

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

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

Role	Responsibilities
Designated Senior Person/Lead Safeguarding and Learner Well-being – Rich Coopey	➤ Designated Senior Person(DSL) responsible for Safeguarding as defined by the Keeping Learners Safe Guidance document no:283/2022 .
Designated Deputies: <ul style="list-style-type: none">• Safeguarding Officers –• Gemma Aiuto-Turner	➤ Act in the absence of the DSL
Ann Craft Trust / Education Training Foundation	➤ Promotion, education and recording of Safeguarding training.

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.

The Children Act 1989 and 2004 are concerned with the emotional, physical or sexual abuse or neglect of children, defined in England as anyone under 18. However, it is recognised that children acquire degrees of legal capacity and maturity before their 18th birthday. It is also recognised that adults over 18 can be vulnerable due to a disability, learning difficulty or circumstance.

Keeping Children Safe in Education 2015 provides statutory guidance from the Department for Education (DfE) issued under section 175 of the Education Act 2002. Schools and colleges, which CAT are referred to as in this document, must regard it when carrying out their duties to safeguard and promote the welfare of children. This guidance uses the word 'children' to identify any learner under the age of 18.

Working Together to Safeguard Children 2018 covers the legislative requirements placed on services. The guidance applies to all organisations and agencies that have functions relating to children. Therefore, CAT must comply with the guidance put in place. 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.

Safeguarding vulnerable adults is defined in the Care and Support statutory guidance issued under the Care Act 2014 as:

- Protecting the rights of adults to live in safety, free from abuse and neglect.
- People and organisations work together to prevent and stop both the risks and experience of abuse or neglect.
- People and organisations are making sure the adult's wellbeing is promoted, including, where appropriate, considering their views, wishes, feelings and beliefs in deciding on any action.
- Recognising that sometimes adults have a complex interpersonal relationship and may be ambivalent, unclear or unrealistic about their circumstances and therefore potential risks to their safety or wellbeing.

Types of abuse.

- Physical abuse is the deliberate bodily injury to a young person/vulnerable adult 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/vulnerable adult, 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/vulnerable adult, though it may occur alone.
- Sexual abuse involves forcing or enticing a young person/vulnerable adult 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/vulnerable adult'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/vulnerable adult 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 is not acknowledged as a direct form of abuse but acts as an indicator that there may be a reason for concern. Vulnerable learners require support if they are putting their well-being at risk in this way.
- 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/vulnerable adult 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/vulnerable adults 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/vulnerable adults 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 vulnerable adults 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
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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/vulnerable adult 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 suspicion, allegation or incident of abuse concerning learners must be reported to the Designated Safeguarding Lead as soon as possible, and in any event, within two hours of becoming apparent.

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 learner concern is considered resolved when:

If a CAT colleague raises the concern without disclosure from a learner or third party, the CAT colleague and Designated, Safeguarding Lead agree that the situation has improved, and no intervention is required.

In the event of a third party disclosure, the CAT colleague, Designated Safeguarding Lead and third party all agree that the situation has improved, and no intervention is required.

In the event of a learner disclosure, or whereby the situation prompting an 8.8.1 or 8.8.2 disclosure deteriorates to the stage where the learner has been directly involved in the conversation; the CAT colleague, Designated Safeguarding Lead and learner all agree that the situation has improved and that no further intervention is required.

Online safety

CAT acknowledges its responsibility to ensure learners are aware of how to protect themselves online. This is concerning risks associated with radicalisation, extremism, grooming and bullying. CAT identifies these risks at induction and provides learners with resources to refer to throughout their time on the programme.

CAT works with employers who have their internal policies that relate to online safety, security and conduct. In addition, CAT supports its learners and promotes online safety through the signposting of policies specific to each learner's business, as well as with CAT resources.

Safeguarding Disclosure Document

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Action was taken in response to this conversation.

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Signed by all people present.

CAT Employee member <hr/>

Learner _____
Any additional people _____

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

CAT recognises its responsibility concerning the Prevent strategy and, more specifically, the Channel programme. CAT is aware that Channel assesses vulnerability using a consistently applied assessment framework built around three criteria. These three criteria are:

- Engagement with a group, cause or ideology.
- Intent to cause harm.
- Capability to cause harm.

CAT colleagues should refer a learner or colleague to the Designated Safeguarding Lead. Then, direct them onto the Channel programme if there is a concern that the learner fits one or multiple criteria listed below. These criteria have been developed because people that fit these are considered more vulnerable or susceptible to radicalisation.

- They feel isolated or express an "us vs them" mentality, particularly about religion or race.
- They exhibit social isolation, e.g. losing interest in activities they enjoy, distancing themselves from friends, family or social groups.
- They have low self-esteem.
- They are experiencing, or have recently experienced, a personal crisis.
- They are individuals with feelings of unmet aspirations or social injustice.
- They are being overly secretive about what they are viewing online.
- They are becoming more argumentative or domineering in their viewpoints, being quick to condemn those that disagree and ignoring views that contradict their own.
- They are downloading or promoting extremist content.
- They may be searching for answers to questions about identity, faith and belonging.
- They have a pre-existing conviction that their religion or culture is under threat.
- They have difficulty empathising with others and/or being able to understand the consequences of their actions.
- They have a history of criminal behaviour.

The Designated Safeguarding Lead has to ensure that all employees, including managers:

- Have undertaken Prevent training.
- Are aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Lead.
- Exemplify British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths and beliefs into their practice.

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.