



# **Calex UK Apprenticeships Programme**

## **Incorporating**

Stellantis, Volvo Cars, Mazda and Porsche Apprentice Programmes

**This policy is promoted to all staff during induction process and updates are promoted through quality meeting updates to ensure all staff are aware of changes. Apprentices are made aware of the importance of this policy and it's content through their formal training, reviews and on-line learning content.**

# SAFEGUARDING AND CHILD PROTECTION POLICY

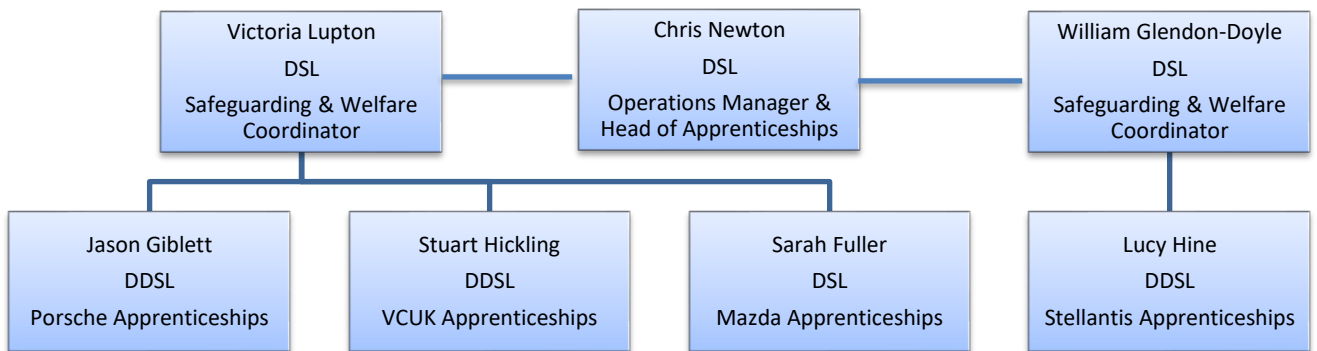
*Calex UK Apprenticeship are committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.*

Date approved by: 04/06/2024

Calex UK Senior Management Team (SMT):

Next review date: June 2025

## Calex Safeguarding Organisation Chart



Programme/Assistant Managers:		
Stellantis Apprenticeships	Justin Ryles (DSO)	Lucy Hine (DDSL)
Volvo Cars Apprentice Programme	Stuart Hickling (DDSL)	Kirsty Moloney (DSO)
Mazda Apprenticeships	Chris Newton (DSL)	Sarah Fuller (DSL)
Porsche Apprenticeships	Jason Giblett (DDSL)	

## Statement of Intent

Calex UK Apprenticeship aims to maintain a safe and welcoming environment on all its sites for staff, apprentices, and visitors. We promote a culture of safeguarding within the programmes and its wider community, where everyone understands the importance of keeping everyone and safe and understand how to seek help. It is committed to meeting its duty to safeguard and promote the welfare of all apprentices and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency.

We are committed to taking a preventative approach to safeguarding all apprentices from potential harm, damage, radicalisation, or terrorism (violent and non-violent extremism).

Calex UK Apprenticeships are committed to take all appropriate actions to address concerns about the welfare of young people, and vulnerable adults and to work to agreed local and national policies, guidance, and procedures to ensure that we provide a safe environment for all apprentices. We recognise that safeguarding affects all areas of an individual's life and aim to build knowledge of Safeguarding and resilience in apprentice within their apprenticeship experience, their workplace, and personal lives as well within the wider community. We ensure that this is an accessible part of each apprentice's programme, regardless of learning needs, disability or contextual differences that may impact access.

Calex UK Apprenticeships seeks to ensure that the policy and procedures comply with statutory duties, as well as reflecting guidance and good practice in safeguarding apprentices. All Apprentice Programme staff complete mandatory safeguarding training throughout the year and in line with updates from government guidelines and legislation.

It is the duty of ALL staff working with the Calex UK Apprenticeship Programmes to familiarise themselves with the safeguarding policy and understand their responsibilities.

Calex UK Apprenticeships recognises the need to work with other agencies in performing its duties under the Education Act 2011 and Children Act 2004. These are, in summary but not restricted to:

- To have in place and follow procedures in keeping with local inter-agency guidelines.
- To operate and adhere to safer recruitment guidance (KCSiE, 2023).
- To have in place procedures to deal with low level and significant allegations against staff.
- To designate senior members of staff as having lead responsibility for safeguarding apprentices and ensure that they receive appropriate training and supported by a safeguarding team.
- To liaise with schools regarding prior school history and handovers into Calex UK Apprenticeship programmes, where appropriate.
- To ensure all staff receive appropriate regular safeguarding training, communications and are aware of their responsibilities.
- To review policies and procedures annually or when there is a change in legislation or guidance.

Through implementation of this policy, all staff will ensure that the Calex UK apprenticeships provide a safe environment for apprentices to learn and develop.

## 1.0 Introduction

1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 (updated in 2014); the Education Act 2002, and in line with government publications: “Working Together to Safeguard Children” 2018 Revised Safeguarding Statutory Guidance 2 “Framework for the Assessment of Children in Need and their Families” 2000, “What to do if You are Worried a Child is Being Abused” 2015. The guidance also reflects, “Keeping Children Safe in Education” 2023.
2. The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our provision to identify, assess, and support those children who are suffering harm. Calex UK Apprenticeships aims to create and maintain a safe environment for young people and similarly for apprentice who are over eighteen, staff and visitors. Calex UK Apprenticeships is committed to working with all other agencies.
3. We recognise that all adults, including temporary staff and governors, have a full and active part to play in protecting our apprentice from harm, and that the young person’s welfare is our paramount concern.
4. All staff believe that Calex UK Apprenticeships should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child / young person.
5. Calex UK Apprenticeships recognises that the welfare of children and vulnerable adults is paramount and takes seriously its responsibility to safeguard and promote the welfare of the apprentice in its care.

### Legal Framework and Guidance

This policy has due regard to statutory legislation and relevant guidance including, but not limited to:

- The Education Act (2002)
- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2018)
- What to do if you are worried about a child (2015)
- Information sharing: Advice for practitioners (2018)
- Guidance for safer working practice for adults who work with children and young people in education settings (2019)
- ‘Keeping children safe in out-of-school settings: code of practice’ (April 2022)
- Human Rights Act (1998)
- Equality Act (2010) & Public Sector Equality Duty
- The Data Protection Act (2018)
- Serious Crime Act (2015)
- Prevent Duty (2015)
- Sexual Offences Act 2003
- Preventing youth violence and gang involvement (2013)
- Criminal exploitation of children and vulnerable adults: county lines guidance (2018)

## 2.0 Coverage

1. The policy applies to the Calex UK Apprenticeship staff, SMT, agency workers, contractors and visitors working within one of the Calex UK Apprenticeship programmes.
2. This policy and procedures within apply to all Calex UK apprenticeships employees, external agencies, visitors, and all extended areas of the business that work in relation to or in contact with apprentices.

## 3.0 Definitions

For the purposes of the Safeguarding Policy:-

1. A 'child or young person' means any person under the age of 18 (i.e. those who have not yet reached their 18th birthday). Children on Calex programmes are "Apprentices" and as such are classed under the description within the Disclosure and Barring Service with 16 and 17 year olds in work.
2. A 'vulnerable adult' means any person " who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness."
3. 'Staff' means all employees, full-time and fractional, and all agencies, franchise, contract and staff working for Calex UK Apprenticeships.

## 4.0 Aims of the Safeguarding Policy

The aims of the policy are as follows:

1. To promote an environment that is safe, where staff and apprentice treat each other with mutual respect and develop good relationships built on trust.
2. To raise the awareness of all staff of the need to safeguard young people and vulnerable adults and of their rights and responsibilities in identifying and reporting possible cases of abuse.
3. To provide a systematic means of supporting young people and vulnerable adults known or thought to be at risk of harm, and ensure we, Calex UK Apprenticeships, contribute to assessments of need and support packages for those apprentice.
4. To ensure that relevant information about a young person or vulnerable adult at risk of harm is disseminated to appropriate staff within Calex UK Apprenticeships on a 'need to know' basis.
5. To emphasise the need for good levels of communication between all members of staff
6. To develop a structured Calex UK Procedure which must be followed by all members of Calex UK Apprenticeships staff in cases of suspected abuse.
7. To support the development of effective working relationships with other agencies.
8. To ensure that all relevant policies and procedures within Calex UK Apprenticeships are linked to, and comply with, Calex UK Apprenticeships Safeguarding Policy and Procedures.
9. To support young people's and vulnerable adults' development in ways that will foster security, confidence and independence and to promote this through the curriculum.
10. To ensure that all staff working with young people have been checked as to their suitability to do so, including verification of their identity, qualifications, and a satisfactory Disclosure & Barring Service (DBS) check (according to guidance) and that a central record is kept for audit.

## 5.0 Safeguarding Roles and Responsibilities

The Designated Safeguarding Lead(s):

William Glendon-Doyle (Safeguarding & Welfare Officer) – Stellantis Apprenticeship Programme

Christopher Newton (Operations Manager & Head of Apprenticeships) – Calex UK

Victoria Lupton (Safeguarding & Welfare Coordinator) – Volvo, Porsche & Mazda Apprenticeship Programmes

The Deputy Designated Safeguarding Leads or DSO's:

Justin Ryles (Programme Manager) - Stellantis Apprenticeship Programme

Stuart Hickling – Volvo Apprenticeship Programme

Jason Giblett – Porsche Apprenticeship Programme

Sarah Fuller – Mazda Apprenticeship Programme

The Designated Person for Looked After Children (LAC):

William Glendon-Doyle (Safeguarding & Welfare Officer) – Stellantis Apprenticeship Programme

Victoria Lupton (Safeguarding & Welfare Coordinator) – Volvo, Porsche & Mazda Apprenticeship Programmes

### **5.1 All staff are responsible for:**

- Knowing who the Designated Safeguarding lead's (DSL) are.
- Raising any concerns with the DSL.
- If at any point there is a risk of immediate serious harm, to contact emergency services and consider a referral to the apprentice's local Multi-Agency Safeguarding Hub (MASH) immediately.
- Completing a formal written or electronic safeguarding concern form when making a referral. Staff should be clear that this should be done immediately, always on the same day.
- Ensuring that their safeguarding training and any other relevant training, as stipulated by governance and the DSL team is up to date.
- Being aware and alert to the signs of abuse.
- Maintaining an attitude of 'it could happen here' and being professionally curious.
- Maintaining an attitude that every child/young person's rights must be protected, and any form of prejudice contributes to a hostile learning environment and therefore must be challenged.
- Maintaining an attitude that harmful sexual behaviour, sexual harassment/violence is never acceptable and will not be tolerated and being alert to inappropriate language and indicators of abuse and never rely on pupils to disclose abuse.
- When concerned about the welfare of an apprentice or young person, staff will always act in the interests of the apprentice/young person.
- Knowing the procedures for reporting apprentices who are absent (from their academy training weeks and workplace reviews), particularly on repeat occasions, and reporting any such concerns to the DSL.
- Sharing information and working together to provide an inclusive and safe environment for all apprentices and staff.
- Understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.
- Referring any low-level concerns about another member of staff and any allegations of abuse directly to a DSL. In the case of where the allegation is regarding the DSL team, they must refer this to the Head of Apprenticeships.
- Raising concerns about poor or unsafe practice and potential failures in Calnex UK Apprenticeships safeguarding practice.

### **5.0 Prevention**

We recognise that Calnex UK Apprenticeships plays a significant part in the prevention of harm to our young people by providing them with good lines of communication through trusted adults, supportive friends and an ethos of protection.

Calnex UK Apprenticeships will therefore:

1. Work to establish and maintain an ethos where young people feel secure and where they are encouraged to talk and where they are always listened to.
2. Include regular consultation with young people e.g. through questionnaires, feedback and in tutorials etc.
3. Ensure that all young people know there is an adult at Calnex UK Apprenticeships whom they can approach if they are worried or in difficulty.

4. Include Safeguarding across the curriculum, including Pastoral and Citizenship. Taking all opportunities to equip apprentices with the skills they need to stay safe from harm and to know who they should turn for help. In particular, this will include topics such as anti-bullying and cyber bullying, e-safety, health education, anti-sexual harassment and preventing radicalisation.
5. Ensure all staff are aware of guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
6. Ensure that Statements about or allegations of abuse or neglect made by young people must be taken seriously.

Calex UK Apprenticeships is further committed to applying these safeguarding principles to vulnerable adults where required.

### **6.0 Safe Calex UK Apprenticeships, Safe Staff**

All members of the SMT understand and fulfil their responsibilities, namely to ensure that:

1. There is a Safeguarding and Child Protection policy together with a Staff Disciplinary & capability policy within the Calex staff handbook. This is available in different formats to ensure accessibility.
2. Calex UK Apprenticeships has procedures for dealing with allegations of abuse against staff and to make a referral to the DBS and Local Authority Designated Officer (LADO) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
3. A member/s of Calex UK Apprenticeship programmes (Mazda Apprenticeships, Stellantis Apprenticeships, Porsche Apprenticeships and Volvo Cars Apprentice Programme) have the Designated Safeguarding Officer (DSO) responsibility. In addition, Calex UK Apprentice Programmes also have access to Designated Safeguarding Leads and Deputy Leads to provide support where required.
4. On appointment, the DSO undertakes training "Designated Safeguarding Officer Training"
5. All other staff undertake Safeguarding training as appropriate.
6. Any weaknesses in Child Protection have to be remedied immediately.
7. Child/Young People Protection policies and procedures are reviewed annually. The Safeguarding policy is available on Calex UK Apprenticeships websites or by other means.
8. Programme DSO's, will take lead responsibility for child and vulnerable adult protection and receive appropriate training and support and adequate resources to carry out this role.
9. Calex UK Apprenticeships will, in addition, have a DDSLs who will deputise for the DSL and will also lead on the implementation of this policy in the areas of Calex UK Apprenticeships for which they have responsibility. The DDSLs will all receive the appropriate training and support and adequate resources to carry out this role.
10. All staff are expected to contact either the DSO or, in their absence, one of the DDSLs, when necessary or to make referrals. A flow chart illustrating the referral process is available in *Appendix 3*.
11. All members of staff are provided with Safeguarding awareness information at induction and have access to online training updates. Calex UK Apprenticeships Safeguarding statement must be included in their arrival pack, so that they know with whom they can discuss a concern.
12. All members of staff are trained and receive regular updates in e-safety and reporting concerns.
13. All staff have awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
14. All staff know how to respond to an apprentice who discloses abuse of any type.
15. All parents/carers are made aware of the responsibilities of staff members with regard to young people protection procedures through publication of Calex UK Apprenticeships Safeguarding Policy on the websites.
16. Hotels used by Calex UK Apprenticeships Programmes are aware of Calex UK Apprenticeships Safeguarding guidelines and procedures, and the appropriate checks are in place.
17. We will ensure that Safeguarding type concerns or allegations against staff working in Calex UK Apprenticeships are investigated in line with staff disciplinary procedures. Any member of staff found not suitable to work with young people will be notified to the Independent Safeguarding Authority for consideration for barring, following resignation, dismissal, when we cease to use their service as a result of a substantiated allegation.
18. Our procedures will be regularly reviewed and up-dated.
19. The name of the designated members of staff for Safeguarding will be clearly advertised within Calex UK Apprenticeship Programmes.
20. All new members of staff have access to our Safeguarding policy, as part of their induction into Calex UK Apprenticeships.
21. The policy is available publicly on Calex UK Apprenticeships websites and via Calex UK quality system.

## 7.0 Responsibility for Child and Vulnerable Adult Protection

**The Designated Safeguarding Officer, and Deputy Designated Safeguarding Leads are responsible for:**

- Managing referrals from staff or any others from outside the training facilities.
- Working with external agencies and professionals on matters of safety and safeguarding.
- Undertaking relevant training and attending update sessions.
- Raising awareness of safeguarding and child protection amongst the staff and parents where applicable; and ensuring that child protection information is transferred to the apprentice's new educational provider, where we can do so.
- Ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from the respective Local Authority and government guidance.
- Informing the relevant Local Authority when a private fostering arrangement is in place.
- Ensuring that important safeguarding related policies are kept relevant and up to date.
- Have an overview of the numbers of safeguarding and child protection referrals made from and share this with the Senior Management Team within the respective apprenticeship programme and Calex UK.
- Having in place effective ways to identify emerging problems and potential unmet needs for apprentices.
- Ensuring that the curriculum makes best use of Citizenship and PSHE opportunities to cover safeguarding issues with children/young people via classroom-based sessions, discussions, and the training platform (Flick Learning).
- Ensuring at least one person on any appointment panel has undertaken safer recruitment training.
- Ensuring procedures are in place to handle allegations against members of staff and volunteers with support from senior management.
- Ensuring there are procedures in place to handle allegations against other apprentices (Child-on-Child abuse/Bullying/Harassment).
- Ensuring that there is support available for staff involved in difficult safeguarding incidents.
- Creating a culture of listening to apprentices and taking account of their wishes and feelings, both in individual decisions and in the academy's development.
- Ensuring through the safeguarding curriculum that apprentices know the process of raising a concern (about themselves or a friend/other), that they know the Designated Safeguarding Lead (and deputy), and are aware of other support mechanisms such as ChildLine, Samaritans, etc.
- Promote and retain oversight of the educational achievement and wellbeing apprentices who are in care or have a social worker working alongside the Designated Person for Looked After Children (LAC) and the local authority virtual school team.
- Making this policy available publicly as appropriate.
- Ensuring that colleagues are competent to carry out their responsibilities for safeguarding and promoting the welfare of apprentices and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- Ensuring all staff review their own practice to ensure they improve over time
- Ensuring all records are kept up to date and secure physically or electronically (CPOMS).
- Ensuring staff are effectively trained to create records and access the safeguarding platform (CPOMS).
- Ensure that online safety awareness is communicated with all staff.
- Keeping all (safeguarding) records up to date and in line with the statutory requirements in KCSIE as a minimum:
- All safeguarding concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. Information should be kept confidential and stored securely.
- Ensuring that either they or the appropriate staff member attend all multi-agency meetings, contribute to assessments and provide reports in relation to an apprentice where they are required to.



## 8.0 Record Keeping

A limited number of staff have full viewing access to the organisations, records on safeguarding and welfare concerns. This is to ensure that safeguarding related information is confidential and shared appropriately on a need-to-know basis.

Records will include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- decision rationale.
- a note of any action taken, decisions reached and the outcome.

Furthermore, they must be records in relation to:

1. Referring an apprentice (under the age of 18) if there are concerns about possible abuse, to the relevant Multi-Agency Safeguarding Hub (MASH) in the apprentice's locality. Definitions of abuse are included in **Appendix 2**.
2. Keeping written records of concerns about an apprentice even if there is no need to make an immediate referral.
3. Ensuring that all such records are held confidentially and securely and that they are kept separate from general apprentice records/main files and are available upon request from an apprentice's next education setting, where appropriate.
4. Liaising with other agencies and professionals.

## 9.0 Allegations against Staff

1. All Calex UK Apprenticeships staff should take care not to place themselves in a vulnerable position with a young person. It is always advisable for interviews or work with individual apprentices or parents to be conducted in view of other adults. For additional advice see **Appendix 4**.
2. Guidance about conduct and safe practice, including safe use of mobile phones by staff will be given at induction.
3. We understand that a student may make an allegation against a member of staff.
4. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with young people, the member of staff receiving the allegation or aware of the information, will immediately inform the Head of Apprenticeships.
5. Calex UK Apprenticeships will follow the company procedures for managing allegations against staff.
6. A flow chart illustrating the referral process is available in **Appendix 3**.

## 10.0 Managing and Reporting of Low-Level Concerns

Definition: The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of an education provision, in this case – the Calex UK Apprenticeship Programmes, may have acted in a way that: Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority examples of such behaviour could include, but are not limited to:

- Being overly friendly with apprentices.
  - Having 'favourites'.
  - Taking photographs of apprentices on their mobile phone
  - Humiliating an apprentice or apprentices
  - Inciting humiliation
1. Calex UK will endeavour to ensure that all low-level concerns are reported and managed effectively by the programme manager. All staff are made aware of how to report low-level concerns to the DSL and/or Head

of Apprenticeships. All members of staff are given access to the KCSiE 2023, that outlines how these types of concerns are managed.

2. The DSL will inform the Head of Apprenticeships of all the low-level concerns and in a timely fashion according to the nature of each low-level concern.
3. Calnex UK recognise the importance of staff, apprentices, and associate staff to feel empowered to confidently report any concerns. To achieve this, the programmes will endeavour to create a culture of trust and transparency within and reaching the breadth of the business. This will be achieved by:
  - Ensuring staff, visitors, agency staff and partners are aware of appropriate behaviour as well as the expectations outlined in The Employee Handbook.
  - **All** staff must read and understand The Department for Education Safeguarding guidance Keeping Children Safe in Education (KCSiE) 2023, Part 1, Annex B and Part 4 (Low-Level concerns).
4. We will investigate all low-level concerns and record the investigation and outcomes. This information will be kept confidential and reviewed by the Head of Apprenticeships and the DSL(s), to ensure any patterns/trends or problematic or concerning behaviour can be identified and managed in an appropriate manner.
5. Any low-level concerns relating to external visitors and/or agency staff will be reported to their employer.

### **10.0 Whistleblowing**

1. The vast majority of people who work with apprentices are well motivated and would never harm a child or young person. Unfortunately, a few do and Calnex UK Apprenticeships offers a culture that makes all staff willing and comfortable to voice their concerns.
2. We recognise that apprentices cannot be expected to raise concerns in an environment where staff fail to do so.
3. All staff should be aware of their duty to raise concerns, where they exist, about the management of Safeguarding and Child Protection, which may include the attitude or actions of colleagues.

### **10.0 Supporting Apprentice**

1. We recognise that a young person who is abused or who witnesses violence may feel helpless and humiliated. They may blame himself or herself, and find it difficult to develop and maintain a sense of self-worth.
2. We recognise that Calnex UK Apprenticeships may provide the only stability in the lives of young people who have been abused or who are at risk of harm.
3. We accept that research shows the behaviour of a child/young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

### **Our Apprentice Programmes will support all apprentice by:**

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe, and positive environment within Calnex UK Apprenticeships.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of apprentices.
- Notifying the relevant agencies as soon as there is a significant concern.
- Providing continuing support to any apprentices, under the age of 18 about whom there have been concerns, who leaves Calnex UK Apprenticeships, by ensuring that appropriate information is provided, upon request to the young person's new setting.
- Ruling out abuse, harassment and bullying of any type.

### **11.0 Supporting Staff**

1. We recognise that staff working in Calnex UK Apprenticeships who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

2. We will support such staff by providing an opportunity to talk through their anxieties with a DSL and to seek further support as appropriate.

## **12.0 Staff Appointments**

Calex UK Apprenticeships will ensure that all staff have been checked for their suitability before taking up their appointment. All applicants will be scrutinised by:

1. Verifying identity and any academic or vocational qualifications.
2. Obtaining professional and character references.
3. Checking previous employment history.
4. Holding face-to-face interviews, with questions asked about Safeguarding and intentions concerning working with young people.
5. Carrying out the mandatory check of staff through the DBS process.
6. Where appropriate, an enhanced DBS check (Disclosure and Barring Service) before the candidate takes up the post. With any disclosures checked for viability of impact on working with children/young people.

## **13.0 Safe Working Practice – Programme Staff, Employers and Apprentices**

1. Calex UK Apprenticeships reserve the right to refuse to admit a learner to a programme, if it judges that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate. This is particularly important during the residential training week(s) at their programme academy.
2. All Calex UK staff members, contractors and volunteers are advised to minimise physical contact with apprentices, except for reasons of health and safety, or where physical contact may be a necessary part of learning.
3. Safe working practice ensures that all staff:
  - are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
  - work in an open and transparent way.
  - discuss and/or take advice from the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead's over any incident which may give rise to concern.
  - record any incidents or decisions made.
  - apply the same standards regardless of gender, sexuality, or ethnicity.
  - Can access their workplace services regardless of additional needs, and/or disability.
  - are aware that breaches of the law and other guidelines could result in criminal or disciplinary action being taken against them.
  - are vigilant of each other, holding each other to the highest standard.
4. Staff should always remain vigilant and ensure that they maintain professional boundaries with the apprentices, so their behaviour is not misinterpreted. Calex UK staff, visitors and associate staff must not use their power over the apprentices for a personal gain.
5. All Staff are responsible for ensuring that they:
  - Familiarise themselves with the safeguarding policy and other safeguarding related documents made accessible to them within the academy site.
  - Promote and practice safeguarding themselves and apprentices.
  - Attend any internal or external safeguarding training as stipulated.
  - Understand what they are required to do if an apprentice makes a disclosure.

- Never attempt to investigate a concern on their own. The Designated Safeguarding Lead should always be informed or a Deputy Designated Safeguarding Lead in their absence.
  - Be vigilant in spotting indicators and signs that could raise a concern.
6. All external agencies scheduled to deliver awareness/enrichment sessions to the apprentices are required to send in an outline of the session content, prior to attending the training facility. This is to ensure that the content is relevant and appropriate. Whether the session is taking place remotely or face-to-face, a member of staff will be present for the duration.
  7. Calnex UK Apprenticeships have limited power to ask about current criminal convictions to apprentices on admission. When while exercising that power and a conviction is disclosed that indicates the individual poses a clear risk to other apprentices, Calnex UK has the right to deny admission to the programme.

#### **14.0 Anti-Bullying**

1. Calnex UK Apprenticeships acknowledges that to allow or condone bullying may lead to consideration under the Safeguarding procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying.
2. We keep a record of known bullying incidents.
3. All staff are aware that apprentice's with Special Educational Needs and Disability (SEND) and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. We will make notes of any bullying incidents within the review and notes section of our BUD system.

#### **15.0 LGBTQ+ Community**

1. Calnex UK Apprenticeships are determined to ensure that it provides an inclusive environment and offer to all its staff and apprentices and that those who identify as part of the LGBTQ+ community feel valued, safe, and respected.
2. Keeping Children Safe in Education 2023 (Paragraph 203), outlined that 'the fact that a child or young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as those who identify as LGBT'.
3. We recognise that the risk is heightened to those who identify as LGBT, who lack a trusted adult with whom they can be open. Therefore, it is vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. The Designated Safeguarding Lead (DSL) at the programme will monitor and review inclusivity for all the LGBTQ community across the Calnex UK apprenticeship programmes.
4. We will strive to ensure that the curriculum offers awareness of LGBTQ inclusion to counter any form of homophobic, bi-phobic, and transphobic bullying and abuse for apprentices and staff alike.

#### **16.0 Staff Induction Training on Calnex UK Apprenticeships Procedures**

The initial training will ensure that all staff:-

1. Know who to contact if they have a concern that a young person or vulnerable adult is at risk of serious harm.
2. Know where to go for advice in relation to safeguarding or child/vulnerable adult protection issues or when they are uncertain about whether to refer a concern about a child or vulnerable adult.
3. Know Calnex UK Apprenticeships procedure for referrals on child and vulnerable adult protection issues.
4. Understand that they have the right to contact the appropriate agencies if they feel that designated Calnex UK Apprenticeships staff are not passing on concerns or are not dealing with those concerns appropriately.
5. Are aware of the requirement to keep detailed, accurate, secure written records of any referrals or concerns.
6. Understand Calnex UK Apprenticeships Prevent Strategy and understand the signs of extremism and referral process

to the Safeguarding Team.

7. Understand e-Safety, and how to minimise the risks of harm to young people.
8. Are able to recognise and respond to safeguarding and welfare concerns.
9. Understand their responsibilities in being alert to the signs of abuse.
10. Know how to respond to an apprentice who discloses abuse or is at risk of self-harm.
11. Understand that there is a need to take special care when working with young people with special needs or vulnerable adults and to be alert to signs of abuse as they may not be able to raise concerns themselves.
12. Are aware of appropriate approaches to confidentiality and disclosure of information.
13. Guidance on relationships with apprentice

#### **Calex UK Apprenticeships will:**

Provide staff with a disciplinary & capability policy within the Calex staff handbook. along with guidance on appropriate relationships with apprentice.

### **17.0 Confidentiality, Reporting and Disclosure**

#### Safeguarding Process and Procedure

The academy leaders will deliver their responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures

#### **17.1 How to report any concerns:**

- Clear procedures on reporting any concerns are given to all staff and volunteers and visitors. This is done as part of the staff induction training or on a safeguarding leaflet as they sign in
- All concerns should be reported via CPOMS electronically or in writing using the programmes safeguarding concern form (paper based).
- Reporting concerns via CPOMS or in paper form should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern form.
- All child protection and or safeguarding concerns should be reported to the respective Designated Safeguarding Lead immediately.
- We take our responsibility to safeguard young people seriously. Failure to follow these reporting procedures may result in disciplinary action.

#### **17.2 Taking Action**

1. If at any time it is considered that an apprentice has or is likely to suffer significant harm or is likely to do so, a referral should be made to the locality safeguarding hub for that apprentice.
2. If you wish to report a matter to the police, call 101 and state your concerns.
3. If you wish to report an **emergency** matter always dial 999

### **17.3 Apprentice disclosure of abuse, neglect, or radicalisation**

- If an apprentice talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the learner know that they must pass the information on to the safeguarding team (DSL) to ensure they can offer the proper support that the apprentice requires.
- Staff members will allow them to speak freely and will not ask investigative questions.
- The staff member will tell the learner what will happen next.
- It is the duty of the member of staff to inform the Designated Safeguarding Lead (DSL) of what has been discussed.

- The staff member will contact the DSL/DSO to discuss the concern and then write up details of the conversation with the learner as soon as possible on CPOMS or via the record of concern form (signed, timed and dated) found in reception and deliver it to the Designated Safeguarding Lead.
- Staff should not wait until the next working day to report a concern.
- Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends or family unless necessary for the welfare of the child / young person.

#### **17.4 Suspecting that a learner is at risk of harm**

- There will be occasions when we may suspect that an apprentice may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the apprentice the opportunity to talk.
- Colleagues will recognise that apprentice may not feel ready to disclose their abuse, exploitation or neglect, or may not recognise it as such. They may feel humiliated or actively being threatened. They may face additional barriers to disclosing such as additional needs, sexual orientation, vulnerabilities or language barriers. Therefore, it is imperative that all colleagues exercise professional curiosity and report their concerns to the DSL.
- Staff should use the concern form/CPOMS referral to record these early concerns. Following an initial conversation with the learner, if the member of staff remains concerned, they should discuss their concerns with the respective Designated Safeguarding Lead
- Staff will be aware of the harm caused by bullying and will use the Behaviour Policy. However, there will be occasions when an apprentice's behaviour warrants a response under child protection rather than anti-bullying procedures.
- We acknowledge that, some young people, and therefore apprentices can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.
- To ensure that all our apprentices receive equal protection, we will give special consideration to apprentices who are considered to be vulnerable.

#### **17.5 Notifying parents/carers where necessary**

1. The programme leaders will normally seek to discuss any concerns about a young person with their parents/carers.
2. The Designated Safeguarding Lead or deputy will contact a parent/carer in the event of a concern, suspicion, or disclosure. However, if the programme believes that notifying parents/carers could increase the risk to the apprentice, exacerbate the problem or compromise the safety of a staff member, advice will first be gained from the relevant local authority multi-agency safeguarding hub.
3. We recognise that all matters relating to child protection are confidential.
4. Designated Safeguarding Leads and Safeguarding Team will disclose any information about an apprentice to other members of staff on a need-to-know basis only.
5. All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard apprentices.
6. All staff must be aware that they cannot promise any apprentice to keep information secret, which might compromise theirs or another's safety or wellbeing.
7. Calex UK Apprenticeships recognises that young people aged 16 or 17 will have the understanding to make decisions about their own lives and their views and wishes will be respected unless, they are deemed to be at risk of harm which is a serious threat to their personal safety or they are the victim of a crime.
8. Vulnerable adults may choose to remain at risk in dangerous situations. Professional staff may find they have no statutory powers in cases where the adult is seen to have sufficient capacity to make his or her own choices and refuses the help which staff feel is needed and where public interest considerations do not apply. In these cases, where a member of Calex UK Apprenticeships staff considers that the decisions of the vulnerable adult should be respected they must immediately seek advice from the Designated Safeguarding Lead.

## **18.0 Prevention of Violent Extremism – The ‘Prevent’ Agenda**

1. Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “*due regard to the need to prevent people from being drawn into terrorism*”. The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.
2. Young people and vulnerable groups are most at risk of being targeted by groups who may promote violent extremist activity.
3. Calex UK Apprenticeships staff should be aware, through training, of signs of radicalisation and have the confidence to report their concerns to the DSO or in his absence, any member of the deputy team.
4. The PREVENT lead and DSL’s will regularly receive updates from the Regional PREVENT coordinator(as) and attend practitioner forums.
5. Calex UK Apprenticeships will also promote the ethos of the ‘Prevent’ agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice and induction activities a belief in Equality of Opportunity and Diversity.
6. Calex UK Apprenticeships has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in Calex UK Apprenticeships and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of apprentice, they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of Calex UK Apprenticeships and could constitute misconduct.
7. Calex UK Apprenticeships will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation. The DSL or DDSL will make the decision whether to involve the police or other external agencies.
8. We recognise that apprentices with additional needs (including but not limited to SEND needs) can increase in their vulnerability to radicalisation and will endeavour to ensure they are not at more risk or at a disadvantage to accessing awareness of support/resources and PREVENT Duty education.
9. Calex UK Apprenticeships ensures that websites promoting extremist views and/or encouraging the radicalisation of young people are monitored and blocked where possible. We endeavour to raise the awareness of the gangers of these sites.
10. Calex UK Apprenticeships has developed a comprehensive *Prevent Strategy and Action Plan*. This strategy details Calex UK Apprenticeships role in preventing the radicalisation of its apprentice and is reviewed annually in line with the updated guidance from government.

## **18.0 Raising Awareness of Safeguarding and Protection Issues**

1. All parents / carers of apprentice’s will have access to information regarding the responsibilities of staff members about safeguarding procedures by publicising a Safeguarding Policy document on the websites. This Information can be found on the apprenticeship websites.
2. All apprentices will be supported to understand safeguarding and protection issues through:
  - A tutorial programme that will support young people’s and vulnerable adults’ development in ways that will foster security, confidence and independence.
  - The creation of a climate in which responsible behaviour is encouraged and where apprentice feel safe to ask for help if threatened or at risk of abuse.
  - The promotion of a healthy lifestyle that includes consideration of diet, sexual relationships, alcohol and drug abuse.

## **19.0 Contextual Safeguarding – The Programmes & Apprentices**

1. Contextual safeguarding is an approach that focuses on understanding the situations outside of an immediate familial environment that may put an individual (between the ages of 10-25) at risk of harm.
2. All staff should have an awareness of safeguarding issues that can put apprentices at risk of harm and be able to convey a link to contextual safeguarding.

3. Calex UK Apprenticeships recognise that the apprentices travel from across the United Kingdom and this creates a further contextual safeguarding element to the apprentices, as they are staying away from home multiple times of the year. Therefore, as part of the apprentices training programme, they attend awareness sessions and expected to be able to share local and national awareness of current safeguarding themes during their visits.
4. We recognise that there are specific safeguarding issues and contexts in which the apprentices are more likely to be at risk from, such as:
  - County Lines
  - Child Criminal Exploitation (CCE)
  - Child Sexual Exploitation (CSE)
  - Domestic Abuse
  - So-Called 'Honour-based' abuse
  - Sexual Violence and Sexual Harassment
  - Child on Child Abuse
5. We therefore recognise that we have a duty of care to ensure apprentices feel safe and supported during their time away from home in their residential training weeks and their attendance to the programmes training facility. Any absences during training will be reported to the appropriate member of staff efficiently.
6. Calex UK Apprenticeships recognise that the age ranges of the apprentices can vary from 16 year upwards and therefore means that under eighteen's (children in the eyes of the law and safeguarding legislation and guidance) and adults will learn together within the same cohorts. This creates a more highlighted need for context on the learners and effective safeguarding within an age-diverse environment and workforce.
7. We therefore recognise that apprentices are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for all learners.
8. Calex UK apprenticeships understand the importance of taking proactive action to minimise the risk of (child-on-child) abuse, or harassment of any kind, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:
  - Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
  - Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
  - Be vigilant of the impact on LGBTQ+ apprentices.
  - Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
  - Ensure staff reassure those reporting abuse to feel safe and taken seriously.

## **20.0 Safeguarding apprentices with Special Educational Needs and Disabilities**

1. Calex UK Apprenticeships recognise that apprentices with special educational needs and disabilities can face additional safeguarding challenges and/or have additional barriers when staff suspect any forms of abuse. We recognise that assumptions could put these learners at further risk of harm if their disability/needs cause staff to overlook indicators of harm such as, behaviour, lack of engagement or injury, as relating to the apprentices' additional needs. Furthermore, the potential for apprentices with SEND being impacted by issues such as being isolated or bullied is increased.
2. All information addressing SEND needs and support will be recorded on the BUD system as well as any supporting documents.
3. Where it is felt appropriate, the apprentice will be provided with a Learner Strategy Profile, to give a 'snapshot' of needs and adjustments.



4. The wider team may also have contact with apprentices who have declared SEND and/or additional needs, these meetings will be held both face-to-face and remotely to ensure accessibility. These will be monitored by the DSLs.
5. All Calex UK Apprenticeships staff will receive training on working with young people with additional needs as well as ensuring that inclusion is continuously promoted throughout the apprentice curriculum and reviewed effectively to remain impactful to the overall ethos of the apprenticeship programmes, staff, apprentices and the dealer network.
6. The Safeguarding will actively promote knowledge and understanding of SEND, disabilities and additional support with staff and apprentices inclusively. Furthermore, the DSL will endeavour to promote and offer professional input to managers and mentors of apprentices who have identified SEND, disability or additional needs to ensure they are able to access and succeed within their apprenticeship.

## 21.0 Vulnerable Adults and Adults at Risk

1. Adult at Risk: Any person over the age of 18 years who is unable to look after their own well-being, property rights or other interests; and is at risk of harm (either from a person's behaviour or from their own behaviour); and because they have a disability, mental disorder, illness or, are more vulnerable to being harmed by other adults.
2. A Vulnerable Adult is a person who is or may be in need of additional care services by reason of disability, age or illness; and who is or may not be able to care for themselves or protect themselves from significant harm or exploitation (Law Commission Report 'No Secrets' Department of Health, 200).
3. Calex UK Apprenticeships have a duty to promote and safeguard the welfare of vulnerable adults and adults at risk who are on the apprentice programme. This will be achieved by ensuring staff are trained in providing a safe environment and reporting any concerns for apprentices.
4. The overall responsibility for compliance monitoring of apprentices that may fall under this category lies with the Designated Safeguarding Leads and Head of Apprenticeships.

These responsibilities include:

- To safeguard adults whose circumstances may lead them to become vulnerable to abuse, by building and maintaining an inclusive culture within the academy and developing staff knowledge and understanding of safeguarding issues.
- Ensuring best practice is applied by the organisation.
- To aid in the identification of vulnerable adults at risk and that all matters are dealt with according to national and legal requirements.
- Work in partnership with other agencies such as the police and act promptly with the best interests of the at risk or vulnerable adult at the forefront of the planning.

## 22.0 Filtering & Monitoring

1. Whilst considering their responsibility to safeguard and promote the welfare of apprentices and provide them with a safe environment in which to learn, each programme site should be doing all it reasonably can to limit exposure to the risks via the apprenticeship programme and partners IT systems.
2. As part of this process, the Calex UK Apprenticeships programmes work to ensure that appropriate filters and monitoring systems are in place.
3. The senior management team and relevant staff will have an awareness and understanding of the provisions in place to filter and monitor any risks identified, and how to escalate them appropriately when necessary.
4. The appropriateness of any filters and monitoring systems used are a matter for individual education provisions and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#)

### **23.0 Looked After Children (LAC) and Care Leavers**

1. The Designated Safeguarding Leads will function as the Designated LAC Lead for apprentices and will collaborate closely with all Local Authorities whereby there are recognised Looked after Children / Children in Care / Previously Looked After and Care Leavers to promote their educational achievement.
2. Looked After Children are supported by a team of external agencies and have a Personal Education Plan (PEP). The PEP is used to support the personalised learning of the young person – both academically and otherwise. Staff will be asked to contribute to the PEP and the Designated LAC Lead (the DSL) will attend meetings regarding that apprentice.
3. Calnex UK Apprenticeships are aware that though their apprentices are still in education, this is not recognised as an education setting to all local authorities and therefore there may not be involvement from Virtual Schools or active Personal Education Plans (PEP's). Therefore, each apprentice that is identified as a Looked after Child, with professionals involved will be contacted as deemed appropriate by the Designated LAC Lead (DSL). Support for each apprentice will remain a priority and effective to ensure their success within their apprenticeship programme.
4. All Looked After Children / Children in Care / Previously Looked After / Care Leavers must be regularly monitored and supported by the Designated lead and wider team.

### **24.0 Health & Safety**

1. Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our young people physically within Calnex UK Apprenticeships environment.
2. The Health & Safety compliance and facility audits are managed by our partners Watson & Watson.

### **25.0 Monitoring and Evaluation**

1. Calnex UK Apprenticeships will review its policies and procedures to ensure that they comply with the relevant legislation. The Safeguarding Policy will be reviewed annually and updated to remedy any deficiencies or weakness concerning child/young people and vulnerable adult protection arrangements, which are identified, immediately.
2. Our Safeguarding Policy and Procedures will be monitored and evaluated by:
  - Senior Management 'drop ins', learning walks and discussions with apprentice and staff apprentice surveys
  - Scrutiny of Attendance data of apprentices attending their formal attend training, virtual classrooms or employer based reviews.
  - Scrutiny of a range of risk assessments
  - Scrutiny of meetings
  - Logs of bullying/racist/behaviour incidents for SMT
  - Review of parental concerns

### **26.0 Linked Policy**

1. Health and Safety Policy
2. Calnex UK Apprenticeships Prevent Strategy
3. e-Safety Procedures
4. Anti-Bullying & Behaviour Policy
5. Child-on-Child Abuse Policy - incorporating into Behaviour Policy
6. Mental Health & Emotional Wellbeing Policy
7. SEND Policy

A handwritten signature in black ink, appearing to read 'DS Miell-Ingram', with a long horizontal flourish extending to the right.

David Miell-Ingram

Managing Director Calx UK

## **Appendix 1**

### **Managing a Disclosure**

If an apprentice makes a disclosure, you must follow the steps outlined below:

- Never promise confidentiality. It is not possible to guarantee to an apprentice that a disclosure of abuse will be kept confidential. Inform the learner that you are duty bound by law to report what they disclose to the respective Calex UK Apprenticeship's Designated Safeguarding Lead (DSL).
- Listen and reassure – Listen carefully to what the apprentice is telling you. You are able to ask open questions such as 'how did that happen?' or 'what was happening at the time?'
- Do not probe or make accusations – remember you are not there to investigate a disclosure. This could also compromise any further criminal investigation.
- Make notes and record the disclosure – as soon as possible, record the conversation with the student. Remember to use the apprentice's own words as far as possible. Report electronically via CPOMS or use the disclosure reporting/referral form (Appendix 6).
- Refer the disclosure to the Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead (DSL) will then arrange to see the apprentice, organise further support as necessary, and notify appropriate authorities. Where contact is made with external agencies, this will be recorded by the Calex UK Apprenticeship's DSL.

## **Appendix 2**

### **Definitions of Abuse**

#### **Physical abuse**

This may take many forms e.g. hitting, shaking, or poisoning a young person or vulnerable adult. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a young person or vulnerable adult.

#### **Emotional abuse**

This is the persistent emotional ill treatment of a young person or vulnerable adult such as to cause severe and persistent effects on their emotional development. Some level of emotional abuse is involved in most types of ill treatment of young people or vulnerable adults, though emotional abuse may occur alone.

#### **Sexual abuse**

This involves forcing or enticing a young person or vulnerable adult to take part in sexual activities. This may include non-contact activities such as looking at or producing pornographic materials, watching sexual activities or encouraging young people or vulnerable adults to behave in sexually inappropriate ways.

#### **Neglect**

Involves the persistent failure to meet a young person or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health and development. This may involve failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

### **The Context of Abuse**

#### **Family Circumstances: Domestic Violence**

Where there is domestic violence evident, the implications for the vulnerable adult or young person at the academy and for younger children in the household must be considered. Young people from families with a history of domestic violence often have behavioural difficulties, absenteeism, ill health, bullying, and drug and alcohol misuse.

#### **Drug/alcohol abusing parents**

There is an increased risk of violence in families where this occurs. A young person at Calnex UK Apprenticeships may have to take on responsibilities for younger children in the family.

#### **Forced Marriages**

Forced marriage is an entirely separate issue from arranged marriage. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage may also be experiencing physical and/or emotional abuse at home.

#### **Mental Health Issues**

Self-harm, suicide threats and gestures by a young person or vulnerable adult must always be taken seriously and may be indicative of a serious mental or emotional disturbance. The possibility that self-harm, including a serious eating disorder has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.

#### **Abuse by peer group: Child-on-Child Abuse - bullying, racism and abuse**

Bullying is a common form of deliberately hurtful behaviour, which is usually repeated over a period of time, when it is difficult for the victims to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting); verbal (e.g. threats); and emotional (e.g. isolating the individual).

It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour, which is offensive to those with learning or physical disabilities.

Severe harm may be caused to young people and vulnerable adults by the abusive and bullying behaviour of their peers. The damage inflicted by bullying is often underestimated and can cause considerable distress. In extreme cases, it can cause significant harm, including self-harm.

## Categories under Child-on-Child Abuse:

- Bullying
- Teenage Relationship Abuse
- Physical Abuse
- Emotional Abuse
- Sexual Violence
- Sexual Harassment
- Consent
- Sharing of nude and semi-nude images
- Upskirting
- Initiation/hazing type violence and rituals

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

Sexual violence and sexual harassment can occur between two apprentice of any age and sex during the apprenticeship programme training period. It can occur through a group of apprentice sexually assaulting or sexually harassing a single learner or group of apprentice. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part One of Keeping children safe in education (KCSIE), all staff working with children are advised to maintain an attitude of 'it could happen here'.

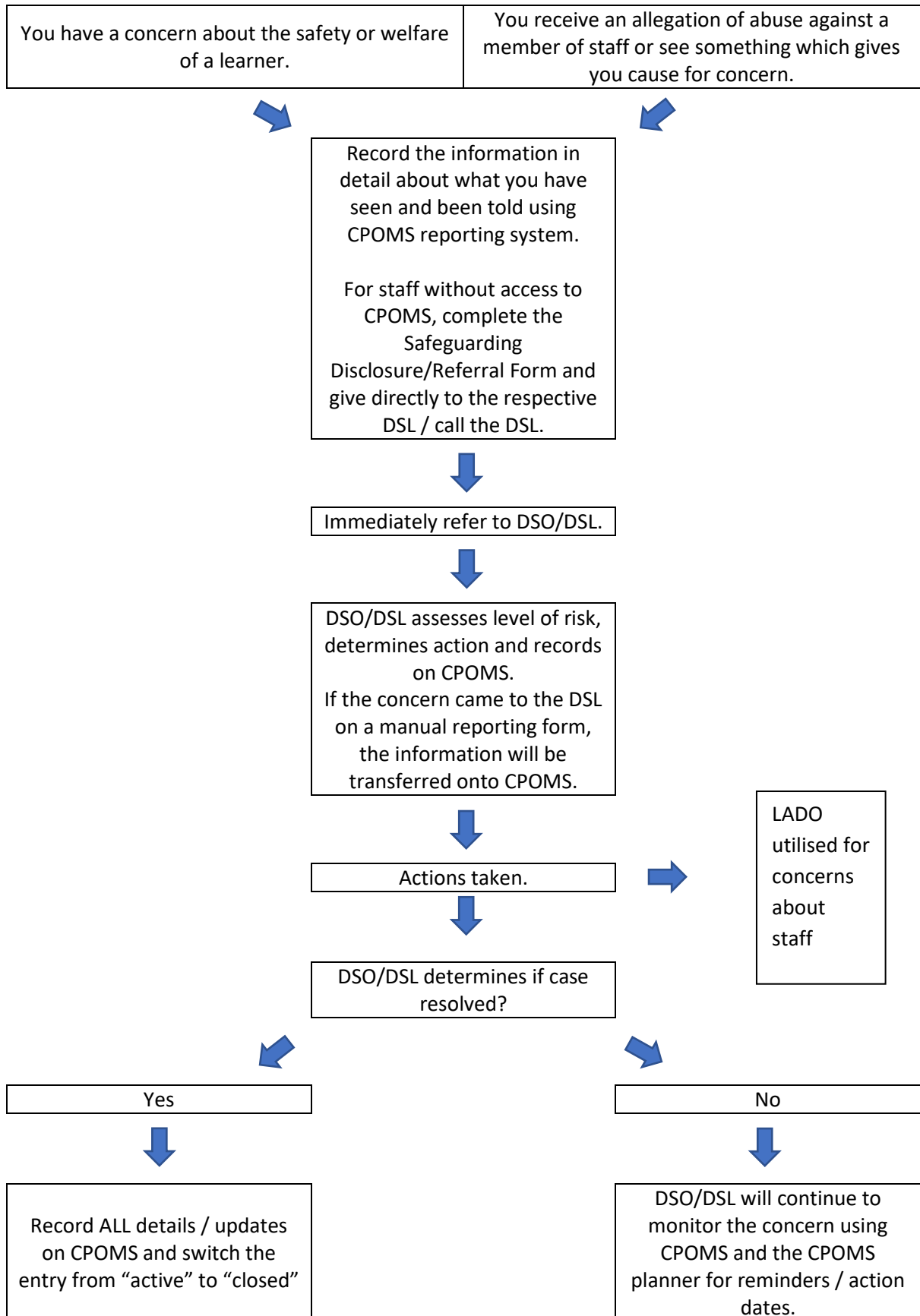
Calex UK require all staff to ensure inappropriate behaviour (even if it appears to be relatively innocuous) should be intervened as soon as it becomes apparent to help prevent problematic, abusive and/or violent behaviour in the future. Apprentice who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational progression and will be exacerbated if the alleged perpetrator(s) continue to attend the training facility/programme. Calex UK and our staff should be that safeguarding incidents and/or behaviours can be associated with factors outside the programme, including intimate personal relationships.

It is essential that all victims are reassured that they are being taken seriously throughout any allegations and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Reports of sexual violence and sexual harassment may become extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their progress and training is not disrupted. It is also important that other apprentice, and staff are supported and protected as appropriate.

Appendix 3 Referral and Information Sharing Flow Chart

**Safeguarding / Welfare Concerns Reporting Process**



## **Appendix 4**

### **Guidance on Relationships with Apprentice's**

The vast majority of staff who work with young people and vulnerable adults in educational settings act professionally and seek to provide a safe and supportive environment for apprentice. It is recognised that achieving this aim is not always straightforward. Much relies on student and staff interactions where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

This guidance should not be interpreted to mean that, in order to avoid misplaced allegations, all forms of physical or close contact with apprentice should be avoided. There will be occasions where physical contact is appropriate, e.g. in situations where a degree of physical intervention is required. The guidance is concerned with avoiding sexual activity in a relationship of trust and other contact, which may be inappropriate.

#### **Relationships of Trust**

A relationship of trust exists where a member of staff is in a position of power or influence over a student by virtue of the work or nature of the activity being undertaken. Those in a position of trust must carry the responsibility of ensuring that they do not abuse their position or put themselves in a position where allegations of abuse of trust, whether justified or unfounded, could be made.

It is important to recognise that a variety of circumstances can arise, including a sexual relationship at one end of the scale, through close friendships, to, at the other end of the scale, an innocent situation that has been entirely misconstrued. Staff should take steps to minimise the risk of circumstances being misconstrued or misunderstood and relationships with language and conduct, which could give rise to comment and speculation.

All staff should clearly understand the need to maintain appropriate boundaries in their dealings with apprentice. Intimate or sexual relationships between staff and apprentice will be regarded as a grave breach of trust. Where a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong. A sexual relationship will be intrinsically unequal within a relationship of trust and is therefore unacceptable. Abuse of trust involving sexual activity with a young person under 18 or a vulnerable adult who is a student at Calnex UK Apprenticeships may be a criminal offence under the Sexual Offences Act 2003.

From time-to-time staff may encounter apprentice who display attention-seeking behaviour, profess attraction to them or begin to develop a relationship of emotional dependency. Particular care should be exercised if the student is vulnerable. Staff should aim to deal with those situations sensitively and appropriately but ensure that their behaviour cannot be misinterpreted. The member of staff should inform Designated Safeguarding, Welfare & Engagement Manager (*DSL*) if they have any concerns or if there is a concern that a young person is becoming attracted to him or her, or that there is a developing attachment or dependency. If a member of staff is concerned that he/she might be developing a relationship with a young person, which could have the potential to represent an abuse of trust, the first advice must be to ensure that the relationship does not develop further. Arrangements should be made by Calnex UK Head of Apprenticeships to minimise direct contact between the apprentice and member of staff and to prevent all contact if possible. Where contact must take place another member of staff should be present at all times.

Staff should be aware that private meetings with individual apprentice might give rise to concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area, which is likely to be frequented by other people. Another student should be present or nearby. Where such conditions cannot apply, staff should ensure that another adult knows that the interview is taking place.

Apprentice should not be asked or encouraged to visit the home of a member of staff or socialise informally outside



Calex UK Apprenticeships. These contacts or visits can place staff in a vulnerable position and can in some case lead to allegations being made against staff. Private or additional tuition for apprentice should be conducted on Calex UK Apprenticeships premises or, if at the young person's home, in the presence of a parent. Meetings away from Calex UK Apprenticeships brand partner premises or arrangements for private tuition in a student's home should only be arranged with the specified approval of Designated Safeguarding Lead and the Head of Apprenticeships.

Staff should adhere to the guidance regarding outside commitments in the Disciplinary & capability policy within the Calex staff handbook for Employees.

The following are examples of actions, albeit not overtly abusive, that could be interpreted as a member of staff 'grooming' a student or allowing a dependent relationship to begin or continue:

- Inviting apprentice to their home.
- Visit apprentice at their home.
- Giving apprentice gifts.
- Offering apprentice lifts outside normal duties.
- Singling individual apprentice out for special attention.
- Seeing apprentice socially.

Staff should not give apprentice their personal mobile or home telephone number, personal e-mail address or access to their own personal social media accounts (not adding apprentice as friends on Facebook, for example). The frequency, nature and degree of such behaviour may justify the need for further investigation.

### **Physical Contact**

Physical contact may be misconstrued by a student, parent or observer. Touching apprentice, including well-intentioned gestures such as putting a hand on a shoulder, can, if repeated regularly, lead to serious questions being raised, particularly if this occurs when a member of staff is alone with a student. As a general principle, staff must not make gratuitous physical contact with their apprentice. It is particularly unwise to attribute touching to their teaching style or as a way of relating to apprentice. Staff do however have the right to use reasonable physical intervention to restrain apprentice in certain circumstances. Staff should be aware of Calex UK Apprenticeship's policy on the use of physical intervention.

**Staff should comply with the expected standards of professionalism as detailed in the Staff Disciplinary & capability policy within the Calex staff handbook.**

## Appendix 5

### Specific Safeguarding Focus Area (Keeping Children Safe in Education)

The newly published guidance from the DfE *Keeping children safe in education 2023* replaces the previous guidance following a period of consultation. In essence, there are some significant changes in the new guidance. There remains a statutory responsibility to keep children safe and to refer concerns to the appropriate authorities.

Staff need to be 'regularly updated' about Calnex UK Apprenticeships procedures as well as when they join Calnex UK Apprenticeships.

Staff need to be vetted on recruitment.

There must be a Designated Safeguarding Lead and Deputy.

The Designated Safeguarding Lead:

William Glendon-Doyle (Safeguarding & Welfare Officer) – Stellantis Apprenticeship Programme

Victoria Lupton (Safeguarding & Welfare Coordinator) – Volvo, Porsche & Mazda Apprenticeship Programmes

The Deputy Designated Safeguarding Lead:

Justin Ryles (Programme Manager) - Stellantis Apprenticeship Programme

Stuart Hickling – Volvo Apprenticeship Programme

Jason Giblett? – Porsche Apprenticeship Programme

Sarah Fuller – Mazda Apprenticeship Programme

Additional guidance on peer-on-peer abuse, to emphasise the importance of staff knowing what it is and how to respond to reports of abuse.

Strengthened guidance on what we should be doing to protect apprentice from peer-on-peer abuse. We should make sure our policy includes:

- Calnex whole approach to Child-on-Child abuse
- Reporting systems in place for apprentice
- Recognition that Child-on-Child abuse may be taking place, even if not reported
- Online safety, including the use of the internet on mobile phones due to its role in Child-on-Child abuse
- Additional barriers when recognising abuse for apprentice with any special educational needs.

Safer recruitment has been restructured with more guidance on the recruitment process with specific changes to Calnex UK statutory requirements. Added elements include more emphasis on the recruitment process including advertising roles, shortlisting, use of references, selection and on-going assessment of new staff.

Updated guidance on sexual harassment and how to this is monitored and dealt with within apprenticeship programme.

There remains the requirement for on-going guidance on the emphasis placed on 'specific safeguarding issues':

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Honour-based Abuse
- Child-on-Child Abuse
- Bullying including cyberbullying
- Domestic violence

- Drug abuse
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Breast Ironing
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- PREVENT – extremism, radicalisation, & terrorism
- Sexting - Sharing of nude and semi-nude images
- Teenage relationship abuse
- Trafficking
- Modern slavery
- Sexual violence / harassment
- Consent
- Upskirting
- Initiation/hazing type violence and rituals
- Financial or Material Abuse
- Discriminatory Abuse
- Organisation or Institution Abuse
- Hate Crimes
- Prejudice Abuse
- Racial Abuse

Further guidance on each of these is available on the DfE website and other sources of information are suggested.



## Apprentice Safeguarding/Welfare Concern

Please report any safeguarding/welfare concerns by contacting the Safeguarding & Welfare Coordinator for your programme – this form can then be used to record any information and outcome from your discussion with the S&W Coordinator.

<b>Apprentice Name:</b>	
<b>DoB:</b>	
<b>Date:</b>	<b>Time (of writing this record):</b>
<b>Name of person completing this form (please print):</b>	
<b>Job Title:</b>	
<b>Signature:</b>	
<b>Reason(s) for recording the incident/concern:</b>	
<b>Record the following factually:</b> <ul style="list-style-type: none"><li>• <b>When</b> - date &amp; time of incident or concern arising?</li><li>• <b>Where</b> did your concerns arise?</li><li>• <b>Who else</b> - were any other young people or staff present?</li><li>• <b>What</b> exactly did you see/hear/smell that raised your concern?</li></ul>	
N.B. Please record any direct disclosures/statements/comments using the apprentices' exact words in quotation marks.	
<b>Name of Designated Safeguarding Lead this form was passed to:</b>	
<b>Date and time incident/concern was shared with Designated Safeguarding Lead:</b>	

**NOW PLEASE PASS THIS FORM TO:**

**Victoria Lupton – Safeguarding & Welfare Coordinator (DSL) – 07824 862382 / Victoria.lupton@calexuk.com**

## Logging a concern about a young person’s safety and welfare

(NB All concerns must be recorded but a Designated Safeguarding Lead must be informed immediately about all disclosures by a young person of abuse and any situation where a young person may be at immediate risk of harm at the end of their training day – this form should then be filled in and passed to the DSL as soon as possible after the DSL has been informed)

Apprentice’s Name:	
Date:	Time (of writing this record):
Name of person completing this form (please print):	
Job Title:	
Signature:	
Reason(s) for recording the incident/concern (headline):	
<p>Record the following factually: <u>When</u> (date &amp; time of incident or concern arising)? <u>Where</u> did your concerns arise? <u>Who else</u> - were any other young people or staff present? <u>What</u> exactly did you see/hear/smell that raised your concern? N.B. Please record any direct disclosures/statements/comments using the young person or adult’s exact words in quotation marks.</p>	
Action taken, including names of everyone spoken to about the incident/concern:	
Name of Designated Safeguarding Lead this form was passed to:	
Date and time incident/concern was shared with Designated Safeguarding Lead:	

Please check to make sure your report is clear; and will be clear to someone else reading it next year

**NOW PLEASE PASS THIS FORM TO:**

**Will Glendon-Doyle – Safeguarding & Welfare Coordinator (DSL) – 07798 725733 / [safeguarding@stellantis.com](mailto:safeguarding@stellantis.com)**