


Control Information			
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Document Author:	Samantha Whenman		
Document Owner:	Sandra Fawcett	Position:	Director of Customer Operations
Approved by:	Sara Shanab	Position:	Group Director of Governance and General Counsel
Signature:			
Applicability:	This Policy is applicable across all learning delivery.		
Summary:	This Policy details the controls required for the management of documents and records that form part of One Academy compliance and quality procedure in relation to Safeguarding.		
Version History			
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V1 Contents	19/9/23	Introduction of Martyn's Law	Samantha Whenman

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1. Policy Statement

One Academy is an Independent Training Provider which was formed to provide apprenticeship provision to the employees of TRGL Group and other employers. One Academy is a part of The Riverside Group Ltd (TRGL) and is subject to organisation-wide governance.

This policy outlines what One Academy requires from staff and its associates to make sure that all our staff, learners and visitors are safe. We expect all our providers to use or be informed by this policy and ensure that their staff are aware of the procedures for safeguarding children and vulnerable/at-risk adults. We expect all staff and our providers to act upon any allegation or concern regardless of how small or trivial it may seem.

2. Objectives

One Academy is committed to raising staff awareness of all aspects of safeguarding, preventing abuse where possible and ensuring that robust procedures are in place for dealing with incidents of abuse. The organisation will not tolerate abuse in any form, and it is committed to promoting wellbeing, preventing harm, and responding effectively if concerns are raised.

One Academy, our staff, our providers, partners, and their staff have a collective responsibility to:

- Protect children or at-risk adults from abuse, neglect, and bullying
- Protect children or at-risk adults from extremism and radicalisation
- Protect children or at-risk adults from violence, and sexual and criminal exploitation
- Respect and confidentiality
- Report any abuse discovered or suspected

3. Related Documents and Policies

This policy should be considered in conjunction with the following TRGL policies and documents;

- One Academy Safeguarding Procedure
- Anti-Social Behaviour Policy
- Anti-Social Behaviour Procedure
- Safeguarding Policy
- Safeguarding Procedure
- Safeguarding Strategy
- Equality & Diversity Policy
- Domestic Abuse Policy
- Domestic Abuse Procedure
- Whistleblowing Policy
- Online Learning Code of Conduct

3.1 Government legislation has an impact on how One Academy manages Safeguarding. Listed below are the key acts and documents:

- The Care Act 2014
- The Care and Support Statutory Guidance –
- Keeping children safe in education: Statutory guidance for schools and colleges 2023
- Prevent Duty Guidance: for further education institutions in England and Wales
- The Protection of Freedoms Act
- Section 175 of the Education Act 2002
- Safeguarding Vulnerable Groups Act 2006

- The Children's Act 2004
- The Female Genital Mutilation Act 2003 ("the 2003 Act").
- The Female Genital Mutilation Act 2003 was amended by sections 70-75 of the Serious Crime Act 2015.
- No Secrets: guidance on protecting vulnerable adults in care - Department of Health
- Data Protection Action 2018
- Martyns Law

4. Definitions

4.1 What is a 'child' and a 'vulnerable adult'?

The Safeguarding Vulnerable Groups Act 2006 defined a 'vulnerable adult'. This definition has now been amended in the Protection of Freedoms Act 2012. Due to this amendment, adults accessing learning through One Academy are not necessarily 'vulnerable'. However, we have a moral duty to safeguard the wellbeing of all our learners and in particular, those who are or may be 'in need of community care services by reason of disability, age, or illness; and who is or may be unable to take care of him or herself against significant harm or exploitation. (Department of Health 2000).

The Children Act 1989 defines a child as being up to the age of 18 years. One Academy works with children and young people in family learning programmes.

Extremism

One Academy uses the following definition of extremism; Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of any person, whether in this country or overseas.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice. Education is a powerful weapon against this by giving people the knowledge, skills and critical thinking to challenge and debate in an informed way. One Academy wants to ensure that all learners thrive, feel valued and not marginalised.

Please also see section 6.5 within this policy.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Child Sexual Exploitation (CSE)

CSE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been sexually

exploited even if the activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

Domestic abuse

The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

Honour-based abuse

Honour-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Criminal Exploitation (County Lines)

Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks groom and exploit vulnerable people (including children and young people) to sell drugs. Often these people are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs. We have a duty to be vigilant and look for the signs of criminal exploitation to protect our learners.

Other types of abuse

Other types of abuse may include:

- Physical abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

Please see The Riverside Group Ltd overarching Safeguarding Policy for further information and definitions.

5. Policy

5.1 Riverside's approach

One Academy Safeguarding and Prevent policy is part of the Riverside Group's Overarching Safeguarding Policy and have an internal Safeguarding Panel which oversees Safeguarding for the wider group.

The Safeguarding Panel has been created internally to oversee our overall approach. It identifies areas of potential risk and provides recommendations on best practice that can be rolled out across all departments within TRGL.

The Safeguarding Panel supports the Group Board in its responsibilities for overseeing and scrutinizing the Safeguarding services across Riverside performance, and operational delivery of Safeguarding services. A representative from One Academy also sits on and reports to the Safeguarding Panel

The Panel's key areas of responsibility are to:

- Regularly report to the Group Board, relevant Board sub-committees and Executive Team
- Review best practice and implement actions to manage risk
- Engage and liaise with Local Safeguarding Boards
- Review training and knowledge across the business
- Continuously review policy and procedure ensuring it is up to date with legislation changes
- Review the efficiency and effectiveness of the delivery of all Safeguarding services including relevant benchmarking and board-level KPIs
- Review serious case reviews and recommend learning across the business
- Manage and identify critical incidents, ensuring mitigating factors are implemented.
- Review Safeguarding performance indicators and targets on an annual basis with residents and partners to ensure they are fit for purpose and challenge improvement.
- Carry out regular internal case audits ensuring that we are learning from best practice and reviewing inconsistencies.
- Scrutinise reporting systems ensuring that they are updated, accurate and enable information-sharing between internal and external partners.
- Carry out regular audits to ensure that we are up to date with improvements in legislation and include additional acts that aim to prevent abuse and support community safety and safeguarding activities.

5.2 Staff

All our staff and volunteers participate in training relevant to their role to raise awareness of the issues and to follow both statutory and Council guidelines in the reporting of concerns.

All staff and volunteers from any service or setting who have contact with learners and children have a responsibility to be aware of issues of abuse, neglect, or exploitation. Staff and providers should pay special attention to any at-risk learner's learning needs and try to take into account any specific requirements that they may have.

If any member of staff or volunteer believes that abuse is or may be taking place, they must act on this information immediately. Doing nothing is not an option as the priority is always to make sure all children and adults are safe and protected.

Senior managers are responsible to make sure that all staff and volunteers understand the Safeguarding policy and procedures and know how to act if they are worried or concerned about a child or learner.

All learning providers and settings have a Designated Lead to promote safeguarding awareness and practice within the organisation. Their contact details are easily available to all staff and volunteers.

All learning providers have a process to identify any at-risk learner at admission onto a course. All providers must inform their tutors if at-risk learners have been admitted onto a course and as soon as they have enrolled.

5.3 Reporting Safeguarding Concerns

At-risk people can potentially be abused by anyone. This includes family members, the community, employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers, and fellow learners.

Your learning provider has a Designated Lead who is responsible for safeguarding. You must make sure you have their contact details easily available. This can be found in the Staff Handbook given out at induction.

You must not try to investigate any potential abuse on your own. Staff and volunteers are not equipped or qualified to do so. If you suspect anything, you should immediately inform your Designated Lead in person or by telephone. Even if you have only heard rumors of abuse, or you have a suspicion but do not have firm evidence, you should still contact them to discuss your concerns.

All staff and volunteers must know what services are available and how to access help and advice for the adult or child at risk. You must also know how and where to make a direct referral if speaking to a manager or Designated Lead would cause a delay and put a person at risk.

Although One Academy and our providers are funded to work with learners over the age of 19, all staff are aware of the mandatory duty to report to police any case where an act of female genital mutilation appears to have been conducted or about to be carried out on a girl under the age of 18.

5.4 What you should do

- Call the police and/or an ambulance if anyone urgently needs medical treatment or protection.
- Make a report to the police about any possible crime. You should also try to preserve any evidence, for example, if there has been a physical or sexual assault, especially if the suspect is still at the scene
- Tell your Designated Lead or line manager about the issue. If the Designated Lead or line manager is implicated in the abuse, then inform a more senior manager. You can also email welfareandsafeguarding@onehousinggroup.co.uk.
- If the learner is a TRGL resident report to safeguarding@onehousing.co.uk

5.5 What to include in the report of your concern and what you did about it

- Make sure your report is purely factual. Don't include opinions or personal interpretations of the facts presented.
- Include as much detail as possible. This could include any apparent physical signs of abuse or other circumstances which led to your suspicions. It could also include an accurate record of what the person involved told you about the abuse.
- Remember to sign and date the report. Store a copy in a secure place.

If you are unsure about reporting concerns, you can get advice from your Designated Lead at One Academy, or the Community Safety Team.

5.6 How to talk to a potential victim of abuse

If a child or an adult comes to you with a report of abuse, you should listen carefully to them, using the following guidelines:

- Tell them that you are required to pass on any information they give you and that you will not be able to keep the information confidential if it is a safeguarding concern if they are in danger or if their case needs to be referred to an external agency.
- Reassure them that they are right to speak up about their concerns
- Allow them to speak without interruption
- Never trivialise or exaggerate the issue. Let them know that you are taking the matter very seriously.
- Never make suggestions, coach, or lead the individual in any way
- Always ask enough questions to make sure you understand, but do not probe, interrogate, or make them repeat themselves over and over
- Remain calm – remember this is not an easy thing for them to do
- Do not show your emotions. If you show anger, disgust, or disbelief, they may stop talking to avoid upsetting you. They may also feel your negative feelings are directed towards them.
- Make the individual feel secure and safe without causing them any further anxiety.

5.7 What to do about confidentiality

All conversations regarding an individual must always be held in private. Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the individual is the main concern. The degree of confidentiality will be governed by the need to protect the individual.

The individual should be informed at the earliest possible stage of the disclosure that the information will be passed on to a Designated Lead and the Designated Lead for One Academy. One Academy complies with the requirements of the Data Protection Act 2018 and the Care Act 2014, which allows for disclosure (or withholding) of personal data without consent where there is a good reason to do so, and this is necessary to protect the vital interests of an at-risk individual.

Information will be dealt with confidentially. Whatever happens, you should always be open and honest with the individual if you intend to take the case further. Staff must not discuss the case with anyone other than those involved in the case. The Designated Lead will only inform other staff if they must know about the situation.

The Designated Lead will create a written record of what information has been shared, with whom, when and why. These records will be stored securely in a central place. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the provider Designated Lead or the Designated Lead for One Academy.

One Academy will not disclose to a parent, other relative or carer any information on a child or at-risk person if this would put them at risk of significant harm.

5.8 Next Steps

The Designated Lead will consider all the information available and decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Camden Adult Social Care or Family Support and Child Protection Team as appropriate
- Make a referral to Social Services
- Report the incident to a designated Social Worker (if the adult has one)
- Report the matter to the police if a crime is suspected
- Liaise with the Community Safety Team if the learner is a resident of TRGL

If a referral is made, this must be confirmed in writing by the Designated Lead to the appropriate agency

within 24 hours.

The Designated Lead will inform the member(s) of staff who raised the concern about the processes and procedure that has been followed within 5 working days. However, they will not feedback on any information that may be considered a breach of confidentiality.

If the member of staff does not agree with the decision of the Designated Lead that no further action is necessary, the member of staff should contact the Head of Adult Learning. If the Head of Adult Learning does not recommend further action and the member of staff still has concerns, then the member of staff has the right and duty to refer the case directly to Camden Adult Social Services or the Local Child Safeguarding Board as appropriate. They should also alert the Council's Director or Assistant Director of Adult Social Care under the council's 'Whistleblowing' procedure.

If the member of staff does not agree with the decision of the Designated Safeguarding Lead that no further action necessary, the member of staff should contact the TRGL Safeguarding Panel. If significant concerns are noted the TRGL Safeguarding panel will contact the LADO and advise on further action.

If any of the individuals, other learners, staff, parents, or carer's involved require counselling, the Designated Safeguarding Lead will make the necessary arrangements.

5.9 Raising Awareness

TRGL has developed a Safeguarding Strategy for customers and staff. Our strategy sets our commitment to preventing abuse and safeguarding our residents and staff through developing clear Safeguarding policies, robust leadership and empowering our staff to deliver services that minimise the risk of abuse to our residents, service users and staff; or intervene swiftly to prevent abuse continuing.

The strategy consists of the following key subject areas;

- Policies and Procedures
- Reporting and Auditing
- Managing and Identifying Risk
- Raising Awareness
- Compliance
- Partnership and Engagement
- Aims and Objectives

The purpose of the strategy is to ensure that all aspects of Safeguarding are fully integrated into the management of TRGL Group across the business, aligning itself to the vision and values of the business.

To raise awareness across the business, TRGL has a dedicated Safeguarding Campaign. The campaign focuses on staff reporting safeguarding concerns, and encourages staff to "Feel, Think, Act"! If they see a safeguarding concern.

- Feel – Does something not quite feel right?
- Think – Does the resident require support, what are their circumstances?
- Act – Reporting and recording information to the safeguarding team.

In alignment with the campaign and strategy as part of TRGL's mandatory induction for all staff, TRGL has developed an online eLearning training video that is suitable for all staff across the business. The training provides a basic overview of the types of abuse, signs of abuse and how to report Safeguarding concerns.

5.10 Extremism and Prevent

One Academy is committed to providing a secure environment for learners, where they feel safe and are kept safe and where equality and inclusion are actively promoted.

We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern. With the impact of Covid-19 leading to increased use of the internet and social media, we must recognise that radicalisation can occur here as well as in other settings. Extremists have been exploiting the pandemic to spread disinformation, misinformation, and conspiracy theories leading to a rise in false and misleading narratives about the virus. This has led to a marked increase in extremist hate narratives and a lack of places where such views can be challenged. If we fail to challenge extremist views, we are failing to protect our learners and to promote equality and diversity.

There is no place for extremist views of any , whether internally (from learners, staff, or governors/trustees) or externally (from the community, external agencies or individuals).

Our workshops must be a safe place where learners can explore controversial issues safely and where our teachers encourage and facilitate this. We have a duty to protect this freedom alongside protecting our learners and staff from extremism. Each of our providers needs to balance their legal duties in terms of both ensuring freedom of speech and also protecting student and staff welfare.

The Government Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. Prevent is not about preventing individuals from having political and religious views and concerns, but about supporting our adults to use those concerns or act on them in a non-extremist way.

Prevent is an important element within our safeguarding policy and processes. Prevent is focused on safeguarding adults and encourages a learning environment where issues can be raised and discussed safely, whilst ensuring that apprentices and employees are resilient to extreme narratives.

All staff should take note of these and also look out for:

- Learners talking about their exposure to the extremist actions, views or materials of others. This might include other learners, relatives, or local community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Learners accessing extremist material online, including through social networking sites.
- Learners voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference. This could include secular or religious intolerance or offensive views based on gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Extreme anti-western or anti-British views.

5.11 Martyn's Law

On 19th December 2022, the government announced details for the 'Protect Duty', to be known as 'Martyn's Law'

in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017.

In order to reduce risk to the public from terrorism, Martyn's Law aims to make the prioritisation, consideration and application of security processes and measures consistent across publicly accessible locations (PALs). Forming part of the government's counter-terrorism strategy (CONTEST), it will require those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

Draft legislation for Martyn's Law is expected to be published in spring 2023. It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

Premises will fall within the scope of the duty where "qualifying activities" take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central government buildings (e.g., town halls), visitor attractions, temporary events, places of worship, health, and education.

Martyn's Law will follow a tiered model linked to activity that takes place at a location and its capacity.

- A standard tier will apply to locations with a maximum capacity of over 100 which can undertake low-cost, simple yet effective activities to improve preparedness. This will include training, information sharing and completion of a preparedness plan to embed practices, such as locking doors to delay attackers progress or knowledge on lifesaving treatments that can be administered by staff whilst awaiting emergency services.
- An enhanced tier will focus on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with a capacity of over 800 people at any time, will additionally be required to undertake a risk assessment to inform the development and implementation of a thorough security plan. Subsequent measures could include developing a vigilance and security culture, implementation of physical measures like CCTV or new systems and processes to enable better consideration of security.

It is assumed that TRGL Group Arlington Conference Centre will be required to meet the Standard Tier requirements due to potential capacity of 110 or more.

Therefore, premises will be drawn into the scope of the duty if they meet the following three tests:

- That the premises is an eligible one – i.e., building or event with a defined boundary.
- That a qualifying activity takes place at the location; and
- That the maximum occupancy of the premises meets a specified threshold – either 100+ or 800+

The changes mean will require the owners and occupiers of publicly accessible locations to do three things:-

- To conduct a risk assessment to consider the threat of a terror attack in their publicly accessible locations;
- To implement measures, so far as reasonably practicable, to reduce the risk of terror attacks (enhanced tier duty holders);
- To have in place robust plans to deal with the threat of terror attacks (as we do in our BC plans) – Run Hide Tell procedure.

The National Counter Terrorist Security Office NaCTSO provide free e-learning training. All One Academy staff are required to complete Action Counter Terrorism (ACT) training in preparation for the implementation of Martyn's Law.

If you have any concerns about extremism or radicalisation, these should be reported to the Designated Safeguarding Lead. Refer to the One Academy Safeguarding Procedure and use the *Channel Referral Process Flowchart* (Channel is a multiagency referral process for at-risk individuals) [One Academy Safeguarding & Prevent Reporting Procedure.docx](#)

5.12 Sexual Harassment and Sexual Consent.

In the June 2023 KCSIE update, staff are also requested to be vigilant around issues associated with sexual violence and sexual harassment between children in schools, colleges and training providers.

The update also provided clarity of managing peer-on-peer abuse and additionally physical relationships between children. Colleagues are additionally expected to be vigilant around harmful online material that may constitute one or more types of abuse.

The Education and Training (Welfare of Children) Act 2021 will apply similar expectations to other further education and skills providers. One Academy will of course, protect any adult apprentice and engage with adult social care, support services and the police as required.

Sexual Harassment will not be tolerated in any form at One Academy. Any incident can have an impact on people's lives. Rubbing against someone, touching someone inappropriately, making unsolicited remarks of a sexual nature, revealing intimate body parts, sending or showing sexual content and taking photos under someone's clothes. It is all sexual harassment and One Academy take it very seriously.

One Academy will require every staff member to be trained in Sexual Consent & Harassment. We will ensure staff understand how to handle reports of harmful sexual behaviour between apprentices both on and outside our premises.

6 Staff

6.1 Staff Code of Behaviour on Safeguarding

Although it is not possible to provide instructions on behaviour that apply to all situations when staff come into contact with at-risk individuals, there are some general principles and standards that can help to make sure both staff and at-risk individuals stay safe. This code should help protect both individuals and members of staff. Any member of staff who does not comply with this Code of Behaviour may be subject to a disciplinary procedure.

Staff must:

- Implement this Safeguarding Policy at all times
- Understand the need to prevent people from being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can "create an atmosphere conducive to terrorism and can popularise views which terrorists exploit."
- Understand the need to prevent people from being drawn into Child Criminal or Sexual Exploitation. This includes an activity to coerce, control, manipulate or deceive a child into any criminal or sexual activity, including County Lines.
- Understand their legal responsibility to promote British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" in their practice.
- Understand how to help learners stay safe online and use digital technologies responsibly

Staff must never:

- Engage in rough, physical games including horseplay with any learners
- Allow or engage in inappropriate touching of any kind
- Make sexually suggestive comments to any learner
- Engage in a personal relationship with an adult learner, or an adult who becomes a learner, except where this is appropriate for a staff/ learner relationship
- Do things of a personal nature for adults or children that they can do for themselves
- Physically restrain an adult or child unless the restraint is to prevent physical injury of the individual or other people. Physical restraint must always be appropriate and reasonable as otherwise it can be

defined as assault.

- Spend time alone with an individual outside of the normal tutorial/workshop situation or learning environment. If a member of staff finds themselves alone with an at-risk individual, they must make sure that they can be observed by others.
- Share personal mobile, email or social media sites with learners.
- Have adults or children in a vehicle unless there is another member of staff or a volunteer with them. If there is an extreme emergency (e.g. for medical purposes) where a member of staff is alone with a learner, a manager, the key worker, or parent/carer must be notified immediately. It is also essential that there is adequate insurance for the vehicle to cover transporting these individuals.

6.2 Recruitment

Everyone that applies to work at One Academy or in one of our partner providers is checked to make sure that they have a right to work in the UK.

One Academy requires its partner providers (subcontractors, guest lecturers, consultants and other associates) to carry out a criminal record check with the Disclosure and Barring Service (DBS) on all staff who have unsupervised access to children and vulnerable/at-risk adults. These checks must be carried out before a member of staff starts working with learners or have access to children or vulnerable/at-risk adults and if they are not, then our providers must carry out a risk assessment.

Managers must adhere to the Recruitment and Selection Policy and Procedure when taking on new staff to work in the TRGL. All of our contractors must have a Safer Recruitment Policy and Procedure to minimise the risk of recruiting unsuitable staff.

New professional Coaches and managers need to pass an Enhanced Disclosure and Barring Service (DBS) check. Existing tutors should sign up to the DBS Update Service, so their certificate stays up to date.

Shortlisting candidates

One Academy will ensure that at least two people carry out the shortlisting exercise and these are the same individuals who carry out the interview for a consistent approach.

In addition, One Academy will carry out an online search as part of their due diligence on the shortlisted candidates using the personal details provided by the candidate. This is to help identify any incidents or issues that have happened and are publicly available online. If this search identifies information about a candidate that is a cause for concern the matter will be discussed further with the candidate either during or following the interview. If this does not allay concerns the recruiting manager will raise concerns with the Riverside Safeguarding Lead for further guidance.

6.3 Training

In line with *Keeping Children Safe in Education: Information for all school and college staff*, September 2023, One Academy expects all contractors and their staff to comply with safeguarding policy and procedures.

The Designated Safeguarding Lead is trained to Level 3/4 standards, and the training must be refreshed every 3 years. In addition, the Designated Safeguarding Lead will undertake annual Continual Professional Development (CPD) which is recorded on the central staff training record. All Deputy Designated Safeguarding Leads receive training at the equivalent to Level 3, but ideally the same as the Designated Lead. This is refreshed every 3 years.

All new staff are required to have a safeguarding induction as soon as they start in their role. This is followed by mandatory safeguarding training within the first 3 months of employment. For staff who

deal with learners, this should meet the Level 2 safeguarding training standards. One Academy has a 'Safeguarding Induction' PowerPoint presentation for use as part of the safeguarding induction. Following this induction, all staff must be given the One Academy 'Our Guide to Safeguarding' leaflet to keep.

Annual Continuous Professional Development (CPD) for all staff is to be delivered by the Designated Safeguarding Lead in each provider. This is certificated and recorded on the central staff training record. All staff should complete formal refresher training every three years delivered by the Designated Lead. This is in addition to annual CPD activity. If there are any updates to policies or procedures in between these times, these will be explained to relevant staff through email, updates or team meetings.

The Designated Safeguarding Lead and the Designated Deputy are also available to offer generic and specific information, advice and guidance to staff around day-to-day safeguarding matters either by phone or by email. In addition, there is also a One Academy Safeguarding workshop delivered by the Designated Safeguarding Lead.

One Academy will train staff to:

- Have a good awareness of the signs that a young person or adult who is an apprentice is being neglected or abused.
- Be confident about what to do if an apprentice reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another apprentice
- Ensure that apprentices are taught about safeguarding risks, including online risks
- Support apprentices to understand what constitutes a healthy relationship, both online and offline
- We will ensure every staff member will be trained in Sexual Consent & Harassment Raise awareness of the importance of being aware of the local threats and crime hotspots and how to search for crime hotspots and threats using the online tool within the locality where they live and work.

<https://www.met.police.uk/area/your-area/>

One Academy will teach apprentices to:

- Have a good understanding the key concepts of Safeguarding, Prevent and British Values as part of their whole learning journey through effective, meaningful and relevant embedded learning content
- Understand what to do if they or a colleague or a beneficiary of the services they provide report abuse, and/or they suspect abuse may be taking place
- Have a good awareness of the signs that a young person or adult who is an apprentice is being neglected or abused.
- Be confident about what to do if an apprentice or colleague reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another apprentice
- Support apprentices and colleagues to understand what constitutes a healthy relationship, both online and offline.
- Raise awareness of the importance of being aware of the local threats and crime hotspots and how to search for crime hotspots and threats using the online tool within the locality where they live and work.

<https://www.met.police.uk/area/your-area/>

6.4 Allegations Against Staff

The primary concern of One Academy is to ensure the safety of the individual. As with any other suspected abuse, any reports of physical or sexual abuse made against a member of staff should result in prompt action.

Anyone who suspects a member of staff of abusing a learner must bring their concerns to the Designated Lead in the organisation. If the allegation concerns any member of the One Academy team, the matter

should be discussed with the Apprenticeship Manager. If the allegation concerns the Apprenticeship Management Team, the matter should be discussed with the Human Resources at TRGL Group and/or their team.

In some circumstances, where allegations are made against individuals not employed by One Academy or one of its partner providers (such as agency staff), the supply agency should be fully involved in any investigation. However, One Academy should take the lead in any such investigation, and the recommendations below apply equally to supply tutors.

To prevent allegations, if there is only one learner present for a workshop or you are working without other staff nearby, additional safeguards should be in place:

- Let the Academy staff know that you are alone working or in a class with only one learner and inform them when the learner leaves.
- Make sure that you are visible. For example, work in a central location in the building, keep the door open and ask other staff to walk past regularly.
- It may be appropriate to ask the learner to remain in reception until another member of staff arrives.

6.6 Visiting External Speakers and Events

We encourage visits from external agencies and speakers to enrich the experiences of our learners. However, we mustn't use agencies that oppose TRGL Group values and ethos as well as the British Values. These values include "*democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs*".

One Academy is responsible for vetting any visitors and G15 Sponsors to make sure the safety, security and welfare of learners and staff are prioritised. One Academy will do this by implementing the Safeguarding and Prevent procedure which requires a due diligence to be carried out and risk reduction measures to be implemented. Refer to the Safeguarding Procedure for guidance. [One Academy Safeguarding & Prevent Reporting Procedure.docx](#)

6.7 Teaching Approaches

At One Academy we promote the values of democracy, the rule of law, individual liberty, mutual respect, and tolerance for those with different faiths and beliefs. We teach and encourage learners to respect one another and to respect and tolerate difference. All staff challenge assumptions that alienate others and take away their power. Our goal is to build mutual respect and understanding and use of dialogue not violence as a form of conflict resolution.

We will ensure that our teaching approaches will:

- Help learners become resistant to extremism by giving them skills, knowledge, understanding and awareness
- Develop a positive sense of identity through the development of critical thinking skills
- Create a 'safe space' for open discussion
- Help learners understand what safe and acceptable behaviour regarding extremism and radicalisation is.

6.8 Online Learning

Delivering learning online has its unique safeguarding implications over and above those which are normally important for delivering learning to adults. These particularly apply to privacy and data protection, professionalism, safe use of technology and staff welfare.

Existing safeguarding policies still apply, so professional coaches and learners should be aware of their general responsibilities and the procedures for reporting safeguarding issues.

Staff and professional coaches delivering learning online should be aware of the following:

- All learners should agree to the One Academy online code of conduct before taking part in learning sessions. This should include agreements on recording, image sharing, language, punctuality, privacy for members of a learner's household and other workshop norms such as respect and politeness.
- The time, date, attendance and length of online sessions with learners should be documented, as appropriate. Where possible, live events should be recorded by facilitators (with consent from learners) in case of a future dispute.
- Facilitators should be clear about how recordings will be stored, how long they will be kept for and who will have access to them in line with Data Protection requirements.
- Where possible, staff should not use personal phones, emails or social media accounts to contact learners. Staff are required to utilize devices provided by the organization and use these for any contact with learners.
- If staff members are accessing learners' contact details at home, they must comply with the Data Protection Act 2018.
- Any resources shared should take licensing and copyright into account.

7. Accountability and Responsibility

7.1 The Director of Customer Operations has overall strategic responsibility and the Head of One Academy has overall operational responsibility for this policy and is responsible for ensuring that staff members are aware of this policy and use the same appropriately.

8. Monitoring and Auditing Controls

- a. One Academy will review our policy and procedures annually to take into account any new government legislation, regulations, or best practice documents to ensure that staff and partners are kept up to date with their responsibilities and duties concerning the safety and wellbeing of children and adults.
- b. TRGL takes our responsibilities concerning safeguarding very seriously by prioritising safeguarding, ensuring the opportunities for abuse are minimised, and that it is safe for those affected to report safeguarding concerns with the assurance they will be managed sensitively and properly.
- c. To ensure that all safeguarding concerns are managed effectively and transparently, TRGL has a robust reporting and monitoring process in place which provides oversight at all levels of the organisation such as regular reporting to the Audit and Risk Committee, Care and Support Committee, Customer Service Committee, The Group Board and Executive Team.

