where appropriate, an enhanced disclosure via the DBS will be secured. SIMIAN will also carry out online searches of potential candidates to identify any causes for concern.
- 9.6. During job interviews the SIMIAN interviewers will explore candidates' ability to support the SIMIAN agenda for safeguarding and promoting the welfare of young people or adults at risk, any gaps in candidates' employment history and any concerns or discrepancies arising from the information provided by candidates and/or referees.
- 9.7. Job offers will be conditional on the necessary DBS and other checks being satisfactory.
- 9.8. All members of staff will have a job description and contract of employment and be required to work a probationary period.
- 9.9. Where the DBS checking process returns information relating to prior criminal convictions of the individual being checked, the detail provided will be a risk assessed by SIMIAN's Board of Directors who will consider the nature of any offence(s) and the passage of time since the offence(s) and in context to the subject's role in the business, prior to a formal offer of employment being made. Where necessary, specialist advice and assistance may be sought in strict confidence from external sources e.g. Warrington Safeguarding Children's Board.
- 9.10. When results of DBS checks are pending, those members of staff shall not have access to any apprentice or other learner or apprentice/learner information that could in any way compromise safeguarding requirements.
- 9.11. All such risk assessments will be documented, retained for future reference and stored securely by the Support Services Manager.

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- 9.12. SIMIAN has a Whistleblowing Policy for enabling members of staff to share, in confidence with the Safeguarding Lead (or any Board member), concerns they may have around the protection of young people or adults at risk. The procedure is intended to provide safeguards to enable members of staff to raise concerns without fear of adverse repercussions.
- 9.13. Should an apprentice or other learner make an allegation against another apprentice or learner, this may be dealt with under the Disciplinary Procedure.
- 9.14. Visitors required to have access to any SIMIAN centre where young persons or adults at risk may be present will be inducted and supervised at all times by a SIMIAN member of staff who holds the relevant DBS clearance.
- 9.15. Online searches of potential candidates for employment will be carried out.

10. Staff Training

- 10.1. Online searches of potential candidates for employment will be carried out.
- 10.2. All members of staff will undergo a mandatory induction programme to SIMIAN which includes safeguarding training. A copy of this policy will be issued to all new members of staff as part of their induction.
- 10.3. All SIMIAN's members of staff are required to undertake mandatory safeguarding training as may be arranged periodically and according to need.
- 10.4. All members of staff will also receive regular updates on safeguarding via e-mail, monthly bulletins, briefings, training sessions and staff meetings.
- 10.5. SIMIAN is committed to ensuring that all members of staff understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Officer.
- 10.6. Members of staff will be made aware of their responsibility to safeguard and promote the welfare of children, young people or adults at risk.
- 10.7. Apprentices and other learners are made aware of the SIMIAN Designated Safeguarding Officer whom they can approach directly with any concerns they may have.
- 10.8. All disclosures, complaints and incidents are to be reported to the Designated Safeguarding Officer. All documentation will be managed and stored securely by the Designated Safeguarding Officer.

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11. What to Do if you Suspect Someone is Being Abused

- 11.1. All members of staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
- 11.2. All members of staff working in direct contact with apprentices and other learners must be alert to the signs of abuse.
- 11.3. Anyone who suspects that abuse is taking place inside or outside SIMIAN's premises, or to whom an apprentice or other learner discloses issues relating to safeguarding, should contact the Designated Safeguarding Officer immediately. This includes low level concerns.
- 11.4. Members of staff who are approached with concerns or suspicions about a child or adult at risk, must bring the concerns raised to the attention of the Designated Safeguarding Officer immediately.
- 11.5. Members of staff should maintain confidentiality by not discussing the concerns or suspicions with anyone other than the Designated Safeguarding Officer.
- 11.6. The Designated Safeguarding Officer will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or adult at risk protection matters, including attendance at case conferences and other external meetings.
- 11.7. If a young person or adult at risk comes to a member of staff with a disclosure of apparent abuse, the member of staff should: -
 - Allow the young person or adult at risk to speak freely without interruption
 - Reassure them, let them know you are glad they have spoken up and that they are right to do so
 - Be honest, let the young person or adult at risk know that you cannot keep this a secret and that you will need to refer it on to get them the support that they need. Be clear that they know what will happen next
 - Never trivialise, exaggerate the issue or make suggestions
 - Try to remain calm, remember this is not an easy thing for them to do
 - Try not to show emotions, if you show anger, disgust or disbelief, they may stop talking because they feel they are upsetting you or they may feel your negative feelings are directed towards them
 - Show concern and refer on any apprentice or other learner who needs support

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- Not offer or promise confidentiality, but to record the facts
- Offer support and security and not to react emotionally
- Understand that protocols may require that they have no further involvement, but will be given feedback
- Make the young person or adult at risk feel secure and safe without causing them any further anxiety
- Tell the learner that the record will be made and the Designated Safeguarding Officer informed
- Refer in an appropriate and timely manner to the Designated Safeguarding Officer
- Write up, to the best of your memory, what was said to you including when, where and who else might have heard it. This should be forwarded, in confidence, to the Designated Safeguarding Officer
- The Designated Safeguarding Officer will take the case forward discussing the matter with relevant local Safeguarding Board. In the case of FGM or if there is an immediate risk to a child or adult at risk, referral should be made to the police
- Referral involves giving Children or Adult Services or the police, information about concerns relating to a child, young person, adult at risk or family in order that enquiries can be undertaken by the appropriate agency followed by any necessary action. In certain cases, the level of concern will lead straight to a referral without external consultation being necessary
- Parents/carers should be informed if a referral is being made except in circumstances where it is considered that informing parents/carers would place a young person, adult at risk, yourself or others at immediate risk. However, inability to inform parents for any reason should not prevent a referral being made. It would then become a joint decision with Children's or Adult Services about how and when the parents or carers should be approached and by whom
- If the concern is about abuse or risk of abuse from someone not known to the child or child's family, young person or adult at risk (stranger abuse) then a telephone referral directly to the police should be made and the parents or carers advised
- If the concern is about abuse or risk of abuse from a family member or someone known to the child, young person or adult at risk, then a telephone referral to the Referral and Assessment Team or the Adult Services Duty Team should be made
- If emergency medical attention is required, this can be secured by calling an ambulance or taking a child, young person or adult at risk to the nearest Accident and Emergency Department. In the case of a young person, it would be appropriate for a responsible person or designated adult to accompany the child to hospital

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- If a young person or adult at risk is in immediate danger the police should be contacted as they alone have the power to remove a child immediately if protection is necessary, via a Police Protection Order.

11.8. Members of staff should not: -

- Panic
- Allow their shock or distaste to show
- Show any disbelief or fail to take the allegations or safeguarding concerns seriously
- Ask questions other than to clarify that they have enough information to act
- Ask questions which could be seen as leading in any way
- Speculate or make assumptions
- Make negative comments about alleged abuser
- Approach the alleged abuser
- Make promises or agree to keep secrets
- Take sole responsibility
- Shirk the responsibility to report the concern
- Treat allegations or safeguarding concerns merely as a domestic issue and send the apprentice or learner back to the family home
- Ignore what the apprentice or learner has told you or dismiss out of hand the need for immediate protection
- Decide that it is not your responsibility to follow-up the allegation or safeguarding concern
- Approach the apprentice's or learner's family or those with influence within the community, without the express consent of the apprentice or learner, as this will alert them to your concerns and may place the apprentice or learner in danger
- Contact the family in advance of any enquiries by the police, adult or children's social care, either by telephone or letter
- Share information outside information sharing protocols without the express consent of the apprentice or other learner
- Attempt to be a mediator or encourage mediation, reconciliation, arbitration or family counselling.

12. Information Required at the Referral Stage

12.1. Information passed to the Safeguarding Board, Social Care or the police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern. Ideally this information should be compiled utilising an Incident Referral Form. The following information may be required: -

- Details of the young person or adult at risk including their name, age, gender, address and contact detail, parental responsibility, disabilities, culture, agencies already working with the family, relationship between the young person or adult at risk and the accused
- Details of the accused including name, address, age, contact details, position held and any other details of known previous incidents
- Primary evidence

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- Core information about the alleged incident
- Facts from the person making the allegation including dates, times, venue and witness detail
- Records with dates
- Details of anyone who has already been informed or already involved in the investigation.

12.2. The Designated Safeguarding Officer or member of staff should ensure that an accurate record is made and kept, detailing the concerns that have been referred. The concerns should be confirmed in writing to the Referral and Assessment Team or Adult Duty Team following the referral (within 48 hours). The action agreed should be recorded or that no further action is to be taken and the reasons for this decision.

13. Confidentiality

13.1. Confidentiality and trust should be ensured in all cases. The degree of confidentiality will be governed by the need to protect the child, young person or adult at risk who is always the primary concern. The child, young person or adult at risk must at the earliest opportunity in the disclosure, be informed of the need to pass information on. Every effort must be made to ensure that confidentiality is maintained when an allegation or safeguarding concern has been made and is being investigated.

13.2. All conversations regarding a safeguarding disclosure made by a child, young person, or adult at risk should always be held in private.

13.3. SIMIAN complies with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) May 2018 but also recognises the principle set out in Keeping Children Safe in Education which is “Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children”.

13.4. Information should be handled and disseminated on a ‘need to know’ basis only. This may include the following people: -

- Designated Safeguarding Officer
- The parents of the person who is alleged to have been abused (only following advice from the Children’s Social Care/Police or where the abuse does not involve the family)
- The person making the allegation or raising the safeguarding concern
- Children’s Social Care, Safeguarding Boards and/or the police
- The alleged abuser (and parents if the alleged abuser is a young person) only following advice from the Children’s Social Care/police
- Information should be stored and retained in a secure place with access strictly limited to designated people, in line with the data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

14. Allegations of Abuse Against SIMIAN Members of Staff

14.1. Allegations of abuse or safeguarding concerns raised against SIMIAN’s members of staff will always be treated seriously. The allegation or concern must always be referred to the Designated Safeguarding Officer who will follow the Safeguarding Procedure in the same way as

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for other safeguarding allegations or safeguarding concerns. The Designated Safeguarding Officer will take the appropriate steps to ensure the safety of the child or adult at risk and any others who may be at risk.

- 14.2. If the allegation or concern is against the Designated Safeguarding Officer, it should be reported without delay to the Managing Director.
- 14.3. Where there is a complaint against a member of staff, the relevant Local Authority Designated Officer (LADO) will be informed and involved. This may result in possibly criminal (police) investigations and/or a young person or adult at risk protection investigation, carried out by Social Services. In this instance, the Local Safeguarding Children Board, LADO Procedure should be followed. All steps of this procedure will be advised and supported by the LADO, working in partnership with SIMIAN.
- 14.4. The LADO will advise on how to proceed and whether the matter can be dealt with within SIMIAN's own disciplinary arrangements or whether a multi-agency strategy meeting is required. Any external investigation must not be compromised by SIMIAN's internal disciplinary procedure.
- 14.5. Where the LADO decides that the issue can be dealt with internally, the reasoning and advice will be recorded and sent to the Designated Safeguarding Officer, the Safeguarding Children Board or the Safeguarding Adults Social Care Team and the Police Child Protection Unit. In this instance it will be necessary to inform the LADO of the outcome of the internal SIMIAN investigation.
- 14.6. Where the LADO decides the case needs to proceed to an 'Incident Evaluation Meeting' (IEM) she/he will make a referral to the Children's Services Referral and Assessment Team and convene the meeting/s in accordance with their guidance.
- 14.7. Complaints made directly to the police will be reported to the LADO as soon as possible and again she/he will decide whether to hold a strategy meeting. The police may interview the complainant if they feel this is appropriate.

15. Guidance for Employees for Safeguarding

- 15.1. It is essential that care is taken to minimise the possibility for abuse and misunderstanding and misinterpretation. False allegations are rare but general good practice will help prevent them. The following examples will help to create a positive culture and climate for children, young people and adults at risk who visit SIMIAN's premises.
- 15.2. The aim is to provide members of staff with advice which will not only help to protect apprentices and other learners but will also help to identify any practices or behaviours which could be mistakenly interpreted and therefore should be avoided in order to prevent false allegations of abuse or safeguarding concerns being made.
- 15.3. Good practice will also protect SIMIAN through reducing the possibility of anyone using their role within the organisation to gain access to apprentices or other learners, in order to abuse them.

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- 15.4. There is lots that members of staff can do to avoid putting themselves in situations where their actions may be misinterpreted, and they inadvertently lay themselves open to accusations of abusing learners.
- 15.5. Members of staff who breach this guidance outside of these specific circumstances may be subject to disciplinary procedures.
- 15.6. Never work alone with children, young people or adults at risk out of public view.
- 15.7. Maintain a safe and appropriate emotional and physical distance from children, young people or adults at risk. It is not appropriate for members of staff to have an intimate relationship with children, young people or adults at risk who attend SIMIAN's premises.
 - Do not engage in rough or sexually provocative games or "horse play"
 - Do not make sexual comments
 - Do not invite or allow children, young people or adults at risk into your home
 - Do not give your personal contact details (including mobile number and e-mail address) to an apprentice or other learner you have met through work
 - Do not give children, young people or adults at risk lifts in your car except in emergencies
 - Never develop a personal relationship. Avoid socialising with apprentices and other learners on occasions when it does not constitute part of normal work duties
 - If it is necessary to being in a position of one-to-one contact with an apprentice or other learner, the member of staff should only do so after discussion with and the approval of their line manager or a member of the SIMIAN senior leadership team at the time
 - Never let allegations or safeguarding concerns, made by anyone, go unacknowledged, unresolved or not acted upon
 - Never engage in inappropriate touching of any kind. If it is an accepted part of an activity, touching children, young people or adults at risk should be appropriate to the situation and follow accepted guidelines where they exist. Consoling a child, young person or adult at risk who is upset, administering first aid or supporting a participant in an activity is acceptable and necessary behaviour
 - Never give apprentices or other learners alcohol, tobacco products or any form of drug or medication
 - Never engage in or tolerate any bullying or harassment of any person
 - Never allow apprentices or other learners to engage in unacceptable behaviour or use offensive or discriminatory language without being challenged

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- It is not appropriate for members of staff to take photographs of learners for their personal use
- Avoid situations where guest speakers and visitors are left alone with apprentices or other learners
- Never expose apprentices or other learners to environments or circumstances or allow them to engage in activities that compromise their health or personal safety
- Always ensure SIMIAN safeguarding procedures are followed at all times

16. Employers

- 16.1. SIMIAN works with a wide range of employers in order to deliver its apprenticeship and other training programmes. Employers may be accessing SIMIAN's services in order to recruit and/or train apprentices, taking learners on work placements and/or work experience or employing young people who access SIMIAN apprenticeship and other training programmes.
- 16.2. SIMIAN will, and as appropriate under our health and safety arrangements, make employers aware of its safeguarding procedures and of their responsibility to ensure appropriate arrangements for safeguarding young people up to age 18 and adults at risk on their premises. Safeguarding is integral to our employer approval arrangements.

17. Online Safety

- 17.1. The Governor's (Officers) of SIMIAN are committed to ensuring that all staff and learners are aware of online safety, and how they can best ensure that they remain free from harm caused by online activities.
- 17.2. SIMIAN must ensure that all members of staff, apprentices and other learners use information and communication technology in a safe and responsible manner.
- 17.3. Potential dangers of using information and communication technology may include: -
 - Access to illegal, harmful or inappropriate images or other content
 - Unauthorised access to/loss of/sharing of personal information
 - The risk of being subject to grooming by those with whom the apprentice or learner may make contact on the internet
 - The sharing/distribution of personal images without an individual's consent or knowledge
 - Inappropriate communication/contact with others, including strangers
 - Cyber-bullying
 - Access to unsuitable video/internet games
 - An inability to evaluate the quality, accuracy and relevance of information on the internet
 - Plagiarism and copyright infringement
 - Illegal downloading of music or video files
 - The potential for excessive use which may impact on the social and emotional development and learning of the learner.

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- 17.4. SIMIAN is committed to ensuring members of staff receive regular training to keep up to date with new developments and ensure they are sufficiently confident to educate apprentices and other learners in the safe and responsible use of technology.
- 17.5. SIMIAN will manage the use of digital images and videos, data protection, digital communications, unsuitable/inappropriate activities and incidents of misuse.
- 17.6. When using digital images, members of staff will inform and educate apprentices and learners about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they will recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- 17.7. Members of staff are permitted to take digital images and video to support educational aims, but must follow SIMIAN's policies concerning the sharing, distribution and publication of those images. Those images should only be taken on SIMIAN equipment: the personal equipment of members of staff should not be used for such purposes.
- 17.8. Care will be taken when capturing digital images and videos that learners are appropriately dressed and are not participating in activities that might bring the individuals or SIMIAN into disrepute.
- 17.9. Apprentices and learners must not take, use, share or publish or distribute images of others without their permission.
- 17.10. Images and videos published on the SIMIAN website, or elsewhere that include apprentices and learners will be selected carefully and will comply with good practice guidance on the use of such images.
- 17.11. Apprentices' and learners' full names will not be used anywhere on a SIMIAN website or blog, particularly in association with photographs.
- 17.12. Written permission from parents/carers will be obtained before photographs of apprentices and learners aged under 18 are published on SIMIAN's website.
- 17.13. Personal data will be recorded, processed, transferred and made available according to the GDPR and Data Protection legislation which states that personal data must be: -
 - Fairly and lawfully processed
 - Processed for limited purposes
 - Adequate, relevant and not excessive
 - Accurate
 - Kept no longer than necessary
 - Processed in accordance with the data subject's right
 - Secure
 - Only transferred to others with adequate protection.
- 17.14. All SIMIAN's members of staff will ensure that: -

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- Care is taken to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Personal data is used or processed on secure password protected devices and that these devices are properly 'logged off' at the end of any session in which they are using personal data.
- When personal data is stored on any portable computer system, USB stick or any other removable media, the data must be encrypted and password protected, the device must be password protected (memory sticks/cards and other mobile devices cannot be password protected), the data must be securely deleted from the device, in line with SIMIAN's policy once it has been transferred or its use is completed.

17.15. When using communication technologies SIMIAN ensures the following good practice: -

- The official SIMIAN e-mail service is regarded as safe and secure. Members of staff, apprentices and learners should therefore use only the SIMIAN e-mail service to communicate with others when on site, on SIMIAN business or on SIMIAN systems.
- Members of staff will be responsible and liable for any content or language used in any e-mail sent or forwarded.
- The e-mail system is a corporate tool and should be used as such. Disciplinary proceedings will result from any misuse. Users must immediately report the receipt of any e-mail that makes them feel uncomfortable, is offensive, threatening or bullying in nature and must not respond to any such e-mail.

17.16. Any digital communication between employees, learners or parents/carers must be professional. These communications may only take place on official SIMIAN systems. Personal e-mail addresses, text messaging or public chat/social network programmes must not be used for these communications.

17.17. Apprentices and learners will be taught about e-mail safety issues, such as risks attached to the use of personal details. They will be taught strategies to deal with inappropriate e-mails and be reminded of the need to write e-mails clearly and correctly and not include any unsuitable or abusive material.

17.18. SIMIAN has in place appropriate filters and monitoring systems to protect learners from harmful online materials.

17.19. Personal information will not be posted on SIMIAN website and only official e-mail addresses should be used to identify members of staff.

17.20. SIMIAN systems are only to be used for agreed, appropriate and suitable work-related activities. Internet activity which is considered unsuitable or inappropriate will not be allowed and if discovered will lead to disciplinary action. Internet activity which is illegal will be reported and

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could lead to criminal prosecution. In the event of an e-safety incident, it is important that there is a considered, coordinated, and consistent approach.

18. Recording Images of Young People or Adults at Risk

18.1. SIMIAN views recording images and videos of young people and adults at risk to create a learning portfolio and gain a qualification as beneficial as it is crucial for progression in their qualification. These images and videos are solely used as evidence in their portfolio. SIMIAN believes that the benefits of recording images and videos in a responsible manner outweigh the potential concerns listed below.

18.2. In order to understand the reasons for the various rules and restrictions relating to the recording of images and videos it is important to understand how they can be misused.

18.3. The key concerns regarding the use of images of young people and adults at risk are: -

- People taking inappropriate photographs or recorded images of young people and adults at risk
- The possible identification of young people and adults at risk when a photograph is accompanied by inappropriate information. In particular, this can be used to give credence to a stranger pretending that they know a young people and adult at risk with a view to abduction or grooming or may allow an estranged parent to track down young people and adults at risk in contravention to a court order
- The inappropriate use, adaptation or copying of images for use on websites showing child abuse images
- Anybody who wants to take photographs or otherwise record images must have a valid reason for doing so
- The photographer/camera person should make themselves known to the organiser or person in charge
- Prior to taking any images, the photographer/camera person must have bona fide identification and be able to produce it on request.

19. Contact Numbers

- The following are useful contact numbers: -
- SIMIAN Designated Safeguarding Officer – Tim Gibbs – 07825 643084
- SIMIAN Deputy Designated Safeguarding Officer – Jessica Hollowell - 07738 417896
- E-mail: safeguarding@simian-risk.com

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- Warrington Public Protection Intelligence Unit – 01606 363854
- Warrington Local Authority Designated Officer Beki Byron, lado@warrington.gov.uk - 01925 443101
- Warrington Children Safeguarding Board – 01925 443126, (01925 444400 out of hours)
- Email: wscb@warrington.gov.uk (non-urgent cases only)
- Warrington Adults Social Care Team – 01925 444239 (01925 444400 out of hours)
- Waltham Forest Multi Agency Safeguarding Hub – 020 8496 2310 (020 8496 3000 out of hours), MASHrequests@walthamforest.gov.uk
- Waltham Forest Safeguarding Children’s Board - Zahra Jones, Strategic Partnership Coordinator on 07968 693 191
- The NSPCC Child Protection 24-hour Helpline - 0808 800 5000

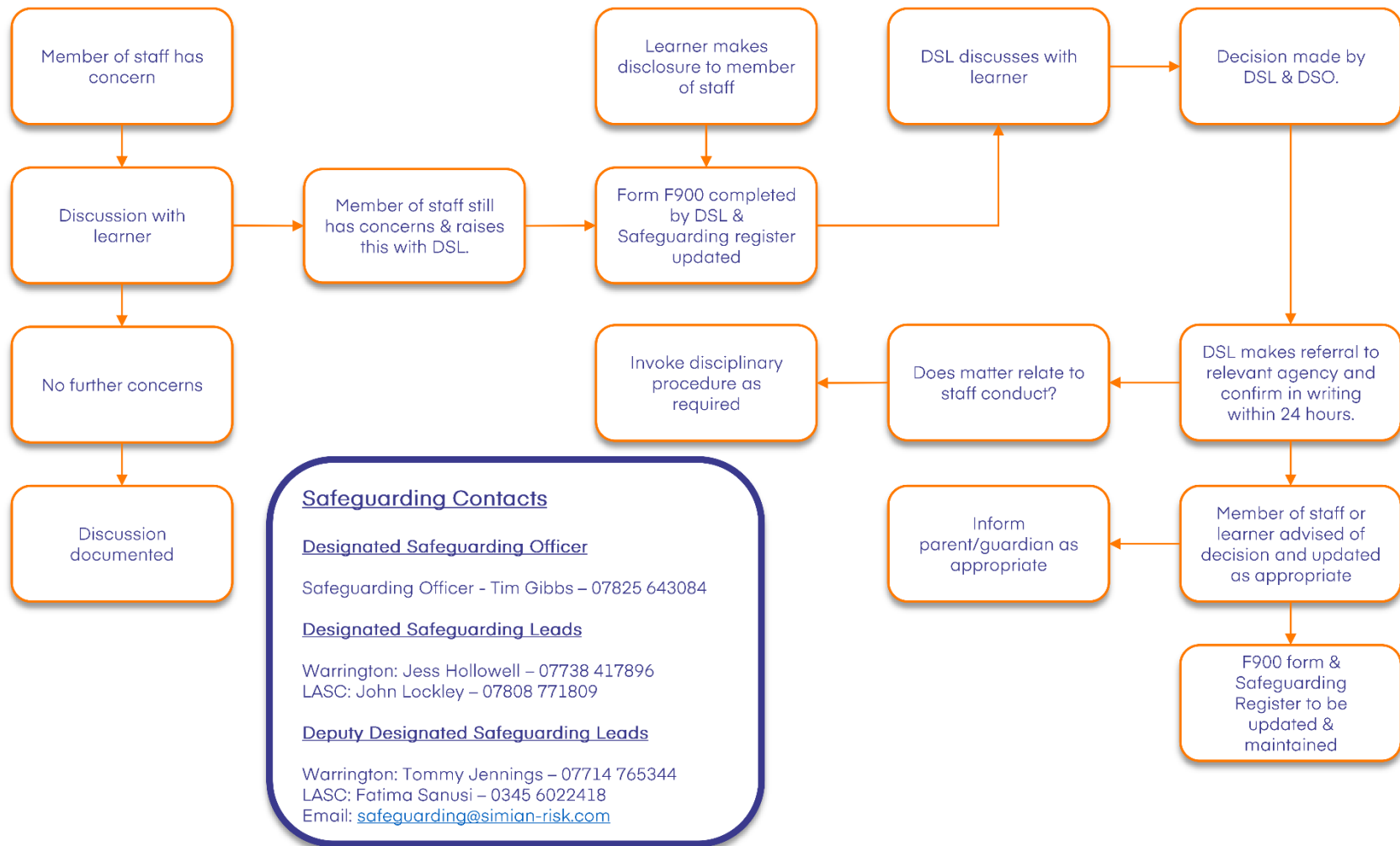
20. Review

This Policy will be reviewed no later than September 2023

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21. Safeguarding Flowchart

To be read in conjunction with the company's Safeguarding Policy and Procedures



This form must be fully completed and emailed to safeguarding@simian-risk.com so follow ups & referrals can be made by the safeguarding team.

Age of Learner:		Incident Time/Day/Date:	
Safeguarding Incident? (Under 18)	<input type="checkbox"/>	Welfare Incident? (Over 18)	<input type="checkbox"/>

