

Crosby Aviation Training Ltd

Annex 6 – Safeguarding and Prevent

Purpose:

The aim of the Quality Management System Manual is to enable Crosby Aviation Training (CAT) to have a systematic approach to ensure that the QMS is regularly checked to maintain currency and reflect existing working practice and current legislation.

Owner: Gemma Aiuto-Turner
CEO



Record of Amendments

Issue	Detail of Change	Issue Date	Review Date	Name & Signature
1.0	Initial Issue	May 21	May 22	Gemma Aiuto-Turner
1.1	Annual Check	Jun 22	Jun 23	Gemma Aiuto-Turner
1.2	Annual Check	Jun 23	Jun 24	Gemma Aiuto-Turner
1.3	Annual Check	Dec 24	Dec 25	Gemma Aiuto-Turner
1.4	New Ofsted framework	Nov 25	Nov 26	Gemma Aiuto-Turner

Scope and Application

CAT's mission is to provide the highest quality education, training and support services for all its learners. This Policy is aligned to CAT's mission and strategic aims and objectives.

This Policy applies to all activities, on and off site and every member of staff and all students.

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1. Statement of Intent

This policy sets out the requirements and responsibilities of CAT for keeping learners safe and promoting the welfare of our learners by creating and maintaining a safe learning environment.

CATs Safeguarding Policy recognises the statutory duty to operate in a way that safeguards its learning community and to ensure that within CATs setting and in related activities, safeguarding is recognised as 'everyone's business' and a core mandatory responsibility.

In working towards this aim, the CAT is committed to working with relevant Multi Agency partners to take all reasonably practical steps to ensure that the legal and pastoral duties owed to learners and staff in respect of safeguarding are discharged in accordance with current legislation and best practice.

This Policy applies to all learners and employees. It is acknowledged that all can be the first point of disclosure or notification of a safeguarding concern.

There are four main elements to our Safeguarding Policy:

- Prevention through the culture, teaching, training and pastoral support offered to learners and staff;
- Procedures for identifying and reporting cases, or suspected cases, of abuse. (Because of employees contact with learners, they are well placed to observe the outward signs of abuse);
- Support to learners and staff who may have been abused; and
- Safe recruitment of staff and volunteers.

2. Roles and Responsibilities

Designated Safeguarding Lead (DSL): Rich Coopey, COO

Deputy Designated Safeguarding Lead (DDSL): Gemma Aiuto-Turner, CEO

3. Arrangements

Promote the policy

CAT is commitment to promotion of welfare and protection from harm. CAT ensures that the initial induction of new employees, in team meetings, during training, that employees are provided with clear information about the subject, the policy and where to find it.

Commitment towards the policy

CAT are not in a position to investigate any concerns. This function is carried out by the relevant agencies that are notified, e.g. Police, social services.

CAT operates in accordance with the Children Acts 1989 and 2004, Keeping Children Safe in Education 2025, which remains in force until 31 August 2026, and Working Together to Safeguard Children 2026. Keeping Children Safe in Education applies to Independent Training Providers. CAT will implement Keeping Children Safe in Education 2026 from 1 September 2026.

For safeguarding purposes, a child is anyone under the age of 18. CAT also recognises its responsibilities towards adults at risk under the Care Act 2014 and associated statutory guidance.

The Referrals section of this guidance stipulates that:

Anyone who has concerns about a child's welfare should make a referral to local authority children's social care and should do so immediately if there is a concern that the child is suffering significant harm or is likely to do so.

Employee training in implementing the policy

Training will be provided, every 12 months, by Education Training Foundation and include;

- Safeguarding in Further Education and Skills
- Prevent for Further Education and Training

Leadership will complete – Safer Recruitment in Further Education and Skills.

The DSL will complete - Safeguarding Adults level 3 Training for Managers and Designated Safeguarding Leads by the Ann Croft Trust.

Definitions

CAT adopts the definitions of safeguarding that Ofsted uses. These have been informed by statutory guidance.

Safeguarding children is defined in Working Together to Safeguard Children as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in the circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

An adult at risk is a person aged 18 or over who:

- has needs for care and support, whether or not those needs are being met by a local authority;
- is experiencing, or is at risk of, abuse or neglect; and
- because of those needs, is unable to protect themselves from the abuse or neglect, or the risk of it.

Adult safeguarding means protecting an adult's right to live safely, free from abuse and neglect.

Types of abuse.

- Physical abuse is the deliberate bodily injury to a young person/adult at risk or the willful or neglectful failure to prevent physical damage or suffering. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, confinement to a room, or inappropriately giving drugs to control behaviour.
- Emotional abuse is the persistent emotional ill-treatment of a young person/adult at risk, such as to cause severe and persistent adverse effects on his or her emotional development. For example, it may involve conveying to him or her that they are worthless or unloved, inadequate, or valued only insofar as they meet another person's needs. In addition, it may involve causing them frequently to feel frightened or in danger or the exploitation or corruption. Some level of emotional abuse is involved in all types of ill-treatment of a young person/adult at risk, though it may occur alone.
- Sexual abuse involves forcing or enticing a young person/adult at risk to participate in sexual activities, whether he or she is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. In addition, they may include non-contact activities, such as involving them in looking at or the production of pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.
- Neglect is the persistent failure to meet a young person's/adult at risk's physical, emotional and/or psychological needs, likely to impair their health or development severely. For example, it may involve a parent or carer failing to provide adequate foods, shelter and clothing, failing to protect a young person/adult at risk from physical harm or danger, failing to ensure access to appropriate medical care or treatment, lack of stimulation or lack of supervision. It may also include non-organic failure to thrive (faltering growth).
- Self-neglect covers a wide range of behaviour in which an adult neglects to care for their personal hygiene, health or surroundings, including hoarding. It may not always result in a section 42 safeguarding enquiry; this will be considered case by case, taking account of the adult's ability to protect themselves and control their own behaviour.
- Organisational or institutional abuse is the mistreatment of people brought about by repeated poor or inadequate care or support or poor systematic practise that negatively affects the whole environment. It occurs when the individual's wishes, needs and requirements are sacrificed for the smooth running of a group, service or organisation.
- Financial or material abuse is the exertion of control over a young person/adult at risk through economic means. This may be limiting access to money or other resources or forcing all financial responsibility onto their victim while limiting their ability to provide this. Financial abuse may include:
 - Taking money from them.
 - Not allowing access to shared money.
 - Making them accountable for everything that they spend.
 - Taking out loans, credit cards or running up debt in the victim's name.
 - Not allowing them to buy necessities.
 - Preventing them from gaining employment.

- Causing them to lose or forcing them to give up employment.
- Female Genital Mutilation (FGM) is the procedure in which the female genitals are deliberately cut, injured or changed, but when there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting".
- Honour-based violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. It can be described as a collection of practices designed to control behaviour within families or other social groups to protect perceived cultural or religious beliefs and/or honour. For example, such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.
- Forced marriage is a marriage conducted without the valid consent of one or both parties and where duress is a factor.
- Grooming happens when the abuser exploits a power differential for their gain and/or gratification. Grooming is how the abuser desensitises the victim to make them less likely to report the abusive behaviour they experience.
- Online abuse is any abuse through the internet, whether through social networks, playing games online or using mobile phones. For example, young people/adult at risks may experience cyberbullying, grooming, sexual abuse, sexual exploitation, blackmail or emotional abuse. This may be an extension of abuse that happens in person, or it may be abuse that only occurs online. Young people/adult at risks are at risk of online abuse from people they know and people they do not.
- Radicalisation is a specific form of grooming and references how adult at risks are targeted and recruited by people to engage in extremist activity.

Indicators of abuse

The following is a list of some indicators of abuse, but it is not exhaustive:

PHYSICAL INDICATORS	BEHAVIOURAL INDICATORS
• Unexplained bruising in soft tissue areas • Repeated injuries • Black eyes • Injuries to the mouth • Torn or blood-stained clothing • Burns or scalds • Bites • Fractures • Marks from implements • Inconsistent stories/excuses relating to injuries	• Unexplained changes in behaviour - becoming withdrawn or aggressive • Difficulty in making friends • Distrustful of adults or excessive attachment to adults • A sudden drop in performance • Changes in attendance pattern • Inappropriate sexual awareness, behaviour or language • Reluctance to remove clothing

Guidelines for employees in relation to a disclosure of abuse

Always:

- Record what has been said on the Safeguarding Disclosure Document, ensuring that this is verbatim and not paraphrased.
- Let them talk, allowing them the time they need to say what they want.
- Explain that you must tell the Designated Safeguarding Lead.
- Remain sensitive and calm.
- Use open questions (who, what, where, when, why, how), but only to clarify details.

- Where appropriate, involve relevant experts/organisations immediately, using the Safeguarding Referral List to identify the most suitable support available.
- Tell them what will happen next and reassure the person that:
- they were right to tell you.
- They are not to blame.
- They are being taken seriously.
- The appropriate support will be sought out.
- Support will be ongoing.

Never:

- Promise confidentiality.
- The question, unless for clarification.
- Use leading or closed questions.
- Make promises you cannot keep.
- Rush into actions that may be inappropriate.
- Make/pass judgment on the situation or anyone involved.
- Take sole responsibility - consult the Designated Safeguarding Lead so you can begin to protect the young person/adult at risk and gain support for yourself.

Reporting of concern or incident

All learners must understand how to raise concerns if they do not feel safe and confident that these concerns are taken seriously. All learners must be notified of the processes that CAT follow in the event of a learner disclosure. This must be done at the very beginning of their programme to be fully informed throughout the course. Learners must be aware of who their points of contact within the business are and their role in handling safeguarding concerns.

All matters relating to a safeguarding concern or incident must be reported to the Designated Safeguarding Lead. All employees will follow the following procedures in writing with such issues.

Any safeguarding concern, disclosure, allegation or incident concerning a learner must be reported immediately to the DSL or, if unavailable, the DDSL. Their absence must not delay appropriate action. If neither is available, staff must seek advice from the appropriate local authority safeguarding service. Where anyone is in immediate danger, call 999.

The learner must be advised by the CAT colleague that, when receiving the report of a suspicion, allegation or incident of abuse, the business has a legal duty to inform an authorised agency if there is a real and/or immediate risk of harm.

In the event of a learner disclosure, the CAT colleague must notify the learner of the support services available within the business/community. In addition, all CAT colleagues have to access the CAT Safeguarding Referral List that is stored on the CAT shared drive. However, the learner is not obliged to avail themselves of these services if they do not wish to do so.

All discussions with the learner must be documented. The documenting of all safeguarding concerns must be done on the Safeguarding Disclosure Document found on the CAT shared drive. This document must be sent to the Designated Safeguarding Lead to be stored securely.

On receipt of a Safeguarding Disclosure Document, the Designated Safeguarding Lead must save this in the restricted access Safeguarding folder on the shared drive. The report will also be recorded on the safeguarding tracker. The Designated Safeguarding Lead is then

responsible for maintaining weekly contact with the learner/CAT colleague to monitor the situation until it has been resolved.

A safeguarding case may only be closed when the DSL has:

- assessed the current risk and determined that no further safeguarding action is required by CAT;
- considered the outcome of any referral or external agency involvement;
- recorded all actions, decisions, outcomes and the reasons for those decisions; and
- confirmed any ongoing support or monitoring arrangements.

Where risk remains, an external agency is still involved or the outcome is unknown, the case will remain open and be reviewed by the DSL. The views of the learner and others involved will be considered, but agreement that the situation has improved will not, by itself, determine that the case is closed.

Concerns or allegations about CAT personnel

Any concern about the conduct of a CAT employee, director, associate, contractor or volunteer must be reported immediately to the CEO. A concern involving the CEO must be reported to the DSL or directly to the relevant external safeguarding authority. A concern involving the DSL must be reported to the CEO.

Where the concern indicates that a person may have:

- harmed, or potentially harmed, a child or adult at risk;
- committed a criminal offence against or related to them;
- behaved in a way that indicates they may pose a risk of harm; or
- behaved in a way that indicates they may be unsuitable to work with children or adults at risk,

CAT will seek advice without delay from the relevant Local Authority Designated Officer (LADO), adult safeguarding service or police. CAT will not begin an internal investigation before obtaining appropriate external advice.

A low-level concern is any concern, however small, that someone working for or on behalf of CAT has behaved inconsistently with expected professional standards but the behaviour may not meet the harm threshold. All low-level concerns must still be reported, recorded confidentially and reviewed for patterns of behaviour.

CAT will make referrals to the Disclosure and Barring Service whenever the legal referral criteria are met.

Online safety

CAT treats online safety as an integral part of safeguarding. Online risks may relate to:

- **content** – exposure to illegal, inappropriate or harmful material;
- **contact** – harmful interaction, grooming or exploitation;
- **conduct** – harmful online behaviour, including bullying and sharing explicit images; and

- **commerce** – scams, phishing, gambling and other financial risks.

CAT provides learners with age-appropriate online safety information at induction and throughout their programme, including the safe use of remote-learning platforms. Learners are told how to report online concerns, which must be handled through CAT's safeguarding procedures.

CAT will apply proportionate safeguards to systems and platforms it controls. Where learners use employer systems, CAT will work with the employer to address concerns connected with learning.

Safeguarding Concern Record

Name		Date	
Contact Number		Time	
Trainer		Location	

Note down the learner's account in their own words in the box below.

Before continuing the conversation, make sure the learner is aware that confidentiality cannot be guaranteed.

Action was taken in response to this conversation.

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

CAT Employee member

Learner _____

Any additional people

Immediate actions taken:	
Description	Performed by:
Date and time reported to DSL:	
DSL Assessment of risk:	
External advice or referral made, including date, time and contact:	
Decision and action taken, including reasons:	
Outcome and any ongoing support or monitoring required:	
Review date, where applicable:	
Record completed by – name, role, signature, date and time:	
Reviewed by DSL/DDSL – name, signature, date and time:	

4. Prevent

Policy

Prevent is part of the UK's Counter-Terrorism Strategy, known as CONTEST. A crucial part of the Prevent strategy is Channel; the Police's work with public bodies, such as training providers, to identify those at risk of being drawn into terrorism, assess what the trouble might be, and then develop tailored support for those referred to them. Channel focuses on providing support at an early stage to people identified as being vulnerable to being drawn into terrorism. In 2015 the law was changed to oblige organisations to actively engage with the Channel programme and refer those identified as vulnerable.

Objective

Prevent forms part of the government's counter-terrorism strategy, CONTEST. Its purpose is to stop people from becoming terrorists or supporting terrorism. CAT will comply with the Counter-Terrorism and Security Act 2015 and the Prevent Duty Guidance 2023 as part of its wider safeguarding responsibilities.

CAT will maintain a proportionate Prevent risk assessment covering national, regional, local and online risks. Where risks are identified, CAT will maintain an action plan setting out the measures required to reduce them. The assessment and action plan will be reviewed at least annually and following any significant change or incident.

Staff must remain alert to changes or behaviour that may indicate susceptibility to radicalisation, without relying upon stereotypes or treating any single characteristic as evidence. Concerns must be reported immediately to the DSL or DDSL, who will apply the Notice, Check, Share approach and seek advice from the local authority Prevent lead or police where necessary.

Where the referral threshold is met, the DSL will submit the national Prevent referral form to the police. The police -not CAT- will assess the referral and determine whether it should progress to a local authority-led Channel panel. Where there is an immediate threat or danger, staff must call 999.

CAT will provide proportionate Prevent training and actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Learners will be supported to challenge extremist ideas while participating in lawful discussion and debate.

5. Monitoring and Review

This Policy will be reviewed and consulted upon annually. The CEO will approve any updates to this policy.

All procedures under this Policy are subject to monitor and review. The main purpose of this review is for the continual improvement of the system.