

Safeguarding Policy: Children and Adults at risk

This document states LRTT Ltd.'s policy on preventing and reducing harm to children and adults at risk when they are in contact with staff, visitors, externally contracted staff (including activities) and apprentices.

The policy aims to:

- Promote and prioritise the safety and wellbeing of children and adults at risk
- Provide assurance to parents, carers and other parties that LRTT Ltd takes reasonable steps to manage risks and keep children and adults at risk safe
- Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters
- Prevent the employment of individuals in work with children and/or adults at risk where they have been barred by the DBS or are deemed by LRTT Ltd to pose an unacceptable risk to at risk groups
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with staff, visitors, externally contracted staff (including activities) or apprentices, whether the harm has taken place on LRTT Ltd premises or not.

The Policy also seeks to manage effectively the risks associated with activities and events involving children and adults at risk during training with LRTT Ltd:

- Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis
- Ensuring that the appropriate DBS or basic disclosure checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children or adults at risk
- Requiring new employees and individuals involved in working with children or adults at risk to familiarise themselves with the content of this policy and associated policies including PREVENT.

This policy requires that any suspicions and allegations involving harm to children and adults at risk are referred to the Safeguarding Lead to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the DBS as required.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and adults at risk from abuse and the need to protect staff, apprentices and visitors from false or unfounded accusations.

The Children and at risk Adult Safeguarding Policy should be used as the basis for preventing and reducing harm to children and adults at risk.

Application and definitions

Application

The key parts of the Children and Adults at risk Safeguarding Policy apply as described below.

Risk assessment process

- Recruitment to a new or existing post which involves working directly with children and/or adults at risk¹
- The commencement of new activities or events involving or potentially involving children and or adults at risk; and
- Changes being made to activities or events involving or potentially involving children and or adults at risk.

Screening check processes

These apply to those carrying out work for LRTT Ltd which involves direct contact with children and/or adults at risk and meets the eligibility criteria for an Enhanced disclosure or Disclosure and Barring Service check.

Procedure for dealing with reported suspicions and allegations

This applies to all LRTT Ltd members of staff, workers, associates, visitors and apprentices made aware of, or involved in, an allegation or suspicion involving harm to children and/or adults at risk.

Appendix B Code of Practice

This applies to all LRTT Ltd members of staff, associates, visitors and apprentices who come into direct contact with children and adults at risk.

Definitions

A child is any person under the age of 18.

¹ Please note: this policy's definition of a at risk adult does not apply to LRTT Ltd employees/workers (except in situations where they receive healthcare from LRTT Ltd). Reasonable adjustments for disabilities and any capability/capacity matters in the workplace are managed outside of this policy. Please contact HR Business Manager/Adviser for further advice as required.

Adults aged 18 and over have the potential to be at risk (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be at risk if they:

- Have a learning or physical disability; or
- Have a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
- Have a reduction in physical or mental capacity; or
- Are in the receipt of any form of healthcare; or
- Are detained in custody; or
- Are receiving community services because of age, health or disability; or
- Are living in sheltered or residential care home; or
- Are unable, for any other reason, to protect themselves against significant harm or exploitation.

It is recognised that people who meet one or more of the criteria above may not be at risk at all, or all of the time. However, until direct contact is made with people on an individual basis, it may be impossible to identify whether vulnerability exists in relation to an activity or event involving adults that they are planning.

Therefore, in order to support staff in identifying and managing potential risks of harm to people effectively, and for the purposes of this policy only, an at risk adult should be identified (for the purposes of this policy only) as a person aged 18 or over who meets one or more of the criteria listed above.

Examples of LRTT Ltd activities involving children and adults at risk

LRTT Ltd staff or apprentices may encounter children and adults at risk in a wide range of situations. These include, but are not limited to, the following:

- During curriculum activities
- During tutorials
- Administering first aid
- During external activities
- During student charitable work
- At skills or trade shows
- During school visits
- Whilst undertaking community projects
- Photography of children for publication
- Open days
- Working with disabled apprentices

Procedure

Raising awareness of the policy

Department leads must ensure that all new members of staff are made aware of this policy and that they are given time to read it during their induction period. This requirement is included in the Induction Checklist.

Training is available upon request from the Safeguarding Lead on conducting risk assessments in relation to working with children and adults at risk.

Initiating the Risk Assessment Process

Organisations are required under health and safety legislation to protect people as far as is 'reasonably practicable'. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks.

The Children and Adults at risk Risk Assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the centre):

- Recruitment to a new or existing post which involves working with children and/or adults at risk
- The commencement of new activities or events involving or potentially involving children and or adults at risk
- Changes being made to activities or events involving or potentially involving children and or adults at risk

Please note that where there are multiple posts, activities, or events of a similar nature, it is unnecessary to complete an individual risk assessment for each of them. Instead, it is possible to complete an overarching assessment for a particular type of post, activity or event and ensure that it manages the relevant risks appropriately. Once it has been identified that the risk assessment process should be initiated, it is vital that the person responsible for the relevant recruitment campaign, activity or event includes completion of this within his/her planning process and ensures that it is completed.

Completing the Risk Assessment Process

A risk assessment must be completed in advance of the relevant recruitment campaign, activity, or event by a competent person (where there are not current, adequate and documented risk management procedures already in place). The Children and Adults at risk Risk Assessment form is provided to assist with this process. Risk assessments must be completed by a competent person; that is, someone who understands the job, activity or event and is aware of the hazards. It is important to note that LRTT Ltd.'s insurance may be invalid if a claim is made and no risk assessment is in place.

The purpose of the risk assessment is to enable the responsible person to identify, mitigate and remove any potential risks relating to contact with children or at risk adults. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or at risk adult and considering whether the activity could be supervised or observed by others.

Any actions identified as a result of completing the risk assessment must be completed within the timescales specified on the form.

The risk assessment should:

- Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised
- Consider if there will be children and adults who are particularly at risk
- Consider whether any children or adults at risk have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties
- Identify any potential areas for harm
- Evaluate the risks
 - Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented
 - Identify those situations that would require a DBS check or a basic disclosure check

Completed risk assessments should be retained by LRTT Ltd whilst an activity/event is ongoing and for five years after it has ceased (or the risk assessment has been superseded). Where an activity is ongoing but unchanged, LRTT Ltd should review the risk assessment on a regular basis to ensure that the measures put in place are still relevant and appropriate.

It is important for individual departments to remember to complete a risk assessment prior to any work experience placement being provided. The Temporary Employment Service (TES) provides advice and support for departments on the arrangement of work experience, including for children, to ensure that appropriate arrangements are in place and that there is compliance with relevant legislation. Further details are available on the TES work experience web pages.

Identifying required checks

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with children and/or adults at risk.

In addition, LRTT Ltd must consider if any required checks should be treated as essential before employment (that is, that the new employee recruited to the role should not be able to start work until the check is completed).

DBS checks

LRTT Ltd is registered with and engages Complete Background Screening to manage its DBS applications. Registered bodies are entitled in law to apply for a DBS check **only** where the position is included in the DBS's list of eligible posts. These posts represent the professions, offices, employments, work and occupations that are known as the exceptions to the Rehabilitation of Offenders Act 1974.

There are two types of check available from the DBS:

- **Standard** - contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not 'protected'. Protected convictions and cautions are normally old and minor; they are filtered by the DBS so they are not disclosed and they must not be taken into account by employers. The filtering rules and the list of offences that will never be filtered are now available for you to view on the DBS's web pages.
- **Enhanced** - contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with children or adults in regulated activity (particular types of work with children and adults).

Many roles in LRTT Ltd which involve working directly with children and adults at risk fall into the category of 'regulated activity' and so are eligible in law for an enhanced DBS check with appropriate barred list check. The most common regulated activities which take place in the LRTT Ltd are:

- Teaching
- Training
- Instructing
- Supervising children whilst unsupervised at least once a week or more

It should be noted that teaching, training, instructing a 16 or 17 year-old's employment (which includes work experience) is not regulated activity and a DBS check may not be requested. A DBS check may only be required for work experience students under 16 in the rare event that the same person is teaching, training, instructing, caring for or supervising them whilst unsupervised on a frequent/intensive basis. Where individuals are not working in regulated activity, they will be eligible for a standard DBS check where his/her work is:

- Of a kind as to enable the individual concerned to have direct, physical contact (such as interviews or focus groups) with persons in receipt of such services in the course of his/her normal duties.
- Full details of the type of work and roles which are eligible for DBS checks are available from the Safeguarding Lead.
- An appropriate individual within the department (for example, the line manager/supervisor for the role or the person providing administrative support to the recruitment process) should review these eligibility criteria at the start of the recruitment process, or as soon as the duties of a role change, to identify whether a DBS check is required and, if it is, which type.
- The appropriate individual should also determine whether the check must be completed before an individual can start work or if there are activities that the individual could reasonably and safely carry out before the check result has been received.

- Appropriate control measures must be set out in the risk assessment and implemented in order to minimise any risk arising from the DBS check not having been completed when the individual begins work. Examples of control measures include not allowing individuals to commence any work relating to the DBS check until it has been completed or ensuring that they are supervised at all times.

Portability

Where an individual has previously undergone a DBS check or basic disclosure required for his/her post with another organisation in the course of his/her employment, this check is not portable to LRTT Ltd. It will not be accepted as meeting LRTT Ltd.'s requirement for a post-holder to undergo a particular type of DBS check or basic disclosure.

Exceptions to this are as follows:

- Where an individual has subscribed to the DBS Update Service – this means that their DBS check will be kept up-to-date and they can take this with them from role to role, where the same level and type of check is needed. With an individual's permission, LRTT Ltd will be able to go online to do a free, instant check (known as a status check) to confirm that their DBS Certificate is still up-to-date.
- Where a DBS check or basic disclosure has been carried out within the last 12 months by LRTT Ltd (or an organisation acting on behalf of LRTT Ltd) for a post with comparable duties - individual cases will need to be discussed with the Compliance Manager and his/her agreement provided that another check is not required.

Disclosure of a criminal record

Where a criminal conviction is disclosed by an applicant or through a DBS check/basic disclosure, the Operations Manager (or nominated deputy) will work with the department (where appropriate) to complete an interview regarding the Disclosure of a Criminal Conviction.

The Operations Manager will consider this assessment objectively and, where the assessment indicates that the level of risk is too high to allow the individual to start/continue working in a particular role/activity, the consequences of this for the individual will dependent upon:

- The check concerned
- The reason for the check (that is, check for a new employee, a recheck for an existing employee in their current post or a check for an existing employee in a new post)
- Relevant legislation
- The post concerned
- Whether the individual is suitable for other employment opportunities available within LRTT Ltd.

Where appropriate, the head of the department will be involved in the decision process. Possible outcomes include amended duties, redeployment, and withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal.

Recruitment of ex-offenders

LRTT Ltd complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly and will decide on the applicant's suitability for the role based on the level of risk the applicant poses to the safety and welfare of apprentices. It undertakes not to discriminate unfairly against any subject of a disclosure because of a conviction or other information revealed.

Dealing with reported suspicions and allegations

Concerns for the safety and wellbeing of children and adults at risk could arise in a variety of ways and in a range of situations. For example, a child/ at risk adult may report or show signs of abuse, someone may hint that a child/ at risk adult is at risk or that a colleague is an abuser, or someone may witness abuse.

According to the Department for Education and Skills, there are five main types of abuse, which are outlined in Appendix A.

It is not always easy to recognise a situation where abuse may occur or has taken place and LRTT Ltd employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or at risk adult.

It is important that the recipient of any complaint or accusation that a child or at risk adult has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

To ensure that all of the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.

It is impossible to promise complete confidentiality when a concern is raised or an accusation made. This is because LRTT Ltd owes a duty of care to its staff, apprentices, visitors or associates that cannot be fulfilled unless LRTT Ltd takes action on the basis of information that may have been provided in confidence.

The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external to LRTT Ltd, should be informed.

Where an individual suspects or is informed that a child or at risk adult has been, is being or could be harmed as a result of taking place in an LRTT Ltd activity/event or through contact with LRTT Ltd staff, visitors, associates or apprentices, it is not the responsibility of that person to decide whether abuse has

taken place. Instead, the individual aware of these suspicions or allegations must contact the Safeguarding Lead immediately for guidance and assistance on the action that must be taken.

If circumstances make this impossible, the Head of Operations or Head of Training must be contacted.

In cases that involve apprentices, the Apprentice Training Centre Manager must be contacted immediately. Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111).

Where a complaint of abuse is reported, the relevant manager will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including The Local Authority Designated Officer, social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify the relevant head of department and take further action through the relevant internal procedures. This may include invoking LRTT Ltd's employee disciplinary procedures, or in the case of apprentices, the student Code of Conduct and Exclusion Policy.

In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), The Safeguarding Lead should make referrals to the police, social services or other appropriate authorities themselves. Where this is necessary, HR should be informed immediately afterwards. In such cases, a criminal investigation may follow.

LRTT Ltd has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

All cases for possible referral must be raised by the HR Manager in the first instance as soon as harm or a risk of harm is identified. The HR Manager and the department head should work together to complete the DBS referral form found on the DBS's web pages. The HR Manager is LRTT Ltd.'s DBS check counter-signatory for employees.

The completed form must then be reviewed and a final decision made on whether the referral is required. Where it is deemed that a referral must be made, the referral form must be forwarded by the HR Manager and be logged prior to being sent to the DBS.

Any enquiries made by the media about possible allegations of abuse regarding children/adults at risk should be referred to the Senior Marketing and Communications Manager.

Data protection

LRTT Ltd complies with the principles of the General Data Protection Regulation 2018 and Human Rights Act 1998 in the way it collects, holds and disposes of personal information.

In accordance with LRTT Ltd.'s Master Records Retention Schedule:

- Completed risk assessments relating to activities involving children/adults at risk must be retained by the Safeguarding Lead whilst an activity/event is ongoing and for a minimum of five years after it has ceased (or the risk assessment has been superseded).
- Details of relevant training (such as on safeguarding or working with children or adults at risk) must be retained by the Safeguarding Lead for a minimum of five years after the training is completed.
- Personal files of all employees (including those who have contact with children/adults at risk) and any documentation related to allegations or suspicions of abuse must be retained for a minimum of six years after the individual concerned leaves LRTT Ltd.

In addition, departments should, wherever practicable, record lists of the individuals (staff, apprentices and child/ at risk adult participants) involved in activities/events for children and/or adults at risk and retain them securely for a minimum of six years after the activity/event.

Information about any allegations or suspicions of abuse must be shared on a need-to-know basis only. Documentation related to allegations or suspicions of must be stored in a secure place which is only accessible to those with appropriate knowledge of the suspicions/allegations.

Where it is necessary for staff, apprentices, associates or visitors to take photographs or video images of children or adults at risk, written consent must be obtained (from parents in the case of children) before these images are taken in order to comply with the General Data Protection Regulation 2018.

Roles and Responsibilities

Petar Kacarevic is LRTT Ltd.'s Designated Safeguarding Lead, Louise Rodger will act as deputy in his absence. As such, he takes overall ownership of the policy and will promote the importance of safeguarding within the centre. Due to the operational responsibilities with the centre, the day-to-day operation of the policy and its procedures will be the responsibility of other individuals, as outlined below.

Each Department Lead is accountable for the adoption and implementation of this policy.

They are required to promote the importance of safeguarding within their department and ensure that appropriate systems in place for:

- All their staff to become familiar with the Children and at risk Adult Safeguarding Policy during their induction;

- Relevant staff to review the department activities and follow the Children and at risk Adult Safeguarding risk assessment process.

It is the responsibility of the member of staff leading the recruitment campaign, activity or event which involves working with Children and Adults at risk to:

- Identify that the Children and Adults at risk Safeguarding procedure is applicable to a particular role, activity or event
- Identify whether individuals recruited require a DBS check and, where applicable, ensure that this is carried out in accordance with LRTT Ltd procedures

Staff, apprentices and associates working with children and adults at risk within LRTT Ltd should be familiar with this policy. In addition, they should, wherever possible, conduct themselves in accordance with the Code of Practice set out in Appendix B. This provides guidance on acceptable and desirable conduct to protect both children and adults at risk who come onto LRTT Ltd Training premises to study and to visit, and those working with them.

Every individual who becomes aware of any suspicions or allegations regarding harm to children or adults at risk is required to report this immediately to the Apprentice Centre Manager/Safeguarding Lead.

The Safeguarding Lead will be the initial point of contact where any allegations of abuse against children and adults at risk are raised. They will hold responsibility for:

- Promoting the Children and at risk Adult Safeguarding Policy within LRTT Ltd.
- Dealing with any reported suspicions and allegations of abuse of children or adults at risk within the Training Centres.
- Providing appropriate information when making referrals to external agencies (such as Social Services or the Police) in all cases of suspected abuse of children or adults at risk.
- Ensuring that appropriate records are kept in relation to the reporting of suspected abuse.
- Determine whether a referral needs to be made to the DBS.

The Safeguarding Lead is also responsible for promoting and providing day-to-day advice on the Children and at risk Adult Safeguarding Policy to each departments. They are also responsible for leading the review and update of the policy document on a periodic basis and to ensure that adequate training is available for staff on safeguarding.

The Apprentice Centre Manager will also provide advice and support for departments on the arrangement of work experience, including for children, to ensure that appropriate arrangements are in place and that there is compliance with relevant legislation.

The Head of HR will process all DBS checks for staff.

Communications Training and Support for Staff

Induction training

LRTT Ltd. commits resources for induction, training and refresher training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding. Induction will include but is not limited to:

- Discussion of the Safeguarding Policy (and confirmation of understanding).
- Discussion of other relevant policies.
- Ensure familiarity with reporting processes, the roles of Designated Safeguard Officer and Designated Persons (and who acts in their absence).
- Targeted training. All staff that, through their role, are in contact with children will have access to safeguarding training at an appropriate level. Sources and types of training will include:
 - Online awareness training.
 - Periodic safeguard workshops, as part of designated CPD.

Communications and discussion of safeguarding issues. Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice:

- Team meetings.
- One to one meetings.
- Staff will be reminded about policy and procedures via the online training.
- Provision of a clear and effective reporting procedure which encourages reporting of concerns.
- Immediate action via a generic email issued to all staff.
- This policy is published and stored within the shared files folder. For staff and volunteers who don't have access to the IT a copy of this procedure is kept at reception.
- Support. We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:
 - Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with.
 - Staff who have initiated concerns will be contacted by a line manager or DSO/DP within 1 week dependable on feedback from other agencies.

Context

LRTT Ltd has a duty, both in law and as a responsible organisation, to take reasonable care of children and adults at risk coming onto its premises. LRTT Ltd aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk. LRTT Ltd encounters children and adults at risk in a variety of settings, including through its teaching, as well as through its outreach programmes.

Safeguarding in relation to children is defined by the Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as requiring:

“Agencies [and organisations] working with children and young people to take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and

Where there are concerns about children and young people’s welfare, all agencies [and organisations] take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies’.

LRTT Ltd is fully committed to meeting the requirements of safeguarding, as defined above, both in relation to children and adults at risk, in order to ensure that they are safeguarded whilst enjoying opportunities to develop their full potential.

This policy should be read in conjunction with the following LRTT Ltd policies and procedures:

- Code of Conduct and Exclusion Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Dignity at Work Policy
- Screening Policy
- Data Protection procedures
- PREVENT Policy

The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- The Police Act 1997
- Protection of Children Act 1999
- Working together to safeguard children 2015
- Management of Health and Safety at Work Regulations 1999
- The Human Rights Act 1998
- Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding at risk Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012

The Protection of Freedoms Act 2012 is of particular importance as all decisions made to bar individuals from working with children or adults are now made by the Disclosure and Barring Service (DBS) under this legislation.

Further information and guidance

Organisations such as the NSPCC and Safe Network have a range of useful information on their web pages, including guidance on minimum levels of supervision for children.

Policy Ownership and Status

The Children and Adults at risk Safeguarding Policy is owned by the Apprentice Centre Manager. It will be periodically reviewed and updated by the Apprentice Centre Manager., in consultation with the Senior Management Team, to ensure compliance with relevant legislation and internal change.

The Apprentice Centre Manager will ensure that each published version of this policy is archived, along with details of when it was in operation.

Appendix A – Types of Abuse

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following:

Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises and broken bones. It can involve hitting, shaking, throwing, poisoning, burning, slapping or suffocating. It is also physical abuse when a parent or carer fabricates, or induces, the symptoms of an illness in a child.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities. It does not necessarily involve violence and the child may or may not be aware of what is happening. Sexual abuse includes: grooming a child with the intention of sexually abusing them; all forms of penetrative and non-penetrative sex; sexually exploiting a child in return for gifts, money or affection; and making, looking at and distributing indecent images of a child.

Emotional abuse is persistent and, over time, it severely damages a child's emotional development. Active emotional abuse involves an adult deliberately trying to scare, humiliate or verbally abuse a child. Passive emotional abuse happens when a parent or carer denies the child the love and care they need in order to be healthy and happy. Such adults might be emotionally unavailable; fail to offer their child praise and encouragement; interact with them in an age-inappropriate way; be over-protective, limiting their opportunities to explore, learn and make friends; or expect the child to meet the parent's own emotional needs.

Neglect is persistently failing to meet a child's basic physical and/or psychological needs resulting in serious damage to their health and development. Neglect is difficult to define as it is hard to describe the absence of something such as love or attention (Daniel et al, 2011). In practical terms, neglect may involve a parent's or carer's failure to:

- provide adequate food, clothing and shelter
- protect the child from physical and emotional harm or danger
- supervise the child properly
- make sure the child receives appropriate medical care or treatment.

Neglect often happens at the same time as other types of abuse (Daniel et al, 2011; Rees et al, 2011).

2 The Department for Education and Skills guidance: "What to do if you're worried a child is being abused" (2006)

Appendix B– Code of Practice

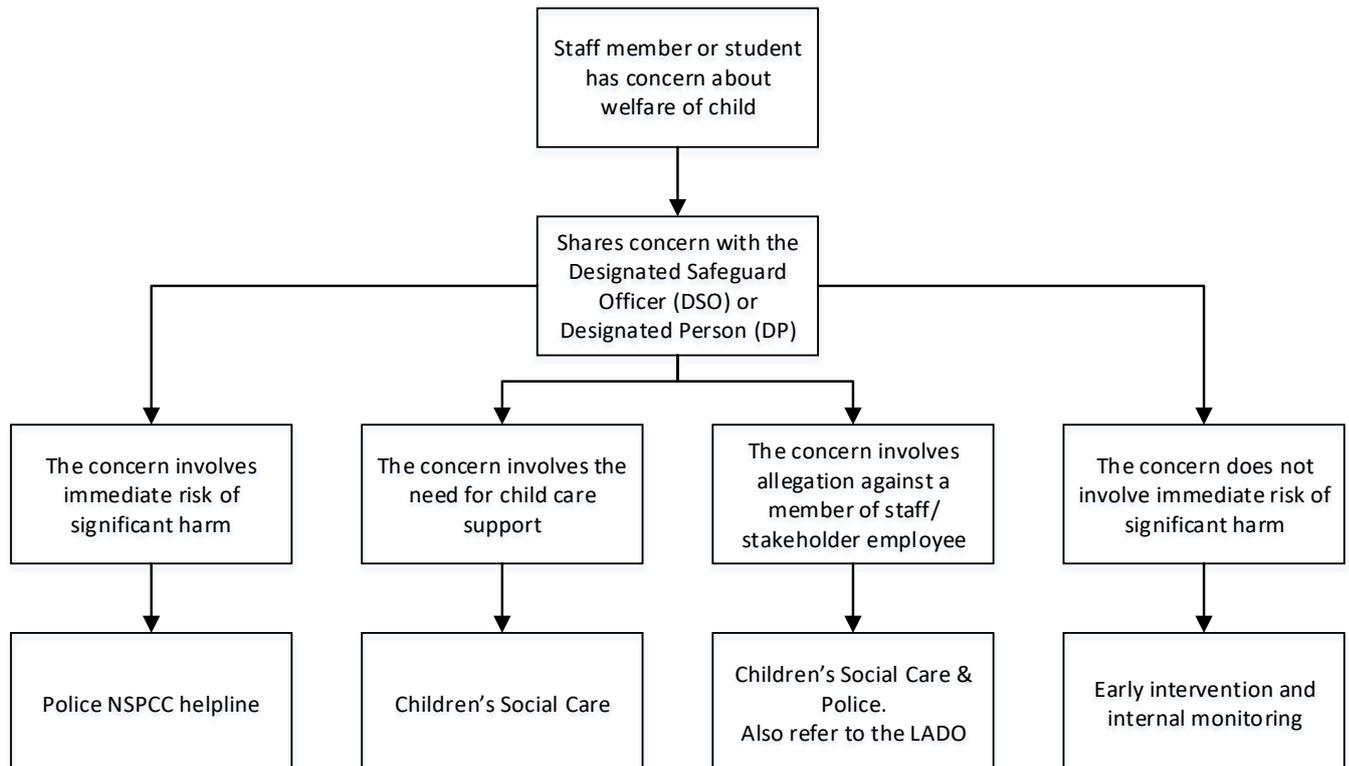
When working with children and/or adults at risk, LRTT Ltd staff, apprentices, visitors and associates are expected to take account of the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of apprentices in advance through proper planning and development of safe methods of working/activities.
- Wherever possible, work in an open environment with children where they can be seen by others.
- Avoid unnecessary physical contact.
- Avoid taking a child or at risk adult alone in a car on journeys, however short.
- Avoid taking a child or at risk adult to the toilet, unless another adult is present or another adult is aware (this may include a parent, or responsible person).
- In a situation where you are alone with a child or at risk adult, make sure that others can clearly observe you.
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
- Avoid showing favouritism towards particular participants.
- Report incidents of alleged abuse to the Apprentice Centre Manager /Safeguarding Lead, and ensure that any allegations are recorded.
- Report any concerns about poor practice to senior management in the relevant department or to the Apprentice Centre Manager/Safeguarding Lead.
- Report any accidents to the Health and safety Manager for recording and investigation where required.
- Avoid personal relationships with a child or at risk adult.
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”.
- Staff, apprentices, visitors and associates should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
- Only official LRTT Ltd social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with children or adults at risk. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL).
- Do not make suggestive or inappropriate remarks to or about a child or at risk adult, even in fun, as this could be misinterpreted.

- Participate in training available to you to support you in your work with children and adults at risk.
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening.
- Do not take children or adults at risk to your home.
- Maintain confidentiality about sensitive information.
- Where it is necessary for staff, apprentices, visitors or associates to take photographs or video images of children or adults at risk, written consent must be obtained (from parents/guardians in the case of children) before these images are taken in order to comply with the General Data Protection Regulation 2018. Personal details and photos which clearly identify individuals must only be published where they (or their parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs (e.g. when taking place in a sporting activity).

REPORTING FLOW CHART

**REMEMBER - DOING NOTHING IS NOT AN OPTION
IF SOMETHING MAKES YOU FEEL UNCOMFORTABLE - REPORT IT**



Contacts:

Local Authority Designated Officer (LADO)

Jane Bee - Children's Local Authority Designated Officer - Gloucestershire

Jane.Bee@gloucestershire.gov.uk

Phone: 01452 426 994

<http://www.gscb.org.uk>

Social Services Children and Families Helpdesk: 01452 426 565 8am-5pm. At all other times, including nights, weekends and bank holidays contact the Emergency Duty Team: 01452 614 694.

childrenshelpdesk@gloucestershire.gov.uk

Safeguarding Children's Service: 01452 583 636.

Gloucestershire Safeguarding Children's Board office: 01452 583 638.

Gloucestershire Police: 999 emergency or 101 non-emergency.

NSPCC Helpline: **0800 800 5000**, help@nspcc.org.uk or text **88858**.