



POST 16 SAFEGUARDING POLICY

www.oteconstruction.co.uk





Safeguarding Policy Contents



Safeguarding Team	Page 3
Safeguarding Statement	Page 4
Designated Safeguarding Roles	Page 5
Policy Overview	Page 6
Safer Recruitment	Page 8 - Page 15
Reporting & Referrals	Page 16 - Page 19
PREVENT & Radicalisation	Page 20 - Page 24
Safeguarding & Prevent Risk Assessment & Action Plan	Page 25
Child Protection	Page 26
Child Sexual & Child Criminal Exploitation	Page 27
FGM – Female Genital Mutilation	Page 27
HSB – Harmful Sexual Behaviour	Page 27 - Page 28
Mental Health & Wellbeing	Page 28 - Page 29
Substance Abuse or Misuse	Page 30
Suspecting learners of substance misuse	Page 31
Making Learners Feel Safe	Page 32 - Page 34
Monitoring and Review	Page 35
Appendix 1 - Safeguarding and Safer Recruitment: Letter of Assurance	Page 36 - Page 38
Useful Contacts	Page 39
Appendix 2 – Safeguarding Reporting & Recording Procedure	Page 40 - Page 45
Appendix 3 – Safeguarding Reporting & Recording Flowchart	Page 46



Safeguarding Team



Ben Mills
Managing Director

‘Providing a supportive environment in which learners and teams feel safe and able to share concerns – if in doubt, speak out’.



Becky Glen
Deputy Safeguarding Lead



Tia Peacham
Deputy Safeguarding Lead



Len Worby
Deputy Safeguarding Lead



Becky Mills
Deputy Safeguarding Lead



Safeguarding Statement



Safeguarding Statement

Orchard Training & Education Ltd (trading as OTE Construction Training) is committed to safeguarding and promoting the welfare of all learners. We recognise our duty to minimise risk, identify harm, and respond swiftly and effectively to concerns. Safeguarding is embedded across every stage of the learner journey—from recruitment and induction to progression and employment—and is central to our organisational culture.

We take a proactive, learner-centred approach to safeguarding, ensuring that all team members are trained to identify and respond to a wide range of risks, including:

- Abuse, exploitation, neglect, and domestic violence
- Harmful sexual behaviour and child-on-child abuse
- Radicalisation, extremism, and online harms including misinformation and conspiracy content
- Mental health concerns and substance misuse
- Emerging risks linked to generative AI and digital technologies

Our safeguarding arrangements incorporate the Prevent Duty, with all Prevent-related actions led by the Designated Safeguarding Lead (DSL), who liaises with Humber and regional coordinators. We use CPOMS to record and monitor all safeguarding concerns across AVANT and OTE delivery, ensuring consistency, transparency, and timely intervention.

We are guided by the principles of Keeping Children Safe in Education (KCSIE) and Working Together to Safeguard Children, and we ensure that all staff act in the best interests of the learner. Safeguarding is everyone's responsibility. All professionals working with young people must adopt a child-centred approach, prioritising safety, dignity, and wellbeing.

Safeguarding contacts are displayed throughout our centres, and learners are actively encouraged to speak out. This policy is reviewed annually, or sooner if required, to reflect changes in legislation, guidance, or operational needs.

Ben Mills
Managing Director
1st October 2025



Designated Safeguarding Roles



OTE Construction Training Delivery - Designated Safeguarding Roles

Pre 16 Construction Programmes or any delivery outside of the AVANT Partnership delivery.

The following team members have been trained and appointed to safeguarding roles within the organisation:

Designated Safeguarding Leads (DSL):

- Ben Mills, Managing Director

Deputy Designated Safeguarding Leads (DDSL):

- Becky Glen, Business Development Co-ordinator
- Tia Peacham, Operational Support
- Leonard Worby, Business Development Co-ordinator
- Becky Mills, Director of Operations

AVANT Partnership Delivery - Designated Safeguarding Roles

The following team members have been trained and appointed to safeguarding roles within the organisation:

Designated Safeguarding Lead (DSL):

- Cassandra Bishop, AVANT

This policy aims to safeguard and protect the welfare of learners, which includes the following (in line with 'Working Together to Safeguard Children'):

- Protecting learners from maltreatment.
- Preventing impairment of learner's health and development.
- Ensuring that learners are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all learners to have the best outcomes.

This policy also aims to protect learners from the following (in line with 'Preventing and tackling bullying')

- Becoming terrorists or supporting terrorism.
- Bullying, including on and offline bullying and prejudice-based bullying.
- Criminal and sexual exploitation and trafficking.
- Child-on-child abuse. • Domestic violence.
- Emotional abuse. • Fabricated or induced illness.
- Female genital mutilation

This policy also aims to protect learners from the following (in line with 'Working Together to Safeguard Children', HM Government, July 2018 & 'Preventing and tackling bullying' Department for Education, July 2017)

- Forced marriage.
- Gender-based violence.
- Harmful sexual behaviour.
- Impact of new technologies on sexual behaviour (e.g., sexting).
- Issues that may be specific to demographic.
- Local issues and threats (e.g., County Lines, knife crime).
- Neglect.
- Peer-on-peer abuse.
- Physical and sexual abuse.
- Racist, disability and homophobic or transphobic abuse.
- Radicalisation and/or extremist behaviour.
- Substance misuse.
- Teenage relationship abuse.
- Other issues not listed here, but that pose a risk to learners

The Safeguarding and Prevent Risk Assessment and Action Plan is completed annually to identify the areas that will pose a risk, the control measures in place and further actions required. This is completed by the DSL and signed off with the Managing Director of Orchard Education and Training (OTE) and the Chief Executive of Avant Skills Academy.

The Safeguarding and Prevent Risk Assessment and Action Plan has been further enhanced with reference to the 20 recommendations from the 'Work based learners and the Prevent statutory duty, Guidance for providers, DfE, September 2018'. Progress towards all actions is reviewed at each Management Meeting and the monthly safeguarding meetings led by the DSL with Avant and Orchard Safeguarding teams.

An annual Safeguarding and Prevent audit will be undertaken, utilising the Safeguarding and Prevent Audit Report.

AVANT Skills Academy have invested in CPOMS, a collaborative software solution for monitoring safeguarding, wellbeing, and pastoral issues. All team members are trained in the use of this system, which replaces previous paper-based recording, enabling a more efficient tracking of learner concerns and incidents.

The information input to CPOMS is shared instantly with the relevant people immediately and securely. As a result of CPOMS, administration will reduce enabling team members to focus on teaching and providing support.

OTE Construction Training record all aspects of Safeguarding through CPOMS whether this is through the AVANT or sole contracts. This ensures the system is the same throughout the organisation, ensuring better monitoring of young people.

This policy has been created with regard to all relevant legislation including, but not limited to, the following:

- Children Act 1989
- Children Act 2004
- Education Act 2011
- Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006

This policy has consideration for, and is compliant with, the following guidance:

- DfE (2018) 'Working together to safeguard children'
- DfE (2019) 'Keeping children safe in education'
- DfE (2017) 'Child sexual exploitation'

This policy will be implemented in conjunction with the following OTE policies:

Health and Safety Policy > Relationships and Sex Education Policy > E-Safety Policy > Anti-Bullying Policy > Equal Opportunities Policy > Students' Electronic Devices Policy



In accordance with the requirements of the DFE guidance Keeping Children Safe in Education (KCSIE), 2025 and the Childcare Disqualification Requirements – Disqualification under the Childcare Act 2006.

Orchard Training & Education Ltd undertake all the necessary safeguarding, safer recruitment and vetting and barring checks for all employees. This includes Enhanced DBS Disclosures for eligible roles undertaking Regulated Activity.

Safer recruitment contributes to our aim of being a safer organisation. We will always consider the welfare of learners when employing team members and we will always seek to prevent inappropriate people from seeking employment to work with us.

All team members engaged with learners require an Enhanced DBS Disclosure, prior to undertaking the role in an unsupervised capacity. A further DBS check are required for all members of the OTE existing OTE team members engaging with learners every 3 years as per the recommended best practice. Any member of the team with a break in service of 12 weeks or more, or there are concerns about ongoing suitability to work with learners. In which case we would carry out the relevant checks as if they were a new member of the team.

However, all team members complete a Staff Annual Declaration to confirm their ongoing suitability to carry out the role in which they are employed. This provides team members with the opportunity to inform the organisation of any change of circumstances since the commencement of their employment.

All team members recruited to teaching positions require a prohibition order check completed in line with the Team Recruitment Procedure.

We have two nominated, training members of the team, completing “Safer Recruitment Training” with NSPCC. The nominated professionals are as follows and confirm at least one of these professionals lead the recruitment for any vacancies within the organisation.

- **Mr Ben Mills, Managing Director**
- **Miss Becky Louise Mills, Director of Operations**

We undertake the following recruitment and child safeguarding checks:

<i>please tick or write 'N/A' where appropriate</i>) Photo ID has been checked	✓	Proof of Address has been checked	✓
Evidence of right to work in the UK has been checked (where applicable)	✓	Criminal overseas checks have been conducted (where applicable)	✓
Evidence of relevant qualifications has been seen	✓	Checks for prohibition from teaching and restrictions from teaching have been undertaken (where appropriate)	✓
Enhanced DBS checks have been conducted as per below	✓	Disqualification by Association declarations have been signed as per below (where applicable)	✓
All staff are appointed under our company's Safer Recruitment Policy	✓	Barred list checks have been carried out for all staff in regulated activity	✓

Attached to the policy, Safeguarding and Safer Recruitment: Letter of Assurance which is shared with all contracting partners to confirm safer recruitment arrangements at OTE Construction Training. This letter of assurance is marked as Appendix 1.

Safer Recruitment - Benefits of Planning the Process

- Reduces the risk of hiring someone unsuitable.
- Helps to ensure all relevant steps are taken.
- Ensures that there are records of the process for future reference.
- Makes for better appointments.
- Ensures adherence to guidance legislation.

Pre-advertising Requirements

- Agreed timescale.
- Agreed selection methods.
- Pre-determined requirements for the post as detailed in the job description, person specification, working hours and pay scale.

Advertising – Advert to include:

- Nature of job
- Wage and location
- Reference to our commitment to Equal Opportunities

- Reference to our Safeguarding Policies
- State requirement for an enhanced DBS

Application Pack

- Standardised application form which will form the basis for shortlisting
- Safeguarding Statement
- Job Description
- Person Specification
- Self-Disclosure Form
- Pro Forma Reference Forms
- Outline of selection process

Interview

- Two references sought PRIOR to interview.
- ID – to satisfy ‘Right to Work’ criteria.
- To be conducted by a minimum of two interviewers – at least one safer recruitment trained.
- A pre agreed template/criteria used.
- Gaps in employment/self-disclosure probed.
- Certificates provided.

Pre-Employment Checks

Offers of employment are made conditionally and based on the following areas being satisfied fully prior to start.

- Evidence of the right to work in the UK.
- Enhanced DBS (including overseas criminal record check if required).
- Evidence and validation of relevant certification.
- Validation of employment history including examination of any gaps.
- References – should have been sourced prior to this stage.

Induction - To Include

- Completion of Mandatory training.
- Introductions. > Local and office geography.
- Managing and recording time.
- Administration of wages.

- Health & Safety.
- Health Screening
- Completion of paperwork.
- Policies and Procedures/expectations.
- Driver Assessment. ➤ Use of resources/email/server.
- Information on management structure and processes.
- Overview of review/appraisal/CPD process

All new team members will undertake a comprehensive induction programme when they commence employment, which will ensure their understanding of the aims, objectives and boundaries of their role and safeguarding arrangements.

The appointed DSL and the Single Point of Contact (SPOC) for Prevent, and the DDSLs (who act in the absence of the DSL), have been trained to the appropriate level required and understand their responsibilities with regards to the protection and safeguarding of learners. DSL training will be updated every two years.

Formal training for all staff will be undertaken every two years, in the following subjects:

- Harmful Sexual Behaviour;
- FGM
- Mental Health;
- Prevent Duty;
- Safeguarding in FE and Training (Except DSL/DDSLs);
- Safer Recruitment (Managing Director / Director of Operations);

Additionally, all team members will undertake safeguarding and prevent refresher training annually, which is delivered by HighSpeed Training and Government Training.

Disclosure and Barring Service (DBS)

Orchard Training & Education Ltd (the company) is committed to the safeguarding of children and will implement working practices which will ensure that all persons having cause to work with children as part of its business will be suitable to work with them. This policy will run in cohesion with the Company's Safeguarding Policy, Data Protection Policy and Recruitment & Selection Policy.

Orchard Training & Education Ltd will adopt all working practices to adhere to:

- The Safeguarding Vulnerable Groups Act 2006 and schedule 4 which relates to regulated activity when working with children.
- The Code of Practice under section 120 of the Police Act 1997
- The Data Protection Act 1998

As a company, in adherence with current legislation, Orchard Training & Education Ltd are legally entitled (by the definition of 'Regulated Activity') to require the disclosure from a person wishing to carry out business activity on its behalf prior to and during employment. With the permission of that person the following will apply

- The company will carry out enhanced checks with children's barred list checks in all instances below.
- All applicants for employment. This will be in line with the Company's Recruitment & Selection Policy.
- The company will (in line with the Data Protection Act 1998) ensure that processes are in place to ensure that existing employees will have DBS status reviewed every three years.
- The company will, where disclosure has been made relating to historical relevant activity, carry out a full risk assessment in relation to suitability to work with children. This will be in consultation with the relevant guidelines and full record will be retained.

Criminal Record Check - Disclosure Risk Assessment Form

This form is to be completed where any employee/candidate/volunteer, as a result of completing their DBS check (enhanced or otherwise) has disclosed any information revealed as a result of this check (e.g., criminal convictions/cautions/warnings/any other information).

This form should also be completed after any other relevant disclosure is made prior to persons carrying out activity with the company. Once completed this form should be signed by the Head of HR and be stored on the individuals personnel file. A review of the risk assessment should be carried out at any stage that a risk is presented. This form is saved on our server.

Staff have Enhanced DBS clearances which cover the following areas:

- any police records of convictions, cautions, reprimands, and warnings
- information from the list held under Section 142 of the Education Act 2002
- Children's Barred List Information – this would show if an applicant is barred from working with children.

Should information be present on the DBS check relating to a person's criminal record such as cautions, reprimands, warnings, spent and unspent convictions or should there be any change to an employee's DBS during their employment, this will be dealt with under the company's Safer Recruitment Policy. Any appropriate risk assessment, change or concern will be discussed with the Trust through our Quality Assurance visits.

Disqualification under the Childcare Act 2006

We have obtained signed declaration forms from all members of staff which affirms to the best of their knowledge that they have not been disqualified under the 2018 regulations, and this declaration is re-signed every year. As company practice, Orchard Training & Education Ltd renew DBS checks every three years as best practice.

I can confirm that all our staff have received Level 2 Safeguarding Training within the last twelve months covering the contents of KCSIE, 2022 as a minimum. Any further updates from the Department of Education around safeguarding are communicated to our staff immediately.

All DSL / DDSL are trained to Level 3, Designated Safeguarding Lead. Our mandatory Safeguarding Training is as follows and is renewed accordingly:

- Advanced Safeguarding Children (Level 2) ➤ Harmful Sexual Behaviour in Orchard Training and Education Ltds
- Mental Health Awareness
- Preventing Radicalisation and Extremism
- Female Genital Mutilation – Recognising and Preventing FGM

All employees have read and will comply with the 'Code of Conduct', safeguarding policies including whistleblowing. I can confirm we hold Public Liability and Employers Liability insurance to the value of at least £10,000,000. Employees will bring photographic ID with them during the recruitment & selection process, and this will be stored internally

The Managing Director is responsible for:

- Appointing an appropriate person to the role of Designated Safeguarding Lead (DSL) and appointing any necessary deputy DSLs.
- Ensuring that necessary child protection and safeguarding policies and procedures are in place within the organisation.
- Ensuring that staff members effectively carry out their duties, including those in relation to child protection.
- Ensuring that all staff members are aware of Orchard Training and Education Ltd policies and procedures, including those in relation to CSE.
- Ensuring that students and parents are made aware of the problem of CSE in an ageappropriate manner.
- Ensuring that all new members of staff receive all mandatory safeguarding training as part of their induction.

The DSL/DDSL is responsible for:

- Acting as the first point of contact for safeguarding concerns and providing staff with appropriate advice.
- Ensuring that staff members receive relevant & current safeguarding training & information, including that in relation to CSE, on a regular basis.
- Completing welfare checks with any vulnerable students who have unauthorised absences.
- Liaising with staff members and external agencies regarding CSE issues.
- Arranging for appropriate CSE-related resources and information to be available to staff members.
- Making all staff members aware of the appropriate information sharing protocols.
- Ensuring that all CSE-related concerns are recorded in writing via CPOMS.
- Ensuring that the voice of the child is heard where a risk of CSE is identified, and that this is done in a safe and sensitive manner.
- Ensuring information is displayed within the Orchard Training and Education which signposts students to where they can access advice about CSE.
- Undertaking child protection and safeguarding training at least every two years.

All staff members are responsible for:

- Playing an active role in supporting Orchard Training and Education Ltd in its commitment to promoting the safety and welfare of all students.
- Acting in accordance with statutory and good practice guidance.
- Reporting any concerns which they may have to the DSL or DDSL's
- Following the guidance set out in the DfE's 'Working together to safeguard children' where they believe a child may be at risk of harm.
- The early sharing of information.
- Respecting the confidentiality of information.
- Ensuring that they are aware of OTE's identification and reporting procedures.
- Reporting unauthorised student absences to parents, ascertaining the reasons for their absence.
- Ensuring that timescales are adhered to and any issues concerning CSE are passed on to the DSL or deputy DSL immediately.
- Attending safeguarding and child protection training, including that in relation to CSE.
- Contacting the police if they think a child is at immediate risk of harm.
- Creating a safe learning environment for students.
- Ensuring incidents of sexual bullying and harassment are dealt with by the Orchard Training and Education Ltd quickly and effectively.

When planning training, the DSL and Managing Director will take the context of Orchard Training and Education Ltd into consideration, whether there are specific issues which need to be addressed as a priority.

During staff training, the following issues will be addressed:

- Warning signs and indicators of CSE
- The different forms of CSE ➤ Students most at risk of CSE
- Protecting and supporting students
- Procedures for reporting suspected cases of CSE
- Information sharing protocols
- Facilitating conversations with students and parents about CSE

- Staff training will be updated on a regular basis, at the discretion of the DSL and managing Director, ensuring that the information staff members have is up-to date with sector developments.
- Child protection and safeguarding updates will be provided annually at a minimum.
- All staff members will be trained to respond to concerns in ways that are Child-centred:
- Developed and informed by the involvement of the child's family, where appropriate. ➤ Responsive and pro-active.
- Relationship-based.
- Informed by an understanding of the complexities of CSE.



Attendance and Safeguarding

In accordance with Working Together to Improve School Attendance (DfE, 2024), Orchard Training & Education Ltd monitors attendance rigorously as part of our safeguarding duties. Unauthorised absences are followed up promptly, and welfare checks are conducted for vulnerable learners. Attendance data is reviewed regularly to identify patterns that may indicate safeguarding concerns.

All members of staff and students will be aware of the reporting procedures, as well as the contact details for the relevant outside agencies. Staff members will keep a log of any suspicious behaviour they witness, which is to be updated on CPOMS.

Any member of staff who suspects a student is at risk of, or has been the victim of, CSE, immediately reports the concern to the DSL or the DDSL. Parents and staff members at Orchard Training and Education Ltd will raise any concerns they have regarding CSE with a member of the Safeguarding team immediately.

All concerns and information regarding cases of CSE will be recorded in writing on CPOMS. The DSL or the DDSL will make an initial assessment and determine the most appropriate actions required, following our safeguarding flowchart documented pg16.

If the student appears to be in immediate danger, the police will be contacted. After the assessment, a multi-agency meeting will be arranged with the parents of the student, as well as representatives from CSCS.

Students will be made aware of the procedures for reporting concerns about CSE, including how confidentiality is guaranteed.

All safeguarding and child protection concerns, including those in relation to CSE, will be dealt with in line with the procedures outlined in Orchard Training and Education Ltd policies, including the Child Protection and Safeguarding Policy.

The following are the contact details in the local authority areas in which we deliver:

East Riding of Yorkshire

- Children's Safeguarding Hub (Under 18) - 01482 395 500
- Children's Safeguarding Hub (Under 18) - 01482 393 939 – (Out of Hours Team)
- Safeguarding Adults (Over 18) Team – 01482 396 940.

Hull -

- Early Help and Safeguarding Hub (EHASH) - Safeguarding Children (under 18) - Telephone: 01482 448879 (Access and Assessment team - during normal office hours) or 01482 300304 (Immediate Help Team - out of office hours)
- Safeguarding Adults (over 18) - Telephone: 01482 616 092 (during normal office hours) or Telephone: 01482 300 304 (out of office hours)

North East Lincolnshire

- Safeguarding Children (under 18) - Telephone: 01472 326 292
- Safeguarding Adults (over 18) - Telephone: 01472 256 256

North Lincolnshire

- Safeguarding Children (under 18) - Telephone: 01724 296 500
- Safeguarding Adults (over 18) - Telephone: 01724 297 000

Additionally, the details of Local Safeguarding Children's Partnerships (LSCP) in the areas in which we deliver are as follows:

East Riding of Yorkshire

East Riding Safeguarding Children Partnership (ERSCP)

Telephone: 01482 395 500

erscp.enquiries@eastriding.gov.uk

Hull

Safeguarding Children Partnership

Midmere Centre

Dorchester Road

Hull

HU7 6BD

Telephone: 01482 379 090

Email: ehash@hullcc.gov.uk

North East Lincolnshire

Safeguarding Children Partnership

3 Town Hall Square

Grimsby

DN31 1HX

Telephone: 01472 326 118

Email: EnquiriesNELSCP@nelincs.gcsx.gov.uk

North Lincolnshire

Children's Multi-Agency Resilience and Safeguarding (MARS) Board
Church Square House
30-40 High St
Scunthorpe
DN15 6NL
Telephone: 01724 296 500
Email: mars@northlincs.gov.uk

For Prevent related concerns and potential Channel referrals in all local authority areas across the Humber, the team at Humberside Police must be contacted:
Prevent@humberside.pnn.police.uk

In addition, the following contact details and referral form must be used, in each local authority area:

East Riding of Yorkshire

EHASH via Prevent@eastriding.gov.uk & safeguardingchildrenshub@eastriding.gov.uk if the referral relates to an individual aged 17 or under.

Hull

EHASH via Prevent@hullcc.gov.uk if the referral relates to an individual aged 17 or under.

North East Lincolnshire

Children's safeguarding via nelcchildrensfrontdoor@nelincs.gov.uk if the referral relates to an individual aged 17 or under.

North Lincolnshire IMAP@northlincs.gov.uk if the referral relates to an individual aged 17 or under.

Humberside police will assess the situation to determine if a Channel referral will be made.

If the concern is related to an online incident, Child Exploitation and Online Protection (CEOP) can be contacted by completing the online form at:
<https://www.ceop.police.uk/ceop-reporting/>

Managing Low-Level Concerns

Orchard Training & Education Ltd maintains a culture of openness and transparency. Staff are encouraged to report low-level concerns that do not meet the harm threshold but may indicate emerging risks. These concerns are logged via CPOMS and reviewed by the DSL. This approach supports early intervention and reinforces our commitment to learner safety and staff accountability.

Other contacts:

Anti-terrorist Hotline 0800 789 321

DfE North East Regional Prevent Co-ordinator

Name: Chris Sybenga

Tel: 07384 456 640

Email: chris.sybenga@education.gov.uk

Local Authority Designated Officer (LADO) - for safeguarding allegations against team member, that meet the harms threshold:

East Riding of Yorkshire 01482 396 999

Hull 01482 790 933

North East Lincolnshire 01472 326118

North Lincolnshire 01724 296 500

FOLLOW UP

When a concern has been reported, the DSL/DDSL will record the outcome on the 'Add Action' section of the incident within CPOMS. If the supporting organisation is providing an intervention, and learning is still able to take place, the learner will remain on programme.

The learner will continue to be followed up until either the learning programme ends, or the supporting organisation has confirmed that the learning programme is not appropriate for the learner at this time.

The team member assigned to the learner will monitor and support them throughout their time on the programme. This will be recorded in the learner progress review, the PTAs Individual Monthly Report and discussed with their line manager during their monthly one to one, as part of the monitoring of their learner caseload. The DSL will monitor all live concerns and incidents, with each individual discussed with ODC line manager monthly. The DSL will also confirm the support provided and identify whether there are any concerns or incidents with any learner on their caseload that has not been reported or reported and not actioned. This must be investigated immediately and reported to the Managing Director.

All concerns and incidents will be reviewed with the Managing Director during the DSLs monthly one to one and shared at the monthly safeguarding meeting.

PREVENT & Radicalisation

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including Orchard Training and Education Ltd to have due regard to the need to prevent people from being drawn into terrorism (“the Prevent duty”).

The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

This policy takes into consideration the new updated guidance

- Ensuring a broad and balanced curriculum is in place to promote British Values as part of the spiritual, moral, social, and cultural development of children and young people.
- Assessing the risk of students being drawn into extremist views.
- Ensuring safeguarding arrangements by working in partnership with local authorities, police, and communities.
- Training staff to provide them with the knowledge and ability to identify children and young people who may be vulnerable to radicalisation.
- Keeping students safe online by using effective filtering and usage policies.

This policy has been devised in accordance with the following legislation and local and national guidance:

- Humberside Channel Procedures
- The Counterterrorism & Security Act 2015
- Prevent Duty Guidance: for England & Wales’, HM Government (December 2023)
- ‘Promoting fundamental British values as part of SMSC in Orchard Training and Education Ltds: Departmental advice for maintained Orchard Training and Education Ltds’, DfE (2014)
- ‘Keeping Children Safe in Education’, DfE (September 2018)
- ‘Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children’, DfE (July 2018)
- ‘Information Sharing: Advice for practitioners’, DfE (March 2015)

We are fully committed to safeguarding and promoting the welfare of all our children and young people. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today’s society.

Orchard Training and Education Ltd are fully recognises the contribution it can make to promoting the welfare of children and protecting them from harm. This policy sets out our strategies and procedures to protect vulnerable pupils from being radicalised or exposed to extremist views. The elements of our policy are prevention, protection, and support.

Orchard Training and Education Ltd we will ensure that:

- All adults understand what radicalisation and extremism is and why we need to be vigilant through effective training.
- Through training, all adults will know what the policy is on tackling extremism and radicalisation and how to respond when concerns arise.
- Through our curriculum, we will promote the spiritual, moral, social, and cultural development of children and young people. Prevent plays a key part in our induction week within all tutor groups.
- Parents/carers and pupils will know that the Orchard Training and Education Ltd has policies in place to keep students safe from harm and that the Orchard Training and Education Ltd regularly reviews these systems to ensure they are appropriate and effective. These can be accessed by parents on our Orchard Training and Education Ltd website.

This policy applies to all children, young people and adults, parents/carers, volunteers, and visitors.

Roles and Responsibilities

It is the responsibility of every member of staff, volunteer, and regular visitor to our establishments to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the children and young people.

The Directors of Orchard Training & Education are accountable for ensuring the effectiveness of this policy and our compliance with it.

- All staff undertakes appropriate training that equips them with the skills to identify and respond appropriately to concerns regarding extremism and radicalization within their induction to the Orchard Training and Education Ltd.
- We will assess the risk of young people being drawn into extremist views. The risk assessment may include consideration of both internal and external issues relating to the Orchard Training and Education Ltd community.
- A broad curriculum is in place to deliver the spiritual, moral, social, and cultural development of students.
- Appropriate safeguarding arrangements are in place by working in partnership with other agencies and communities as required.
- There are systems in place for keeping children and young people safe from extremist material when accessing the internet in our establishments by using effective filtering and usage policies.

The Designated Safeguarding Lead (DSL) will carry out their role in accordance with the responsibilities outlined in Annex B of 'Keeping Children Safe in Education'. As part of this responsibility, the DSL will act as the point of contact for any concerns relating to radicalisation and extremism.

The DSL at our establishments will make referrals in accordance with N.E. Lincs/Humberside Police Channel procedures to the MASH Team where appropriate and will represent our Orchard Training and Education Ltd at Channel meetings as required.

The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedures they need to follow. They will ensure that all staff have received appropriate training.

Providing Support

Staff members will undergo training on an annual basis so that they can fully understand the needs of a student that has experienced CSE and provide effective support. Staff members will build trusting relationships with students which reinforce positive relationships.

Students will be reassured that they can talk to staff members if they feel unsafe. A listening culture within OTE will be actively promoted by all staff members. Mentors will be allocated to students who have experienced CSE, and frequent contact will be maintained to develop a trustworthy and consistent relationship.

Trained staff will provide students with advice on where and how to obtain confidential advice, counselling, and treatment, as well as advice on emergency contraception and its effectiveness.

Online Safety

Online safety is promoted in line with OTE's E-Safety Policy. All staff members, students will be made aware of the potential risks and dangers they may experience online.

Staff will be able to understand the risks associated with online safety and be confident that they have the relevant knowledge and capability to keep students safe online.

Staff will be trained to ensure they have the capability to support students with SEND online and can recognise the risks associated with online safety for students with SEND, for example, online bullying, grooming and radicalisation.

All students will be informed how to stay safe whilst online, including how to:

- Identify risks online.
- Recognise unsafe online contacts.
- Report concerns about themselves or others.

Through training, we will ensure that all of our staff are made fully aware of the threats, risks and vulnerabilities that are linked to radicalisation. Staff will be able to identify children at risk of being drawn into extremism and develop the confidence to challenge extremist ideas. All staff will understand how we can provide support to ensure that our students are resilient and supported to resist involvement in radical or extreme activities. From 2019 there is additional PREVENT training broken down into appropriate levels. The Orchard Training and Education Ltd will train to the levels below

- Staff to complete the 'prevent awareness' training.
- DSL and DDSL's 'Prevent Referral'
- DSL 'channel awareness'

At Orchard Training and Education Ltd we provide students with a personalised curriculum and 'no limits' thinking, and promote the spiritual, moral, social and cultural (SMSC) development of our pupils. Children and young people will be encouraged to regard people of all faiths, races and cultures with respect and tolerance, and to embrace diversity.

Through our curriculum we will aim to:

- Improve our learners understanding and awareness of Prevent from their first day as will include a key theme around this subject in our induction to the Orchard Training and Education Ltd year.
- enable students to develop their self-knowledge, self-esteem, and self- confidence.
- enable students to distinguish right from wrong and to respect the civil and criminal law of England.
- encourage students to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of the Orchard Training and Education Ltd and to society more widely.
- enable students to acquire a broad general knowledge of and respect for public institutions and services in England.
- Further tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures through off site activities.
- encourage respect for other people both within Orchard Training and Education Ltd and externally.
- encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

We recognise the role that external agencies and speakers can play in enhancing the learning experiences of our students. Where we use external agencies and individuals in this way, we will positively vet them to ensure that their messages are consistent with, and not in opposition to, our values and ethos.

We adhere to the procedures that have been agreed locally through the North East Lincolnshire Safeguarding Board for safeguarding individuals vulnerable to extremism and radicalisation. Please also refer to our Safeguarding and Child Protection Policy for further information about our wider safeguarding responsibilities.

We recognise that adults in our Orchard Training and Education Ltd can play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned, and this includes vulnerability to radicalisation.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018).

The Designated Safeguarding Lead (DSL) should be used as a first point of contact any safeguarding concerns at Orchard Training and Education Ltd. Any member of staff or visitor to the Orchard Training and Education Ltd who receives a disclosure of or suspects that a child is at risk of radicalisation must report it immediately to the DSL or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

Following receipt of any information raising concern about vulnerability to radicalisation, the DSL will consider what action to take and will follow the North East Lincolnshire Channel procedures by making a referral via the MASH as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

If an allegation is made or information is received about an adult who works in our setting which indicates that they may be unsuitable to work with children because of concerns relating to extremism and radicalisation, the member of staff receiving the information should inform the principal immediately in line with the procedures outlined in our Safeguarding Policy and the Whistleblowing Policy.

Risk Assessments

The Safeguarding and Prevent Risk Assessment and Action Plan is completed annually to identify the areas that will pose a risk, the control measures in place and further actions required. This is completed by the DSL and signed off with the Chief Executive of Avant and the Managing Director of Orchard Education and Training Ltd.

The Safeguarding and Prevent Risk Assessment and Action Plan has been further enhanced with reference to the 20 recommendations from the 'Work based learners and the Prevent statutory duty, Guidance for providers, DfE, September 2018'. Progress towards all actions is reviewed at each Management Meeting and the monthly safeguarding meetings led by the DSL with Avant and Orchard Safeguarding teams.

An annual Safeguarding and Prevent audit will be undertaken, utilising the Safeguarding and Prevent Audit Report.

We have invested in CPOMS, a collaborative software solution for monitoring safeguarding, wellbeing, and pastoral issues. All team members are trained in the use of this system, which replaces previous paper-based recording, enabling a more efficient tracking of learner concerns and incidents.

DSL & DDSL's have a higher level of access to general staff members to ensure confidentiality is not breached.

The information input to CPOMS is shared instantly with the relevant people immediately and securely. As a result of CPOMS, administration will reduce enabling team members to focus on teaching and providing support.

All those working regularly with children for Orchard Training & Education Ltd must read 'Keeping Children Safe in Education – Part 1 (DfE 2022)', which sets out what all staff need to know, what they need to look out for and where they should report their concerns. Where appropriate, staff or volunteers not working directly with children may instead read 'Keeping Children Safe in Education – Annex A (DfE 2022)', which contains a condensed version of the information in KCSIE Part 1.

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical
- Emotional
- Sexual
- Neglect

Our organisation is aware of the signs of abuse and neglect so we can identify children who may need help or protection. Safeguarding incidents and/or behaviours can be associated with factors outside the Centre and/or can occur between children outside the Centre. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Technology is a significant component in many safeguarding and wellbeing issues.

Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos can be signs that children are at risk.

Orchard Training & Education will ensure staff have the skills, knowledge and understanding necessary to keep children who are looked after safe. The DSL/DDSL's will have information regarding our learner's care arrangements and the levels of authority looking after them. We will ensure children who are looked after achieving the same rate or better than their peers be robust data monitoring, support, and intervention.

Kinship Care and Virtual School Support

Where learners are in kinship care arrangements, Orchard Training & Education Ltd will liaise with the relevant Virtual School Head to ensure appropriate support and oversight. Staff will be briefed on the specific needs of children in kinship care and will ensure their safeguarding and educational needs are met in line with statutory guidance.

Orchard Training and Education strive to ensure the safety and wellbeing of all students. To effectively achieve this, staff members at OTE must safeguard and protect children against CSE. This policy outlines Orchard Training and Education Ltd procedures for preventing, managing, and reporting cases of CSE and CCE.

To effectively implement this policy and ensure the necessary control measures are in place, parents are responsible for working alongside OTE to identify concerns and potential risks, to ensure the health and safety of their children.

All staff members should be aware of the signs of abuse and neglect. Knowing what to look for is vital to the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation, so that staff can identify cases of children who may need help or protection.

Staff at Orchard Training & Education take time to observe and get to know our students. We develop trust and build relationships creating an environment where students know they can talk to staff about any concerns they have. Posters around our Centre reinforce this. Staff members are advised to maintain an attitude of 'If in doubt, speak out' where safeguarding is concerned. Our staff receive regular training to help equip them with the tools to recognise different forms of peer abuse, and the mechanisms for responding and reporting incidents.

RSHE and Gender Identity

Orchard Training & Education Ltd is committed to delivering Relationships, Sex and Health Education (RSHE) that is inclusive, age-appropriate, and aligned with DfE guidance. Staff will be trained to support learners who are exploring or questioning their gender identity, ensuring that safeguarding responses are sensitive, respectful, and child-centred. Updates to RSHE guidance will be incorporated into staff training and curriculum planning.

FGM – Female Genital Mutilation

All staff within Orchard Training and Education are required to complete FGM online training to ensure that FGM symptoms, changes in behaviour, and physical signs of FGM can be identified and reported to the safeguarding team to be dealt with appropriately following the Female Genital Mutilation Act 2003 (as amended by sections 70-75, Serious Crime Act 2015).

All staff also receive KCSIE as part of the safer recruitment process and are required to read this document before their start date to ensure understanding of FGM.

HSB – Harmful Sexual Behaviour

All staff within Orchard Training and Education are required to complete HBS online training and complete CPD.

All Orchard Training and Education staff have completed accredited training on HSB, this allows us to be aware of signs to look out for regarding HSB. All staff are to follow the reporting procedure for safeguarding concerns (page 17).

DSL/DDSL should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care. (especially the child protection policy) and responses, and the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.

All staff also receive KCSIE as part of the safer recruitment process and are required to read this document before their start date to ensure understanding of HSB.

Mental Health

Orchard Training & Education Ltd has an important role to play in supporting the mental health and wellbeing of learners and employee's and recognise how important mental health and emotional wellbeing is to our lives in just the same way as physical health. We recognise that children and young adults mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement and, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Our aim is to provide a safe environment to help develop the factors which enable children to express themselves, be listened to, and to build resilience to mental health problems
We're a Orchard Training and Education Ltd where:

- All learners and employees are valued.
- Everyone has a sense of belonging and feel safe.
- Learners feel able to seek help and talk openly with trusted adults about their problems without feeling any stigma.
- Positive mental health is promoted and valued.
- Bullying is not tolerated.
- Ensure the welfare and safety of children are paramount.
- Early identification of children who may have mental health needs and planning support to meet their needs, including working with specialist services.
- Involve parents and carers when their child needs support.
- Involve children in the care and support they receive.
- Monitor, review and evaluate the support with children and keep parents and carers updated.
- Training staff to develop their understanding, knowledge, and response to children with poor mental health.

We believe that all staff have a responsibility to promote positive mental health, and to understand the risk factors. Some children will require additional help and all staff have undergone training within their induction to gain the skills to look out for any early warning signs of mental health problems and ensure that children experiencing this get the support they need.

If there is a concern that the child or young person is at high risk or in danger of immediate harm, the Orchard Training and Education Ltd child protection procedures should be followed. If the child or young person presents a high-risk medical emergency, our emergency first aid procedures should be followed, including involving the emergency services if necessary.

Any member of staff concerned about a student will take this seriously and talk to the Mental Health First Aiders and or the Designated Safeguarding Leads, following this up with a report on the Orchard Training and Education Ltd's Child Protection reporting system, CPOMS.

Individual Mental health and wellbeing appointments will be arranged and diarised to ensure regular support is offered within a secure and confidential environment.

Daniel Peacham, Mental Health First Aider - dpeacham@oteconstruction.co.uk

Tia Peacham, Deputy Designated Safeguarding Lead / Mental Health First Aider - tpeacham@oteconstruction.co.uk

Becky Glen, Deputy Designated Safeguarding Lead / Mental Health First Aider - bglen@oteconstruction.co.uk

Len Worby - Deputy Designated Safeguarding Lead / Mental Health First Aider - lworby@oteconstruction.co.uk

Becky Mills - Deputy Designated Safeguarding Lead / Mental Health First Aider - blmills@oteconstruction.co.uk

Online Harms and Misinformation

Orchard Training & Education Ltd recognises the growing impact of online disinformation, misinformation, and conspiracy theories on learner wellbeing and safety. Staff are trained to identify signs of distress or behavioural change linked to harmful online content and to respond appropriately. Learners will be supported to critically evaluate online information and to report concerns about misleading or extremist content. These risks are monitored as part of our Prevent and safeguarding arrangements.

Cyber Resilience and AI Awareness

In line with emerging guidance, Orchard Training & Education Ltd is committed to promoting cyber resilience and safe use of emerging technologies, including generative AI. Staff will be briefed on potential safeguarding risks linked to AI-generated content, including impersonation, manipulation, and exposure to inappropriate material. Learners will be supported to use digital tools responsibly and to report any concerns linked to AI or online safety.

Substance Abuse or Misuse

The Misuse of Drugs Act 1971 Under this Act, it is an offence for a person knowingly to allow controlled drugs to be used, kept or supplied on his/her premises (the use and possession of controlled drugs is lawful in certain specified circumstances, for example when prescribed by a doctor). It is also illegal to ignore such occurrences.

Orchard Training & Education Ltd states clearly that possession, use or supply of illegal drugs is strictly forbidden. The Act lists the drugs that are subject to control and classifies them in three categories according to their relative harmfulness when misused. CLASS A: includes ecstasy, cocaine, heroin, LSD, mescaline, methadone, morphine, opium and injectable forms of Class B drugs CLASS B: includes oral preparations of amphetamines, barbiturates, cannabis, cannabis resin, codeine and methaqualone (Mandrax) CLASS C: includes most benzodiazepines (e.g. Temazepam, Valium), other less harmful drugs of the amphetamine group, and anabolic steroids

The penalties for offences involving controlled drugs depend on the classification of the drug. Penalties for misuse of Class A drugs are more severe than those for Class B drugs which in turn are more severe than the penalties for Class C drugs.

The Act also distinguishes, in terms of the penalties that may be imposed, between the offences of possession and drug trafficking or supplying, with the latter attracting higher penalties. It is possible that in certain circumstances charges may be brought against an employer or an employee under this Act, the Health, and Safety at Work Act or both. It would be up to the courts to decide on the circumstances of each case. Orchard Training & Education Ltd will report all illegal acts to the Police.

Under this policy OTE have created a procedure in the form of a flow chart to manage the responsibility of our learners and employees when tackling suspected or misuse of drugs or alcohol. Any cases should be reported to the Designated Safeguarding Lead (DSL) for this to be dealt with appropriately. This should be raised as a safeguarding concern, CPOMS entry and all OTE staff have a responsibility to highlight and report. OTE reserve the right to deal with each incident on individual merit as dealing with our client group means we will be subject to several learners who come from a background where drugs or alcohol misuse is common.

All cases will be monitored by our DSL team and all team members will be required to support the team with the submission of updates on a regular occurrence as will be stated by the DSL team which will be determined as to the severity of each case.

OTE team will not discriminate against any persons and will offer support to each individual where applicable. OTE Designated Safeguarding Team will ensure all learners and staff remain safe throughout the management of suspected or misuse of drugs or alcohol.

Suspecting learners of substance misuse

As previously stated within the policy, all concerns are to be raised with the DSL team and in line with the reporting of safeguarding concerns flow chart. Any members of the OTE who fail to raise safeguarding concerns could be dealt with under the disciplinary policy.

Within the suspecting of substance misuse, it will be the responsibility of the Designated Safeguarding Team to make the overall decision, however where the DSL Team are not able to agree on the course of action, the Managing Director make the overall decision.

On suspecting any learner, a dynamic risk assessment will be taken by the DSL team and an agreed course of action will be documented. This will include action, support, and regular follow ups to ensure the issue is resolved. The dynamic risk assessment will take place and it will be agreed on whether the learner, peers and staff would remain safe if the accused remained within training.

If the suspicion is classed as “high” then the learner will be asked to leave site, this will be due to physical signs or a strong odour to suggest the learner has been in direct contact within the day. If a learner was to develop an odour throughout the day, for example if they returned after break with any smell of substance, then they will automatically become high risk.

Subtle smelling of cannabis for example will be discussed with the learner of healthy options and the impact of substances have on creating opportunities. Subtle smells we would accept the learner may have been in contact with but not within the same day. We will work with the learner and offer support, guidance to ensure this is resolved and ensure they are aware of the way in which they present themselves when in or looking for employment.

When determined to be under the influence Staff or learner is to be transported home by a member of staff (DSL Team). Under no circumstances are they to drive a vehicle or make their own way home.

We will be able to allow a learner's parental responsibility to collect them from site if this is an option.

If a learner or staff member is suspected to be under the influence and pursue to break the law in driving a motor vehicle, then OTE have a duty of care to the public to report any instances to the police. If this occurs this would be deemed as gross misconduct.

Making Learners Feel Safe

During the learner interview and initial assessment stage of the recruitment process, team members will ensure welfare, learning and safeguarding needs are identified and recorded.

If any concerns are identified at this stage, and the learner has recently been in learning with a local provider, the DSL will contact the DSL at the provider to discuss any known concerns or issues.

All learners undertaking learning programmes with Avant, participate in a face-to-face induction prior to the start of their learning programme.

This induction introduces acceptable behaviour, the importance of attendance and communication for absence, complaints process, data and ICT security, equality and diversity, health and safety and safeguarding (including British Values, e-safety, Prevent and Harmful Sexual Behaviour) through activities and worksheets.

These topics are further reinforced throughout the learning programme, with learners receiving and completing a Learner Handbook and completing the following workbooks: Equality & Diversity Workbook; Health & Safety Handbook; Safeguarding Handbook, which enables the additional testing of learner understanding.

These activities and documentation are intended to make all learners feel safe, reduce harm or risk of harm, minimise impact and understand how to seek support, advice, or report if they feel unsafe or have any concerns.

All 14–18-year-old learners, including those learners that undertake work experience as part of their programme, will be provided with a copy of the Management of Learner Health and Safety document, to help support them when making age-appropriate decisions regarding reasonable risks in their workplace.

A face-to-face visit will take place with all apprentices and their employer in the workplace, within the first four weeks of them starting their programme. For traineeship learners their first face to face visit will take place within the first two weeks of them starting their work experience placement. This enables an early check on learner progress, welfare and safeguarding.

Reviews are then undertaken with apprentices at least every ten weeks and reviews with traineeship learners at least every six weeks.

Team members must be vigilant to any changes in learner's appearance and behaviour and report any safeguarding or learner welfare concerns, to the DSL in line with Sections 6 and 7 of this policy.

Team members will monitor learner attendance at all training sessions (including face to face and online), and on work experience, in line with the Learner Attendance and Absence Management Procedure, to identify patterns that may relate to an underlying concern or issue.

Team members must understand the importance of challenging inappropriate behaviours between peers, including child-on-child and peer-on-peer sexual violence and sexual harassment. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for learners and in worst case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it.

Team members must reassure learners who are victims of abuse that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Where learners display difficult or challenging behaviour, team members should follow the Behaviour Management Procedure, using strategies appropriate to the circumstance and situation.

It is an offence for a team member in a position of trust to engage in sexual activity with a learner under 18 years of age and would be a matter for criminal and disciplinary procedures. Any sexual behaviour by a team member with or towards any learner is unacceptable and will be dealt with following the Disciplinary and Dismissal Procedure.

Team members working in one-to-one situations with learners, in both training centres and employer’s premises, can be more vulnerable to allegations or complaints.

Team members must ensure that wherever possible there is visual access and/or an open door in one-to-one situations and avoid use of ‘engaged’ or equivalent signs wherever possible, as such signs may create an opportunity for secrecy or the interpretation of secrecy. Where team members work one to one with a learner on a virtual platform, these same principles of openness and visibility apply.

Arranging to meet learners away from the centre or their work premises must not be permitted unless the necessity for this is clear, and approval is obtained from your line manager.

Team members must not work alone in the training centres with a learner or learners at any time.

Photography, videos, and other images/media of learners must only be undertaken for displays, marketing, publicity and celebrating achievement. Team members must not take images of learners for their personal use.

The COVID-19 pandemic and resulting lockdowns, home-working and self-isolation required an increased use of online and remote learning, which presented greater risks to learners.

As a result, we reviewed our arrangements for delivery including training for team members and learners in the safe and effective use of equipment and staying safe online, (including increased exposure to illegal, inappropriate or harmful content and harmful online interaction with other users). Arrangements are detailed within our ICT and Data Security Policy.

Team members should take extreme care to ensure that young people are not exposed, through any medium, to inappropriate or indecent images. There are no circumstances that will justify adults: making, downloading, possessing, or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the settings or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.

We have implemented a granular content filtering and internet security system to filter inappropriate content, restrict certain sites, protect learners against terrorist content and monitor use of ICT within the training centre, in line with our ICT and Data Security Policy.

Alerts generated by the filtering system are sent to the DSL, DDSL and the management team to review.

When an alert is received, all recipients the DSL or DDSL will advise the other members of the management team that the alert is being actioned.

The DSL/DDSL will investigate the alert to establish if there is a cause for concern that requires further investigation. If an issue or concern is identified, the DSL/DDSL will proceed in line with stage 7 of this policy.

Where the DSL/DDSL has identified that the alert does not require investigation in line with section 7 of this Policy, the recipients of the original alert will be notified that no further action is required.

If the site that was trying to be accessed was being blocked in error, only the DSL/DDSL can approve that the site is added to the 'Whitelist'.

This Safeguarding Policy and our arrangements for the safety of our learners apply to all of our learners, regardless of where their learning takes place or which organisation is delivering their training.

Monitoring and Review

OTE is responsible for reviewing this policy in conjunction with the leadership team. The effectiveness of this policy will be monitored and evaluated by all members of staff. Any concerns will be reported to the DSL immediately. Following each case of CSE, this policy and learners HCP’s will be updated and amended as necessary. All changes needed to this policy will be implemented by the DSL in conjunction with all deputies. Any changes to this policy will be communicated to all staff members.

OTE Construction Training will further update and amend policies to ensure these are in-line with AVANT Skills Academy, ensuring all practices are adhered to maintain the partnership standard.

	Review 1	Review 2	Review 3	Review 4
Signed	Ben Mills	Ben Mills	Ben Mills	Ben Mills
Position	Managing Director	Managing Director	Managing Director	Managing Director
Date	07/03/2023	16/04/2024	12/08/2025	01/10/2025

Appendix 1 - Safeguarding and Safer Recruitment: Letter of Assurance

In accordance with the requirements of the DfE guidance Keeping Children Safe in Education (KCSiE), 2025 and the Childcare Disqualification Requirements – Disqualification under the Childcare Act 2006,

I can confirm Orchard Training & Education Ltd have undertaken all the necessary safeguarding, safer recruitment and vetting and barring checks for all employees. This includes Enhanced DBS Disclosures for eligible roles undertaking Regulated Activity.

Orchard Training & Education have two nominated, training members of the team, completing “Safer Recruitment Training” with NSPCC. The nominated professionals are as follows and confirm at least one of these professionals lead the recruitment for any vacancies within the organisation.

1. Mr Ben Mills, Managing Director
2. Miss Becky Mills, Director of Operations

I can confirm that we undertake the following recruitment and child safeguarding checks:

(please tick or write 'N/A' where appropriate)

Photo ID has been checked	✓	Proof of Address has been checked	✓
Evidence of right to work in the UK has been checked (where applicable)	✓	Criminal overseas checks have been conducted (where applicable)	✓
Evidence of relevant qualifications has been seen	✓	Checks for prohibition from teaching and restrictions from teaching have been undertaken (where appropriate)	✓
Enhanced DBS checks have been conducted as per below	✓	Disqualification by Association declarations have been signed as per below (where applicable)	N/A
All staff are appointed under our company's Safer Recruitment Policy	✓	Barred list checks have been carried out for all staff in regulated activity	✓

Staff have Enhanced DBS clearances which cover the following areas:

- Any police records of convictions, cautions, reprimands, and warnings
- Information from the list held under Section 142 of the Education Act 2002
- Children's Barred List Information – this would show if an applicant is barred from working with children.

Should information be present on the DBS check relating to a person's criminal record such as cautions, reprimands, warnings, spent and unspent convictions or should there be any change to an employee's DBS during their employment, this will be dealt with under the company's Safer Recruitment Policy. Any appropriate risk assessment, change or concern will be discussed with the Trust through our Quality Assurance visits.

Disqualification under the Childcare Act 2006

We have obtained signed declaration forms from all members of staff which affirms to the best of their knowledge that they have not been disqualified under the 2018 regulations, and this declaration is re-signed every year. As company practice, Orchard Training & Education Ltd renew DBS checks every three years as best practice.

I can confirm that all our staff have received Level 2 Safeguarding Training within the last twelve months covering the contents of KCSiE, 2022 as a minimum. Any further updates from the Department of Education around safeguarding are communicated to our staff immediately.

Orchard Training & Education Ltd have a dedicated Safeguarding team as follows.

1. Ben Mills – DSL
2. Becky Glen – DDSL
3. Tia Peacham - DDSL
4. Leonard Worby - DDSL
5. Becky Mills - DDSL

All DSL / DDSL are trained to Level 3, Designated Safeguarding Lead.

I can confirm under Safeguarding Training, our mandatory training is as follows and is renewed accordingly.

- Advanced Safeguarding Children (Level 2)
- Harmful Sexual Behaviour in Schools
- Mental Health Awareness
- Preventing Radicalisation and Extremism
- Female Genital Mutilation – Recognising and Preventing FGM

I can confirm that staff employed by us have read and will comply with the 'Code of Conduct', safeguarding policies including whistleblowing.

I can confirm we hold Public Liability and Employers Liability insurance to the value of at least £10,000,000.

Employees will bring photographic ID with them during the recruitment & selection process, and this will be stored internally.

This letter is therefore being sent to you to confirm our commitment and assurance that all the above noted checks are undertaken and records maintained accordingly in our confidential systems.

Yours Sincerely,



Ben Mills
Managing Director

Useful Contact Numbers



Hull:

Hull ECHP/SEND Assessment & Review Team - 01482 616 007
Early Help Locality Hub - 01482 828 901 (North Locality) / 01482 708 953 (East Locality) / 01482 305 770 (West Locality)
Early Help and Safeguarding Hub (EHASH) - 01482 448 879 option 4
Emergency Duty Team (out of hours) - 01482 300304
CAMHS Crisis & Intensive Home Treatment Team - 01482 259400
Hull Women's Aid - 01482 446099
Domestic Abuse Partnership (DAP) - 01482 318 759 (Female Number) / 01482 613 978 (Male Number)
MIND Hull and East Yorkshire - 01482 240200
Youth Justice Service - 01482 614200
ReFresh - 01482 331059
Seed: Eating Disorder Support Service - 01482 421525
Warren Youth Project - 01482 218115
Cornerhouse - Flipside Project - 01482 2626968
Humbercare Accommodation Service (HAS) - 01482 586633
Young People's Substance Misuse Service - Ads UK - 01482 336675
TPSG Hull and East Riding Service User Groups (LGBTQ+) - 078327 63796
Refugee Integration Service - 01482 300300

North East Lincolnshire:

Emergency Duty Team - 01472 326292 option 2
Care Leavers - 01472 325232
Special Education Needs and Disability (SEND) – Assessment and review - 01472 323170
Youth Justice Service - 01472 325252 or 326294 option 5
Children Looked After - 01472 313131
North East Lincolnshire Mental Health Service (NAVIGO) - 01472 256256 option 3
North East Lincolnshire MIND - 01472 349991
YMCA - 01472 403020
With You (Drug and Alcohol Service) - 01724 857633
Housing Related Support - 01472 326296 option 1
Young People's Support Service - 01472 326294 option 1

General Helplines:

Young Minds - 0800 802 5544
Family Lives - 0808 800 2222
Beat - 0808 801 0711
Talk to Frank - 0300 123 6600
Childline - 0800 1111
The Samaritans - 116123
Survivors UK - 0845 122 1201
Victim Support - 0845 30 30 900
Campaign Against Living Miserably (CALM) - 0800 58 58 58
The Mix - 0808 808 4994

SAFEGUARDING REPORTING AND RECORDING PROCEDURE

This procedure outlines the stages to be followed in the identification, reporting and recording of all learner safeguarding, prevent, health and wellbeing concerns.

1 IDENTIFYING ISSUES AND CONCERNS

- 1.1 All team members have a responsibility to identify issues and concerns with any learner that visits or is in learning.
- 1.2 All concerns and issues that relate to learner health, safety and wellbeing (including but not limited to abuse, harmful sexual behaviour, mental and physical health, radicalisation or terrorism) will be taken seriously and responded to appropriately.
- 1.3 If a learner informs a team member that they have health, safety or wellbeing concerns or issues, they must be acknowledged, listened to and taken seriously.
- 1.4 The learner must be informed that the team member must report this information to the DSL/DDSL. Confidentiality to the learner cannot be promised.
- 1.5 The team member must offer the learner assurance that the matter will be shared only with the people who need to know about it, i.e. the DSL/DDSL and Chief Executive for Avant, the Managing Director of OTE, relevant social services and, potentially the Police.
- 1.6 The team member must not ask too many questions, certainly not leading questions, but should listen carefully, acknowledging the seriousness of the situation and let the learner know that they understand.
- 1.7 Under no circumstances should the team member investigate any accusations or take any further action themselves.
- 1.8 The team member must record the discussion as per stage 7.1 and raise the matter with the DSL/DDSL, who will investigate in line with stage 7.2.
- 1.9 If a concern has been identified, rather than declared by the learner themselves, the concern must be shared with the DSL/DDSL at the earliest opportunity to agree required action. This may not include a discussion with the learner. Certainty is not required to share an allegation, concern or disclosure, the DSL/DDSL will listen to the information and respond accordingly.
- 1.10 Safeguarding allegations, concerns or disclosures should be reported no matter how small or insignificant they may seem. Remember *'If in doubt, speak out'*.

2 MANAGING ISSUES AND CONCERNS

- 2.1 All team members that identify health, safety and wellbeing (including safeguarding and prevent) related issues or concerns, must follow this section of the policy for Recording, Investigation and Reporting, utilising our CPOMS system.

2.2 Recording

- 2.2.2 As soon as possible after identifying a concern, certainly the same day, the team member must record the details of what has been disclosed to or identified by them (in line with Section 6 of this policy), using the 'Add Incident' option within CPOMS. At this point the team member can categorise the concern as Behaviour, Health and Wellbeing, Prevent or Safeguarding. The learner will be automatically categorised as a 'Monitored Student' in CPOMS.

- 2.2.3 On receipt of the CPOMS Alert, the DSL (or DDSL acting in their absence) will immediately notify the other members of the group that the concern is being actioned.

- 2.2.4 If within one hour of the team member recording the incident in CPOMS, they have not been contacted about the concern, they must immediately raise the concern verbally with a member of the safeguarding team.

2.3 Investigation

- 2.3.1 Whenever the DSL/DDSL is made aware of a concern, they must meet with the team member raising the concern together with the relevant learner, when appropriate.

- 2.3.2 After gathering the facts, the DSL/DDSL must complete the 'Add Action' section of the incident within CPOMS.

- 2.3.3 The DSL/DDSL will categorise the 'Risk' within CPOMS as follows:

- Low – learner health or safety not at immediate risk
- Medium – continuation or repeat of previously notified concern
- High – learner in immediate danger

- 2.3.4 If the risk is categorised as low, this will be handled in line with section 8 of this policy.

- 2.3.5 If the risk is categorised as Medium or High advice must be sought from the relevant organisation/agency (detailed in section 7.4).

- 2.3.6 Where it is agreed that the situation warrants formal reporting, the DSL/DDSL will update the 'Add Action' section of the incident within CPOMS and refer to the relevant contact at the reporting authority.

2.4 Reporting

- 2.4.1 When it has been deemed appropriate to report the concern, following are the contact details in the local authority areas in which we deliver:

East Riding of Yorkshire

Children's Safeguarding Hub (Under 18) - 01482 395 500

Children's Safeguarding Hub (Under 18) - 01482 393 939 – (Out of Hours Team)

Safeguarding Adults (Over 18) Team – 01482 396 940.

Hull -

Early Help and Safeguarding Hub (EHASH) - Safeguarding Children (under 18) - Telephone: 01482 448879 (Access and Assessment team - during normal office hours) or 01482 300304 (Immediate Help Team - out of office hours)

Safeguarding Adults (over 18) - Telephone: 01482 616 092 (during normal office hours) or Telephone: 01482 300 304 (out of office hours)

North East Lincolnshire

Safeguarding Children (under 18) - Telephone: 01472 326 292

Safeguarding Adults (over 18) - Telephone: 01472 256 256

North Lincolnshire

Safeguarding Children (under 18) - Telephone: 01724 296 500

Safeguarding Adults (over 18) - Telephone: 01724 297 000

- 2.4.2 Additionally, the details of Local Safeguarding Children's Partnerships (LSCP) in the areas in which we deliver are as follows:

East Riding of Yorkshire

East Riding Safeguarding Children Partnership (ERSCP)

Telephone: 01482 395 500

erscp.enquiries@eastriding.gov.uk

Hull

Safeguarding Children Partnership

Midmere Centre

Dorchester Road

Hull

HU7 6BD

Telephone: 01482 379 090

Email: ehash@hullcc.gov.uk

North East Lincolnshire

Safeguarding Children Partnership
3 Town Hall Square
Grimsby
DN31 1HX
Telephone: 01472 326 118
Email: EnquiriesNELSCP@nelincs.gcsx.gov.uk

North Lincolnshire

Children's Multi-Agency Resilience and Safeguarding (MARS) Board
Church Square House
30-40 High St
Scunthorpe
DN15 6NL
Telephone: 01724 296 500
Email: mars@northlincs.gov.uk

- 2.4.3 For Prevent related concerns and potential Channel referrals in all local authority areas across the Humber, the team at Humberside Police must be contacted: Prevent@humberside.pnn.police.uk. In addition, the following contact details and referral form must be used, in each local authority area:

East Riding of Yorkshire

EHASH via Prevent@eastriding.gov.uk & safeguardingchildrenshub@eastriding.gov.uk if the referral relates to an individual aged 17 or under.

Hull

EHASH via Prevent@hullcc.gov.uk if the referral relates to an individual aged 17 or under.

North East Lincolnshire

Children's safeguarding via nelcchildrensfrontdoor@nelincs.gov.uk if the referral relates to an individual aged 17 or under.

North Lincolnshire

IMAP@northlincs.gov.uk if the referral relates to an individual aged 17 or under.

Humberside police will assess the situation to determine if a Channel referral will be made.

- 2.4.4 If the concern is related to an online incident, Child Exploitation and Online Protection (CEOP) can be contacted by completing the online form at:

<https://www.ceop.police.uk/ceop-reporting/>

2.4.5 Other contacts:

Anti-terrorist Hotline

0800 789 321

DfE North East Regional Prevent Co-ordinator

Name: Chris Sybenga

Tel: 07384 456 640

Email: chris.sybenga@education.gov.uk

Local Authority Designated Officer (LADO) - for safeguarding allegations against a team member, that meet the harms threshold:

East Riding of Yorkshire

01482 396 999

Hull

01482 790 933

North East Lincolnshire

01472 326118

North Lincolnshire

01724 296 500

3 FOLLOW UP

- 3.1 When a concern has been formally reported to an external agency, the DSL/DDSL will record the outcome on the 'Add Action' section of the incident within CPOMS. If the supporting organisation is providing an intervention, and learning is still able to take place, the learner will remain on programme.
- 3.2 All learners categorised as 'Monitored Students' will continue to be internally monitored and supported until either the learning programme ends or it is deemed the identified concern is no longer a risk, which for concerns categorised as a low risk will be internally agreed with the Safeguarding Team. For formally reported concerns this will be informed by the external supporting organisation confirming that the learning programme is not appropriate for the learner or that external support is no longer required. Closing any live concern or removing a 'Monitored Student' category will be undertaken in line with 8.6.
- 3.3 The PTA assigned to a learner categorised as a 'Monitored Student' will monitor and support them throughout their time on the programme. This will be recorded in the learner progress review, the PTAs Individual Monthly Report and discussed with their line manager during their monthly one to one, as part of the monitoring of their learner caseload.

- 3.4 The DSL will monitor all live concerns and incidents, with each individual discussed with the Head of Centre/tutor's line manager on a monthly basis. The DSL will also confirm the support provided and identify whether there are any concerns or incidents with any learner on their caseload that has not been reported or reported and not actioned. This must be investigated immediately in line with Section 7 of this policy and reported to the Chief Executive.
- 3.5 All 'Monitored Students' will be reviewed by the Safeguarding Team during the monthly meeting. A consensus must be reached by the team, before any 'Monitored Student' category is removed, which will require a clear justification for removal. Where this is agreed, the Safeguarding Administrator will create an incident in CPOMS, including the justification and remove the 'Monitored Student' category.

This procedure is extracted from the Avant *Safeguarding Policy*, as a procedure for use across the partnerships in the identification, recording and reporting of safeguarding concerns. The full safeguarding policy is available at the following location: [Safeguarding Policy](#)

SAFEGUARDING REPORTING AND RECORDING FLOWCHART

