

**SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY**

Date of policy: 30/09/2024

This policy will be reviewed every 12 months (as a minimum).

Review Date: 30/09/2025

**Safeguarding Roles and Responsibilities**

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## 1. Introduction

Safeguarding is everyone's responsibility. Alternative Provision by Ackerman Pierce acknowledges the duty to safeguard and promote the welfare of children and adults at risk; and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All children and adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

This policy applies to all staff and will be widely promoted and be mandatory for everyone involved in Alternative Provision by Ackerman Pierce. Failure to comply with this policy and the company's safeguarding procedures may result in disciplinary action being taken, including termination of employment and/or contract.

All staff placed by Alternative Provision by Ackerman Pierce are expected to familiarise themselves with arrangements for safeguarding children and adults at risk in the organisation where they are placed and to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

Here at Alternative Provision by Ackerman Pierce we expect all staff to follow and promote good practice in safeguarding. In order to do so, they should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries and safe working practices.
- Report any concerns or disclosures related to the protection and safety of children and adults at risk.
- Undertake mandatory safeguarding and child protection training and awareness sessions where provided.
- Help educate learners/service users in placements regarding matters of keeping safe, including acting as a good role model.

## 2. Our Commitment to Safeguarding

This policy is designed to meet the above principles by ensuring that:

- Alternative Provision by Ackerman Pierce has robust safer recruitment processes that ensures that those who are known to be a risk to children or adults do not gain access to them; those whose actions suggest that they are a risk to children/adults are detected at the earliest stage and prevented from continuing to work with children/ adults; and that those who intend to do harm are prevented at every possible stage from entering the workforce.
- Staff should be prepared to identify children who may need early help. Early help is providing support as soon as a problem appears at any point in the child's life, from early years to teenage years. Where identified this should be raised with the Local Authority.
- Staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and adults at risk.
- There is an open and transparent culture which enables staff to raise concerns around children/adults at risk, those that work with children/adults at risk, and processes within Alternative Provision by Ackerman Pierce.
- It is as simple as possible for an individual to report concerns about harm or risk and clear procedures are implemented where safeguarding and child/adult protection issues arise. Where concerns are reported Alternative Provision by Ackerman Pierce will ensure that individuals are supported.
- Alternative Provision by Ackerman Pierce has robust policies and procedures in place, which are reviewed and updated at least every 12 months or in line with legislative updates.
- Alternative Provision by Ackerman Pierce stays up to date with developments on safeguarding best practice and legislative changes, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- Alternative Provision by Ackerman Pierce will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon

as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.

- Alternative Provision by Ackerman Pierce will work in partnership with other services (including local authority children's and adult social care) to ensure that those who are identified as being at risk of abuse are protected.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

### **3. Relevant Legislation and Guidance**

The principal legislation and guidance governing this policy is:

- Working Together to Safeguard Children 2023 (HM Government)
- Keeping Children Safe in Education 2024 (Department for Education)
- The Children Act 1989
- The Children Act 2004
- The Care Act 2014
- Care and Support Statutory Guidance 2023 (Department of Health and Social Care)
- Information Sharing: Guidance for practitioners and managers 2018 (HM Government)
- Rehabilitation of Offenders Act 1974
- Mandatory reporting of female genital mutilation (FGM) (Home office 2016)
- Disqualification under the Childcare Act 2006 - Update 2018 (Department for Education)
- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers 2015 (Department for Education)
- Modern Slavery Act 2015
- Human Rights Act 1998
- Local Safeguarding Partners/Arrangements/Local Safeguarding Adult Board
- Guidance for safer working practice for those working with Children and Young people in Education settings 2022 (Safer Recruitment Consortium)

This policy should be read in conjunction with our other relevant safeguarding policies, such as:

- Health and Safety Policy
- Allegations Policy
- Complaints Policy
- Code of Conduct
- Whistleblowing

#### **4. The role of the Designated Safeguarding Lead (DSL)**

The role of the DSL includes:

- Ensuring that all relevant staff have received at induction safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) appropriate to their role and continue receiving training to enable the development of skills and good practice when working with children/adults at risk.
- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by staff members or partner agencies.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to candidates or children/adults at risk that they work with.
- Liaising with Designated Safeguarding Leads in partner organisations.
- Acting as a source of support, advice and expertise for staff with concerns and liaising with other agencies and professionals.
- Supporting staff involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Referring any allegations of abuse or safeguarding concerns to the relevant children or adult social care and if relevant, the police and/or the Local Authority's Designated Officer (LADO). In order to do this, the DSL will need to consult the Local Safeguarding Partnership Arrangements/Local Safeguarding Adult Board for the area in which the organisation is located. Further details on referral routes are located in Working Together to Safeguard Children (2018), Care and Support Statutory Guidance 2022, and in Keeping Children Safe in Education (2024).

- Reporting concerns to the Disclosure and Barring Service (DBS), this may be where a staff member or candidate has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and the company believes they pose a risk to children/vulnerable adults. The DSL will complete the necessary referral documents to the DBS and liaise with them thereafter if they have any further questions regarding the staff member or candidate.
- Keeping senior management apprised of any safeguarding incidents and their outcome.
- Liaising with the Company's Compliance Officer and senior management regarding training and skill development programmes available to staff and candidates.
- Policy development (or overseeing this), including ensuring that all policies are updated as and when needed, but in any event on an annual basis ensuring all staff are fully up to date.

## 5. Definitions

According to the Children Act 1989, a '**child**' is anyone who has not yet reached their 18<sup>th</sup> birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under current legislation.

In this policy, the terms 'child' and 'young person', or 'children' and 'young people', are used interchangeably to refer to any individual under the age of 18.

The Care Act 2014 defines an '**adult at risk**' as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and.
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm.

The Children Act 1989 defines ‘**harm**’ as “ill-treatment or the impairment of health or development”. ‘Development’ means physical, intellectual, emotional, social or behavioural development; ‘health’ means physical or mental health; and ‘ill-treatment’ includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes “impairment suffered by hearing or seeing the ill-treatment of another”

Abuse may be perpetrated by an individual from the child or adult’s school, college, day centre, community, family, those in a position of trust or another child/vulnerable adult.

**Abuse:** a form of maltreatment of a child. Someone may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including what they see, hear or experience its effects. Children may be abused in a family or in an community setting by those known to them or, rarely, by others. Abuse can take place wholly online or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults to by another child or children.

### **Child on child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, up-skirting, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

## **6. Categories of abuse - Children**

**Child abuse can be one of four different categories as set put in Working Together to Safeguard Children (2023):**

**Physical Abuse:** Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing



physical to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Female Genital Mutilation (FGM):** The World Health Organisation defines Female Genital Mutilation (FGM) as "Comprising of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons." (World Health Organisation-1997). Alternative Provision by Ackerman Pierce can provide FGM training for all staff at the front line working with children if requested. We have a separate Female Genital Mutilation Policy which includes additional information on the definition, early identification of risk and action to take to ensure child safety.

**Emotional Abuse:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Involving/exposing children to terrorism, and/or the radicalisation of children into extremist or terrorist related activities.

**Terrorism/Radicalisation:** Prevent is aimed at safeguarding and supporting vulnerable people to stop them from becoming terrorists or supporting terrorism. It is one of the four strands of the government's "CONTEST" counter-terrorism strategy; the other strands are Pursue, Protect and Prepare.

Channel is a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist related activity.

It works with the consent of the vulnerable person or if appropriate, their parents. Referrals to Channel are assessed by a multi-agency panel consisting of the local authority, Police, health and education professionals and other key interested stakeholders.

**The Channel process aims to:**

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned.

Full details can be found on the Home Office website.

<https://homeofficemedia.blog.gov.uk/2021/10/18/factsheet-prevent-and-channel-2021/>

The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. As part of our safeguarding policy, we follow Prevent and Channel guidance.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual Abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of

clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For detailed guidance on the signs which may indicate abuse and neglect see [What to do if you're worried your child is being abused \(2015\)](#).

## 7.Safeguarding Children with SEND

Some children have an increased risk of experiencing abuse, and additional barriers can exist with respect to recognising or disclosing it. We are committed to anti- discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. The additional barriers that can exist when recognising abuse and neglect in this group, include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.

- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Children with disabilities may have regular contact with a wide network of carers and other adults for practical assistance in daily living including personal intimate care, hence being mindful that such situations can increase risk.

Further information can be found from specialist organisations such as:

NSPCC- Safeguarding children with special educational needs and disabilities.

<https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send>

## **8. Children Missing Education**

The Local Authority (LA) has a legal duty to identify when there are Children Missing in Education (CME) and help them back into education. Please refer to our Children Missing Education Policy and Attendance and Absence Policy v1 which highlights what Alternative Provision by Ackerman Pierce will do to support the LA .

## **9. Early Help**

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Careplan)
- has mental health needs
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime group or county lines
- is frequently missing/ goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or forced marriage
- is a privately fostered child.

### **10. Categories of abuse - Adults at risk**

The categories of adult abuse are set out in the Care Act 2014 and are as follows:

**Physical Abuse:** including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.

**Female Genital Mutilation (FGM):** The World Health Organisation defines Female Genital Mutilation (FGM) as "Comprising of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons." (World Health Organisation-1997). Alternative Provision by Ackerman Pierce can provide FGM training for all staff at the front line working with children if requested. We have a separate Female Genital Mutilation Policy which includes additional information on the definition, early identification of risk and action to take to ensure child safety.

**Domestic Violence:** including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.

**Sexual Abuse:** including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

**Psychological Abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. Involving/exposing vulnerable person to terrorism, and/or the radicalisation of vulnerable into extremist or terrorist related activities.

### **Terrorism/Radicalisation**

Prevent is aimed at safeguarding and supporting vulnerable people to stop them from becoming terrorists or supporting terrorism. It is one of the four strands of the government's "CONTEST" counter-terrorism strategy; the other strands are Pursue, Protect and Prepare.

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It works with the consent of the vulnerable person or if appropriate, their parents. Referrals to Channel are assessed by a multi-agency panel consisting of the local authority, Police, health and education professionals and other key interested stakeholders.

### **The Channel process aims to:**

- Identify individuals at risk of being drawn into terrorism
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Full details can be found on the Home Office website.

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The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. As part of our safeguarding policy, we follow Prevent and Channel guidance.

**Financial or Material Abuse:** including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

**Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Discriminatory Abuse:** including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

**Organisational Abuse:** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Neglect and Acts of Omission:** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Self-neglect:** this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Further information can be found at

<https://www.gov.uk/government/publications/adultsafeguarding-statement-of-government-policy>

## **11. Reporting & Response to Suspected, Alleged or Confirmed Cases of Abuse**

The Safeguarding Officer is the designated contact with direct responsibility for handling any suspected or alleged incidences of abuse. Any employee, contractor, temporary worker, parent, family member, carer or any other individual with concerns about possible abuse should report the matter to this member of our staff. Where it is suspected that such abuse may be caused by another staff member, then reporting the matter will be done in accordance with the company's Whistleblowing Policy.

Any instance of suspected or alleged abuse should be reported immediately to the Safeguarding Officer and the employee, contractor or temporary worker must not attempt to investigate the abuse themselves. The company will take vigorous action against anyone trying to suppress a possible report of abuse.

Contact details for the Safeguarding Lead are:

Name: Raymond Jarvis

Email: [safeguarding@ackermanpierce.com](mailto:safeguarding@ackermanpierce.com)

Address: Lovet House, Lovet Road, Harlow, Essex CM19 5TB

Deputy Designated Safeguarding Lead Name: Sabrina Laverty

Tel No: 0203 761 0233

Email: [safeguarding@ackermanpierce.com](mailto:safeguarding@ackermanpierce.com)

Address: Lovet House, Lovet Road, Harlow, Essex CM19 5TB

All incidences of child abuse or neglect will be reported immediately to the Local Authority Social Services Department, DBS and the Police. The company may also invoke its own disciplinary procedure and the abuser may be suspended pending investigation.



In all cases, the Safeguarding Officer is responsible for maintaining complete case records of the suspicions raised, or allegations made, including dates, times and persons involved, and details of the time, date and content of any report made to the Local Authority Designated Officer, DBS and Police.

In addition, the company will undertake preventative action in the form of strategies to be implemented with the objective of halting further abuse and preventing a similar situation from arising elsewhere. Where such cases involve Alternative Provision by Ackerman Pierce employees, contractors or temporary workers, a robust review of current practices and procedures will take place to determine what additional protective measures, if any, need to be incorporated into the standard processes and systems.

Incidents of alleged / confirmed abuse will be logged and reviewed on a quarterly basis to identify and eliminate any possible adverse trends and inform the company regarding training needs.

If the person against whom the allegation is made is an employee of Alternative Provision by Ackerman Pierce then they will be informed of the allegation and their rights under the disciplinary procedure. If they are a contractor or temporary worker they may be suspended pending investigation. In the event that the person against whom the allegation is made is a 3rd party (e.g. parent, friend etc), then the Safeguarding Officer will consult with the appropriate authorities.

The company expects its employees, contractors and temporary workers to take all possible steps to co-operate with investigations by any statutory bodies.

### **Emergency Situations**

If the situation is an emergency and a child is in immediate danger, employees, contractors and temporary workers are instructed to call for assistance immediately. They should give any necessary first aid and contact appropriate emergency services if necessary. If the abuser remains present and poses a threat to any employee, contractor or temporary worker present, they are not expected to put themselves at risk. Company procedures in relation to

responding to abusive or aggressive behaviour are detailed in the company's induction training and in policies relating to Health & Safety.

## 12. Recruitment and Selection Process

Alternative Provision by Ackerman Pierce is committed to protecting children and adults at risk through a careful recruitment and selection process (see below), our complaints and whistleblowing policies and guidance on appropriate behaviour (Code of Conduct).

These documents should be read alongside this policy.

Alternative Provision by Ackerman Pierce's rigorous procedures ensures that any member of staff found to have a history of unacceptable conduct or practice, will not be placed.

All staff are fully compliant based on KCSIE regulations in line with this policy.

### Key Processes of our Recruitment Selection and Vetting Policy

When recruiting staff or temporary workers who take part in regulated activities involving children, Alternative Provision by Ackerman Pierce will ensure the following:

- Thorough interviews are conducted to establish the candidate's employment history and any gaps identified, discussed and verified. This will be by trained staff who have received guidance in relation to current legislation and best practice pertaining to the recruitment and placement of candidates who are to take part in regulated activity.
- The member of staff's personal identity will be verified by checking an original form of recent photographic identification.
- Qualifications and training relevant to the role being recruited will be verified by checking original certificates and validating these for authenticity with the awarding body.
- A minimum of two written references, one being the most relevant position, covering the last three years of employment, with all gaps identified;
- All staff must hold a current Ackerman Pierce Enhanced DBS Certificate including

- Children’s Workforce Barred List check. If the DBS certificate was not processed through Ackerman Pierce then the member of staff must hold a Child Workforce Enhanced DBS certificate subscribed to the DBS Update Service.
- Signed Rehabilitation of the Offenders Act statement.
- Teaching Regulation Agency (TRA) online status and records checked for all candidates who hold QTS and confirmation through SET (Society for Education & Training) if a candidate holds QTLS.
- TRA status check for all associated sanction/barred lists ie. Prohibition Orders.
- Evidence of Right to Work in the UK.
- Health Declaration.
- Evidence of Child Protection Training completed (within the last 2 years as a minimum) or the candidate will complete Ackerman Pierce Online Child Protection Training.
- As part of our recruitment process, candidates are sent the Department of Education’s ‘Keeping Children Safe in Education document.
- Completion of PREVENT training.

### 13. DBS Process

Staff joining Alternative Provision by Ackerman Pierce are required to hold either a valid Enhanced DBS certificate with subscription to the update service or complete a new DBS Enhanced Disclosure; both of which will need to be with Barred List Check with the “Child Workforce” prior to placement.

- Where a DBS has been applied for by another company or employer and is subscribed to the Update Service, then the following steps will be taken:
- The original certificate is sighted, checked for any criminal information and a copy retained.
- An online Employer’s Update Service check is completed with the permission of the candidate to ensure that the information on the original certificate remains unchanged. This is repeated annually unless there is a break of service of more than three months, then in this instance a new update service check will be completed.

- Alternative Provision by Ackerman Pierce run internal risk assessments, any notified change to the original certificate will result in a new DBS certificate being required. If a worker in a role at the time of there being a change to the original certificate, the worker will be asked to provide a written statement to the compliance manager confirming the reason for the change. This statement will be forwarded to the client immediately so that a decision can be made as to whether the placement continues.

If a member of staff completes a new DBS certificate with Ackerman Pierce and has subscribed to the Update Service, then the following will be completed:

- A copy of the member of staff's DBS certificate is sighted and a copy retained.
- An online Employer's Update Service check is completed at repeated annually to ensure that the information on the original certificate remains unchanged, unless as above.
- Any notified change to the original certificate will result in a new DBS certificate being required.

Staff who hold an Ackerman Pierce DBS certificate but do not subscribe to the Update Service will be required to complete a new DBS check annually. All staff are encouraged to annually subscribe to the DBS Update Service.

If a member of staff registers with Alternative Provision by Ackerman Pierce with cautions or convictions on their DBS a risk assessment will be carried out by the Compliance Manager and will determine whether to progress their application.

Alternative Provision by Ackerman Pierce will then make the school/client aware of the reason and gain agreement that they wish to accept the member of staff.

#### **14. Responding to Safeguarding Concerns**

**All staff** have a responsibility to protect children/adults at risk. This includes:

- Observing Alternative Provision by Ackerman Pierce policies and processes including any Code of Conduct

- Attending the recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date.
- Awareness of Channel and Prevent policies and guidance and raising concerns with the DSO.
- Reporting any concerns arising from meeting staff or carrying out pre-placement checks to the DSL without delay and making a clear written record of all relevant information to be passed to the DSL
- Reporting any concerns arising from organisation visits/placements to the Designated Safeguarding Lead at the relevant organisation and confirming that this has been done to Ackerman Pierce DSL
- Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.

**All staff** working through Alternative Provision by Ackerman Pierce are expected to keep children and vulnerable adults safe by:

- Following the Alternative Provision by Ackerman Pierce policies including the Code of Conduct
- Following the Safeguarding Policy of each placement, including any Code of Conduct
- Making the Designated Safeguarding Lead at the placement aware of any concerns regarding any children/vulnerable adults; or any adults caring for or working with those persons
- Seeking advice and support from Alternative Provision by Ackerman Pierce's DSL when they have reason to believe that their concerns have not been responded to appropriately or they have concerns about practice in the placement.

## 15. Reporting a Safeguarding Concern

Our process is:

1. Once the student has confided in the tutor, reassurance is given to ensure that the issue has been heard and our tutor is there to support the student.
2. If needed the tutor can reference their welcome pack which outlines our safeguarding policies and procedures to complete the next steps correctly.
3. In line with our safeguarding policy and in the event of having a child protection issue, tutors must report the concern to the Designated Safeguarding Officer/Lead at Ackerman Pierce immediately.
4. Parents/carers are informed about the concern and consent is gained for the tutor to make contact with all relevant parties (unless making this contact will put the child at risk).
5. The tutor will need to complete the safeguarding report which includes a timeline of events document which clearly states the events of the disclosure (without any opinion/hearsay affecting the report). Once completed this is sent to the Designated Safeguarding Lead. We ensure that that the safeguarding report is maintained and securely stored in line with GDPR.
6. Once we have received the safeguarding report this is shared with all relevant parties and we discuss collaboratively next steps and an action plan is agreed this will include key points of contacts, who need to be notified, action that needs to be taken to prevent further risk/harm to the student/others and a timeline to complete this.
7. If a referral is based on the actions of one of our tutors or a child is at risk of harm, provision is stopped immediately with that tutor. We will contact the LADO within one working day, providing as much detail as possible. Depending on the allegation, the police may be informed and Children's Social Care.

8. Those who are involved are kept updated throughout the process, having access to all documentation, attending meetings and any further information that is disclosed.
9. The parents/carers are kept informed at all stages, advice or guidance may also be given to the relevant parties around the safeguarding concern raised.
10. We work in collaboration with all agencies to support all actions taken. If the enquiry has been closed and the tutor believes that the concern has not been resolved, they can raise this again internally and externally to ensure the issue is resolved.

We work in line with legislation and industry best practice to ensure we are providing a safe consistent service to our students and a safe working environment for our tutors. We ensure our policies are visible on our website, included in our welcome packs and available if requested and we are always available for feedback positive or negative via the contact details provided. Our staff are clear on the safeguarding processes and timelines and escalation points included and working to these at all times.

## **16. Dealing with allegations of abuse made against candidates**

All staff placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, such as the Code of Conduct.

In accordance with the Care Act (2014), Working Together (2023) and Keeping Children Safe in Education (2024), where an organisation has received an allegation that a volunteer, supply staff or member of staff who works with children/vulnerable adults has:

- behaved in a way that has harmed a child/adult, or may have harmed a child/adult;
- possibly committed a criminal offence against or related to a child/adult;

- behaved towards a child/adult in a way that indicates he or she may pose a risk of harm to children/vulnerable adults; or
- or behaved or may have behaved in a way that indicates they may not be suitable to work with children/vulnerable adults,

A referral should be sent to the LADO within one working day, giving as much detail as possible.

Details regarding allegations that meet the harms threshold and concerns that do not meet the allegations threshold (referred to as 'low level concerns'), including who will take responsibility for this once a candidate is placed, are set out in Alternative Provision by Ackerman Pierce's Allegation Policy which should be read alongside this policy.

### **17. Duty to make a referral to the DBS**

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child or adult at risk, there is a legal duty on Alternative Provision by Ackerman Pierce to report that person to the Disclosure and Barring Service using their guidance available [here](#). The DBS has statutory authority to bar a person from working in regulated activity with children and/or adults at risk in the UK.

A referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

Alternative Provision by Ackerman Pierce will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with children/vulnerable adults. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.



Anyone who is concerned about a child's or adult at risk's welfare or who believe that a child or adult at risk may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

### **18. Whistleblowing**

Staff may find it difficult to raise concerns about colleagues, managers, people in placement or concerning how safeguarding concerns are responded to within a setting.

Alternative Provision by Ackerman Pierce has a specific Whistleblowing Policy which encourages staff to raise concerns and also provides details of outside organisations that staff can approach for support and advice. Alternative Provision by Ackerman Pierce aims to have an open and honest culture where safeguarding is responded to effectively, and both staff feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to.

### **19. Summary**

Alternative Provision by Ackerman Pierce will make clients and staff aware of the Safeguarding Policy through the following means; Company Website, AP Welcome Pack & Code of Conduct.

All staff, temporary workers, and contractors must be aware that they have a professional duty to share information with other recruitment firms in order to safeguard children/adults at risk. The public interest in safeguarding children/adults at risk may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by Alternative Provision by Ackerman Pierce.