



Safeguarding Children & Adults at Risk Protection Policy

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Section A - Policy

1.0 Policy, Aims and Intent

Policy statement

‘Kleek Apprenticeships ensures that it fulfils its responsibilities to work jointly with others to safeguard and promote the welfare and safety of all learners.’

Aims and Intent

Kleek Apprenticeships has a specific responsibility to safeguard all learners (apprentices) including all young people and adults entrusted to its care.

Kleek Apprenticeships aims to:

Create an environment that promotes the wellbeing, personal safety, and security of all learners.

Ensure that staff are trained to a high standard, including in the Prevent Duty, and follow agreed procedures. Compliance with the Prevent Duty will reflect existing good safeguarding practice and promotion within the curriculum.

Actively engage with safeguarding partners ensuring that legislation and statutory duties are adhered to including local Safeguarding teams, Children Multi Agency Partnership and the Police.

Operate in line with the statutory requirements as set out in S175 of the Education Act 2002 (update 2011), “Keeping children safe in education 2025” and the government guidance “Working together to safeguard children 2023”, “Care Act 2014” and “Safeguarding Vulnerable groups Act 2006”. This list is not exhaustive.

Adhere to safer recruitment practices and Kleek procedures including the use of DBS checks. Team members cannot start in post until the DBS checks has been received, where there is a delay (which is sometimes out of our control) the appropriate measures will be put in place to ensure the team members are not left in isolation with a learner.

Staff are required to declare if there has been any change to their DBS at any point during their employment. We apply for a full enhanced DBS check every 3 years.

Senior management and staff of Kleek Apprenticeships Ltd take seriously their responsibility to promote the welfare and the safeguarding of all young people and adults at risk entrusted to their care.

The policy recognises that all young children and adults at risk regardless of gender, ethnicity, disability, sexuality or beliefs have the right without exception to protection from abuse.

2.0 Audience

2.1 All staff, governors, volunteers, employers, partners, employers and learners. The term learner also refers to apprentices throughout.

3.0 Management of safeguarding and communication

3.1 The Designated Safeguarding Lead (DSL) has overall responsibility for safeguarding within Kleek Apprenticeships and is supported by 2 Deputy Designated Safeguarding leads (DDSLs). The DSL provides supervision and support to the DDSLs.

The safeguarding team meets monthly to review cases and developments. Governance is provided by the Kleek Board who meet 3 times a year and provide scrutiny and guidance. The governance board has a dedicated specialist Safeguarding person to add scrutiny and challenge.

4.0 Preventing extremism and radicalisation.

4.1 An integral part of our safeguarding responsibilities is ensuring that staff will be alert to:

- disclosures by learners of their exposure to the extremist actions, views, or materials of others outside of Kleek Apprenticeships, such as in their homes or community groups
- graffiti symbols, writing or artwork promoting extremist messages or images.
- local risks including crime statistics.
- learners accessing extremist material online, including through social networking sites.
- reports of changes in behaviour, friendship or actions and requests for assistance
- learners voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths or cultures or advocating violence towards others.
- use of extremist or "hate" terms to exclude others or incite violence.
- intolerance of difference, whether secular or religious or, in line with our Equality, Diversity and Inclusion (EDI) policy, views based on, but not exclusive to, gender, disability, sexuality, race, colour or culture.
- attempts to impose extremist views or practices on others.
- making remarks about being at extremist events rallies

5.0 External speakers

5.1 Kleek Apprenticeships values the opportunities provided by external speakers to widen learner knowledge and experience. Speakers also provide the opportunity for learners to experience diverse opinion and enter into debate. It is essential that these activities are carried out safely. Speakers will:

- value the tradition of academic freedom and hold that no subject or belief should be excluded from reasonable, constructive discussion and debate.
- value freedom of opinion and speech but recognise that, in the interests of the whole learning community, this must exist within formal procedures.
- recognise and support the moral and legal frameworks of the society and community that they work within.
- not speak in a way that offends and is considered to be intolerant. Specifically, this means offensive “street,” misogynistic, misanthropic, sexual, or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.

5.2 Kleek Apprenticeships will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence.

5.3 All speakers are required to be supervised. Any speaker requesting to distribute leaflets, weblinks or QR codes on site must seek approval from Kleek Apprenticeships prior to distribution, where the team will check its content is appropriate.

6.0 Specific groups of learners

Whilst Kleek Apprenticeships discharges its responsibility to safeguard all learners we acknowledge that some learner groups may require an increased level of care. This includes but is not limited to:

- children and young people identified as needing early help – concerns should be addressed early on and referrals made as appropriate.
- learners receiving support from child or adult services.
- Learners with a EHCP
- learners who are a child in care or have been care experienced.
- learners who are a carer for a family member.
- young people who have been missing and absent from Education.
- learners of all ages with an additional need such as a learning difficulty, disability, or mental health difficulty.
- Involvement with youth justice services/prison.

7.0 Digital safeguarding including filtering and monitoring.

7.1 Kleek Apprenticeships takes proactive steps to prevent harm and abuse from occurring through digital means. The term “digital” encompasses the whole range of devices available for connectivity. Learners are made aware through the curriculum; of measures they can take to keep safe and reduce harm. Many safeguarding concerns that present offline also present online and can be exacerbated. The three main areas of risk are:

- content: being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, deep fakes, racist or radical and extremist views.
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.

7.2 Kleek Apprenticeship uses DNS Protection filter to monitor internet usage on site in all the academies. All educators’ laptops used for work-based learning all have the appropriate software and firewalls. All company owned devices issued to educators and available for learners to have the appropriate software installed. The logs are reviewed monthly and any areas of concern followed up with individual learners and staff where necessary. Where a generic website is such, a hot topic is put in place to raise awareness on the subject matter.

8.0 Whistleblowing

8.1 It is important for learners and staff to have an appropriate means to raise concerns within Kleek Apprenticeships. Kleek Apprenticeship has a Whistleblowing Procedure. Learners and staff may become aware of, or directly witness, situations or conduct that makes them feel uncomfortable or they regard as inappropriate. The Whistleblowing Procedure provides a means for concerns to be raised.

Section B - Procedure

9.0 Introduction

- 9.1 This Procedure details the action that staff must take in the event of a concern, allegation or incident involving any learner or visitor including a vulnerable adult, adult at risk (of any age) or a child (legally defined as anyone aged under 18 years of age).
- 9.2 The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL) have responsibility for safeguarding day to day within working hours defined as Monday to Friday 9am until 5p.m. There are also out of hours support for safeguarding concerns.

The role of ALL Kleek Apprenticeships staff is to be alert to vulnerabilities and indicators of abuse, to respond sensitively, to report to the DSL and to record information in a timely manner.

- 9.3 Every reported safeguarding concern must be addressed with appropriate urgency, reported, and recorded as detailed in this procedure.
- 9.4 If a DSL/DDSL is not available, then another DDSL should be contacted immediately. ALL staff can contact the DSL/DDSL directly. The DSL must be notified immediately of any serious concerns. This will be done by the DDSL.
- 9.5 Out of hours: If an emergency occurs out of normal working hours and someone is at immediate risk then staff should dial 999. For non-emergencies requiring police input dial 101. DSL can also be contacted out of hours via phone call, WhatsApp and email for advice and guidance.

Social Services may be contacted for a consultation. This should be done through the DSL at the earliest opportunity. Contacts for regional social services can be found at the back of this policy. It is the responsibility of the Social Services Central Duty Team to decide how to respond to a referral made by Kleek Apprenticeships.

- 9.6 All Kleek staff must be aware of the Safeguarding and reporting procedures and what to do if they have a concern. All Kleek staff must also complete online safeguarding awareness training every two years and attend the annual safeguarding update training at CPD week.

10.0 Recognition and categories of abuse

- 10.1. All Kleek staff must be aware of the possible vulnerabilities and indicators of abuse. Some learners may disclose by talking, drawing attention to physical signs, or displaying certain gestures/actions. This may be their only means of communication. Concerns may be reported by third parties (for example employers) and should be acted upon and recorded as per Kleek procedure.
- 10.2. Some indicators of abuse or vulnerability to abuse that may be apparent are:
- Unexplained bruising or injuries
 - A history of unexplained falls or minor injuries
 - Unexplained changes in demeanour and behaviour
 - Social withdrawal and isolation
 - Uncharacteristic aggression or manipulation
 - Poor physical condition
 - Fearfulness and anxiety
 - Loss of esteem
 - “Hiding” online activity.
 - Poor mental health
 - Reduction in/nonattendance
- 10.3. Abuse may be:
- A single act
 - Something occurring over a period of time.
 - Intentional
 - An unintentional act or omission.
- 10.4. Different types of abuse include:
- Physical abuse
 - Sexual abuse, harassment, and assault
 - Learner to learner abuse
 - Psychological/Emotional abuse
 - Neglect and acts of omission
 - Discriminatory abuse
 - Financial abuse
 - Institutional
 - Domestic abuse
 - Hate/mate crime.
 - Online risks including malicious communications and harassment.
 - Being drawn into extremism and radicalisation

This list is not exhaustive.

10.5. Abuse by one vulnerable adult of another within a Kleek Educational setting should be addressed as a safeguarding concern and learner to learner abuse. This also applies to child-on-child abuse for children.

11.0 Responding, recording, and reporting.

11.1. Concerns for any learner may come to the attention of staff in a variety of ways, for example, through observation of behaviour, injuries, or disclosure, or from a third party.

11.2. Any member of staff who has a concern however insignificant this might appear to be must discuss this with their DSL.

11.3. If a person makes a disclosure, the member of staff must:

- Provide an environment and atmosphere suitable for the person to feel safe to talk. Allow him/her to make the disclosure at their own pace and in their own way.
- Not promise to keep the matter confidential as this may not be possible. Staff must explain that they have certain duties to help keep that child/adult safe that may involve informing others.
- Avoid interrupting except to clarify what the person is saying (attentive listening/reflective feedback).
- Not ask leading questions or probe for information that the person does not volunteer.
- Use the “TED” approach – Tell, Explain, Describe
- The “What happened form” is a suitable tool to use when supporting an adult who may find communication hard.
- Reassure the person that they have been heard. Staff must explain what they will do next and to whom they will talk.
- If recording bruising/injuries, indicate position, colour, size, and shape.
- Not give opinions unless there is some form of evidence base, which can also be quoted.
- Not contact the alleged abuser.
- Not pass on the information to anyone other than those who need to know (see section 5).
- Where possible get the person’s consent to pass the information on.
- Information may still be passed on where not to do so would put the person at further risk.
- Record the conversation as soon as possible
- Inform the DSL, as soon as possible.

11.4 In the event that a learner does not attend the academy or their employment, and we are not notified, the educator should contact the learner/parent/employer as appropriate. If it is identified that the learner is missing, the educator needs to advise the DSL of the situation, and what action has been taken. The educator also needs to advise relevant staff of the situation so the staff member can act accordingly.

The same action may also be necessary if a vulnerable adult does not attend when expected to.

11.5 There may be cases where it is appropriate to contact Social Services or the police immediately. The non-emergency police number is 101. All staff are authorised to call the police, social services, and/or ambulance service without referring to a DSL/DDSL if this would cause delay in situations where there is an immediate risk of harm or need for treatment. The DSL should always be informed immediately if this situation arises. However, where it is practical, the DSL should be responsible for making the report of referral.

11.6. The early involvement of the police for serious incidents, such as physical or sexual assault, may have benefits, in particular to ensure evidence is not lost or contaminated. Consultation will enable the police to establish whether a criminal act has been committed and if they need to be involved.

11.7 The DSL, unless it is an emergency will decide whether the concern needs to be escalated. The DSL or DDSL when instructed to will:

- If necessary, contact Social Services for a consultation.
- Report serious concerns immediately to the Designated Safeguarding Lead and take appropriate action.
- Complete with the person who has reported the concern and record on the VLE for all concerns whether serious or minor.
- Record referrals to social services – Safeguarding and Prevent – External reporting.
- It is essential that at the end of this process everyone is clear whether a referral to social services is being made or not and of the potential outcome.
- The DSL will monitor follow up of the concern.
- Lead DSL will collate the reports which will be stored in a password protected folder on S drive.
- The reports are regularly reviewed by senior management and by the governance board, to ensure that we have taken appropriate action.
- SMT also meets to discuss trends and any themes that arise monthly.

11.8 Prevent referrals.

- All concerns relating to Prevent/terrorism/extremism/radicalisation risks must be reported to the DSL.
- Any immediate risks will be addressed as per the steps above.
- The concern will be brought to the DSL to determine whether the concern has met the threshold for referral and any other actions that need to be taken.
- Collect as much contextual information as possible to be shared with the police. The DSL or an equivalent might share this information on your behalf, or you can share it directly.
- A police gateway assessment will determine if the referral needs to be discussed at a multi-agency meeting. The assessment determines the level of susceptibility and risk around the referred person.
- A multi-agency meeting, called a Channel panel decides whether the person will be adopted as a case and how they will be supported. This is detailed in the action plan created at the meeting. In Scotland, the meeting is known as a Prevent Multi-Agency Panel (PMAP).
- You may be called upon to provide information to the panel and provide support to the person as agreed in the action plan.

12.0 Confidentiality

- 12.1. It is important to remember that any concerns are confidential, and information will be shared on a strict 'need to know basis' or in the case of adults at risk it may be 'in the public interest'. However, staff must not promise to keep concerns to themselves.
- 12.2 In the case of a vulnerable adult, he/she must be consulted about information being shared on his/her behalf. Where he/she has capacity, agreement must be sought, and refusal respected unless to not do so would present substantial risk. If other adults at risk are at risk the "public interest" principle may over-ride this decision.
- 12.3 Staff must be aware that anyone, in a private capacity, may report concerns of abuse or suspected abuse directly to the social services agency, regulatory bodies and/or the police. However, if a concern involves a learner or a member of staff, the internal procedure must be followed.
- 12.4 Records will be stored securely by SMT support in line with Kleek's retention policy and the Data Protection Act 2018. Whilst we will endeavour to employ the best principles as laid out in the Act there will be cases where the serious harm test is met and these restrictions for sharing information will not apply. Kleek will always aim to gain consent before sharing information unless to do so would cause significant harm. This must be recorded on the information sharing log:

13.0 Information Sharing:

13.1 Referrals to Children's Services "Front door" (Children or Young Persons)

13.2 It is the responsibility of the DSL to decide when to make a referral

13.3 Concerns discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.

13.4 In all but the most exceptional cases parents/carers will be made aware of the concerns felt for a learner or young person at the earliest possible stage and in the event of this becoming necessary, their consent to a referral will be sought. An exceptional case may be where the parent is alleged to be the abuser and there is significant risk of immediate harm.

14.0 Children and Young People already open to children's services

14.1 Many learners may already be "open" to children's services. Kleek Apprenticeships aims to ascertain this at initial engagement, regard and seek further information as appropriate to minimise any ongoing safeguarding risks.

14.1 If a learner is referred to children's services, their staff will check with existing records to see if the young person is already open to them and put us in touch with their local team.

14.2 New referrals to Children's and adult services must be made with the support and agreement of the DSL. Staff including DDSLs should not attend external meetings such as strategy and child in need/protection meetings without the permission of the DSL.

15.0 Concerns involving members of staff.

- 15.1. Any concerns that involve allegations against a member of staff and meet the harm threshold should be referred immediately to the DSL. In any case involving a learner, the DSL will contact the LADO (Local Authority Designated safeguarding Officer) to discuss and agree further action to be taken in respect of the child and the member of staff.

For an adult at risk it may also be appropriate to contact social services via the central duty team.

Where there are low level concerns about a member of staff this must be reported to a DSL, recorded and measures taken in conjunction with their line manager.

Examples of low-level concerns may be:

- Being over friendly with learners
 - Having favourites
 - Humiliating learners
- 15.2. All staff should note that failure to report a concern about the conduct of a member of staff that could place a child, young person or adult at risk could result in disciplinary action. When in doubt, consult the DSL.
- 15.3 If a member of staff leaves Kleek Apprenticeships before enquiries are complete then the concerns may meet the threshold to report under DBS – Duty to refer.

16.0 Code of Conduct

- 16.1. All Kleek Apprenticeship staff should take care not to place themselves in a vulnerable position including their own use of social media.
- 16.2 Staff should be made aware at induction and during disclosure that any information that puts them or others at risk will be passed on.
- 16.3 It is always advisable for interviews or work with any learner to be conducted in view of other adults.
- 16.4. Physical intervention is not advised and if there is an immediate risk then the police should be called.
- 16.5. Staff should never promise a child/young person/adult to keep certain information confidential. It must be explained that staff have certain duties to help keep that person safe, which may involve informing others.

17.0 Supervision and support

- 17.1 Any member of staff affected by issues arising from concerns can seek support from the Kleek Apprenticeships DSL.
- 17.2. The Designated Safeguarding Lead (DSL) will put staff and parents/carers in touch with outside agencies for professional support as appropriate.

18.0 Staff wellbeing and safeguarding concerns

- 18.1 Staff may also raise wellbeing and safeguarding concerns with DSLs for non-work-related matters.
- 18.2 DSLs will work with staff members to identify appropriate support and signposting and where necessary make formal referrals.

19.0 Risk management and planning for safeguarding.

- 19.1 Risk management MUST be undertaken for all activities engaging with learners, employers and partners ACROSS the provision including individual disclosures.
- 19.2 This will include key steps as follows:
- Identification of the activity
 - Risks associated with the activity.
 - People/ Partnerships/ Employers involved in the activity considering background and dynamics.
 - Control measures to be implemented.
 - Communication of control measures and ongoing review
- 19.3 Risk assessments must be recorded on the appropriate risk assessment form.
- 19.4 If there are any concerns then a DSL/DDSL or Manager needs to be notified to seek further advice.

20.0 Disclosure of criminal convictions by learners

- 20.1 All learners who are known to have a criminal conviction or under investigation will be required to complete to disclose and record on the VLE.
- 20.2 Disclosures will be risk assessed and suitability for joining the course decided by a DSL and appropriate manager.

21.0 Storage of reporting form and data

- 21.1 Only DSLs will keep hard copies of report forms and data relating to these, but this must be avoided where possible.

Individual Educators or academies must NOT keep HARD copies of any documentation.

- 22.2 All information relating to safeguarding must be stored and passed confidentially and securely in line with data protection and information governance.

23. Responsible Staff:

The designated Child Protection Manager who has overall responsibility for child protection at Kleek Apprenticeships Ltd is the Managing Director Tina Ockerby.

Designated Safeguarding Leads (DSL)

Tina Ockerby - 07968869213 - tina@kleek.ac.uk
Mandy McMullen - 07899950872 – mandy@kleek.ac.uk
Nicola Aviolet - 07703702146 – nicola@kleek.ac.uk

Safeguarding Officers:

Covers all areas – Male Safeguarding Officer - Mark Grainger 07525966978 – mark@kleek.ac.uk
Darlington Academy - Tegan Chapman 07895 304916 – tegan@kleek.ac.uk
Maidstone Academy - Nicola Aviolet 07703702146 – nicola@kleek.ac.uk
Camden Academy – Issy Isted – 07955 286698 – issy@kleek.ac.uk
Colchester Academy – Amy White – 07928 664265 – amy@kleek.ac.uk
Newcastle Academy Aimee Mcpherson – 07515 286689 aimee@kleek.ac.uk
Stockton Academy - Louise Ions – 07515 286691 – louise@kleek.ac.uk
Covers all Academies - Jude Speed – 07889 010806 – jude@kleek.ac.uk

24.0 Definitions for clarity:

A “**child**” for the sake of this policy is called “a learner” who has not yet reached their 18th birthday.

In the context of safeguarding (such as in education and child protection policies) an **adult at risk** is defined as:

An individual aged 18 or over who may be unable to protect themselves from harm, abuse, or exploitation due to personal circumstances.

This vulnerability can arise from a range of factors, including:

- **Physical or learning disabilities**
- **Mental health conditions**
- **Age-related frailty**
- **Chronic illness**
- **Substance misuse**
- **Situations of dependency** (e.g., relying on others for care or support)

Tina Ockerby

Head of Education

Signature:

