



Safeguarding Policy

Our duty

GTG has a moral and statutory duty to promote the welfare of children, young people and vulnerable adults and to safeguard them from harm. This document explains how we will meet this duty. The policy refers to 4 types of abuse; *emotional, physical, neglect and sexual*. The policy also takes account of concerns related to radicalisation. GTG operate a zero-tolerance approach to all forms of abuse and other harmful behaviour. The policy applies to all staff, including; Governors, directors, managers, practitioners and others having direct contact with GTG learners. GTG staff, and the wider GTG community, are responsible for the safeguarding and protection of children, young people and vulnerable adults. This responsibility applies to individuals when they are both in and out of education or the workplace environment, and includes use of the internet and electronic communication devices, regardless of ownership of the device. Abuse can happen both in and out of education.

Our commitment

- We will put systems and measures in place to keep all children, young people and vulnerable adults safe from harm, and to protect the welfare of these groups to provide them the best opportunity to learn throughout their journey
- We will ensure that all staff, volunteers and subcontractors are rigorously processed prior to employment at GTG. This includes DBS and Disclosure Scotland, also any other checks prior to allowing access to children, young people and vulnerable adults. Staff are interviewed and undertake a 2 stage assessment process to ensure that they meet all requirements
- We will put systems and measures in place keep all patrons safe from accidents, incidents and other harmful acts that will contravene the statutory duty of the Health and Safety at Work Act 1974
- Will have a Safeguarding lead, who is responsible for the coordination and development of safeguarding across the business, and who will ensure that a dedicated team of safeguarding officers are in place
- We will provide a safe, effective, comfortable learning environment at all times
- We display information outlining our safeguarding duties around our premises and on our website
- We raise awareness of our safeguarding duties with learners' at induction and throughout their journey
- All staff and *key stakeholders* undertake safeguarding training, and annual updates are undertaken
- Staff will undertake the 'Raising Awareness of Prevent' workshop
- We will develop links with relevant organisations and public bodies to support our safeguarding policy, procedure and ongoing updates
- We will promote positive behaviours relating to safeguarding, to raise awareness and build resilience, as part of our Behaviour strategy
- The safeguarding team will meet regularly to discuss all issues, updates and procedures. Minutes are taken and actions are recorded and disseminated
- We will provide staff with an understanding of our 'early help' responsibilities, to ensure that potential help and support are provided as quickly as possible and for those with specific challenges;
 - is disabled or has additional learning needs
 - has special educational needs, with or without a statutory education, health care plan
 - is a young carer
 - showing signs of being involved with or being drawn into criminal or anti-social behaviour
 - has poor attendance at GTG, remote learning sessions or at work
 - at risk of exploitation, in-line with the modern slavery act
 - at risk of extremist views, or radicalisation
 - any such other personal circumstances that prevent access to education, and/or presents barriers to learning out-with their control i.e. others with substance abuse, personal substance abuse, domestic violence, bullying or mental health issues and those having gone through the care system

The safeguarding processes

We will all be alert to the signs of abuse and will treat all instances seriously. It is important that we listen and are supportive. If you suspect that someone is being abused or if someone discloses something to you; you must report it to the designated Safeguarding team within **2 hours**. You can do this by email; help@gtg.co.uk or by using the telephone number **07887293277**.

- You should record
 1. The date
 2. The time
 3. The name of the person you are concerned about
 4. The name of the complainant (if different from above)
 5. The place where the alleged abuse happened
 6. Basic details of the concern (if it is a reported concern, you should use the words as far as possible of the person making the complaint)
 7. A description of any injuries you have seen
- There must be **NO LEADING QUESTIONS**
- There can be **NO PROMISE OF CONFIDENTIALITY** to an individual raising a concern as you will be obliged to pass any concerns onto the safeguarding team. GTG is also obliged to refer any concerns to relevant safeguarding partners and/or The Police
- If someone begins to disclose something but stops once you say that you cannot guarantee confidentiality, you should still inform the designated safeguarding officers
- It is not your responsibility to investigate suspected cases, this will be done by a safeguarding officer in conjunction with the appropriate external party 'on a need to know basis'
- You must not discuss safeguarding issues with people internal or external of GTG, with the exception of signposting and on a 'need to know' basis only (those authorised to provide support etc.)

Record-keeping, review and monitoring

- The safeguarding officer will maintain complete records of all conversations that take place during a safeguarding disclosure. All referral forms will also be kept
- These forms will be kept confidentially and the information will only be shared on a 'need to know' basis
- The safeguarding officer will keep records of all safeguarding instances and referrals
- All safeguarding instances and referrals will be reported to the Board quarterly
- The safeguarding lead will discuss all aspects with the Board representative allocated to safeguarding
- The safeguarding team will monitor safeguarding by reviewing various learner voice activities, throughout the year. Annually the team will consider the effectiveness of policies and procedures. It will respond to any issues or trends that come out of the above monitoring and action plans will be set with the appropriate GTG staff/management

Managing the safeguarding email

- Access to this mailbox is restricted to all designated safeguarding officers and lead safeguarding officer only
- The email address for a safeguarding referrals is; help@gtg.co.uk
- The telephone number is **07887 293277**
- Emails sent to this address will be read and manually re-routed to the appropriate designated safeguarding officer. However all safeguarding officers have permission to send communication from this account
- *Any communication received will be auto-responded to;*

"Thank you for your email. A member of the safeguarding team will contact you within 24 hours, however if it is an urgent matter you can speak to a member of the safeguarding team on; 07887 293277"

- Deal with it by responding to the email or by passing it on to someone else within the team, as appropriate
- If you allocate an email to a colleague, or communicate details to an external party, make physical contact to ensure that the communication has been received
- Inform the safeguarding team and lead officer that this email has been actioned and update the safeguarding log, if required
- Before you deal with an email check that it has not already been dealt with?
- Arrangements are made for person(s) involved to visit with, or speak to over the phone with an appropriate GTG staff member, and in a safe and confidential environment. GTG staff must not put themselves, or related persons in a vulnerable position
- Make sure that all email communication is saved; emails you send and emails you receive, and the subsequent communication trail in relation

Residential safeguarding

GTG and employer partners recognise a heightened risk to those required to reside away from home, as part of the apprenticeship programme.

Proactive measures – physical spot checks are undertaken at all residential properties by GTG, to assure;

- Bookings made for students by age (at time of stay) to identify that 16 or 17 year olds are not allocated rooms with those over 18 years
- Vulnerable learners are not allocated rooms with others learners, if it is deemed inappropriate
- Learners are not allocated rooms with others of mixed gender/sex
- Sensitivities raised by individual learners and/or parents/guardians will be considered and accommodated as appropriate
- Amend the accommodation plan if any learners have been allocated unsuitable roommates
- Confirm the hotel's acceptance of the amendments
- Ensure the welfare support officer provides support, if there are vulnerable learners on site
- Ensure that hotel management enforce the accommodation plan, spot check the premises and liaise with the learners throughout the duration of their stay

Types of abuse and recognition

Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

Indicators of emotional abuse may be;

- Developmental delay
- Aggressive behaviour towards others
- Low self- esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others

Physical Abuse

It isn't accidental. Children who are physically abused may suffer violence such as; being punched, slapped, kicked, poisoned, burned, or having objects thrown at them. Sometimes parents/guardians/carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII). Physical abuse causes serious, and often long-lasting, harm and in severe cases, death. The following are regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- Reluctance to give information or mention previous injuries

Neglect or acts of omission

Everyone has the right to an adequate standard of care. Neglect is defined as not providing reasonable, appropriate or agreed care or a failure to act in a way that any reasonable person would act.

Indicators may be;

- not responding to a person's basic needs, i.e. assisting with feeding, drinking, toileting or in meeting personal care needs
- preventing someone else from responding to those needs
- not meeting the basic standards of professionalism
- withholding or preventing access to medical care or treatment
- withholding or preventing access to the receipt of goods or services
- being prevented from interacting with others
- failing to undertake a reasonable assessment of risk or allowing a person to harm themselves or cause harm to others

Sexual Abuse

Children and vulnerable adults may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a learner to talk about. Please take full account of the sensitivities of any individual when handling claims. Recognition can be difficult, unless the person discloses, and is believed. There may be no physical signs and indications are likely to be emotional/behavioural. Some behavioural indicators associated with this form of abuse are;

- Inappropriate sexualised conduct
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self- mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- Up-skirting (taking photographs underneath a persons' clothing without their consent)

Sexual Abuse/Violence between children and young people cannot be 'normalised' in any educational setting. It is vital that we understand and make it clear;

- Sexual violence or harassment is unacceptable, will not be tolerated and is not a 'part of growing up'
- Never dismiss sexual violence or harassment 'banter' or 'just joking about'
- Inappropriate (criminal) conduct involving 'grabbing bottoms, breast, genitalia or looking up or down clothing' is not 'normal' and will never be tolerated. We will report any such behaviour to the authorities
- Educate those to understand why this behaviour is sometimes 'normalised', by the wider society i.e. stereo typing, everyday exist language and ignorance – but is never accepted or tolerated at GTG, or to those aligned with GTG

There are many more types of abuse that can affect people throughout their lifetime; please see appendix A for a more detailed list.

Dealing with allegations of abuse

Dealing with allegations of abuse against a member of GTG staff

GTG staff come in to contact with a number of young people. We understand that an allegation of abuse may be made against a member of staff and we must recognise that this may or may not be true. Those dealing with such allegations must do so with an open mind and ensure a timely and thorough discussion is undertaken.

- Allegations of abuse or concerns raised against a member of GTG staff will always be treated seriously. If a member of staff receives such an allegation or has concerns, this must always be referred to their line manager and the lead safeguarding officer
- This must be done within **2 hours** and should follow the procedures described above
- GTG will then follow the relevant stakeholder guidance: handling allegations of abuse against staff
- The safeguarding officer will record all the relevant information of the case using the GTG SG Incident Report form
- The safeguarding officer will refer to safeguarding partners or other agencies where necessary if permitted by the safeguarding lead. As previously consent for the referral from the young person/vulnerable adult will be sought, although the referral will be made without it
- The relevant Safeguarding officer will inform HR if permitted by the safeguarding lead. Advice will be sought from Social Services whether to suspend the member of staff. Once a referral has been made the safeguarding partners or The Police investigation takes precedence over any GTG disciplinary procedure
- If a member of staff is dismissed or resigns before the disciplinary process is completed, they will be informed of GTG's duty to inform the Disclosure and Barring Service of the situation
- GTG will carry out a full review of all investigations, to ascertain improvements and whether lessons can be learned

Dealing with allegations found to be without foundation

If there is an allegation that is proved unfounded, we will:

- Inform The People Team of the conclusion
- The People Team will inform the member of staff, in person, and in writing of the outcome and any further actions
- Inform the student/parents/carers of the outcome of the investigation, in line with the Data Protection Policy
- Hold a series of restorative meetings, to repair harm and instil confidence

Dealing with allegations found to be with foundation

If there is an allegation that is proved founded, we will:

- Inform The People Team of the conclusion
- The People Team will inform the member of staff, in person, and in writing of the disciplinary action to be taken
- Inform the student/parents/carers of the outcome of the investigation; in line with the Data Protection Policy
- Inform Wolverhampton Local Authority Designated Officer
- Inform the appropriate crime agencies that allegations have been founded

Dealing with allegations of abuse against a member of the public

- The designated safeguarding officer will record all the relevant information using the GTG SG Incident Report. This will form the basis of any decision to refer and will include the information required, should a referral be made
- The designated safeguarding officer will decide whether a referral to specialist support services is required – this includes Safeguarding partners, Channel and/or others as appropriate. If a referral is made we will require consent from the young person/vulnerable adult, if they are deemed competent to give it. Although it is best practice to have consent for referrals, there may be situations that warrant a referral without consent

Dealing with allegations of Peer on Peer abuse

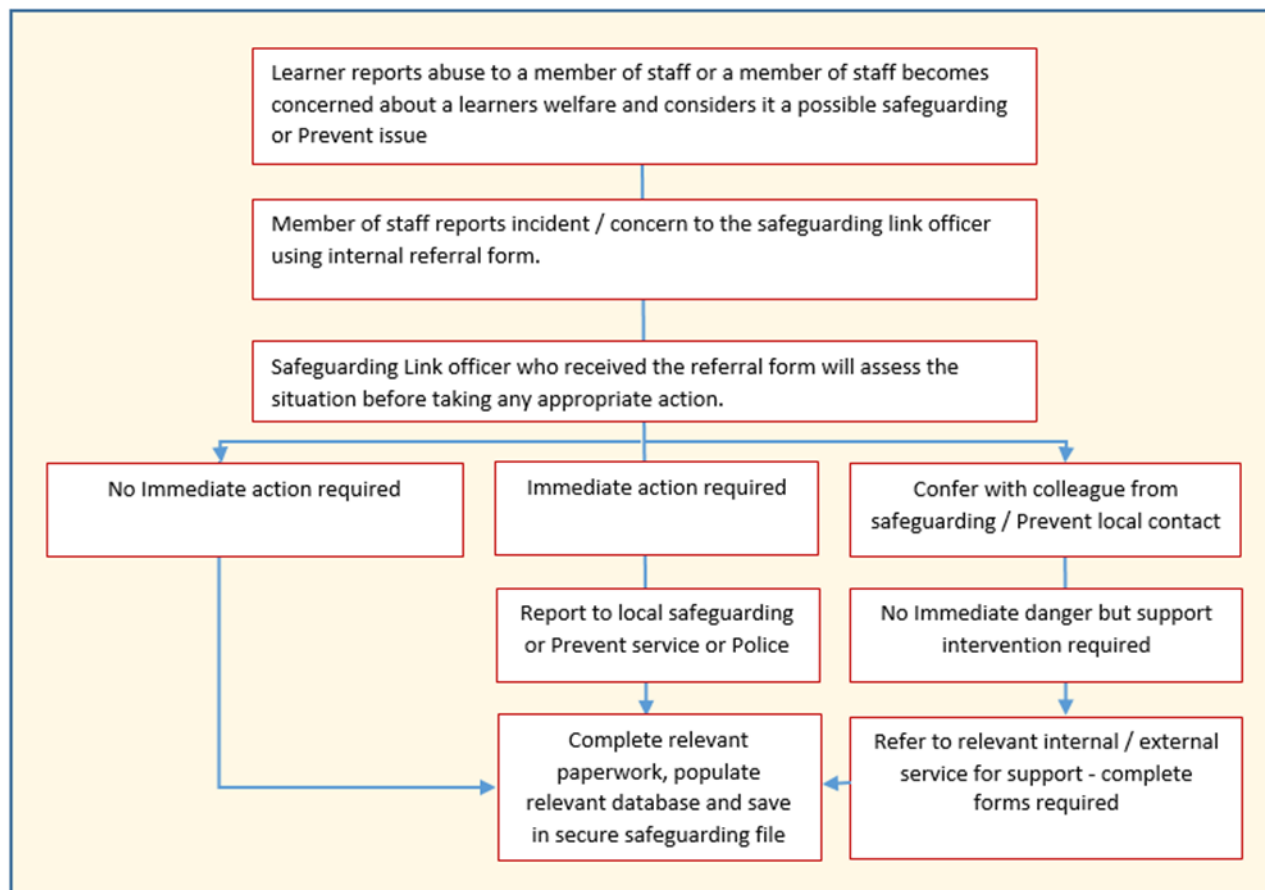
All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). ***This is most likely to include, but may not be limited to;***

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Up-skirting, which typically involves taking a picture under a person's clothing obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Sexting (also known as youth produces sexual imagery)
- Initiation/hazing type violence and ritual

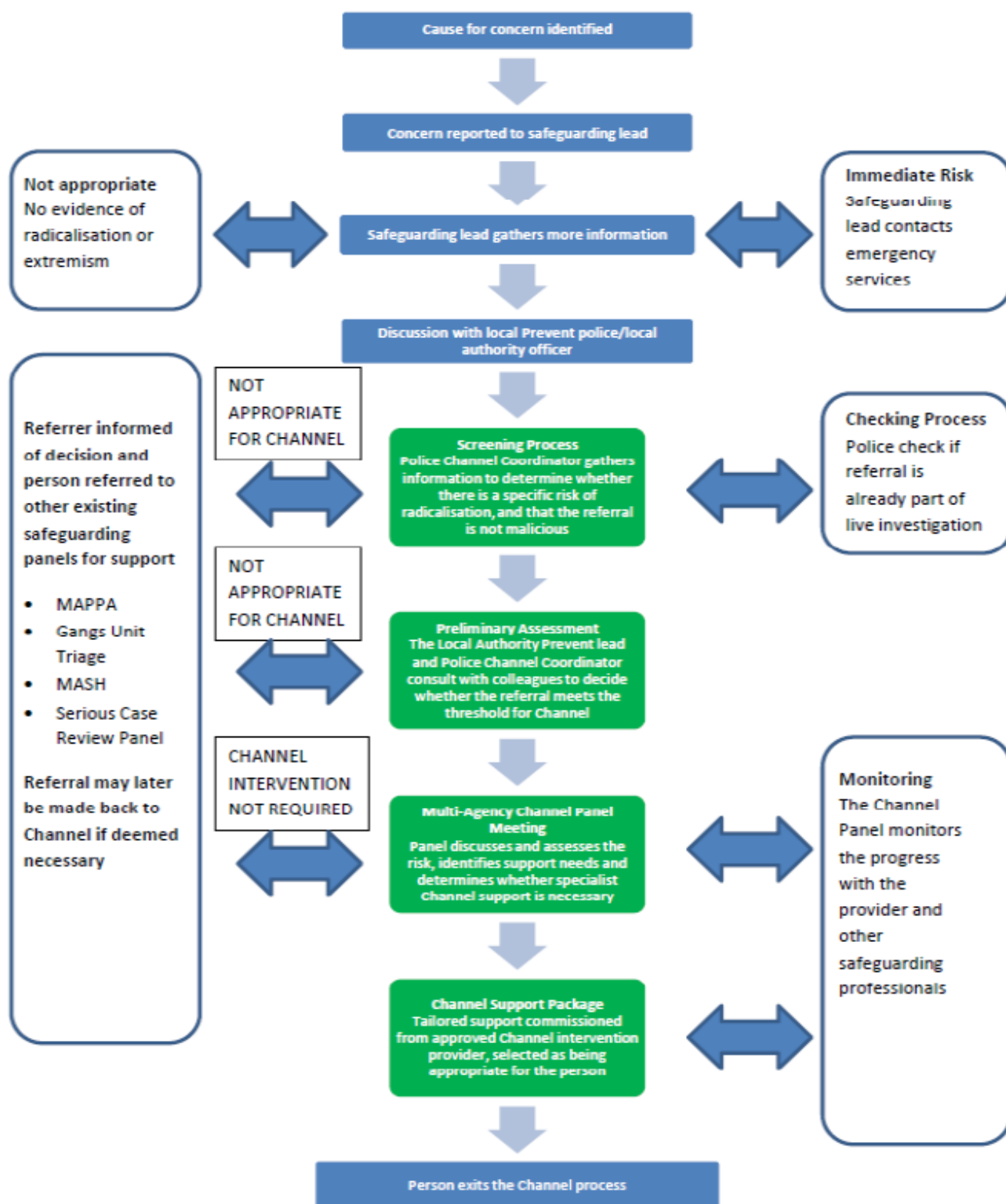
If an allegation of abuse is made against another student, the safeguarding officer will remove the student from duties within GTG using the staff disciplinary policy if permitted by the safeguarding lead. The safeguarding officer will inform the young person's parents that the matter had been referred to the safeguarding partners if permitted by the safeguarding lead.

Safeguarding Procedure flowcharts

The following flowcharts detail the procedures for reporting a safeguarding / Prevent incident and the Channel process for FE.



The Channel Process within FE Colleges



Safeguarding and Prevent referral contacts and agencies

GTG Training Ltd		
Title	Email / Web	Call
Safeguarding & Prevent Lead	Thomas.Madden@gtg.co.uk	01902 308493 or 07887 293277
Confidential Anti-terrorism hotline	https://west-midlands.police.uk/specialist-teams/ct-faq	0800 789 321
Channel Coordinator local authority	Alison Potts ext. 871 3034	101
Crime stoppers	crimestoppers-uk.org	0800 555 111
West Midlands Police	https://www.west-midlands.police.uk/	101

Safeguarding Partners

GTG Training Ltd has an extensive list of all learners on programme and their local Safeguarding Partners – this can be made available on request

Support Agencies

Title	Email / Web	Call
BEN	www.ben.org.uk	08081 311 333
Citizens Advice	www.citizensadvice.org.uk	0344 411 1444
Samaritans	www.samaritans.org	116 123 free from any phone
Papyrus	www.papyrus-uk.org	0800 068 4141
Switchboard	https://switchboard.lgbt/	0300 330 0630

Location and access of this procedure

This policy is available for viewing from the GTG website and the GTG QMS

Appendix A.

Types of Abuse

Bullying (Inc. cyberbullying)

Behaviour by group of individual repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, social media exchanges)

Indicators may be;

- Signs of physical abuse; bruising, welts, burns, scarring etc.
- Signs of emotional abuse; withdrawn, anxious, anger, excessive crying or nervousness
- Protracted use of mobile/fixed communication devices for internet usage
- Very little use of mobile/fixed communication devices for internet usage

Gangs and youth violence

Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending.

Indicators may be;

- May have expensive items
- Change in behaviour and perhaps respect for others
- Bruises, cuts, welts, burns, scarring etc.
- Social activities change
- Social media interaction and language has changed
- Evidence of gang tattoos; more or irregular choice of tattoos and in highly visible areas
- Carrying, or evidence of concealed weapons

Radicalisation

Process by which a person comes to support/ partake in terrorism and extremism (also includes – political/ animal rights and ecological extremist). Extremism is ideology that is considered to be far outside the acceptable mainstream attitudes of society. – include opposition to British values.

Indicators may be;

- Long trips away from home
- Talking about being wronged by a state or political system/ changing to a better life
- Strong views about changing life
- Talk of harming others in plight for cause
- Social media interaction and language has changed

Sexting

Exchange of self-generated sexually explicit images through mobile picture messages, social media or any other platform for sharing images.

Indicators may be;

- Overhear others boasting, or discussing body images of others
- Protracted use of mobile phones
- Very little use of mobile phones
- Signs of emotional changes; withdrawn, anxious, anger, excessive crying or nervousness

Mental health

Absence of psychological wellbeing and effective physical or psychological functioning.

Indicators may be;

- Signs of emotional changes; withdrawn, anxious, anger, excessive crying or nervousness
- Withdrawing from social interaction
- Changes in behaviour or personal appearance
- Less punctual than normal, less interest

Child Sexual Exploitation (CSE)

A form of sexual abuse that involves the manipulation and/or coercion of young people, under the age of 18, into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. It is a crime, not a choice made by victims. The manipulation or 'grooming' process involves befriending children, gaining their trust and supplying, for

ingestion, drugs and alcohol. These manipulations may occur over a long period of time, and also before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no person under the age of 18 can legally consent to being in a relationship.

Financial or material abuse

Everyone has the right to money and property that is legally theirs. Financial abuse is when someone takes your money or belongings without asking and uses this for their personal gain.

Financial abuse may include;

- money or possessions stolen, borrowed or withheld without permission
- preventing someone from buying goods, services or leisure activities
- staff or volunteers borrowing/accepting gifts or money from service users
- goods or services purchased in someone's name but without their consent
- being deliberately overcharged for goods or services or being asked to part with money on false pretences
- being asked to sign or give consent to financial agreements when a person does not have the mental capacity to understand or give an informed consent

Honour Based Abuse

Has been extended to clarify the fact that FGM and Forced Marriage are examples of Honour-based abuse.

Forced Marriage (FM)

Forced marriage is a marriage in which one or more of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in choosing a spouse. It is a human rights abuse. Young men and women can be at risk in affected ethnic groups. Other indicators may be detected by changes in behaviours. Forced marriage is now a crime. Forcing someone to marry against their will is now a criminal offence. Legislation introduced by the government is designed to help people in England and Wales. It also applies to UK nationals overseas who are at risk of becoming the victim of a forced marriage.

Psychological abuse

Psychological abuse signs and symptoms may start small at first as the abuser "tests the waters" to see what the other person will accept, but before long the psychological abuse builds into something that can be frightening and threatening. It's important to remember that any of these examples of psychological abuse can happen to any individual.

Examples of psychological abuse;

- You're so cute when you try to concentrate! Look at her, man, she's trying to think
- That isn't at all what I meant, you'll never understand how much I love you
- I am more capable, smarter, and better educated than you. I will take our kids if you leave me
- Let me do the talking; people listen to men
- You took a vow in front of God and everybody and I expect you to honour it
- Keep your stupid beliefs to yourself
- We are married and you are to subjugate yourself to me in all ways

Discriminatory abuse

This type of abuse is motivated by discriminatory and oppressive attitudes towards people on the grounds of disability, gender and gender identity and reassignment, age, race, religion or belief, sexual orientation, and political beliefs. It may be a feature of any form of abuse and manifests itself as physical abuse/assault, sexual abuse/assault, financial abuse/theft, neglect and psychological abuse/harassment. It includes verbal abuse and racist, sexist, homophobic or ageist comments, or jokes or any other form of harassment. It also includes not responding to dietary needs and not providing appropriate spiritual support.

Examples of discriminatory abuse include;

- A person may reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices;
- A person making complaints about the service not meeting their needs;
- Signs of a sub-standard service offered to an individual;
- Repeated exclusion from rights afforded to citizens such as health, education, employment, criminal justice and civic status;

Domestic Abuse

Is defined as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common. In the vast majority of cases it is experienced by women and is perpetrated by men.

Domestic abuse can include, but is not limited to;

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical or sexual abuse
- Financial abuse
- Harassment and stalking
- Online or digital abuse

Domestic abuse is a gendered crime which is deeply rooted in the societal inequality between women and men. Women are more likely than men to experience multiple incidents of abuse, different types of domestic abuse (intimate partner violence, sexual assault and stalking) and in particular sexual violence. Any woman can experience domestic abuse regardless of race, ethnic or religious group, sexuality, class, or disability, but some women who experience other forms of oppression and discrimination may face further barriers to disclosing abuse and finding help.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of learner abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. What is FGM? - It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Types of procedure;

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

FGM legalities;

- FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK

Modern Slavery

Today slavery is less about people literally owning other people – although that still exists but more about being exploited and completely controlled by someone else, without being able to leave. Modern slavery encompasses slavery, human trafficking, and forced labour and domestic servitude. Trafficking and slave master’s use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Someone is in slavery if they are;

- forced to work – through coercion, or mental or physical threat;
- owned or controlled by an ‘employer’, through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as ‘property’;
- Physically constrained or have restrictions placed on their freedom of movement.

Self-Neglect abuse

Self-neglect is any failure of an adult to take care of himself or herself that causes, or is reasonably likely to cause within a short period of time, serious physical, mental or emotional harm or substantial damage to or loss of assets.

Self-neglect can happen as a result of an individual's choice of lifestyle, or the person may;

- be depressed,
- have poor health,
- have cognitive (memory or decision making) problems, or
- be physically unable to care for self.

Self-neglect may include;

- Living in unsanitary conditions
- Suffering from an untreated illness, disease or injury
- Suffering from malnutrition to such an extent that, without an intervention, the adult's physical or mental health is

likely to be severely impaired.

- Creating a hazardous situation that will likely cause serious physical harm to the adult or others or cause substantial damage to or loss of assets, and
- Suffering from an illness, disease or injury that results in the adult dealing with his or her assets in a manner that is likely to cause substantial damage to or loss of the assets.

Serious Violence

The Serious Violence Strategy, which was introduced by the government in 2018, identifies offences such as homicides and knife and gun crimes as key factors which account for around one percent of all recorded crime. The impact of serious violent crime on individuals and the community is significant. Tackling serious violence is not a law enforcement issue alone; it requires a multiple- strand approach involving a range of partners across different sectors.

The main areas that the Serious Violence Strategy focuses on are;

- Tackling county lines
- Early intervention and prevention
- Supporting communities and local partnerships
- Effective law enforcement and the criminal justice response

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime.

Indicators may include;

- Increase absence from school
- A change in friendships
- Relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm
- Significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

All staff should be aware of the associated risks and understand the measures in place to manage these.