



ATNA
GROUP

Achieving Together Not Alone

ATNA Group 's Contents page

Introduction

Background and Context

Behaviour Management

Bullying

Rules & Expectations

Risk assessing

Implementing Positive Handling

Staff Development and Support

Equality and diversity

Leaving a mentor

Pastoral Support

Damage

Police

Home visits

Lone working policy

Conduct and behaviour

Safeguarding and Child protection

Child on child abuse

Monitoring and review

Roles and responsibilities

Good practice guideline

Allegations

Allegations against staff

Other allegations

Prevent

Whistleblowing

Data protection

ICO

Short listing and referencing

Offer of employment

Health & Safety

Complaints

Introduction

ATNA Group's Policies and Procedures Introduction:

ATNA Group emphasises openness, honesty, and transparency in its collaborations with clients, colleagues, and professionals. The organisation upholds high standards and outlines its policies and procedures to clearly demonstrate how it operates, maintains these values and the working practices.

At ATNA Group we regularly review and update our policy and procedures to stay aligned with operational changes and legislative developments.

At ATNA Group we aim to communicate clearly and concisely, working together as a team to achieve success and deliver the best outcomes for everyone involved.

ATNA Group

“Achieving together not alone”

Background and Context

At ATNA Group, we work with young people, from 11 years old to 18 years old. We work with a variety of young people. Some young people may have complex needs/issues/additional needs such as but not limited to.

- Suffered abuse; emotional, physical, sexual, neglect, domestic abuse,
- Been through trauma
- Exposed to particular lifestyle styles (toxic trio)
- Behavioural difficulties
- Additional needs
- Have an EHCP
- Have anxiety
- Have mental health issues
- Anti social behaviour
- Additional medical needs
- Presenting challenging behaviour at school/parents/carers or in the community
- Low self esteem
- Sense of belonging
- Lack of school attendance

At ATNA Group, our main aims of our service

- Engage with our young people
- Build positive relationships
- Ensure we develop trusted relationships
- Provide each young person with the effective tools, support and positive partnerships to ensure and develop growth
- Achievements and personal success

At ATNA Group, we achieve this by

- Gathering all information about the young person, factual, life chronology, relevant information
- Get to know the individual young person, such as but not limited to, likes, interests and wishes
- Correct matching of a young person with a mentor
- Bespoke support packages

- Dedicated timings of sessions to be scheduled to fit around the young person
- Strategies, support plans and steps created to support each young person's needs and individual requirements
- Time to build trusting relationships
- Plan targeted specific areas of needs
- Goals to achieve outcomes

At ATNA Group, we promote positive partnerships

- Encouraging young people to have certain positive behaviour expectation to others, other colleagues, mentors, those in the local community, all outside agencies involved in a young person's life.
- Listen to others
- Be respectful of each other
- Work in positive collaboration
- To ensure that we and others are all safe around us
- Show empathy and kind regard to others
- Respectful of different opinions, cultures, religions, beliefs and differences
- Ensure the safety of others
- Mutual respect and tolerance
- Have a positive attitude to learning and self-growth

To help each young person achieve and reach their full potential we offer a calm, positive, caring, nurturing, encouraging positive working relationship with each mentor to ensure that each young person feel safe, secure, happy and ready to grow and reach full potential and individual outcomes in self-success, self-growth, self-confidence and self-esteem.

Behaviour Management

The ATNA Group, we promote a positive approach to behaviour management, our mentors are all trained in behaviour management, so they can use their skills, knowledge and experience to navigate situations. Positive behaviour from young people benefits their own personal success, positive relationships, raises self-esteem, self-worth, curricular success, self-growth and long-term behavioural change.

We promote positive relationships and positive behaviours by

- The development of good Mentor/pupil relationships through which empathy, understanding, fairness and trust may be established.
- Regular positive reinforcement of acceptable behaviour and effort through praise
- The recognition of success, effort from the pupil and small improvements.
- Parental/carers support, without which little progress will be affected.
- Mentors continuous professional training and development
- Introducing incentives and positive praise

- Mentors role modelling acceptable behaviour
- Setting out clear boundaries and expectations
- Mentors having a consistent approach to managing positive behaviour

Bullying

At ATNA Group, we have a zero-tolerance approach to Bullying. We ensure that a strong, consistent and concise approach from all mentors is adhered to and shared with young people. At ATNA LTD we believe that all young people, mentors and all agencies involved have the right to be and feel safe from all types of abuse, such as but not limited to; physical harm, emotional abuse, sexual abuse, psychological, neglectful, trauma, verbal, disrespect, or suffering from any form of fear.

At ATNA Group, we work either one to one, or in extremely small groups. Supervision and close working are paramount. Bullying would be picked up promptly and dealt with immediately. Any serious cases of bullying would be recorded and reported to parents/carers and all agencies involved. These situations would prompt discussions with the young person on bullying, to try and bring behavioural change by talking through strategies and to talk about emotions, feelings and empathy for the victim and others and resolution.

Rules & Expectations

At ATNA Group, we set rules and strong expectations for all young people to adhere to. This is to ensure we have mutual respect and tolerance for one another.

- Be kind to one another, show respect
- Listen to others point of views and opinions
- Celebrate one another's differences
- Allow others to learn – do not disturb them
- Listen to instructions and follow them in an appropriate manner
- Respect your own and other people's property and feelings
- Treat others how you wish to be treated
- Celebrate each other's successes
- Work hard and be the best you can be

Assessing

At ATNA Group, risk assessments are created and in place at the start of a new young person starting with ATNA, ongoing risk assessments will be created and assessed during sessions where applicable.

Any risks or growing concerns will be shared with relevant agencies working in partnership and parent/carers where needed.

All information will be recorded on each young person's file.

Implementing Positive Handling

At ATNA Group, physical intervention should only be used as a last resort, where all other strategies have been explored and unsuccessful. Physical intervention is used to de-escalate a conflict situation when negotiations, diffusions, distractions and de-escalation strategies have failed.

At ATNA Group, we use the team teach positive handling is a behaviour management approach that emphasises understanding challenging behaviour as a form of communication. It promotes proactive strategies to prevent incidents, the use of de-escalation techniques to reduce conflict, and a strong focus on the wellbeing and safety of both mentors and students. The approach encourages positive relationships, risk reduction and reflective practice, aiming to create a safe, supportive learning environment.

Keeping in line with government guidance, emphasising the need to not use physical intervention unless absolute necessary, and only after other forms of intervention have not been effective. The Care and Control Policy adhere to the commitment given in various DfE policies and guidance including the guidance on the Use of Reasonable Force issued in July 2015.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf

At ATNA Group, we have a duty to safeguard and protect all. Safeguarding is paramount.

At ATNA Group, mentors are only authorised to use physical intervention in the following circumstances

- A pupil is endangering the safety of another pupil
- A pupil is endangering their own safety
- A pupil is endangering the safety of a member of staff
- A pupil is causing/attempting to cause criminal damage to property or the building

At ATNA Group, physical intervention should be carried out in such a way as to safeguard the pupil and staff's wellbeing and be used for the minimum amount of time possible to bring the situation under control. All physical intervention will be recorded on each young person's file. Explaining why it was used, including how the young person was held and a copy sent to parents/carers and all agencies involved where applicable. Carers will be informed on the day of the intervention either by a phone call and Face to Face where possible.

Staff Development and Support

At ATNA Group, we hold continuous staff personal and professional development as an integral part of ATNA, Staff continuous training and development is a key factor to ensure each of our mentors are fully resourced, trained and updated with new guidance and regulation.

At ATNA Group, we ensure that

- Mentors are qualified and experienced to do their role
- All mentors have a LIVE DBS

- On induction of new mentors, they undergo a bespoke training programme to the job description and role
- Mentors participate in termly training and courses
- We ensure that all mentors receive ongoing training relevant to their role.

Equality and Diversity

At ATNA Group we are committed to promoting equality, diversity, and inclusion in all aspects of our mentoring services. We value the unique contributions of every individual and aim to create an environment where everyone feels respected, supported, and empowered to thrive.

This policy outlines our commitment to:

- Promoting equal opportunities in all mentoring relationships and activities.
- Preventing discrimination, harassment, or victimisation.
- Fostering a diverse and inclusive culture for both mentors and mentees.

This policy applies to:

- All mentors and mentees
- Staff, volunteers, and partners
- All activities, communications, and events run by the service

Our Commitments - We will:

- Treat all individuals with fairness and respect.
- Actively challenge and eliminate discrimination, harassment, and bullying.
- Promote inclusive mentoring practices that consider the diverse needs of mentees and mentors.
- Provide reasonable adjustments where required (e.g. for disabilities or neurodiversity).
- Encourage applications and participation from underrepresented groups.
- Monitor and review our practices to ensure inclusivity and accessibility.

Protected Characteristics

We oppose all forms of unlawful discrimination based on (but not limited to):

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation
- Socio-economic background
- Language or communication needs

We strive to ensure that

- Mentor-mentee matches are made with sensitivity to individual needs and preferences.
- Language and content used in mentoring sessions is inclusive and respectful.
- Both mentors and mentees are trained or briefed on inclusive practices and expectations.

Responsibilities

- Leadership/Management: Responsible for ensuring the policy is implemented, monitored, and updated regularly.
- Mentors & Mentees: Expected to uphold the values of this policy in all interactions.
- All Staff/Volunteers: Must complete relevant training and act in line with this policy at all times.

Reporting and Complaints

- Any concerns about discrimination, harassment, or exclusion should be reported in confidence to the designated safeguarding/equality officer.
- All complaints will be investigated promptly, fairly, and confidentially.
- Disciplinary action may be taken where this policy is breached.

Monitoring and Review

- We will collect anonymous demographic data (where appropriate and with consent) to evaluate the inclusivity of our service.
- This policy will be reviewed annually or sooner if required by law or organisational change.

Leaving a Mentor

At ATNA Group, we prioritise building positive and supportive relationships between mentors and young people. Our aim is to ensure that all sessions run smoothly, with careful consideration of any potential risks.

In the event of a situation that may pose a risk or escalate to the point where a young person may disengage or leave the mentor, a decision may be made to end the session early. This is done to safeguard the wellbeing of all involved.

Carers, guardians, and any relevant agencies will be informed immediately. A detailed record of the incident will be logged on the young person's file, and the risk assessment will be updated where necessary.

We will also ensure that, upon the young person's return home, a carer or guardian is present if required, to provide appropriate support.

In the event that a young person absconds during a session, mentors will not pursue them. Pursuit may escalate the situation and lead to unsafe or harmful behaviours such as aggression, risk-taking, or actions that could compromise the safety of both the young person and the mentor. This approach aligns with our safeguarding responsibilities.

Parents and carers are asked to inform ATNA Group, as soon as the young person returns home.

At the next session this will be discussed and explained the consequences or the risks behind the behaviour and how the impact it could have on future sessions. The young person would be aware of the implications if their behaviour which would result in it being unsafe to do outside sessions.

Pastoral Support

- At ATNA Group, each mentor is responsible for the pastoral support of their young people. Many of the young people will also be experiencing Socio-economic background

difficulties in their home, the community, or both. Close liaison and links with parents/carers, BCP and professionals involved is essential if issues are to be resolved and progress made for each individual.

All Mentors are familiar with the young persons journey, background, difficulties, areas of concerns and aware of stresses and changes in the young person life by having positive relationships and communication with all professionals involved. Mentors do their best to manage this and the affect these have on their behaviour and the ability to cope in certain situations.

Damage

At ATNA Group, we promote respect for the community, belongings and people. In the instance of a young person causing damage to a property, someone's personal belongings, or any other items the pupil may be expected to contribute to the cost to repair or replacement. The decision will be taken after careful consideration by Director Nathaniel Peprah after consideration of all factors involved.

Police

At ATNA Group, Police intervention will be sought in circumstances where the young person has caused excessive damage to property, has assaulted a mentor or another young person. Police, professionals involved and parents/carers will be notified immediately.

Police will be called if an incident has occurred, where a young person has failed to respond to the mentor, de-escalation techniques or is in immediate danger of harming themselves or others.

Home Visits

At ATNA Group, we recognise that home visits are a vital and integral part of our mentoring service. This policy outlines the procedures and safety protocols for home visits conducted by mentors as part of our Atna Group Service. The primary objective is to safeguard both the young people and mentors involved in the service while ensuring professional, transparent, and supportive interactions within the home environment.

This policy applies to all mentors, volunteers, and staff members conducting or supporting home visits with young people and their families under the Atna Mentoring Service.

- The safety, dignity, and well-being of the young person and the mentor are of paramount importance.
- Mentors must always maintain appropriate professional boundaries.
- Visits must be conducted in a transparent, safe, and supportive manner, respecting the family's home environment.
- All home visits must be pre-arranged and agreed upon by the service, the parent/guardian, and the young person.
- The parent or guardian must give written or verbal consent for the visit.
- The date, time, and purpose of the visit must be clearly communicated and recorded in advance.

At ATNA Group, the Presence of Parent or Guardian is mandatory

- Mentors must never be alone in the home with the young person.
- A parent or guardian must be present in the home for the entire duration of the visit.
- If a parent or guardian is not present upon arrival, the visit must not proceed and must be rescheduled.

At ATNA Group the expectation of the location of the meeting must be adhered to...

- Mentors must not enter the young person's bedroom alone or with the door closed.
- If interaction occurs near or within the bedroom:
 - The mentor must sit outside the bedroom with the door fully open.

- If it becomes necessary to enter the bedroom (e.g., to check on wellbeing), the door must remain fully open at all times.
- The parent or guardian must be informed and aware of this arrangement.

At ATNA Group Professional Conduct must be adhered to...

- All interactions must remain professional, respectful, and within agreed boundaries.
- No personal or physical contact beyond a standard greeting (e.g., handshake or wave) is appropriate.
- Mentors must not accept or offer gifts, money, or personal favours.

At ATNA Group Mentors must take a record of the visit, including:

- Date and time of arrival and departure
- Who was present in the home
- Topics discussed or activities carried out
- Any concerns or incidents
- This record must be completed immediately after the visit and submitted to the service manager or designated safeguarding lead.

At ATNA Group Safeguarding and Reporting is paramount

- Any concerns regarding the safety or welfare of the young person must be reported immediately following the organisation's safeguarding policy.
- If a mentor feels unsafe or uncomfortable at any point during the visit, they should leave the premises and report the incident immediately.

Lone Working Policy

This policy establishes ATNA Group's approach to supporting and safeguarding staff, volunteers, and service users when mentoring activity takes place without direct supervision or in community settings. ATNA Group recognises that lone working can present increased health, safety, and safeguarding risks and is committed to ensuring these risks are effectively identified, assessed, and managed. We strive to provide a safe working environment by offering clear procedures, appropriate training, regular monitoring, and supportive supervision, ensuring that all individuals involved in the service are protected.

This policy applies to all individuals undertaking mentoring activities on behalf of ATNA Group, including:

- All employees and volunteers providing mentoring support
- Subcontractors working on behalf of ATNA Group

- Any individual representing ATNA Group in community, home-based, or remote environments

Lone working refers to any situation where individuals undertake their duties without direct physical supervision and are out of sight or earshot of other colleagues. Within ATNA Group, this includes, but is not limited to:

- Mentoring sessions in service users' homes
- Community-based meetings (e.g., cafés, libraries, youth or community centres)
- Remote or telephone mentoring
- Transporting service users, where applicable
- The aims of this policy are to ensure that ATNA Group:
 - Protects staff and volunteers from foreseeable risks associated with lone working
 - Ensures safe and appropriate working environments
 - Promotes safe decision-making and effective communication at all times
 - Ensures that service users receive safe, high-quality mentoring support

Roles & Responsibilities

Senior Management

- Ensure effective lone working procedures, training, and equipment are in place
- Review incidents, identify learning, and update the policy as required

Line Managers

- Assess staff readiness and suitability for lone working
- Conduct and maintain risk assessments
- Monitor compliance with this policy and associated procedures

Mentors / Staff

- Always follow ATNA Group lone working procedures
- Report risks, concerns, and incidents promptly
- Maintain regular communication with supervisors during lone working activities

Service Users

- Respect professional boundaries and safety guidelines set by ATNA Group staff and volunteers

Risk Assessment

A risk assessment must be completed before any lone working activity begins and reviewed periodically to ensure safety remains effectively managed.

When assessing risk, consideration should be given to:

- Nature of the service user's needs
- Known or potential risks (e.g., violence, substance use, mental health concerns)
- Location factors (e.g., home environment, neighbourhood safety)
- Time of day the activity will take place
- Travel and transport safety

Staff must decline or reschedule a session if:

- A risk is identified that cannot be reasonably mitigated
- Their personal safety feels compromised at any time

Procedures for Lone Working

Booking and Scheduling

- All mentoring meetings must be recorded on the central calendar
- Supervisors must be informed of the location, start time, and expected end time of all sessions

Check-In Requirements

- Staff must check in with their supervisor both before and after each session
- If a staff member fails to check in, the organisation's escalation procedures will be followed

Safe Location

Meetings should take place:

- In public spaces wherever possible
- In service users' homes only when assessed as safe

Mentors have the right to end a visit immediately if they feel unsafe

Home Visit Protocol

- Assess the environment on arrival for potential hazards
- Maintain awareness of exits and escape routes
- Do not enter the premises if there are signs of intoxication, aggression, or threat

Transport

- Staff should avoid transporting service users wherever possible
- If transportation is required, a specific risk assessment must be completed and approved

Communication

- Staff must carry a fully charged mobile phone at all times during lone working activities
- Share location details with supervisors before the start of each session
- Use any SOS or alert systems provided by ATNA Group
- Maintain accessible emergency contacts for immediate use if needed

Personal Safety Guidance

Staff are expected to:

- Trust their instincts and withdraw from situations that feel unsafe
- Position themselves near exits whenever possible
- Keep personal belongings secure
- Avoid sharing personal information with service users
- Immediately leave any session if they feel threatened

Incident Reporting

- All incidents, including near misses, safeguarding concerns, aggression, or environmental hazards, must be reported promptly
- Staff should use ATNA Group incident reporting procedures to document events
- Follow-up reviews will identify lessons learned and improvements to policy and practice

Training

All lone workers must receive training on:

- Lone working procedures and risk assessment
- Safeguarding and escalation processes
- Conflict management and de-escalation techniques
- Mental health awareness
- Emergency response protocols

Training will be refreshed periodically to ensure compliance and awareness

Confidentiality

- Staff must always maintain confidentiality of service users
- Personal safety takes priority over confidentiality in emergency situations
- Information sharing must follow safeguarding procedures and legal requirements

Safeguarding

- Lone workers must be fully familiar with ATNA Group safeguarding procedures
- Any concern regarding abuse, neglect, or exploitation must be reported immediately
- Safeguarding procedures take precedence over all other lone working protocols

Emergencies

- In the event of an emergency, staff must contact emergency services if required
- Supervisors must be informed as soon as possible
- Follow ATNA Group incident reporting procedures for all emergencies

Escalation Procedure:

1. If a check-in is missed, the supervisor attempts immediate contact
2. If no contact is made, senior staff are notified
3. Emergency services are contacted if concern persists

Monitoring & Review

- This policy will be reviewed at least annually
- Reviews may also occur following major incidents, changes in legislation, or service restructuring
- Updates will be communicated to all staff and volunteers

Appendices

Appendices may include:

- Lone Working Risk Assessment Form

- Visit Log Sheet
- Check-In / Monitoring Procedure
- Emergency Contact List

Conduct and Behaviour

At ATNA Group we have the highest expectation and standards for all who work with a professional capacity.

All mentors who work at ATNA Group are in a position of trust in relation to individuals in their care and so must adopt high standards of personal integrity and conduct and behave in such a way that does not compromise their position both within and outside of the workplace or the safety and/or welfare of children and young people.

Mentors should be aware that it is a criminal offence (Sexual Offences Act 2003: abuse of a position of trust) to engage in sexual activity with a pupil under the age of 18.

Staff should never make (or encourage others to make) unprofessional comments or use physical force as a form of punishment.

Staff should not use any information obtained in the course of their employment for personal gain or benefit. Nor should they pass it on to others who might use it in such a way.

Safeguarding

At ATNA Group, we take our safeguarding responsibilities extremely seriously. Safeguarding in all forms is paramount. The safety and welfare of children will always be our focus. Everyone has a legal duty to safeguard all children and young people. If we have any concerns, we have a duty to report according to the local authority safeguarding board. (BCP Borough & Pan Dorset Partnership)

At ATNA Group, we refer to documents such as but not limited to, 'Working together to Safeguard Children', 'What to do if you are worried a child is being abused' and 'Working together to Safeguard children 2023' In guidance such as 'Working together to Safeguard Children 2023' The term children and young people refers to a person who has not yet reached their 18th birthday. In guidance the term 'practitioner' refers to individuals who work with children in any capacity.

At ATNA Group, we ensure that all mentors and employees are trained in Safeguarding and ensure that on the induction process that they know the systems, processes and procedures to safeguard all. Training must be continually updated, accessed and adhered to.

At ATNA Group, we ensure that all mentors, always dress appropriately. Professional work attire is expected to role model and always promote a positive and professional reflection at all times. Mentors are responsible for their own code of conduct, actions and behaviours at all times. Mentors should act professional at all times to ensure that there is no cause for concern that would lead to any reasonable person to question their motivation or intentions. Mentors should

apply the same professional conduct and standards regardless of culture, beliefs, disability, gender, language, racial origin, religious belief and sexual orientation.

At ATNA Group, all mentors must ensure they disclose any information or medication that may impact their ability to work. Mentors should not consume or be under the influence of alcohol or substances, including prescribed medication that may affect their ability to care for children.

At ATNA Group, we ensure that all Mentors know their legal and moral duty to keep children safe and protect them from harm. Mentors should ensure they do not put themselves in situations in which allegations of abuse or inappropriate behaviour could be made.

At ATNA we have a duty to safeguard pupils/students from:

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- online abuse
- Bullying
- Missing children
- Child sexual exploitation
- Abuse by children and young people peer on peer
- Bullying and abuse through the digital media
- Violent extremism
- Self-harm and suicidal behaviours
- Gang activity, youth violence and criminal exploitation affecting children
- Harmful sexual behaviour

At ATNA Group, all Mentors have a duty to safeguard children and young people. All Mentors have the legal duty to report child welfare concerns to the Designated Safeguarding Lead (DSL). At ATNA Group the DSL is Nathaniel Peprah. All incidents and concerns must be immediately passed onto the DSL at all times.

Mentors should be aware of, refer to and adhere to, the recommended procedures and best practice guidance outlined in the national [Guidance Working together to safeguard children 2023: statutory framework](#)

At ATNA Group, Mentors should be aware of all forms of abuse including the risks to children from radicalisation and being drawn into terrorism as outlined in the [Prevent Duty](#) guidance.

Types of Abuse...



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Physical Abuse	Abusive Action; Hitting. Slapping. Pushing. Kicking. Poisoning. Drowning. Suffocating. Burning / Scalding. Misuse of medication. Restraint. Inappropriate sanctions. Signs & Symptoms; Series of unexplained falls, major injuries or pain. Injuries/bruises at different stages of healing. Bruising in unusual sites e.g. inner arms, thighs, ears, hands. Abrasions. Teeth indentations. Injuries to head or face. Young person very passive.
Sexual Abuse	Abusive Action: Including rape and sexual assault or sexual contact and acts to which the student has not consented, or could not consent, or was pressured into consenting. It may also include non-contact activities involving children in looking at or the production of sexual images, watching sexual activities, encouraging sexual behaviour or grooming (including via the internet). Perpetrators can be both adults and children. Victims may be any age or gender. Signs & Symptoms; Change in behaviour. Overt sexual behaviour or language. Difficulty in walking, sitting or stomach pain. Pain/itching or injuries to genital and/or anal area. Fear and nightmares / bed wetting. Change in eating patterns.
Emotional Abuse	Abusive Action; threats of harm or abandonment. Deprivation of contact. Humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Age or developmentally inappropriate expectations or overprotection. Seeing or hearing the ill treatment of another. Bullying including cyberbullying. Signs & Symptoms Failure to thrive, self harm, withdrawal, depression. Cowering and fearfulness. Change in/disturbed sleep patterns. Agitation, confusion, change in behaviour. Change in appetite/weight.
Neglect	Abusive action; Includes acts of omission. Ignoring physical or medical care needs. Failure to provide access to appropriate health, social care or educational services. Withholding necessities of life e.g. nutrition, heating, medications. Signs and Symptoms; Absence of food, heat, hygiene, clothing, comfort. Preventing students from having access to services. Isolation. Absence of prescribed medication. Complaining of being tired all the time.

Forms of Abuse – Recognising child abuse – signs and symptoms

Recognising child abuse is not always easy, and it is not the responsibility of ATNA GROUP staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. All staff, however, have a clear responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. They should maintain an attitude of 'it could happen here' and always have the young person's best interests in mind.

It is accepted that in all forms of abuse there are elements of emotional abuse, and that safeguarding issues are rarely standalone events that can be covered by one definition or label. Some children and young people are subjected to more than one form of abuse at any one time and in most cases, multiple issues will overlap with one another. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or an institutional or

community setting by those known to them or, more rarely, by others (e.g. via the Internet). They may be abused by an adult or adults or by another child or children, this is known as peer-on-peer abuse.

Child on Child abuse can take many forms and can include (but is not limited to) bullying (including cyber bullying), sexual violence and sexual harassment, physical

abuse such as hitting, kicking, biting or otherwise causing physical harm. Hazing or other initiation activities which develop into bullying or criminal misconduct are also in this category. This also includes up skirting, which typically involves taking a picture

under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. This is now a criminal offence. Abuse is abuse and should not be dismissed as "banter", "just having a laugh" or "part of growing up".

Sexting is a form of child-on-child abuse which involves images or videos which are indecent or of a sexual nature, generated by children under the age of 18 or of children under the age of 18, shared via a mobile phone, handheld device, or website. We will adhere to guidance from UKCCIS regarding reporting and responding to sexting incidents.

We recognise that child on child abuse is gendered in nature and girls are more likely to be victims and boys perpetrators but that all peer-on-peer abuse is unacceptable and will be taken seriously by ATNA

There is a risk that children may be approached by or become involved with individuals associated with criminal networks and gangs involved in serious violent crime. This could include involvement in county lines networks. Indicators that may signal this are similar to those in child sexual exploitation but also may include increased absence and missing episodes and signs of assault or unexplained injuries.

Examples of possible indicators of each of the kinds of abuse. The list below is not exhaustive:

Examples of possible indicators of each of the kinds of abuse. The list is not exhaustive:

Discriminatory	Abusive action; Racist, sexist, or that based on a young person's disability. Other forms of harassment, slurs or similar treatment. As a result, you may see, low self esteem, withdrawal, depression, fear and anger.
Linked to Culture, Faith or Belief	Abusive action: Female Genital Mutilation (FGM), Forced Marriage. So called 'honour-based violence'. Radicalisation and extremism. Signs and Symptoms; Change in behaviour, withdrawal, prolonged absence from school, planned long holidays, unreasonable restrictions and controls. Talk of a 'special procedure or celebration'. Vocal or active opposition of fundamental British values. Expression of extreme views, and lack of respect to others or tolerance to diversity. Obsessive and extended secretive use of internet.
Child Sexual Exploitation	Abusive Action: Exploitative situations, contexts and relationships where young people receive something e.g. alcohol, affection, gifts,

	money as a result of performance of sexual acts. This can occur through technology e.g by posting sexual images on the internet / mobile phones. Grooming methods may lead students not to recognise they are being abused but consider they are acting voluntarily/ 'in a relationship'. Signs and Symptoms; Change in behaviour, friendship groups, social activities. Sudden increase in wealth and possessions.
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Child on child abuse

ATNA GROUP endeavours to minimise risk by:

- Training staff on the nature and prevalence and effect of child on child abuse and how to prevent, identify and respond to peer on peer abuse.
- Educating young people about the nature and prevalence of child on child abuse via open dialogue in citizenship and e-safety lessons and the wider curriculum.
- Ensuring that all child on child abuse issues are fed back to the DSL so that any trends can be identified.
- Creating a culture in which young people feel safe and able to share their concerns openly in a non-judgemental environment and have them listened to and responded to promptly and appropriately.

Allegations will be recorded, investigated and dealt with in the same way as any other safeguarding concern. We will be mindful, as stated in KCSiE, that “all systems and processes should operate with the best interests of the child at their heart”. In cases of peer-on-peer sexual violence a risk assessment should be completed by the DSL and should consider the victim, the alleged perpetrator, all other children and if appropriate any adults in the setting that may require protection. We will particularly consult the DfE’s advice - Sexual Violence and Sexual Harassment Between Children in Schools and Colleges: Advice for Governing Bodies, Proprietors, Head Teachers, Principals, Senior Leadership Teams and Designated Safeguarding Leads (May 2018). We recognise the need to provide support for victims, perpetrators and any other child or young person affected by the incident of abuse and will draw upon local services and agencies to guide us with processes and support appropriate to our young people to ensure that all needs are met.

Monitoring and Review

At ATNA Group, mentors ensure that safeguarding is embedded day in and day out. Effective safeguarding practices, constant monitoring, recording and reviewing ensure that safeguarding remains paramount and at the forefront of practice.

Feedback from our young people, finding the degree to which they feel safe and happy
 Feedback from our fellow professionals and parents, finding the degree to which they feel their
 young people are safe and happy
 Feedback from staff in training sessions and appraisals as well as through questionnaires
 Record and chronologies of incidents reported to the DSL

Roles and responsibilities

ATNA GROUP will ensure that.

- Staff are appropriately trained (accredited training every two years)
- The directors receive an annual report from the designated Safeguarding Lead in order to help monitor compliance with statutory responsibilities (recommended by the Pan-Dorset Safeguarding Children Partnership). This will be reviewed regularly and allow monitoring of whether mandatory policies, procedures and training are in place, and more importantly, are effective.
- Directors will act in accordance with Section 175 / Section 157 of the Education Act 2002 and the supporting statutory guidance 'Keeping Children Safe in Education' (September 2023) to safeguard and promote the welfare of young people at ATNA GROUP
- Act as sources of support and expertise to the setting
- Keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file
- Refers cases of suspected neglect and/or abuse to children's social care or police in accordance with this guidance and local procedure
- Develop effective links with relevant statutory and voluntary agencies.
- Ensures that all staff sign to indicate that they have read and understood this policy
- Ensures that the safeguarding policy is updated annually
- Keep a record of staff attendance at child protection training and makes this policy available to parents.
- Everyone must follow guidance in this policy and Code of behaviour issued to all staff, especially if a young person makes a disclosure of abuse.

Good practice guidelines

To meet and maintain our responsibilities towards children, the setting agrees to the following standards of good practice:

- to treat all children with respect
- to set a good example of conducting ourselves appropriately
- to ensure the staff are positive role models to children and other members of the team and never engage in rough, physical or sexually provocative games
- to involve children in decision-making which affects them (taking age and development of children into account)
- to encourage positive and safe behaviour among children
- to be a good listener
- to be alert to changes in a child's behaviour
- to recognise that challenging behaviour may be an indicator of abuse
- to read and understand all of the setting's safeguarding and guidance documents on wider safeguarding issues, for example physical contact and information-sharing
- to ask the child's permission before doing anything for him/her (taking age and development of the child into account) which is of a physical nature, such as administering first aid

- to maintain appropriate standards of conversation and interaction with and between children and avoid the use of sexualized and derogatory language
- to be aware that the personal and family circumstances and lifestyle of some children lead to an increased risk of neglect and/ or abuse
- to raise awareness of child protection issues and equip children with the skills to keep themselves safe
- to provide any form of manual or physical support required, as a last resort and to do so openly and appropriately, and to always consult the children and gain their agreement (taking age and development of children into account)
- to establish a safe environment in which children can learn and develop, particularly in their confidence and self-esteem and to provide opportunities for achievement.

If staffs receive a disclosure they will:

- take what the child says seriously and react calmly; do not interrupt
- tell the child they are not to blame – young people are the victims of abuse, never the cause
- explain what will happen next as early as possible; do not promise not to tell anyone, even if this means that the child refuses to disclose anymore
- ensure they are clear about what has happened but keep questions to an absolute minimum; anything that could be construed as leading the child will invalidate their testimony in court
- remember TED: tell / explain / describe
- record the conversation as accurately as possible, as soon as possible after the event using the child's language
- pass on the information immediately to the DSL either in person or via the designated mobile numbers.

If you are concerned about a young person's safety and wellbeing, or there is a concern, complaint or allegation about an adult or yourself, you should do the following:

- tell the DSL immediately
- write careful notes of what you witnessed, heard or were told, past your notes on to the DSL, making sure you sign and date
- take advice from the DSL to reduce or remove risk to the welfare of young people

If the young person is at immediate risk of significant harm, ask the DSL or a senior member of staff to contact the police or social services to make a referral.

Any adult has the right to report any concerns or suspicions about another in confidence and free from harassment. Please see whistle blowing policy for further information.

Any action taken when dealing with an issue of child protection will be in line with the procedures outlined in documentation from Pan-Dorset Safeguarding Children Partnership.

If a teacher/mentor/director, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out, or is in danger of being carried out, on a girl under the age of 18 the individual must report this to the police. This is a mandatory duty.

Allegations

The term ‘allegation’ means where it is alleged that a person who works with children has

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child; or,
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Acted inappropriately which has caused concern

Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct, prohibition from teaching by the National College of Teaching & Leadership (NCTL).

Mentors should continually monitor and review practice of colleagues and professionals who they work with and be vigilant to ensure this guidance is followed and should understand their responsibilities to safeguard and protect children.

Mentors should discuss and/or take advice promptly from the DSL or another senior member of staff over any incident which may give rise to concern.

Records should be made of any incident and decision made or where further actions have been agreed, in accordance with ATNA policies and confidentiality.

All Mentors should know who the DSL Lead is, adhere to policy and procedures and be familiar with local child protection arrangements, arrangements for managing allegations against staff, whistleblowing procedures and their Local Safeguarding Children Board (LSCB) procedures.

Allegations against staff

In cases of all allegations and allegations of abuse made against a member of staff, the Local Authority Designated Officer (LADO) known as the DO (Designated Officer) at BCP Council and the police will be informed immediately. The BCP Social Services LADO can be contacted at lado@bcpcouncil.gov.uk by secure email. BCP Designated Officers: Hayley Cowmeadow and Carline Benoit can also be contacted by telephone: 01202817600

In the case of any allegations of abuse, the member of staff concerned may be suspended immediately (without prejudice) subject to further investigation. Further information can be found in the Whistleblowing and Resolving Problems policies.

Other Allegations

In cases of allegations of abuse of a young person by a member of the local community, The Children's Service First Response Hub is the first point of contact for everyone, providing all services for children and families living in Bournemouth, Christchurch and Poole.

The Children's services First response hub provides the public and professionals with information and support for children who are vulnerable and at risk and is made up of the Multi-Agency Safeguarding Hub (MASH) and Early Help Team.

The service can be contacted on 0120212334 between the hours of Monday to Thursday 8.30am-5.15pm and Friday 8.30am-4.45pm. Email: childrensfirstresponse@bcpcouncil.gov.uk

The out of hours service is available but should only be contacted if the safety and/or welfare of a child or young person is at serious risk of significant harm and the situation can not wait until 9am the next working day.

This out of hours service can be reached on 01202738256, between the hours of 5pm to 9am Monday to Friday, all day Saturdays and Sundays, all bank holidays, including Christmas day and New Years Day.

In an emergency situation where you believe a child or young person is at immediate risk of harm then please call the police immediately on 999.

Prevent

Under section 26 of the Counterterrorism and Security Act 2015, staff must have 'due regard to the need to prevent people from being drawn into terrorism. Staff should refer any concerns regarding radicalisation to the Designated Safeguarding Lead or a senior member of staff, following Atna's safeguarding procedures.

Relevant staff should understand when it is appropriate to make a referral to the Channel programme, a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

Mentors should ensure they have undertaken some form of Prevent awareness training

In cases of suspected radicalisation and extremism the Dorset Prevent Team can be contacted during office hours on 01202 222777 or dorsetprevent@dorset.police.uk Referrals can be made to this service if you are concerned about someone.

Written records will be kept of any referrals and stored securely in line with data protection procedures. We will support the young person throughout the process by ensuring that they are fully informed and have access to counselling or support. If necessary, the DSL or another nominated Mentor will take the role of "Appropriate Adult" for police or Social Care interviews. ATNA will co-operate fully with external agencies and share information as appropriate. ATNA will attend any strategy meetings convened. In addition, we will endeavour to attend multi-agency meetings and keep regular contact with the local Social Services Officer and the Pan-Dorset Safeguarding Children Partnership to ensure we aim for best practice at all times.

ATNA GROUP Whistleblowing Policy

Purpose and scope

At Atna we are committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage or at any time during any interactions.

We also recognise the negative effect, which malpractice can have on the organisation, and therefore encourage you to raise any concerns, or any suspicions you may have concerning misconduct.

This policy is intended to cover concerns that are made in the public interest. This policy applies to full and part-time workers, and contractors, home workers and agency workers and anyone involved in ATNA group.

Definition

Whistleblowing is when someone who works in or for an organisation passes on information, which they reasonably believe shows wrongdoing or a cover-up by that organisation. For example, the information may be about activity that is illegal or that creates risks to the health and safety of others. The concern may relate to something that has happened, is happening or that a person may fear will happen in the future.

Protection

We appreciate that those reporting concerns may be apprehensive. We want to reassure anyone that they can report a concern no matter how big or small and there will be no repercussions for them reporting and whistleblowing. Anyone sharing concerns will be protected and will suffer no detrimental treatment as a result of voicing your concerns.

At ATNA Group, we do not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

Should you feel you have been subjected to any detriment as a result of raising a concern under this Policy you should notify **Director and DSL Nathaniel Peprah at 11 SPENCER ROAD, BOURNEMOUTH, BH1 3TE**

Contact number 07928471730 or email nathaniel@atnagroup.co.uk

Disclosures under this Policy

You can make a disclosure under this policy, if you have any concerns relating to any of the following areas of malpractice, or suspected malpractice (This list is not exhaustive):

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment (pollution, etc)

- Deliberate attempt to conceal any of the above

The malpractice can be past, present, or prospective. It may have occurred inside or outside the United Kingdom.

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

Confidentiality and anonymity

Any disclosure you make under this policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

How to make a disclosure

In the first instance you should bring the matter to the attention of Nathaniel Peprah who is Director and DSL (Tel: 07928471730 email: Nathaniel@atnagroup.co.uk)

If your disclosure contains allegations, which you do not wish to make to Nathaniel Peprah, you can make the disclosure to another person in the leadership or go directly to LADO, Social care, Police, Ofsted or any other professional agencies who will support you with Whistleblowing.

There are further ways an employee may raise concerns, should you not feel able to speak to your employer directly. These are as follows:

- The union or professional body.
- The independent whistleblowing charity [Public Concern at Work](#);
- An independent legal advisor.

The worker can also whistle blow to the relevant regulatory body for example Ofsted, The department of Education (DFE), the GMC or HCPC. Similarly, the various Ombudsman offices can be contacted such as the [Parliamentary and Health Service Ombudsman](#); or the [Local Government Ombudsman](#).

The Pan-Dorset Safeguarding Children Partnership for the area and the Local Authority may also have a whistleblowing policy to which the worker can refer. Whistleblowing directly to the services the concerns are about can result in a quick response as they have the power to act immediately on the concerns. Whichever way you wish to report your disclosure to, you will be asked a number of questions so they can determine the best way to proceed and support you. You must make your concerns clear and ensure your disclosure is reported to the right person either within the organisation or to the organisations outlined above. When making a disclosure please consider the following:

- Does the worker believe that a service user is at immediate risk of harm?
- To set out the facts
- Do other workers share the concerns?
- Whether the concerns have already been raised with the employer and, if so, what the response was?
- What the workers views are about what should be done?

Investigation Once a concern has been raised, we will investigate this. If the whistleblowing statement has not been made anonymously, you will be asked to attend a meeting as part of this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

Dissatisfaction with the outcome of the process

If you are dissatisfied with the outcome of the investigation, you should raise this with the relevant local authority, giving the reasons for your dissatisfaction. They will respond in writing notifying you of their acceptance or rejection of the need for further investigation and the reasons for this.

If you wish to contact LADO, their contact details are as follows:

BCP LADO:

Allyson Donovan or Hayley Cowmeadow

The main contact number for the service is **01202 817600**

The secure email for the service is lado@bcpcouncil.gov.uk

Dorset LADO:

Lynne Bowman, Martha Sharp or Laura Tulk

The main contact number for the service is **01305 221122**

The secure email for the service is lado@dorsetcouncil.gov.uk

Children's Advice and duty service:

The main contact number for the service is 01305 228558

The secure email for the service is childrensadvicanddutysevice@dorsetcouncil.gov.uk

Breach of this Policy

We may invoke the Disciplinary Procedure if you are found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled us in respect of any matter, breached this Policy in any other way and/or if we believe that you have made a false allegation maliciously.

Data Protection

Achieving Together Not Alone (ATNA) collects and uses personal information about staff, students, parents and other individuals who come into contact with the organisation. This information is gathered to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.

Education establishments have a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 2018, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines

What is classed as Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

Data Protection Principles

The Data Protection Act 2018 establishes eight enforceable principles that must be always adhered to:

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained only for one or more specified and lawful purposes.
- Personal data shall be adequate, relevant and not excessive.
- Personal data shall be accurate and where necessary, kept up to date.
- Personal data processed for any purpose shall not be kept for any longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 2018.
- Personal data shall be kept secure i.e., protected by an appropriate degree of security.
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of data protection.

General Statement

The organisation is committed to always maintaining the above principles.

Therefore, the organisation will:

ATNA GROUP LTD
"Achieving Together Not Alone"
11 Spencer Road, Bournemouth BH1 3TE
Tel: 07928471730 Email:
Registered No: 16301628

- Inform individuals why the information is being collected when it is collected.
- Inform individuals when their information is shared, and why and with whom it was shared.
- Check the quality and the accuracy of the information it holds.
- Ensure that information is not retained for longer than is necessary.
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely.
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Share information with others only when it is legally appropriate to do so.
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure our staff are aware of and understand our policies and procedures.

Complaints

Complaints will be dealt with in accordance with the organisation's complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator).

Review This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years.

Contacts

If you have any enquires in relation to this policy, please contact the Director who will also act as the contact point for any subject access requests.

Further advice and information are available from the Information Commissioner's Office, www.ico.gov.uk or telephone 01625 545745.

Procedures for responding to subject access requests made under the Data Protection Act 2018

Rights of access to information

There are two distinct rights of access to information held by education establishments about pupils.

Under the Data Protection Act 2018 any individual has the right to make a request to access the personal information held about them.

The right of those entitled to have access to curricular and educational records as defined within the Education Pupil Information (Wales) Regulations 2004.

These procedures relate to subject access requests made under the Data Protection Act 2018.

Actioning a subject access request

Requests for information must be made in writing, which includes email and be addressed to the Director. If the initial request does not clearly identify the information required, then further enquiries will be made.

The identity of the requestor must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the child. Evidence of identity can be established by requesting production of:

- passport
- driving licence
- utility bills with the current address
- Birth / Marriage certificate
- P45/P60
- Credit Card or Mortgage statement

This list is not exhaustive.

Any individual has the right of access to information held about them. However, with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Director should discuss the request with the child and take their views into account when making, a decision. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent an individual with parental responsibility or guardian shall make the decision on behalf of the child.

We may make a charge for the provision of information, dependent upon the following:

- Should the information requested contain the educational record then the amount charged will be dependent upon the number of pages provided.
- Should the information requested be personal information that does not include any information contained within educational records schools can charge up to £10 to provide it.
- If the information requested is only the educational record viewing will be free, but a charge not exceeding the cost of copying the information can be made by the Managing Director.

The response time for subject access requests, once officially received, is 40 days (calendar days). However, the 40 days will not commence until after receipt of fees or clarification of information sought.

The Data Protection Act 2018 allows exemptions as to the provision of some information; therefore, all information will be reviewed prior to disclosure.

Third party information is that which has been provided by another, such as the Police, Local Authority, Health Care professional or another school. Before disclosing third party information consent should normally be obtained. There is still a need to adhere to the 40-day statutory timescale.

Any information which may cause serious harm to the physical or mental health or emotional condition of the pupil, or another should not be disclosed, nor should information that would reveal that the child is at risk of abuse, or information relating to court proceedings.

If there are concerns over the disclosure of information, then additional advice should be sought.

Where redaction (information blacked out/removed) has taken place then a full copy of the information provided should be retained in order to establish, if a complaint is made, what was redacted and why.

Information disclosed should be clear, thus any codes or technical terms will need to be clarified and explained. If information contained within the disclosure is difficult to read or illegible, then it should be retyped.

Information can be provided to help and explain matters if requested or provided at face-to-face handover. The views of the applicant should be considered when considering the method of delivery. If postal systems need to be used, then registered/recorded mail must be used.

Contacts

If you have any queries or concern regarding these policies / procedures, then please contact the Director. Further advice and information can be obtained from the Information Commissioner's Office, www.ico.gov.uk

Short-Listing and References

The shortlisting exercise must be completed objectively, and applicants should be graded against the criteria identified within the person specification and job description. General assumptions should be avoided about the age or ability to do the job of men/women, married/unmarried people or people with disabilities

Where possible, references will be taken up before the selection stage, so that any discrepancies can be probed during the selection stage.

The purpose of references is to obtain information about a candidate's employment history, qualifications, experience and/or an assessment of the candidate's suitability for the post in question.

They should seek to obtain objective and factual information to support a recruitment decision.

A reference should be obtained from the most senior person of the applicant's current or most recent employer.

References will be sought directly from the referee and not from personal email addresses. References or testimonials provided by the candidate will never be accepted.

Where necessary, referees will be contacted by telephone or email in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

Where necessary, current / previous employers who have not been named as referees will be contacted in order to clarify any anomalies or discrepancies. A detailed written not will be kept of such exchanges.

Referees will always be asked specific questions about:

- the details of the applicants, current duties / position and salary
- the candidate's suitability for working with children and young people
- any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children,
- the candidate's suitability for this post.
- reason for leaving
- Conducting online search for candidates

Employees are entitled to see and receive, if requested, copies of their employment references.

Interviews

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates.

Interviews will always be face-to-face. Telephone interviews may be used at the short-listing stage but will not be a substitute for a face-to-face interview (which may be via visual electronic link).

Candidates will always be required:

- to explain satisfactorily any gaps in employment.
- to explain satisfactorily any anomalies or discrepancies in the information available to recruiters.
- to declare any information that is likely to appear on a DBS disclosure.
- to demonstrate their capacity to safeguard and protect the welfare of children and young people.
- answer screening questions regarding extremism

Offer of Employment

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date
- the receipt of two references (one of which must be from the applicant's most recent employer)
- verification of identity, qualifications and right to work in the UK
- receipt of a satisfactory enhanced disclosure from the Disclosure and Barring Service and other relevant screening documentation

If the above conditions are satisfied and the offer is accepted, then the applicant will be issued with a contract of employment as confirmation of employment.

All Associate Staff appointments are subject to a six months probationary period during which the notice period to terminate the employment for whatever reason, by either the employee or the school is four weeks. ATNA alternative education provision also reserves the right to extend this probationary period should it deem this necessary.

Pre-employment checks

In accordance with the recommendations of the DfE in "Safeguarding Children: Safer Recruitment and Selection in Education Settings" the ATNA alternative education provision carries out a number of pre-employment checks in respect of all prospective employees. Verification of identity and address

All applicants who are invited to an interview will be required to bring the following evidence of identity, proof of eligibility to live and work in the UK, address and qualifications:

- current driving licence or passport or full birth certificate.
- and two utility bills or statements (from different sources and less than 3 months old) showing their name and home address.
- and documentation confirming their National Insurance Number (P45, P60 or National Insurance Card)
- and documents confirming any educational and professional qualifications referred to in their application form.

Where an applicant claims to have changed his/her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change.

ATNA will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant before any appointment is confirmed.

Disclosure and Barring Service

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

Due to the nature of the work, the ATNA alternative education provision applies for DBS certificates in respect of all prospective staff members, governors and volunteers.

The ATNA alternative education provision will always request an Enhanced Disclosure as described below.

- An Enhanced Disclosure will contain details of all convictions on record including current and spent convictions (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It may also contain non-conviction information from local police records which a chief police officer thinks may be relevant in connection with the matter in question.

- If the individual is applying for a position working with children or young adults, it will also reveal whether he/she is barred from working with children or vulnerable adults by virtue of his/her inclusion on the lists of those considered unsuitable to work with children or vulnerable adults maintained by the DfE and the Department of Health. Applicants with recent periods of overseas residence and those with little or no previous UK residence may also be asked to apply for the equivalent of a disclosure, if one is available in the relevant jurisdiction(s).

Where ATNA alternative education provision uses staff from supply agencies, contractors, etc then the centre expects those agencies to have registered these staff with the DBS following their own policy or their own comparable policy. Proof of registration will be required before the centre will commission services from any such organisation.

Contingency and Disaster Recovery Policy

Purpose

The purpose of this policy is to:

- Ensure continuity of mentoring services in the event of a disruption.
- Minimise the impact of emergencies on mentors, mentees and staff.
- Provide a clear action plan for recovery from critical incidents.

Scope

This policy applies to:

- All staff, mentors, and volunteers
- All service delivery formats (in-person, online, hybrid)
- All IT systems, facilities, data, and communications

Definitions

- Contingency Plan: A proactive strategy to deal with potential emergencies or disruptions.
- Disaster Recovery: The process of restoring normal operations after a significant incident.
- Critical Incident: Any event that disrupts service delivery, such as a natural disaster, data breach, illness outbreak, or major IT failure.

Key Risks Addressed

This policy covers potential events including (but not limited to):

- Natural disasters (e.g., floods, fires, storms)
- IT system failures or cyberattacks
- Power outages or utility disruptions
- Data loss or corruption
- Staff shortages (due to illness, strikes, etc.)
- Pandemic or public health emergencies

- Physical security breaches or vandalism

Contingency Planning

We will:

- Maintain up-to-date contact lists for all mentors, mentees, staff, and emergency services.
- Establish communication channels (email, SMS, social media, phone) for urgent updates.
- Ensure critical data is backed up regularly and stored securely.
- Identify alternative venues or platforms for service delivery if primary location is inaccessible.
- Cross-train staff and volunteers to provide cover where needed.

Disaster Recovery Plan

In the event of a critical incident, we will take the following steps:

a. Assessment and Response

- Assess the nature and severity of the incident.
- Activate the appropriate contingency plan.
- Notify staff, mentors, and mentees of the disruption and immediate next steps.

b. Communication

- Communicate clearly and promptly with all parties involved.
- Use pre-identified communication methods to provide regular updates.

c. Service Continuity

- Move mentoring sessions online (if applicable).
- Reschedule or relocate in-person sessions where safe to do so.
- Offer remote support or check-ins until normal operations resume. (phone calls or teams online)

d. Data Protection

- Restore data from backups where required.
- Report any data breaches to relevant authorities (e.g., ICO) within required timeframes.
- Follow GDPR and data protection protocols throughout recovery.

Roles and Responsibilities

Role	Responsibility
Service Manager	Oversee disaster response, authorise actions, liaise with authorities
IT/Data Officer	Implement data recovery, maintain backups and cyber security
Safeguarding Lead	Ensure vulnerable individuals are supported during disruptions
All Staff & Volunteers	Follow procedures, report issues, support continuity efforts

Backup and Data Recovery Procedures

- **Frequency of Backup:** All digital files (mentor/mentee records, session notes, contact info) are backed up at least weekly.
- **Storage Locations:** Backups stored securely in the cloud and on an encrypted external drive.
- **Access Control:** Only authorised personnel may access backups and recovery tools.

Review and Testing

- This policy and its procedures will be reviewed annually.
- Scenario-based tests (e.g., mock data loss or venue unavailability) will be carried out at least once per year to evaluate preparedness.

ATNA Group Health and Safety Policy

ATNA Group is committed to ensuring the health, safety, and wellbeing of all staff, volunteers, service users, and anyone affected by its mentoring services. The organisation will provide a safe working environment, prevent accidents, and effectively manage risks in all settings, including service users' homes, community venues, and during travel.

This policy applies

- All employees and volunteers delivering mentoring support
- Subcontractors and contractors working on behalf of ATNA Group
- Service users, carers, and visitors engaging with ATNA Group services
- All locations where ATNA Group services are provided, including offices, community venues, and homes

Legal Framework

This policy complies with relevant legislation, including:

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Local social care regulations and guidance

Roles and Responsibilities

Senior Management

- Ensure health and safety procedures, training, and resources are in place
- Monitor compliance and review the policy regularly
- Promote a culture of safety and accountability

Line Managers

- Conduct risk assessments and ensure staff follow safety procedures

- Monitor staff health and wellbeing
- Investigate incidents and implement corrective measures

Mentors / Staff

- Follow ATNA Group health and safety procedures at all times
- Report hazards, accidents, or near misses immediately
- Maintain personal wellbeing and seek support when needed

Service Users

- Cooperate with staff to maintain a safe environment
- Follow guidance provided by ATNA Group staff

Risk Assessment

- Risk assessments must be conducted before all mentoring activities
- Factors to consider:
 - Service user needs and vulnerabilities
 - Environmental risks (home conditions, community settings)
 - Travel and transport safety
 - Potential behavioural risks (aggression, mental health concerns, substance use)
- Risk assessments must be reviewed and updated periodically

Lone Working and Personal Safety

- Staff must follow the ATNA Group Lone Working Policy
- Carry a charged mobile phone and check in with supervisors before and after sessions
- Avoid situations where personal safety could be compromised
- Leave immediately if a session becomes unsafe

Safe Working Practices

- Maintain safe premises in offices and community venues
- Use appropriate techniques when assisting service users physically
- Ensure first aid equipment is accessible
- Follow infection control procedures, including hygiene and PPE when required
- Report and document all accidents, incidents, and near misses

Training and Competence

All staff and volunteers must receive training in:

- Health and safety awareness
- Lone working and personal safety
- Risk assessment and management
- Safeguarding and first aid

Training will be refreshed periodically and documented.

Incident Reporting

- All incidents, accidents, and near misses must be reported immediately
- Reports should include:
 - Date, time, and location of the incident
 - People involved
 - Nature of the incident or hazard
 - Actions taken
- Records are reviewed to prevent recurrence

Emergency Procedures

- Staff must know how to contact emergency services
- Follow ATNA Group escalation procedures for serious incidents
- Evacuation procedures must be in place for all venues
- Supervisors must be informed immediately in any emergency

Wellbeing

- ATNA Group recognises the importance of staff mental and physical wellbeing
- Staff should report stress, fatigue, or wellbeing concerns
- Supervisors provide guidance, support, and reasonable adjustments where necessary

Monitoring and Review

- Health and safety procedures and this policy are reviewed annually
- Reviews also occur after:
 - Serious incidents
 - Legislative changes
 - Service delivery changes

- Lessons learned from incidents inform policy updates and training

References

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- ATNA Group Lone Working Policy
- ATNA Group Safeguarding Policy

ATNA Group Complaints Policy

Policy Statement

ATNA Group is committed to delivering high-quality, safe, and professional mentoring services. We value feedback from service users, families, carers, and partners. This policy ensures that any complaints are addressed promptly, fairly, and transparently, with the aim of improving services and safeguarding all parties.

This policy applies to complaints raised by:

- Service users
- Family members or carers
- Advocates or representatives
- Referring agencies
- Any other stakeholder interacting with ATNA Group mentoring services

This policy covers complaints about:

- Service delivery or quality
- Staff or volunteer conduct
- Poor communication
- Safeguarding concerns
- Discrimination or harassment
- Data handling or confidentiality
- Organisational decisions

Definitions

Complaint:

An expression of dissatisfaction about a service, action, or decision made by ATNA Group that requires a response.

Informal Concern

A verbal or minor issue that can be addressed immediately without a formal investigation.

Principles

ATNA Group will:

- Treat all complaints seriously and respectfully
- Maintain confidentiality at all stages
- Ensure no negative consequences for raising a complaint
- Respond in a timely and fair manner
- Use complaints to improve service quality and staff practice
- Comply with safeguarding and data protection requirements

How to Make a Complaint

Complaints can be submitted:

- Verbally (in person or by phone)
- In writing (letter or email)
- Online (if applicable)
- Through an advocate or representative

Complaints should ideally be raised within 12 months of the incident occurring.

Support for Complainants

ATNA Group will provide reasonable support to enable individuals to make a complaint, including:

- Advocacy support
- Interpreter or communication assistance
- Accessible formats for written or verbal communication

Complaints Procedure

Stage 1: Informal Resolution

- Raise the complaint with the staff member or their supervisor
 - Aim to resolve within 5 working days
 - Document outcome for records
- If unresolved, the complaint progresses to Stage 2

Stage 2: Formal Complaint

- Submit the complaint to the Complaints Lead or Manager
 - Acknowledgment within 3 working days
 - Investigation by a manager not involved in the issue
 - Complainant may be invited to provide further details
 - Outcome and formal response issued within 20 working days
- Possible outcomes may include:
- Apology or explanation
 - Changes to service or procedures
 - Staff training or disciplinary action
 - Confirmation that no fault was found

Stage 3: Appeal

- Complainant may request an appeal within 20 working days of the formal response
- Reviewed by a senior manager or board representative
- Outcome is final within ATNA Group

Escalation to External Bodies

If dissatisfied after internal resolution, the complainant may contact:

- Local commissioning authority
- Local Government & Social Care Ombudsman (or equivalent in your jurisdiction)
- Care inspectorate or regulatory body

Safeguarding Concerns

If a complaint involves allegations of abuse, neglect, or exploitation, safeguarding procedures will take precedence, and referral to local safeguarding authorities will be made immediately.

Confidentiality and Data Protection

- Complaints are handled in accordance with GDPR and data protection law
- Information is shared only with relevant personnel for investigation
- Records are stored securely for a minimum of 3 years

Recording and Monitoring

ATNA Group maintains a complaints log including:

- Complainant details (if provided)
- Summary of complaint
- Actions taken and outcome
- Learning points

Complaints data will be reviewed regularly to identify trends and inform service improvements.

Learning and Service Improvement

ATNA Group commits to learning from complaints by:

- Updating policies and procedures
- Providing additional staff training
- Making improvements to service delivery
- Communicating lessons learned to staff and volunteers

Staff Responsibilities

Staff are expected to:

- Listen respectfully to complaints
- Document and report complaints promptly
- Support individuals to raise complaints
- Cooperate with investigations

Staff must not:

- Victimise or penalise complainants
- Conceal information relevant to a complaint

Timeframes

Stage	Target Response Time
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Acknowledgement	3 working days
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Informal Resolution	5 working days
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Formal Investigation	20 working days
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Appeal Decision	20 working days
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Accessibility

This policy is available in:

- Easy read format
- Large print
- Different languages
- Audio format

Reasonable adjustments will be made on request to ensure access for all service users.

Review

This policy will be reviewed:

- Annually
- After a serious complaint
- Following any changes in legislation or regulatory guidance

Policy and Procedures signing page

ATNA GROUP LTD we require all staff on induction and starting with the company to read, understand and adhere to and to sign this document to ensure that they understand all of our policies and procedures that underpin ATNA GROUP LTD. Policy and procedures should be reviewed and updated regularly and signed on updates.

By signing the below, I confirm that I have read and will comply and adhere to all policies and procedures and will review continuously:

Signed: _____ **Position:** _____

Print Name: _____ **Date:** _____

Signed: _____ **Position:** _____

Print Name: _____ **Date:** _____

Signed: _____ **Position:** _____

Print Name: _____ **Date:** _____

