

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 1 of 48
Title: Safeguarding Policy for Skills		

Last Reviewed	13/10/2024
Reviewed by	Bob Pinner
Ratified and approved by	Jodi Pearson
Next Review	13/10/2025
Frequency of review	Annually or when legislation requires

Authorised by Signature



Name Bob Pinner

Role: Head of Educational Strategy and Safeguarding

ABOUT THIS POLICY

1.1 Purpose

At PET-Xi Training Limited (PET-Xi) we are committed to safeguarding and promoting the welfare of all learners, staff, volunteers, visitors, contractors, and partners. Our legal duty includes the education and training of adults at risk, as detailed in the Care Act 2014, which has replaced the previously used term ‘vulnerable adult’, thereby focusing on the situation causing the risk rather than the specific characteristics of the adult. Any reference in the policy to an adult at risk applies to anyone aged over 18 who may, for a variety of reasons, have needs for care and support, regardless of whether the local authority is meeting those needs; experiencing or at risk of abuse or neglect due to their care and support needs and/or unable to protect him or herself from significant harm or exploitation.

PET-Xi has developed procedures in line with, and taking account of, guidance issued by the Department for Education, Leaders in Safeguarding and other relevant bodies. We operate in line with the requirements of the local authority safeguarding arrangements.

Whilst overall responsibility for safeguarding adults at risk is vested in the Executive Leadership Team. PET-Xi has a named Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL) who are responsible for ensuring compliance to this policy and its procedures. PET-Xi operates an ethos that safeguarding is everyone’s responsibility.

PET-Xi is committed to the following principles:

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 2 of 48
Title: Safeguarding Policy for Skills		

- Promote safeguarding and protection of adults at risk to demonstrate PET-Xi's commitment to keeping all learners safe.
- Provide all members of staff with the information and training (including online safety) required to meet their safeguarding duty.
- Ensure that staff understand, can recognise and response to indicators of harm.

1.2 Applicability

This policy covers all employees, officers/governors, consultants, contractors, volunteers, interns, work experience, students, learners, casual workers and agency workers and our learning partners. The word '*staff*' is used for ease of description. This policy incorporates process for both online delivery and face to face.

This policy does not form part of any employee's contract of employment, and we may amend it at any time to ensure its compliance.

Key Internal Contacts

Chair of Governors	Mrs Olga Bottomley Email: olga@straight4ward.org
Safeguarding Governor	Mrs Sarah Rennie Email: sarah@sprennie.co.uk
Head of Educational Strategy and Safeguarding	Mr Bob Pinner Email: bpinner@pet-xi.co.uk
Designated Safeguarding Lead (DSL) Schools	Mr Jamie Sheerman Email: jsheerman@pet-xi.co.uk
Designated Safeguarding Lead (DSL) Skills	Mrs Karen Hill Email: khill@pet-xi.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Olivia Cooke Email: Ocooke@pet-xi.co.uk Tom Callnon Email: tcallnon@pet-xi.co.uk Arfan Shafi Email: ashafi@pet-xi.co.uk

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 3 of 48
Title: Safeguarding Policy for Skills		

1.3 The legal framework for the role of PET-Xi is as follows:

The Education Act 2002 - Section 157 & 175

Requires local authorities and governing bodies of further education institutions to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children, young people and adults at risk. In addition, they should have regard to any guidance issued by the Secretary of State in considering what arrangements they may need to make.

Keeping Children Safe in Education (2024)

Sets out the safeguarding statutory responsibilities of schools and colleges, as well as good practice recommendations in relation to children. This covers the relevant legislation; the responsibilities of Governing Bodies and Principals; safer recruitment practice; recruitment and vetting checks; dealing with allegations of abuse or misconduct against staff; and also, checklists, flowcharts and thematic topics.

The Department for Education (DfE) published an updated version of the statutory safeguarding and child protection guidance for schools in England, Keeping children safe in education (KCSIE) 2024 which will come into force from the 2nd September 2024 and replace KCSIE 2023.

The guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18.

Key Changes to KCSIE 2024

The updates to KCSIE 2024 were published on 2 September 2024 and mainly include changes to the wording. There are no dramatic changes to KCSIE 2023, and the summary explains each of the 5 key parts.

Here, we summarise the 4 key changes to KCSIE 2024 and how they will affect schools' safeguarding of pupils and staff.

- **Exploitation** – Now included more comprehensively so “abuse and neglect” becomes “abuse, neglect and exploitation”.
- **Updated definition** – New emphasis on early help and promoting the welfare of children.
- **Terminology changes** – Clarification about school absences and changes in context.
- **Data protection** – Clarifying schools' responsibilities regarding the Data Protection Act 2018 regarding handling personal information in compliance with UK GDPR.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 4 of 48
Title: Safeguarding Policy for Skills		

Schools should review their child protection and safeguarding policies to align with the Keeping Children Safe in Education 2024 changes. One of the minor updates clarifies staff responsibilities regarding filtering, monitoring, and online safety in schools.

Part 1 of KCSIE 2024 is to be read by all staff new and existing. Further information can be found in KCSIE 2024. [Keeping children safe in education 2024: part one \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Keeping-children-safe-in-education-2024-part-one.pdf)

Working Together to Safeguard Children (2018)

Provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children/young people. In addition, it sets out the framework for the formation of Local Safeguarding Children Boards and details the allegation management process. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Access is allowed for children's social care from the local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. Safeguarding arrangements consider the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB).

Safeguarding Vulnerable Groups Act (2006 changes updated 2021)

The Disclosure and Barring Service (DBS) has been introduced to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

DFE Statutory Guidance (2014)

Provides guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004. The guidance plays an important role in embedding this responsibility in the work of key agencies which have contact with children and young people. It reflects the recognition that protecting children from harm cannot be separated from policies to improve children's lives as a whole.

Protection of Freedoms Act (2012) Part 5 - Safeguarding vulnerable groups, criminal records etc.

Covers the reduction in scope of the definition of regulated activity, new services provided by the DBS, and disregarding convictions and cautions for consensual gay sex.

Mental Capacity Act (2005)

Provides a way in which people who may need help to make decisions can get that help from someone who can be trusted to act in their best interests. Mental Capacity under the Act means being able to make your own decisions. The Mental Capacity Act and its Code of Conduct contain a set of rules, procedures, and guidance. The Act applies in full to those aged 18 or over,

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 5 of 48
Title: Safeguarding Policy for Skills		

the entire Act except making Power of Attorney or Making a Will applies to 16- and 17-year-olds. The Act only applies to those under 16 in very limited circumstances and these would have to be determined by a court.

Children's Act 2004

The 2004 Children's Act was introduced as a development and extension of the same act from 1989. The main way in which the 2004 Children's Act differentiates from the 1989 Children's Act is in its focus on ensuring that all people (both individuals and organisations) that are working with children have a responsibility for safeguarding children and promoting their welfare.

The Marriage and Civil Partnership (Minimum Age) Act 2022

Gained Royal Assent in April last year, has come into force today (27 February 2023). It means that 16- and 17-year-olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent.

2. DUTIES

The safeguarding team is:

Bob Pinner Head of Educational Strategy and Safeguarding
Jamie Sheerman Designated Safeguarding Lead (Schools)
Karen Hill Designated Safeguarding Lead (Skills)
Arfan Shafi Deputy Safeguarding Lead
Olivia Cooke Deputy Safeguarding Lead
Tom Callnon Deputy Safeguarding Lead

2.1 The Role of the Head of Safeguarding

The DSL is committed to ensuring that PET-Xi:

- Lead, develop, manage, and implement an effective safeguarding strategy including a clear audit programme ensuring compliance with national safeguarding standards and in line with the PET-Xi's vision & mission.
- Undertake an annual review of Safeguarding provision.
- Make sure safeguarding policies and procedures are fully implemented and followed by staff, learners, and trainers.
- Ensure DLS (Schools and Skills) provide safeguarding induction for all staff
- Provide safeguarding induction for all staff.
- Liaise with HR to ensure SCR is kept up to date.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 6 of 48
Title: Safeguarding Policy for Skills		

- Develop resources and implement a learning and development strategy for safeguarding and mental health across PET-Xi
- Build and maintain positive relationships with statutory agencies and safeguarding partners.
- Ensure all policies, procedures and guidance remain up to date in line with Government legislation and guidance.
- Report daily and weekly data on live learners and welfare concerns to Head of Skills and schools
- Oversee and support the DSLs for Schools and Skills
- Hold weekly and monthly safeguarding meetings.
- Update on Safeguarding at Quality, ELT, and Governance meetings.
- Assist with the development and implementation of education, behaviour, mentoring and other plans; undertake comprehensive assessment of students to determine those needing specific help, monitor and report on progress as required.
- Have full oversight of all incoming concerns, investigation, risk management and, supervision and expert advice to employees and officials and take appropriate action in response to safeguarding issues that arise.
- Have oversight of all referrals into statutory agencies.
- Reporting trends and data from Safeguarding analysis to the Executive Leadership Team.

2.2 The Role of the Designated Safeguarding Lead (DSL)

The DSL is committed to ensuring that PET-Xi:

- Raises awareness of issues relating to safeguarding and promotes the welfare of all.
- Provides a safe environment (including online) for children, young people and adults at risk.
- Responsible for ensuring there is an effective online monitoring and filtering process in place.
- Identifies those who are suffering or at risk of suffering significant harm and takes appropriate action to ensure they are kept safe.
- Has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers.
- Operates safe recruitment procedures.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 7 of 48
Title: Safeguarding Policy for Skills		

- Designates a member of staff with sufficient authority to take a lead role for safeguarding.
- Remedies any weaknesses and areas for improvement relating to safeguarding that are brought to their attention.
- Ensure all staff members receive appropriate child protection and safeguarding training which is regularly updated.

The Role of the Deputy Designated Safeguarding Lead (DDSL)

- To assist and support the DSL in effectively carrying out their role.
- To deputise for the DSL in their absence.

2.3 The Role of Staff

2.3.1 Staff Member with Lead Responsibility

There is a designated member of staff with lead responsibility for safeguarding issues. The key responsibility of that member of staff is to lead on raising staff awareness concerning all issues relating to safeguarding, and to promote PET-Xi as a safe environment for learning and being cared for. They have received the appropriate training as required by the Local Safeguarding Children Board and will maintain the currency of their knowledge on safeguarding issues. The Designated Safeguarding Lead (DSL) is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations
- Giving advice and support to staff on matters relating to safeguarding
- Maintaining a proper record of any safeguarding referral, complaint, or concern received
- Ensuring that parents/carers of children, young people and adults at risk are aware of the safeguarding policy.
- Liaising with other agencies as necessary
- Liaising with secondary schools sending learners to ensure that appropriate arrangements are made for them.
- Ensuring there is liaison with employers and training organisations providing learners with placements to ensure proper safeguarding arrangements are in place.
- Ensuring that all staff receive training about safeguarding matters and the procedures.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 8 of 48
Title: Safeguarding Policy for Skills		

- Providing termly reports to the Safeguarding Board
- Reporting any flaws in procedure to the Safeguarding Board as soon as possible
recording rigorous reports and/or statements
- Storing all information and recordings in a secure manner and in accordance with Data Protection Act 2018 (GDPR)
- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Having received training in safeguarding issues and inter-agency working, as required by the Local Safeguarding Children's Board, and will receive refresher training at least every 2 years.

In the absence of the DSL a deputy DSL will carry out the same responsibilities. In the absence of both, the Head of Quality and Compliance will carry out their responsibilities.

2.3.2 All Staff

All staff, volunteers and Governors will receive annual statutory training compliant with the SCR to familiarise them with safeguarding issues and the policy and procedures, with refresher training at least every two years. In addition, regular updates are provided by the DSL for skills and schools.

Staff are made aware of the importance of: making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and up skirting (as per KCSIE 2023); dismissing or tolerating such behaviours risks normalising them.

2.3.3 The Safeguarding Governor

To ensure there are policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's and adults at risk welfare.

To activists and gain re-assurance that the arrangements are effective and that the processes in practice are robust, creating a proactive and practical safeguarding environment for all stakeholders.

2.3.4 Learners

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers, and others on site

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 9 of 48
Title: Safeguarding Policy for Skills		

- Reporting any concerns to a member of staff or directly to the Safeguarding Team with whom they feel comfortable discussing these concerns.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

3 DEFINITIONS

3.1 Child

Within the context of this policy a “child” is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002). Further, the additional duties regarding support, protection and safeguarding also extends to learners within the 14 to 16 age range from local schools.

3.2 Adult at Risk

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) we use the following indicators to identify an adult who is, or may become “at risk” whilst they are registered with us:

The individual:

- Is or may need community care services by reason of mental or other disability, age, or illness.
- Is or may be unable to take care of themselves.
- Is unable to protect themselves against significant harm or serious exploitation.

Whilst not definitive, the main categories of people covered by the definition of “adult at risk” include those who:

- Have a learning disability.
- Have a physical or sensory impairment.
- Have a mental illness including dementia.
- Are old and frail.
- Are detained in custody or under a probation order.
- Are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker)

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 10 of 48
Title: Safeguarding Policy for Skills		

vii. Within the new Care Act 2014 there are 10 elements of abuse:

- **Physical abuse** - This can include assault, hitting, slapping, pushing, and misuse of medication, restraint, or inappropriate physical sanctions.
- **Domestic violence** - Including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence. In 2013, the Home Office announced changes to the definition of domestic abuse:

- Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse... by someone who is or has been an intimate partner or family member regardless of gender or sexuality.
- Includes: psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence; Female Genital Mutilation (FGM); forced marriage.

Age range extended down to 16.

- **Sexual abuse** - including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** - Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or material abuse** - Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.
- **Modern slavery** - Difference between smuggling and trafficking: Trafficking is further exploitation after movement.
 - Sexual
 - Forced Labour
 - Financial
 - Child Trafficking
 - Criminal Exploitation
 - Illegal Adoption
- **Discriminatory abuse** - including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 11 of 48
Title: Safeguarding Policy for Skills		

A hate crime is any criminal offence that is motivated by hostility or prejudice based upon the victim's:

- disability
- race
- religion or belief
- sexual orientation
- transgender identity.
- Hate crime can take many forms including:
 - physical attacks such as physical assault, damage to property, offensive graffiti and arson
 - threat of attack including offensive letters, e-mails, abusive or obscene telephone calls, groups hanging around to intimidate and unfounded, malicious complaints.
 - verbal abuse, insults or harassment, taunting, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes, and bullying at school or in the workplace.
 - The use of electronic media to abuse, insult, taunt or harass.
- **Organisational abuse** - including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes and practices within an organisation.
- **Neglect and acts of omission** - including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Medication errors where the patient has incurred harm will be classified as a safeguarding concern. Likewise, medication incidents where the patient has not necessarily incurred harm but the perpetrator is the same member of staff for multiple incidents will be classified as a safeguarding concern.

Grade 3 and 4 pressure ulcer ulcers are considered in this context if elements of essential care are found to be omitted.

The Mental Capacity Act created the criminal offences of ill-treatment and wilful neglect in respect of people who lack the ability to make decisions. These offences can be committed by anyone responsible for that persons care and support. (Care Act – section 14 - 14.48).
- **Self-neglect** - this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 12 of 48
Title: Safeguarding Policy for Skills		

Trust staff will be expected to work sensitively with the patient, identifying care and social needs, offering comprehensive discharge planning with multi-professionals, taking care to respect the patient's lifestyle and wishes.

3.3 Adults at risk in Need of Protection and Early Help

Some adults at risk are in need because they are suffering or likely to suffer “significant harm”. Where local authorities believe adult at risk is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a learner, this can be done through contacting the local authority early help team to share concerns and ensure the early identification of needs.

3.6 Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of an adult at risk who is suffering, or likely to suffer significant harm.

3.7 Abuse

“Abuse” relates to the mistreatment of an individual's human and civil rights by any other person or persons and may consist of single or repeated acts. Incidents of abuse can be either to one person or more than one person at a time. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm.

The main types of abuse are:

Type of abuse	Information
Physical	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Emotional	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 13 of 48
Title: Safeguarding Policy for Skills		

	say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
Sexual	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Consent: happens when all people involved in any kind of sexual activity agree to take part by choice. They also need to have the freedom and capacity to make that choice. If someone says 'no' to any kind of sexual activity, they are not agreeing to it. But, if someone doesn't say 'no' out loud, that doesn't automatically mean that they have agreed to it either.
Sexual exploitation	It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive an adult at risk (a) in exchange for something the victim needs or wants, (b) for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been sexually exploited even if the sexual activity appears consensual.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 14 of 48
Title: Safeguarding Policy for Skills		

	Sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Neglect	The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Further definitions are contained within Appendix 6 and Appendix 8 for indicators of abuse.

4 RADICALISATION AND ACTS OF TERRORISM

The Counter Terrorism & Security Act (2015 with updates 2021) and The Prevent Duty

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and
- The threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with

The strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 15 of 48
Title: Safeguarding Policy for Skills		

- The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Offices uses a range of measures to challenge extremism in the UK, including:
- Where necessary, preventing apologists for terrorism and extremism from travelling to this country giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers.
- Funding a specialist police unit which works to remove online content that breaches terrorist legislation.
- Supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations.
- Supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on specified authorities including skills training, further and higher education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

PET-Xi is committed to supporting vulnerable students through its safeguarding policies and procedures and recognises that this can support the contribution to the Prevent duty.

Serious Violent Crime: As included in KCSIE 2023, all staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or significant change in well-being;
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions.

These could indicate that adults at risk have been approached by, or are involved with, individuals associated with criminal networks or gangs.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 16 of 48
Title: Safeguarding Policy for Skills		

All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice can be provided in the Home Office's 2018 guidance documents: Preventing Youth Violence and Gang Involvement and Criminal exploitation of children and adults at risk: county lines guidance.

All staff receive annual PREVENT training and the PREVENT policy is updated on an annual basis.

5 CORE PRINCIPLES

- PET-Xi is fully committed to safeguarding the welfare of all children and adults at risk by taking all reasonable steps to protect them from neglect, physical, sexual or emotional harm. PET-Xi's Safeguarding Policy and Procedure is based on the principles contained within UK and international legislation and government guidance. All staff will, at all times, show respect and understanding for the rights, safety and welfare of the children and adults at risk in our care and conduct themselves in a way that reflect the principles of our organisation. We will do this by:
- Ensuring that all new staff, including volunteers and interns, are made aware of PET-Xi's arrangements for safeguarding children and their responsibilities. Providing mandatory safeguarding training for staff and volunteers which will be reviewed on an annual basis and updated in line with Local Safeguarding Children's Board requirements. The Designated Safeguarding Lead (DSL) and Deputy Safeguarding Officers (DDSL) will receive training updated every two years, including training in interagency procedures.
- All staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e- bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Recognising the roles and responsibilities of the statutory agencies in safeguarding learners and the responsibility and expertise of the relevant agencies in determining whether individuals have or may have been abused or otherwise harmed.
- Carefully assessing all risks which children and adults at risk encounter and taking all necessary steps to minimise and manage them.
- It is the responsibility of child protection professionals to determine whether abuse has taken place, but it is everyone's responsibility to report concerns. All staff must follow the procedures in place for reporting concerns or disclosures.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 17 of 48
Title: Safeguarding Policy for Skills		

- Informing parents, children, and adults at risk on how to voice concerns or complaints about anything that they may not be happy with.
- Giving parents, children, adults at risk, and staff information about what we do and what can be expected from us.
- Responding to allegations appropriately with full investigation and, if appropriate, implement PET-Xi disciplinary and appeals procedures.
- Appointment of a Special Educational Needs Co-Ordinator (SENCO) to support children and adults at risk with additional needs. PET-Xi is aware that children and adults at risk with additional needs and disabilities may be more vulnerable to abuse both online and offline and additional barriers may exist.
- illustrating a clear commitment to prevention of abuse through rigorous recruitment and training and the promotion of safer working practice which supports transparency and prompt reporting of suspicions or allegations.
- Monitoring and reviewing systems to ensure compliance with Child Protection Legislation and procedures.

PET-Xi is committed to ensuring that the organisation:

- Provides activities and events that are planned, taking into consideration the safety and well-being of children and adults at risk, and organised in a way which minimises the possibility of them being harmed.
- Practices safe recruitment in checking the suitability of staff (including agency staff), volunteers and contractors to work with or in an environment where young people and adults at risk are present.
- Will notify the DBS of any suspicions regarding staff or prospective members of staff.
- Identifies children and adults at risk who are suffering, or likely to suffer, significant harm. In addition, ensuring that the safety of children and adults at risk is always considered where domestic abuse, mental health or drug and alcohol abuse are known to be a factor.
- Takes appropriate action to see that such children and adults at risk are always kept safe.
- Takes appropriate action to ensure that such children and adults at risk have access to all appropriate, available support to improve life chances and opportunities to learn and achieve.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 18 of 48
Title: Safeguarding Policy for Skills		

- Ensure staff are trained appropriately in recognising signs of child abuse or neglect and the safeguarding procedures they need to follow. (Including the signs and symptoms that may suggest a child, young person or adult at risk, is being drawn into terrorism or violent extremism
- Ensure staff are trained in procedures to protect themselves and limit the opportunities for misconduct allegations.
- As an organization, we do not offer personal care services or attend to the needs of individual adults through our staff. Basic Disclosure and Barring Service (DBS) checks will be carried out for two categories of staff:
 1. Delivery staff who have direct contact with learners.
 2. Staff involved in quality assurance, induction, enrolment, and review activities.
- Backroom staff with minimal or no direct contact will not require a DBS check unless they have disclosed convictions as part of our safer recruitment policy. The safeguarding team will conduct a risk assessment to determine whether a Basic DBS check is necessary.
- In the pursuit of these aims, PET-Xi will annually review policies and procedures with the aim of:
- Raising the awareness of issues relating to the welfare of children and adults at risk and the promotion of safe environments in which they can learn. Including online safety, child on child abuse and SEND learners.
- Aiding the identification of young people and adults at risk of significant harm, from others or themselves, and providing procedures for reporting concerns.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff
- As Technology, and risks and harms related to it evolve and changes rapidly, during the annual review of this policy PET-Xi will also conduct a risk assessment of current trends in social media platforms to ensure Safeguarding advice is current and appropriate.
- Ensuring the effective and safe recruitment of staff. PET-Xi will assess all posts to be filled and ensure recruitment checks. including Disclosure and Barring Service (DBS) checks are undertaken in line with the PET-Xi Recruitment Policy. Recruitment, selection and pre-employment vetting is carried out in accordance with Keeping Children Safe in Education 2022.

	Policy: SA01	 European Union European Social Fund
	V.7	
	Date: 13/10/2024	Page 19 of 48
Title: Safeguarding Policy for Skills		

- In developing these policies and procedures, PET-Xi will consult with, and take account of, guidance issued by the Department for Education, the Disclosure and Barring Service (DBS) and other relevant bodies and groups.

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 20 of 48
Title: Safeguarding Policy for Skills		

6 GOOD PRACTICE GUIDELINES

To ensure the objectives of this Policy are met a certain level of conduct is required from all our staff:

- Treat all staff, pupils, business partners and learners with respect.
- Recognise that challenging behaviours or changes in behaviours may be indications of abuse.
- Avoid befriending learners on a personal level or sharing too much information about personal lives, this includes by social media.
- Ensuring dignified and positive conduct with learners even when faced with challenging behaviours.
- Avoiding all physical contact with learners and unnecessary time alone.
- Respecting professional boundaries with other staff when pupils present.
- Careful use of reasonable force and only in times of physical danger. All instances of force used must be reported to the DSL and recorded.
- Dealing with any issues of learner infatuation and misconduct in a professional way and reporting it to the DSL
- Referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to police or children's social care
- The use of photography of other staff and learners must be limited and done with their consent. The photos must not be taken of learners unless the purpose has been previously identified and agreed with the DSL.

Treat online safeguarding concerns with equal measure as face-to-face delivery. Including awareness of and reporting of child-to-child concerns.

Avoiding all inappropriate behaviours towards pupils. Under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.

6.1 What we do at PET-Xi

PET-Xi has a number of provisions in place to ensure there is a positive culture of Safeguarding.

- A Safeguarding Team to support and promote a positive safeguarding culture.
- Company ID passes for all staff with safeguarding contact information attached.

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 21 of 48
Title: Safeguarding Policy for Skills		

- Safeguarding posters placed around the company offices.
- Dedicated safeguarding page on the company website.
- Safeguarding policy and procedures on the company website and internal staff SharePoint
- Online safeguarding system (CPOMS) to ensure concerns can be raised effectively. Including a dedicated safeguarding number and email address
- Weekly as well as monthly safeguarding meetings with the Safeguarding team
- A safeguarding governor to ensure that safeguarding process are scrutinised and effective.
- Annual safeguarding and prevent training for all staff
- New staff induction includes a safeguarding talk by a member of the Safeguarding team.
- Monthly newsletters and updates regarding safeguarding updates/topics
- Safer recruitment processes in place for new staff
- Annual external audits to ensure safeguarding processes are effective.
- Mental Health First Aiders to support with any wellbeing matters.

Group	Training	Frequency
All staff and annual updating	• Safeguarding/Prevent • KCSIE part 1 • Policies • Training events/newsletter/videos by safeguarding team	At induction and annual updating or at time of changes
Safeguarding Team	• DSL training • Safeguarding weekly & monthly briefing meetings • KCSIE updates	Ongoing throughout the year
ELT/Governors	Annual training/update	Annual and where required

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 22 of 48
Title: Safeguarding Policy for Skills		

Learners	• Safeguarding newsletters • Z cards/banners contract safeguarding information • Inductions and Career and Learning Plans	Ongoing
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6.2 Curriculum and Safeguarding

PET-Xi recognises the importance of making children and adults at risk aware of safeguarding when learning with PET-Xi. Therefore, the following provisions are put in place:

- Safeguarding information banners and Z cards on courses
- Learner inductions contain our safeguarding processes including who the safeguarding team is and how to raise a concern or request support.
- Safeguarding is embedded within our Career and Learning Plan and initial advice and guidance processes (CLP)
- Specific courses contain specific safeguarding training at the request of third party employers.

6.3 Confidentiality

The Data Protection Act (2018) and General Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children and adults at risk safe. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children, young people, and adults at risk of harm, abuse, or neglect.

Colleagues should never promise that they will not tell anyone about an allegation or disclosure, as this may not be in the best interests of the child, young person, or adult at risk of harm or abuse. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018),

7 PROCEDURE FOR REPORTING CONCERNS

Staff working with adults at risk will be issued with guidance and training on safeguarding procedures as part of PET- Xi's Welcome Induction. All reports are to be treated with the utmost confidentiality and only discussed with the DSL or DDSL. The reporting process is as follows, including online concerns and child to child / adult to adult concerns:

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 23 of 48
Title: Safeguarding Policy for Skills		

- In Skills, we have simple approach to reporting concerns and supporting our learners each member of staff knows that if they witness anything they see as a cause for concern that they ring a DSL and enter the details on CPOMS.
- The primary point of contact are the Learner Engagement Officers. It is their responsibility to not only ascertain the learner's eligibility for each course but to gently probe about possible barriers or causes of concern that need to be highlighted before the start of the course. These are fed directly to the DSL (Skills) as well as highlighted on the learner profile within Magn8. This ensures the trainers are prepared before the course begins.
- The second line support comes in the form of the Group Information sessions. Once again, any concerns are immediately fed back to the DSL (Skills).
- Once courses begin, daily reports on Magn8 are closely monitored by the Skills Operations Administrator.
- This comprehensive approach to reporting enables PET-Xi to provide wraparound support focusing on promoting learners' success through a process of identifying, securing, and coordinating relevant support.
- All SEND and cause for concerns are documented onto CPOMS, regardless of the RAG rating. Here they are monitored and constantly updated until the cases are deemed fit to be closed and archive.
- All active staff have an account on CPOMS and are encouraged to report concerns directly to this platform.
- All concerns or SEND barriers reported are actively monitored throughout the learners' time with PET-Xi. Learners will be signposted to relevant external agencies if required. Open communication between PET-Xi and work coaches / Job centres ensures the learners receive the best possible tutelage.
- In addition, PET-Xi has a dedicated Safeguarding phone line. The technical term for the system is a Hunt Group. Every call made to the Safeguarding line cycles through the members within the Safeguarding team, starting with the Head of Safeguarding and ending with a failsafe.
- There is a designated DDSL who oversees the Safeguarding email. Emails are distributed accordingly, including the Head of Safeguarding, and updated onto CPOMS.
- In addition to the monthly Safeguarding meeting, the team has a scheduled weekly meeting in which cases are discussed with the group to ensure that the care and support provided is consistent throughout our company and across both School and Skills.
- Trends, spikes and demographic differences are also discussed within the weekly meeting and fed back to the broader team, including Curriculum where course material is altered or amended to further support the learners.
- Weekly meetings are held between Head of Skills, Senior Contract Manager, and the DSL (Skills) to ensure that all areas within the department are consistently triangulated.

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 24 of 48
Title: Safeguarding Policy for Skills		

- Senior Contract Manager to ensure learner outcomes and/or progression routes are updated onto Magn8 which then feeds back to the DSL (Skills). Learner outcome will dictate whether cases are closed, or further support is offered.
- If the DSL or DDSL do not respond following the placing of phone call, voicemail, email and text the person reporting the incident must contact management to make them aware that there is a potential safeguarding issue, and that the Manager needs to contact the DSL or DDSL to advise them of the situation. These matters are to be treated in the strictest confidence, the manager need only be advised that there is a safeguarding concern, not the details.
- In the absence of any of the Designated Contacts, if at any point there is a risk of immediate harm to a vulnerable adult, staff are responsible for reporting the concern directly to Social Care and/or the Police immediately. (see contact information section for external agencies)
- This policy should be read in conjunction with PET-Xi's Whistle-Blowing Policy. In addition, the Low Levels concerns policy should be read to ensure staff understand they types/levels of concerns that can be raised.
- In all cases the DSL will be responsible for suitable secure written records to be maintained including actions, recommendations, or further actions to be taken.
- Quarterly updated given to the board of governors on incidents, actions taken and outcomes

7.1 Definitions used for identifying levels for reporting:

High Risk - Requires immediate action, call and speak with the head of safeguarding or DSL by phone.

Any high-risk concerns and issues that could impact on self or others, consider reporting to emergency services. E.g.: Suicidal or Self harming thoughts, threat to self/domestic violence, suspension from work with police, or similar involved.

- **All staff will contact the Head of Safeguarding or DSL directly.**
- Trainers or Line Managers must speak with DSL for support.
- Reporting and intervention will require to be documented on CPOMS and submitted to DSL.
- Any external reporting will be done by the DSL.
- Any interventions require follow updates with target dates – minimum review time required 1-3 days.
- Will require an action plan of support with DSL and any other stakeholders.
- Consideration of the possibility, there may be long term effects on an individual.

Making the decision on a high-risk concern or incident can be difficult, if you are unsure, please contact Head of Safeguarding / DSL for advice and support. Should a learner become

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 25 of 48
Title: Safeguarding Policy for Skills		

either an early leaver or be withdrawn the Head of safeguarding should be notified.

Medium Risk – Requires reporting to DSL or DDSL

A medium concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life.

EG: Grief, depression, stress, anything that may need support such as GP, other signposting to a third sector specialist.

- reporting and intervention will require to be documented on CPOMS
- an action plan of support by the line manager/trainer is required.
- requires review dates to ensure check-ins with the individual – minimum review time required – 1 week.
- may require signposting, information, advice, and guidance.
- all staff should be able to signpost an individual to a support network.
- all staff can ask advice of DSL or DDSL

Offering signposting, support, advice, and guidance can be difficult for Line Managers/Trainers, **staff are not counsellors and should not try to be**. Pastoral support is different. DSL or DDSL's will be able to support. Should a learner become either an early leaver or be withdrawn the DSL (Skills) will be notified.

Low Risk – Requires reporting to DSL or DDSL as an when occur.

A low concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life, but is short term. This may be a reactive response an immediate worry, a short-term worry or welfare concern.

- Low level concerns should be documented for all learners and staff,
- Incidents or concerns must be reported on CPOMS by **Line Manager and Trainers**
- Requires a planned follow up Trainer/Line Manager within 1-2 weeks.
- Requires check-ins with the individual until closed.
- May require signposting, information, advice, and guidance.
- All staff should be able to signpost an individual to a support network.
- All staff can ask advice of Head of Safeguarding / DSL or DDSL

Should a learner become either an early leaver or be withdrawn the Head of safeguarding should be notified.

7.2 Learner missing from education.

Following KCSIE 2023, staff must report immediately to the Safeguarding Team if adults at risk

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 26 of 48
Title: Safeguarding Policy for Skills		

fail to attend a course or go missing during a course.

The Safeguarding Team will try to contact the learner in the first instance. If unsuccessful, the next of kin or key contact will be contacted. If still unsuccessful, the Safeguarding Team will contact a third-party agency (including the Local Authority. Work coach and / or Job centre).

7.3 Risk Assessments:

Although the phrase "risk assessment" may conjure up images of a complex process of judgement, based upon skilled technical knowledge, the assessment is in fact nothing more than a careful examination of what is likely, in the workplace, in the learning environment or across the organisation as a whole, to cause harm to learners, staff, visitors or anyone else who could be affected by the PET-Xi activities. The purpose of the assessment is to identify action necessary to comply with legal requirements, making suitable and sufficient assessments of risks, arrangements for the effective planning, organisation, control, monitoring, and review of the preventive and protective measures required to safeguard all staff and learners. Risks are primarily identified through the risk assessment process. Care Risk Management is a process where risks associated with learners are identified and analysed. Steps are then taken to reduce, control, or eliminate the risk while meeting learners needs.

8. HANDLING STAFF ABUSE ALLEGATIONS

PET-Xi adheres to local safeguarding procedures for managing staff allegations, applicable to all staff and volunteers.

8.1 Overview: PET-Xi acknowledges that staff may face abuse allegations, which may or may not be true. Investigations are thorough, unbiased, and prompt. The welfare of the adult at risk is paramount, and decisions regarding staff are careful and informed to avoid damaging reputations and careers.

8.2 Allegation Receipt: Allegations should be immediately reported to the Head of Safeguarding, or the Head of Quality and Compliance if the allegation involves the former. If the CEO is implicated, the Chair of Governors is notified, and the Head of People may conduct the investigation.

8.3 Initial Assessment: The Head of Safeguarding, in consultation with the DSL and relevant local authority, assesses the allegation. If it warrants further investigation, it proceeds per PET-Xi's disciplinary policy, with the local authority designated officer (LADO) kept informed. PET-Xi leads allegations against supply staff, communicating with the LADO and supply agency.

8.4 Enquiries and Investigations: PET-Xi conducts internal enquiries independent of external agency investigations, ensuring no prejudice to the investigation. The DSL and/or Head of

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 27 of 48
Title: Safeguarding Policy for Skills		

Safeguarding contribute to inter-agency strategy discussions, maintaining confidentiality and advising the implicated staff to consult a representative.

8.5 Suspension: Suspension, a neutral act, is considered at any stage of the investigation and conducted per PET-Xi disciplinary procedures. Alternatives include paid leave of absence and withdrawal from specified duties.

8.6 Disciplinary Investigation: Disciplinary investigations follow PET-Xi disciplinary procedures.

8.7 Unsubstantiated Allegations: Unfounded allegations may signal abuse issues elsewhere, thus necessitating record-keeping. In collaboration with the DSL, a senior leader should:

- Verbally and in writing, assure the implicated staff member that no further disciplinary action will ensue. Consider offering counselling and support to restore their confidence. Inform the involved parties' parents/carers about the allegation and its outcome.
- If the allegation originates from a learner other than the alleged victim, contemplate notifying that learner's parents/carers.
- Draft a report detailing the allegation, the reasons for its dismissal, and confirmation of the actions taken.
- Under certain circumstances, consider broader disclosure of the investigation's outcome, especially if the matter is of public interest, widely known, or a subject of general gossip. Accurate public information is essential.

8.8 Record Keeping: Maintain all investigation-related documents securely, along with a written record of the outcome. If disciplinary action is taken, retain details on the staff member's personal and confidential file. If the allegation is unfounded, keep a record of the allegation, investigation, and outcome.

If a staff member is dismissed or resigns before the disciplinary process concludes, inform them about PET-Xi's statutory obligation to notify the Disclosure and Barring Service. Additionally, update the LADO on the case outcome.

All safeguarding incident recordings are stored on CPOMS.

8.9 Confidentiality: PET-Xi strives to uphold confidentiality and prevent unwanted publicity during an allegation's investigation or consideration. The Education Act 2011 introduced reporting restrictions to prevent any material that could identify an accused teacher from being published. These restrictions apply until the accused is charged with an offence, or until information about an investigation or decision in a disciplinary case arising from the allegation

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 28 of 48
Title: Safeguarding Policy for Skills		

is released by the appropriate body. The restrictions also cease if the individual waives their right to anonymity or if a judge lifts the restriction.

8.10 Organisations or individuals using PET-Xi premises: All visitors and employers are fully supervised when on PET-Xi premises. PET-Xi will follow its internal safeguarding process if a safeguarding concern is raised.

Please see Appendix 2 for a step-by-step guide on reporting a safeguarding concern.

9 SAFER RECRUITMENT:

PET-Xi has in place robust recruitment procedures which ensure that care is taken to protect young or vulnerable learners. PET-Xi has a single central record in place to track all pre-employment checks. The procedures apply to all staff and volunteers, and they are reviewed regularly to take account of following principles following the KCSIE 2024 guidance:

- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- Everyone in regulated activity will have an enhanced DBS with Bared list check.
- Online searches will be carried out candidates will be made aware this is part of the pre-employment checks process.
- Probation Order checks will be carried out where there is a teaching related role.
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants.
- Requirement of documentary evidence of academic and vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history including the explanation of any gaps.

Please see the Safer Recruitment Policy for further information regarding recruitment and pre-employment checks.

10 Online Monitoring and Filtering

PET-Xi recognises that in today's world, children and adults at risk need to be safeguarded from potentially harmful and inappropriate online material on the internet.

The breadth of issues can be categorised currently into four areas of risk as taken from Keeping Children Safe in Education 2023:

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 29 of 48
Title: Safeguarding Policy for Skills		

- Content - being exposed to illegal, inappropriate, or harmful content (pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism)
- Contact - being subject to harmful online interaction with other users (peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit)
- Conduct - online behaviour that increases the likelihood of, or causes, harm (making, sending and receiving explicit images)
- Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams

From the 1st of September 2024 under KCSIE 2024, the DSL is responsible for ensuring adequate and appropriate online monitoring and filtering standards.

PET-Xi use a DFE approved online monitoring and filtering software that is installed on to all laptops/desktops for learners and staff. This software will detect any harmful content that is searched, created, or transferred and immediately notifies the DSL and IT Manager.

The software has five levels of severity for example level five including content relating; suicide, terrorism and matters of a sexual nature. If a level five severity is raised, the DSL will take immediate action.

Harmful content will be blocked by the IT Department whilst anyone is using PET-Xi devices in a PET-Xi building regardless of age.

The DSL and IT Manager will review the software every week to ensure its effectiveness and reviewing content.

All staff receive E-Safety training when they start with PET-Xi and are provided with a copy of the E-Safety policy to ensure they understand the risks associated online for themselves, other employees, and learners. This is in addition to the annual safeguarding training all staff receive. The DSL and IT Manager will provide updates throughout the year in relation to E-Safety.

In line with training and PET-Xi policies, if anyone becomes aware that a staff member or learner is trying to or has accessed harmful content, they must notify the Safeguarding Team immediately.

PET-Xi cannot control what staff, children, and adults at risk access on their personal mobile phones. Therefore, PET-Xi have adopted the approach that mobile phones are not permitted during a course/teaching.

PET-Xi has the Cyber Essentials accreditation and has measures in place to mitigate the risk from data breaches and/or cyber-attacks.

Please refer to the E-Safety policy for further information or contact the Safeguarding Team.

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 30 of 48
Title: Safeguarding Policy for Skills		

11. EXTERNAL SPEAKERS AND EVENTS

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with us, or one of its contracted partners, who has been invited to speak to staff/learners.

The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events.
- Processes or protocols to demonstrate how information about the speaker is used to decide about whether to allow their event to take place or not (risk assessed)
- A requirement for speakers to sign up to the organisation's Equality, Diversity, and Inclusion Policy
- Evidence of the final decision made about whether to allow the speaker into the organization, including the mitigation measures put in place.

12 LINKS TO OTHER POLICIES

- Staff Disciplinary Policy and Procedures
- Anti-bullying Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Prevent Policy
- Safer Recruitment Policy
- Low Level Concerns Policy
- E-Safety Policy
- Wellbeing Policy
- Keeping Children Safe in Education 2023 (including Part 2 that includes Equality, Human Rights, SEND etc)

13. MONITORING EFFECTIVENESS

Where an allegation has been made against a member of staff, the designated senior manager, and other colleagues as appropriate, should, at the conclusion of the

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 31 of 48
Title: Safeguarding Policy for Skills		

investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of PET-Xi's procedures. Consideration should also be given to the training needs of staff.

14 EQUALITY IMPACT ASSESSMENT

This policy has been assessed for its impact on equal opportunities and has been informed by the aim to eliminate all forms of discrimination in all strands of the equal opportunities legislation.

15 REVIEW OF POLICY

The above policy will be reviewed annually or as required subject to legislative changes.

16. KEY EXTERNAL CONTACTS DETAILS

Local Authority Designated Officer (LADO) – Coventry	Email: lado@coventry.gov.uk Tel: 024 7697 5483 Online referral: www.coventry.gov.uk/ladorefferral
LADO – Warwickshire	Tel: 01926 410410 Contact us – Warwickshire County Council
LADO – Birmingham	Tel: 0121 675 1669 Email: Ladoteam@birminghamchildrenstrust.co.uk
LADO – Solihull	Tel: 0121 788 4310 Email: cpru@solihull.gcsx.gov.uk
LADO – Sheffield	Email: lado@sheffield.gcsx.gov.uk
Local Authority Childrens Social Services.	Tel: 02476 788555 Email: MASH@coventry.gov.uk
Multi-Agency Safeguarding Hub (MASH)	Emergency Duty Team Tel: 02476 832222
Coventry Safeguarding Children Partnership (CSCP)	Coventry Safeguarding Children Partnership MASH online referral form (MARF) Website: http://www.coventry.gov.uk/safeguardingchildren Warwickshire Safeguarding Children Partnership Telephone: 01926 410410 Emergency Team: (Out of hours): 01926 886922 Solihull Local Safeguarding Children Partnership Telephone: 01217884325

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 32 of 48
Title: Safeguarding Policy for Skills		

	Children's Services (Office hours): Telephone 01217884333 Emergency Team (Out of hours): Telephone 0121 605 6060 Website: https://solihullscps.co.uk Birmingham Safeguarding Children Partnership Specific area needs to be contacted. Information via Integrated Access Team (IAT) IAT Citywide service: Telephone: 0121 303 9515 Website: http://www.lscpbirmingham.org.uk
West Midlands Police Coventry Child Abuse Investigation Unit	Telephone: 024 7653 9044 Address: Little Park Street, Coventry, CV1 2JX
Support and Advice about Extremism	Local Authority Prevent Co-ordinator: Refer to MASH Channel Lead, Coventry: Telephone 02073407264 Email: Prevent@coventry.gov.uk And/or CTU: Gateway@west-midlands.pnn.police.uk Police Telephone: 101 Telephone: 0345 113 5000 Department for Education Non-Emergency Number: Telephone 020 7340 7264 Email: counter.extremism@education.qsi.gov.uk
PREVENT	Prevent Education Officer: Viv Brosnahan (part-time only) Telephone: 07701022994 (mobile) Email: viv.brosnahan@coventry.gov.uk Or Email: prevent@coventry.gov.uk
Prevent/ Channel Panel Referral	Refer to MASH: Email: mash@coventry.gov.uk and to CTU GATEWAY@west-midlands.pnn.police.uk
Female Genital Mutilation	Known FGM or disclosure by victim in immediate danger: Telephone 999 FGM hotline Telephone: 0800 0283550 Email: fqmhlp@cvnspcc.org.uk
Operation Encompass	Email: info@operationencompass.org

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 33 of 48
Title: Safeguarding Policy for Skills		

(Domestic Violence)	Website: https://www.operationencompass.org
NSPCC Whistleblowing Advice Line	Telephone: 0800 028 0285 Email: help@nspcc.org.uk Address: Weston House, 42 Curtain Road London EC2A 3NH
NSPCC Report Abuse	Sexual Violence and Sexual Harassment Report Abuse in Education Telephone: 0800136 663 Email: help@nspcc.org.uk NSPCC Helpline for Professional Telephone: 0808 800 5000
UK Safer Internet Centre for Professionals	Telephone: 0344 38147772 Email: helpline@saferinternet.org.uk
Child Exploitation Online Protection (CEOP)	Think U Know Website: https://www.thinkuknow.co.uk Website: www.ceop.police.uk
Disclosure and Barring Service	Telephone: 01325 953795 Email: dbsdspatch@db.s.qsi.gov.uk Address: PO Box 181, Darlington, DL1 9FA
Teaching Regulation Agency	Telephone: 0207 593 5393 Email: misconduct.teacher(a)education.gov.uk
Support contact details	Samaritans 116 123 (free 24hr service) www.samaritans.org.uk NSPCC For any adult who may have concerns about a child 0808 8005000 Childline 0800 1111 www.nspcc.org.uk Relate 0300 100 1234 www.relate.org.uk CALM (for males) 0800 58 58 58 www.thecalmzone.net For men who are feeling low in self- esteem or in crisis Refuge (for females) 0808 2000 247 www.refuge.org.uk Frank 0300 123 6600 www.talktofrank.com For anyone concerned about drug and alcohol use

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 34 of 48
Title: Safeguarding Policy for Skills		

	The Mix 0808 808 4994 www.themix.org.uk Essential information for under 25s Papyrus 0800 068 4141 www.papyrus-uk.org.uk Support for those dealing with depression, suicidal feelings or emotional distress, particularly teenagers and young adults Runaway Helpline 116 000 www.runawayhelpline.org.uk
Useful websites	Assertiveness www.mindtools.com www.skillsyouneed.com Career Explorations www.barclayslifeskills.com Communication Skills www.mindtools.com Confidence www.barclayslifeskills.com Finances www.moneyadviceservice.org.uk Health, Fitness and Exercise www.nhs.uk.co.uk Healthy Eating www.nhs.uk/LiveWELL/healthy-eating Housing www.coventry.gov.uk/housing Mental Health and Wellbeing www.youngminds.org.uk , www.mindtools.com, www.mind.org.uk Citizens Advice www.citizensadvice.org.uk Tel: England: 0800 144 8 444

17. Safeguarding Summary

PET-Xi is committed to safeguarding children and adults at risk and will always make safeguarding decisions that are in the best interests of the child and vulnerable adult.

18. Appendix

1. Statement
2. Reporting
3. Work Placements
4. E-Safety
5. Disclosure
6. Definitions
7. QR code to safeguarding webpage

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 35 of 48
Title: Safeguarding Policy for Skills		

Appendix 1: Statement

Safeguarding Statement

PET-Xi is committed to protecting young people and adults at risk from harm.

As a Safe Organisation:

We ensure that all our employees are aware of their responsibilities to safeguarding children and adults at risk.

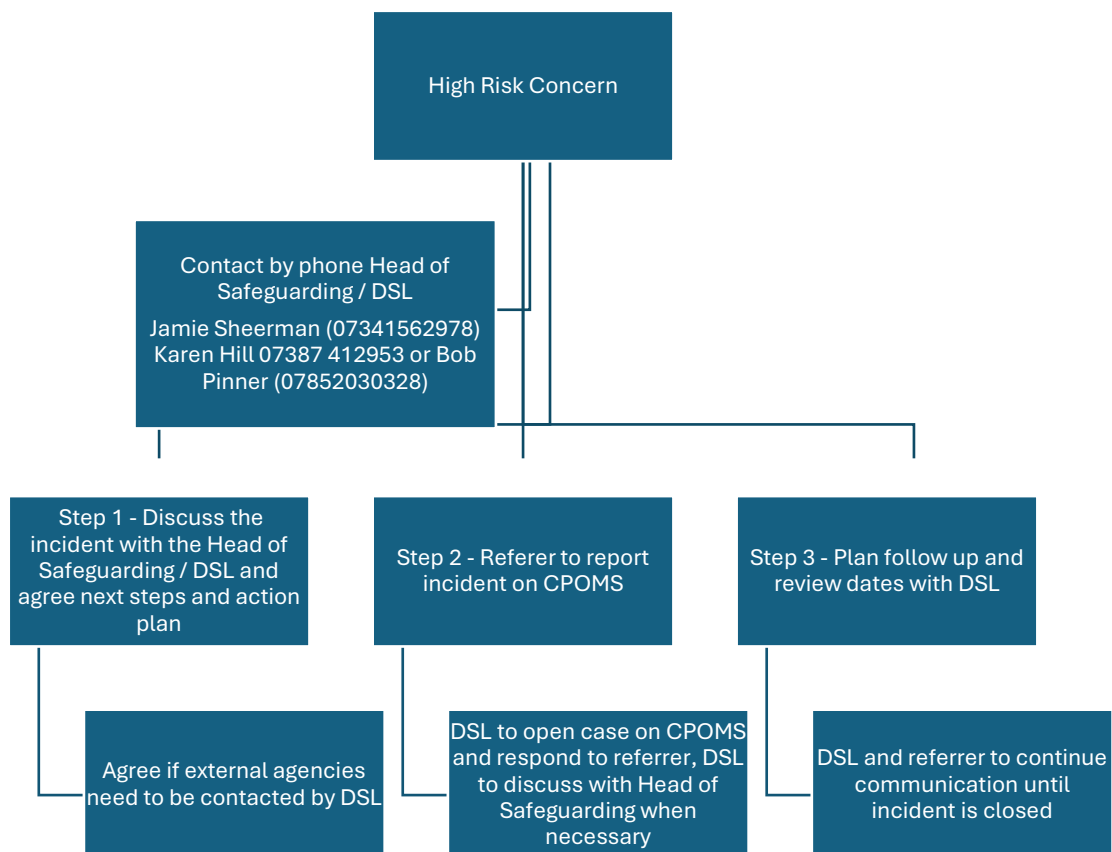
We do this by:

- Adopting safer recruitment practices of staff to work with young people and adults at risk.
- Clear expectations of staff about personal conduct and responsibility to always promote the wellbeing of young people and adults at risk.
- Good induction systems and ongoing training/updates for staff on safeguarding young people and adults at risk.
- Ensuring all staff have access to information and guidance on procedures for child protection and protection of adults at risk.
- A team of named managers trained to provide access to specialist advice on child protection and the protection of adults at risk.
- Sound data protection, information sharing and referral procedures.
- The promotion of a culture of safeguarding throughout the company.
- Listening to the concerns of young people and adults at risk with an open mind.
- Clear procedures for investigating allegations of harm to young people or adults at risk by persons in positions of trust within the company, including independent advice and referral to the police as necessary.
- Regular reporting of safeguarding incidents to the Senior Management Team.
- A clear and accessible complaints procedure where there are concerns to be raised.

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 36 of 48
Title: Safeguarding Policy for Skills		

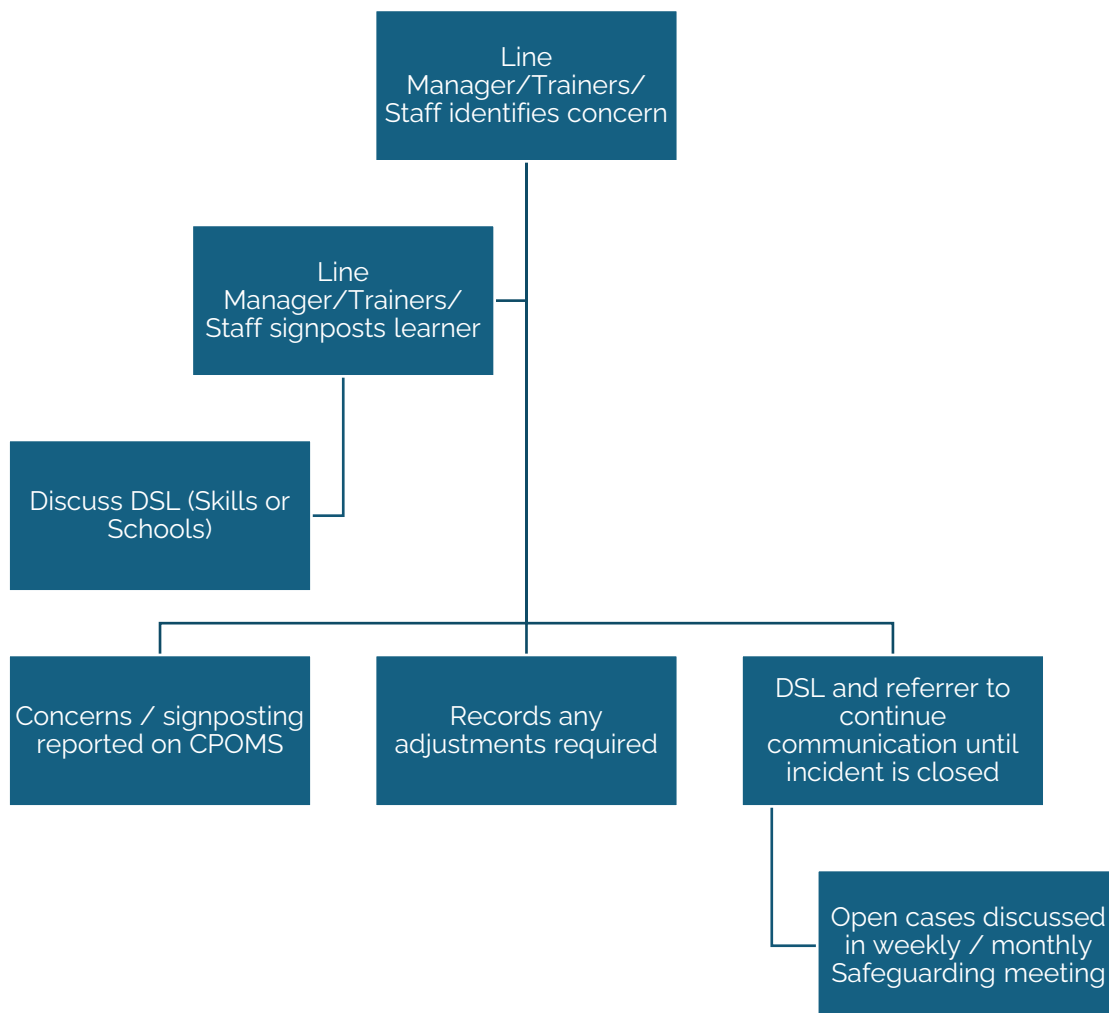
Appendix 2: Reporting Flow Charts:

High Risk Level – Concern/Incident



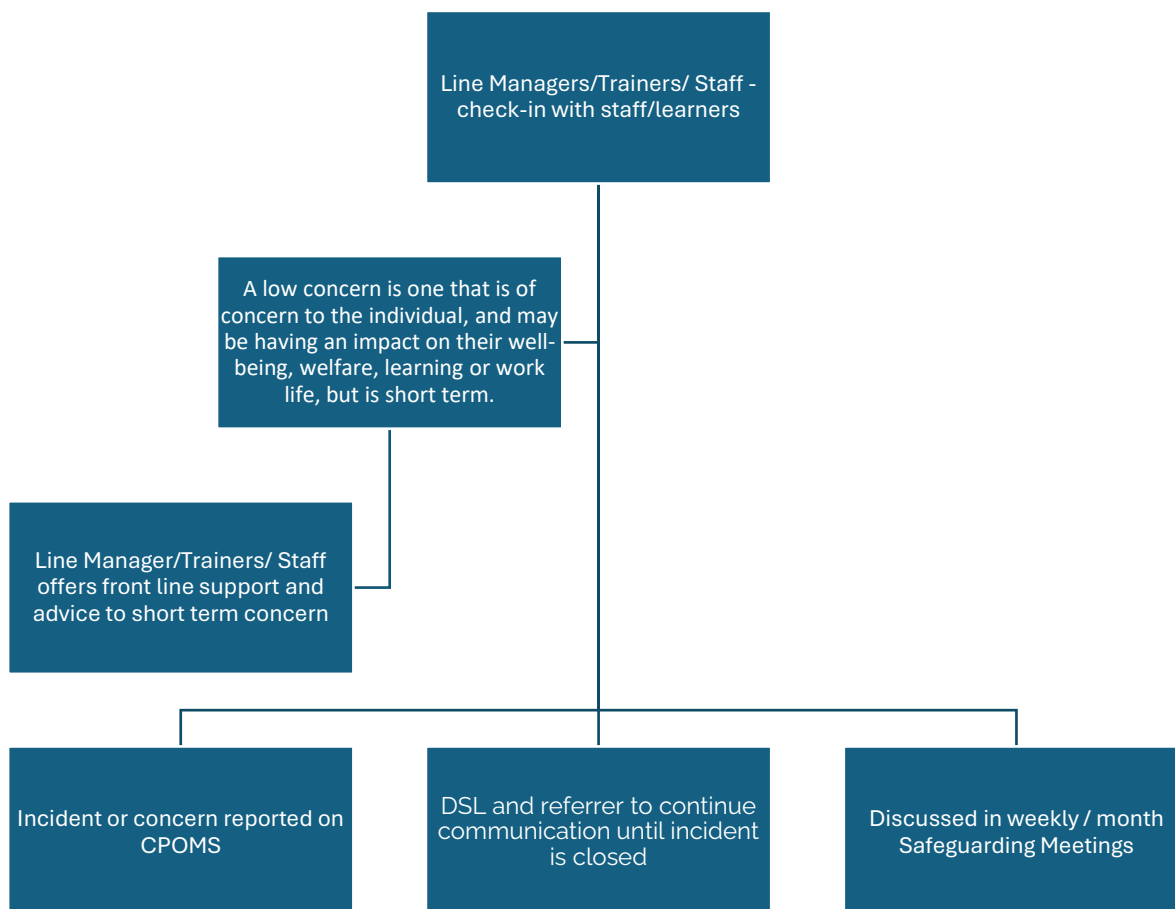
Medium Risk Level – Concern/Incident

	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 37 of 48
Title: Safeguarding Policy for Skills		



	Policy: SA01	 European Union European Social Fund
	V.6	
	Date: 29/04/2024	Page 38 of 48
Title: Safeguarding Policy for Skills		

Low Risk Level – Concern and/or Welfare



	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 18 of 48
Title: Safeguarding Policy		

15.

Appendix 3: Work Placements

Safeguarding Guidelines for Work Placements

Schools, colleges and training providers organising work placements must ensure that policies and procedures are in place to protect children and young people from harm.

It is essential that the key supervisor of the learner is aware of the procedures in place to ensure the safety of the young person.

Introduction

Any young person under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidelines (Working Together to Safeguard Children 2013).

Incidents of child abuse are not common BUT any child aged between the ages of 0 and 18 must be considered as vulnerable to abuse whether this is in the home, in school or College, in the workplace or in some other place.

Child abuse can take many forms, but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that young people are protected from harm.

Procedure

1. All complaints, allegations or suspicions of abuse must be taken seriously.
2. If an allegation is made that a learner has been abused or if there is a suspicion that a student has been abused this should be reported to the student's college supervising member of staff immediately. If the learner's college supervisor is not available, please contact one of the DSL immediately.
3. Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured.
4. If the complainant is the learner, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 19 of 48
Title: Safeguarding Policy		

¹⁵leading questions can cause problems for the subsequent investigation and any following court proceedings.

5. A full record shall be made as soon as possible of the nature of the allegation and any other relevant information including:

- The date
- The time
- The place where the alleged abuse happened.
- Your name and the names of other present
- The name of the complainant and, where different, the name of the student who has allegedly been abused.
- The nature of the alleged abuse
- A description of any injuries observed.
- The account which has been given of the allegation that should be signed and dated by the person completing the report.

Please note: Some learners with learning disabilities may need different treatment to others e.g. in the way their physical/mental condition might mask possible abuse.

Apprentices

- Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding.
- Placement Officers/Assessors will carry out all risk assessments and include safeguarding discussion as part of workplace reviews with students.
- Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details.

Appendix 4: E-Safety

E-Safety Policy and Procedure

1.0 All online safeguarding concerns will be dealt with in line with this policy, particularly in terms of referral and recording procedures.

2.0 All members of staff will be advised of the company's IT Acceptable User Policy (AUP) and E-Safety Policy and will agree to adhere to it.

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 20 of 48
Title: Safeguarding Policy		

3.15 The prevalence of issues arising through children's access to the online world is significant and all staff should be aware of associated risks and signs/symptoms. These are categorised within KCSIE 2022 as

• Content • Contact • Conduct

This includes non-age-appropriate content, self-harm and suicide, sexting, cyberbullying, grooming, radicalisation, and gaming (now identified by the World Health Organisation as a disorder)

KCSIE 2022 makes specific reference to keeping children safe online including when they are online at home. This is partly in response to the significant impact of COVID-19 in relation to children's use of the online world and the challenges as a result.

Staff may become concerned about children, young people, and adults at risk if they are:

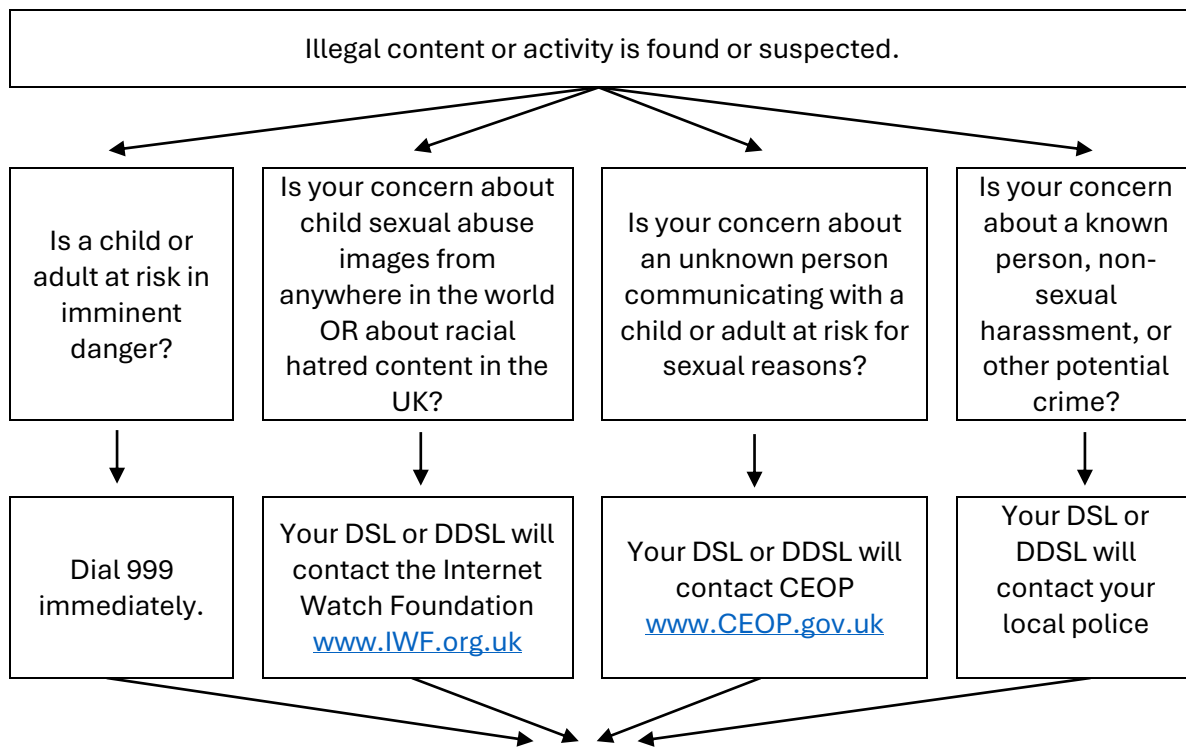
- Accessing illegal websites or inappropriate "lifestyle" or for their age and ability.
- Receiving unwanted or upsetting text or e-mail messages or images.
- Being "groomed" by a responsible adult with a view to meeting the child, young person, or adult at risk for their own illegal purposes including sex, drugs, radicalisation, or criminal activity.
- Viewing or receiving socially unacceptable material such as inciting hatred or violence.
- Sending or receiving bullying messages or posting malicious details about others.
- Scamming for financial gain.
- Ignoring copyright law by downloading music videos.
- Becoming secretive about where they are going or who they are meeting.
- Secretive about what they are accessing online.
- Using a phone, iPad or tablet in a closed area, away from other people.
- Accessing the web or using a handheld device for long periods and at all hours.
- Constantly clearing their browsing history.
- Receiving unexpected money or gifts from people they meet online.
- Sending sexually inappropriate images of themselves to others (i.e., "sexting") which, for under 18-year-olds, is an offence under the Sexual Offences Act 2003.

4.0 Staff may become concerned about a member of staff who:

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 21 of 48
Title: Safeguarding Policy		

15. Befriends or communicates with learners who they work with, especially by their personal phone, online, by messaging and social media etc.
- Is secretive about what they are doing and who they are meeting.
 - Takes images of company activities with their own phone, iPad, or tablet without permission of their line manager.
 - Does not seek parental permission for taking images of children and young people under 18 years of age.
 - Constantly clearing their browser history.
 - Is viewing pornography at work.
 - Is viewing child sexual abuse images at any time.
 - Is promoting discrimination, illegal acts, or racial or religious hatred of any kind.
 - Sharing confidential or sensitive information.
 - Circulating or messaging any information which may be offensive.

E-Safety Referral Flowchart



	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 22 of 48
Title: Safeguarding Policy		

15.

Always seek support and guidance from the Safeguarding Team

APPENDIX 5: Disclosure

Guidelines for Dealing with Disclosure

If a child, young person or adult at risk tells a member of staff about possible abuse, the member of staff should:

- Listen carefully and stay calm, never promise confidentiality.
- Not interview the alleged victim, but question normally and without pressure, to be sure that the member of staff understands what the alleged victim is telling them.
- Do not suggest the wording that the alleged victim should use.
- Reassure the alleged victim that, by telling the member of staff, they have done the right thing.
- Inform the alleged victim that the information must be passed on, but that only those that need to know about it will be told. Inform the child or young person of to whom the matter will be reported.
- Record the main points carefully.
- Make a detailed record of the date, time, place, what the alleged victim said, did and the questions asked by the member of staff, etc.

Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Safeguarding Lead (DSL).

Contact details for PET-Xi designated safeguarding managers and key external agencies will also be included in the Business Continuity Plan

APPENDIX 6: Definitions

Definition of young people and adults at risk

Definition of Child - Working Together to Safeguard Children - HM Gov 2015

The policy and procedures apply to all children and young people up to the age of 18 years. Within the document the terms “children” or “child” refer to all children and young people up to the age of 18 years.

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 23 of 48
Title: Safeguarding Policy		

15.

The fact that a child has become sixteen years of age, is living independently or is in further education, is in the armed forces, in hospital, or in prison or a young offender's institution, does not change their status or their entitlement to services or their protection under the Children Act 1989.

Definition of an Adult at risk of abuse or neglect – Care Act 2014

When a young person reaches the age of 18 the responsibility for their well-being may transfer to adult service providers. Although they cease to be subject to the Safeguarding Children Procedures, some adults may continue to be at risk of abuse or neglect.

The safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Since the publication of the Care Act 2014, the range of people considered to be vulnerable has been widened to include people trafficking and modern slavery, adults encountering domestic abuse violence, substance misusers, asylum seekers and those who self-neglect.

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 24 of 48
Title: Safeguarding Policy		

15.

Harm

Harm includes ill treatment (including sexual abuse, exploitation and forms of ill treatment which are not physical); the impairment of health (physical or mental) or development (physical, intellectual, emotional, social, or behavioural); self-harm and neglect; unlawful conduct which adversely affects a person's property, rights, or interests (for example, financial abuse)

Radicalisation

The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups

Extremism

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs

Exploitation

Exploitative situations, contexts, and relationships where a person or persons receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) because of them completing a task on behalf of another individual or groups of individuals

Victimisation

The action of singling someone out for cruel or unjust treatment

Welfare

The health and happiness of a person or group

Data Protection

Legal control over access to and use of stored data

Modern Slavery Act 2015 (<https://www.gov.uk/government/collections/modern-slavery>)

Modern slavery takes many forms. The most common are:

- Human trafficking. The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal
- Forced labour. Any work or services people are forced to do against their will, usually under threat of punishment
- Debt bondage/bonded labour. The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 25 of 48
Title: Safeguarding Policy		

- 15. Descent-based slavery (where people are born into slavery). A very old form of slavery, where people are treated as property, and their “slave” status has been passed down the maternal line.
- Child slavery. When a child is exploited for someone else’s gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery
- Forced and early marriage. When someone is married against their will and cannot leave. Most child marriages can be considered slavery
- Domestic servitude. Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person’s home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

Child on Child

This form of abuse is when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children/young people both on and offline.

APPENDIX 8. Indicators of abuse

See below for possible indicators of abuse. (Taken from 'What to do if you are worried a child is being abused', 2015):

- Children/Adult whose behaviour changes - they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children/Adult with clothes which are ill-fitting and/or dirty;
- Children/Adult with consistently poor hygiene;
- Children/Adults who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children/Adult who don't want to change clothes in front of others or participate in physical activities;
- Children/Adult who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children/Adults who talk about being left home alone, with inappropriate carers or with strangers;
- Children/Adults who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children/Adults who are regularly missing from education;
- Children/Adults who are reluctant to go home after school;
- Children/Adults with poor school attendance and punctuality, or who are

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 26 of 48
Title: Safeguarding Policy		

15. consistently late being picked up;
- Children/Adults who drink alcohol regularly from an early age;
 - Children/Adults who are concerned for younger siblings without explaining why;
 - Children/Adults who talk about running away; and
 - Children/Adults who shy away from being touched or flinch at sudden movements;
 - FGM – difficulty walking/standing/sitting, increased frequency in toilet habits and frequent stomach and related issues.

PET-Xi recognises that the above list of indicators is not exhaustive, and staff will receive training on indicators of abuse.

Version	Action	Author	Verifier	Comments	Date
1	Original	Simon Fitzgerald	Nasir Lakhanpal	Created	20/10/2017
1.1	Update	Simon Fitzgerald	Nasir Lakhanpal	Amended Version Control	14/11/2017
1.2	Update	Simon Fitzgerald	Nasir Lakhanpal	ESF Logo added	15/05/2018
1.3	Update	Simon Fitzgerald	Nasir Lakhanpal	Updated	23/10/2018
2	Annual Review	Simon Fitzgerald	Nasir Lakhanpal	Updated Contact details and referral agencies	01/08/2019
3	Annual Review	Simon Agar	Simon Fitzgerald	Updated Contacts	26/08/2020
3.1	Review	Jas Mann	Simon Agar	Reviewed	02/02/2021
4.0	Review	Simon Agar	Ruth Exelby	Inclusion and updates to reflect KCSIE 2021	12/08/2021
4.1	Update	Simon Agar	Ruth Exelby	Inclusion of CAB Contact	10/09/2021
4.2	Update	Susan O'Neill	Gary Drake	DSL name change	05/08/2022
4.3	Update	Bob Pinner	Susan O'Neill	Review in line with KCSIE2022	01/09/2022
4.3	Review	Bob Pinner	Anne Brennan Governor	Sign off on above changes	26/09/2022
5.0	Review	Dale Ball	Olga Bottomley, Governor	Review following safeguarding audit	17/04/2023
6.0	Annual Update	Dale Ball	Olga Bottomley,	KCSIE 2023 Update	15/08/2023

	Policy: SA01	 European Union European Social Fund
	V.5	
	Date: 17/04/2023	Page 27 of 48
Title: Safeguarding Policy		

15.			Governor		
6.0	Review	Dale Ball	Olga Bottomley, Governor	Change of Team	01/12/2023
				Review	15/08/2023
7.0	Annual Update	Vivienne Turner		Change in Team	29/04/2024
8.0	Review	Bob Pinner		Team Changes	13/10/24