

## SAFEGUARDING POLICY

Accountancy Learning is fully committed to providing a working and learning environment that is free from abuse and harm for all its staff, freelance tutors and learners. We actively promote a culture of vigilance across the business by:

- Clearly identifying and communicating the roles and responsibilities within the organisation for safeguarding
- Having clear procedures in place
- Guiding all our staff in safeguarding procedures
- By allocating sufficient resources to safeguarding and applying 'zero' tolerance to any form of abuse and harm.

### Purpose

The safety and wellbeing of children and adults with safeguarding needs is a topic that is rarely out of the news. High cases of abuse of children and adults with safeguarding needs highlight the importance of vigilance by all professionals who work with children and adults with safeguarding needs. Newer forms of abuse such as internet grooming, the financial abuse and the extreme difficulties faced by young people post-Covid, mean our policies and procedures need to be continually reviewed to keep abreast of these developments.

Because of the importance of safeguarding we aim to inculcate this into our culture at all levels. We will always respond effectively to concerns act in the best interests of our apprentices, whether that relates to giving them the right advice for their training, career advice or welfare.

### Roles and Responsibilities of SMT

- Allocate required resources to provide adequate safeguarding measures
- Provide leadership in ensuring the safety of learners and staff, whether employed or freelance
- Approve this policy annually or when required following changes in legislation or a case of abuse
- Manage complaints against Designated Safeguarding Leads who are members of staff
- Receive and review concerns from members of staff
- Give advice and guidance on actions to be taken
- Report twice a year to the Governance Board

**Safeguarding Designated Persons are:** Rosauro Aala and Antonio Buendia Castro (01392 435 349)

The key role of the Designated Safeguarding Lead is to:

- manage referrals from staff or received externally;

- support staff in this process;
- review and update the safeguarding policy;
- update staff training;
- work with external agencies and professionals on matters of safety and safeguarding, including seeking updates on safeguarding and Prevent matters;
- undertake training; and
- raise awareness of safeguarding and child protection among staff and employers.

For safeguarding to be part of our culture, tutors and all staff (whether employed or freelance) must be part of our safeguarding procedures. Our system of personal tutors allocated to each learner allows staff to build a good working relationship with them and encourages a relationship of trust. Apprentices are more likely to disclose issues to their personal tutor than they are to an unknown Designated Safeguarding Lead. One of Accountancy Learning core values is “care” – we take an interest in our apprentices.

All staff need to be familiar with the signs that there is a safeguarding issue.

### **On recruitment and induction**

- Follow up any gaps in service
- Do not appoint without obtaining satisfactory references to verify no unexplained gaps in employment
- Follow safer recruitment practice
- Obtain Disclosure and Barring Service certificate and references for all staff
- Monitor completion of safeguarding training by Designated Safeguarding Lead
- Manage the application of safeguarding procedures in their curriculum/course area
- Keep safeguarding on the agenda, updated and any issues addressed

### **On an on-going basis**

- Seek additional DBS certificate if they have a break in work for at least three months, if they move to a new role with greater access to apprentices, or if there are any concerns about a person which may affect their suitability to work with apprentices.
- Read Keeping Children Safe In Education each year to refresh about the types of safeguarding issues and the signs of those issues.
- Discuss safeguarding issues at tutor meetings and other staff meetings as needed
- Undergo safeguarding training as needed

Staff have the following responsibilities to safeguarding:

- Understand their safeguarding responsibilities as defined in this policy

- Be aware of be able to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to them
- Follow the safeguarding referral procedure
- Maintain security of learner data and the confidentiality of learners in line with this policy
- Complete on-going training as described in this policy
- Act in the best interest of the learners
- Give highest priority to learner welfare
- Be alert to the risks which abusers, or potential abusers (including peers), may pose
- Be aware of the importance of the role of education in promoting the welfare of apprentices

### Who needs to be safeguarded?

The Children's Act defines a 'child' as a person under the age of 18.

Accountancy Learning is fully committed to safeguarding all apprentices and staff, including those who may be:

- Receiving a social care service
- Receiving a health service
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of his or her affairs
- People with disabilities or with physical or mental health conditions

Accountancy Learning adopts the definition used in the **Children's Act 2004** and the DfES guidance document: [Working Together to Safeguard Children](#)' (2023) and [Keeping children safe in education](#) which focuses on safeguarding and promoting children and young people's welfare and can be summarised as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully



The principles for staff in identifying and responding to incidents of concern in relation to adults are the same as those for children and young people. In most cases exactly the same process and guidance will need to be followed by the staff member.

We also recognise our safeguarding duties to adults.

Under the Care Act 2014 adult safeguarding duties apply to an adult who:

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

## **Safeguarding our learners**

In all activity, Accountancy Learning will, as well as responding to immediate concerns, ensure that appropriate measures and practice to safeguard and promote the welfare of our apprentices are in place and bring matters requiring attention to the relevant authorities.

All Accountancy Learning staff should have a good understanding of safeguarding concerns, including potential abuse and neglect of apprentices, which may come to light in the workplace or other locations where the apprentice may be, e.g. at clients' premises. At whatever level we identify risks we will highlight them and seek to ensure that appropriate steps are taken to safeguard the apprentices concerned.

We recognise our responsibility to the Prevent Duty and have a separate policy document for this.

We will ensure that all Accountancy Learning staff and those who undertake work on our behalf maintain a proper focus on safeguarding our apprentices and that this is reflected both in sound individual practice and our internal policies and guidance.

We recognise that online abuse (both sexual and bullying) occurs even if not reported and such abuse is unacceptable in any circumstances. We recognise that we have a responsibility to promote online safety and to ensure our learners know how to keep themselves safe online. This has increased in importance as more people work remotely.

Accountancy Learning staff may interact with learners in a virtual environment to provide tutorials and progress review amongst other things. Learners may be in their office or possibly working from home. Staff must record all such meetings so that they may be inspected to ensure the safety of all participants.

Accountancy Learning will ensure that it fulfils its responsibilities to work jointly with others via multi-agency bodies to safeguard and promote the welfare of our apprentices and staff and, where necessary, to help bring to justice the perpetrators of crimes against them.

We will share all relevant information with the respective statutory child protection agencies (social care services and/or police) without delay and within agreed protocols.

We shall assess for each apprentice the risk of a safeguarding vulnerability using these factors:

**Inherent risk** – we shall consider the risks inherent in the apprentice’s environment, including their background, history and national, regional and local issues e.g. the extent of county lines in a particular location. This may also include the extent of office work, home working and client premises work. Inherent risk considers the various forms of abuse included in Appendix 1.

**Control risk** – we shall consider the extent of controls in place at Accountancy Learning and at the place of work.

**Detection risk** – we shall consider the risk of not detecting abuse.

An initial assessment will be undertaken and recorded on the apprentice’s file. This assessment will be reviewed as the apprentice progresses through the apprenticeship, typically at review meetings. If the assessment suggests either a medium or high risk the Designated Safeguarding Lead will be informed so that either the apprentice is monitored, or action taken to safeguard the apprentice.

### **Procedures for responding to specific apprentice protection concerns**

Accountancy Learning staff may encounter child protection and vulnerable adult concerns. Such concerns could emerge from Accountancy Learning’s work, or through a concern or complaint raised with Accountancy Learning.

The concern might relate to what is or maybe happening or happened in the past to a child, young person or vulnerable adult either within Accountancy Learning or outside, either in the work environment or even at home or socially.

The concern may be brought to our attention by the child, young person or vulnerable adult themselves, alleged by others or through direct activity and observation by our staff.

The concerns may therefore be about the behaviour of a:

- Member of staff (for instance a tutor)
- Peer (for instance another young person)
- Child or young person or adult in the community (for instance a relative or family friend)

The concern could relate to **actions or inaction** - for instance an insufficient response to information regarding the risk of significant harm to our apprentices, whether they be a child, young person or vulnerable adult.

The concern may be about a current situation or past events and may be about allegations or disclosures of *inter alia* physical abuse, sexual abuse, emotional abuse, sexting or neglect, or a combination of one or more of these categories. Accountancy Learning staff may receive this information by one or more means such as a telephone call, a letter, an email, through observation, discussion or learner documents.

**Any member of Accountancy Learning staff could receive such information. In all circumstances they must respond in accordance with the following procedure.**

- **Immediate action to take if, as a member of Accountancy Learning staff, you observe abuse whilst it is taking place** Abuse is a violation of an individual's human and civil rights by other person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he is she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm, or exploitation of, the person subjected to it.

Abuse can take a number of forms, for instance seeing an adult or peer hit a young person, observing a member of staff using inappropriate restraint on a young person, using inappropriate language, or witnessing the neglect of basic care needs of a disabled learner.

First, if you can stop the abuse immediately without putting the child, young person or vulnerable adult or you at undue risk, do so. Inform the perpetrator of your concerns. Advise him/her to stop the action immediately. Ask them to move themselves to an area where there is no contact with the person at risk. Advise him/her that you will immediately be informing the senior manager on site or elsewhere within the organisation of what has happened.

Then:

- **If the perpetrator fails to desist** – take appropriate action to stop the abuse and call for assistance
- **If the perpetrator does desist**, and even if they leave the scene as requested, it is essential that you **stay with the vulnerable person** until you can transfer them to the care of another responsible adult. Then:
- Inform the Designated Safeguarding Lead for Accountancy Learning of the incident

**Take notes of what has been said, what you have actually heard or seen** – if it is not possible to take notes at the time, do so immediately afterwards. Keep the notes taken at the time, without amendment, omission or addition. Whatever subsequent events occur; the notes should then be updated and signed. The notes should cover what you saw, who said what, what action you took, and the details of date, time and location and name of abused person and perpetrator. Do not make assumptions and only record what you have witnessed. Use the actual words spoken rather than your interpretation of them.

## **Immediate action to take if you receive an allegation of possible significant harm to a child or young person**

If you are in direct contact with the person raising the concern, for instance through a telephone call, receipt of a complaint or as part of an interview

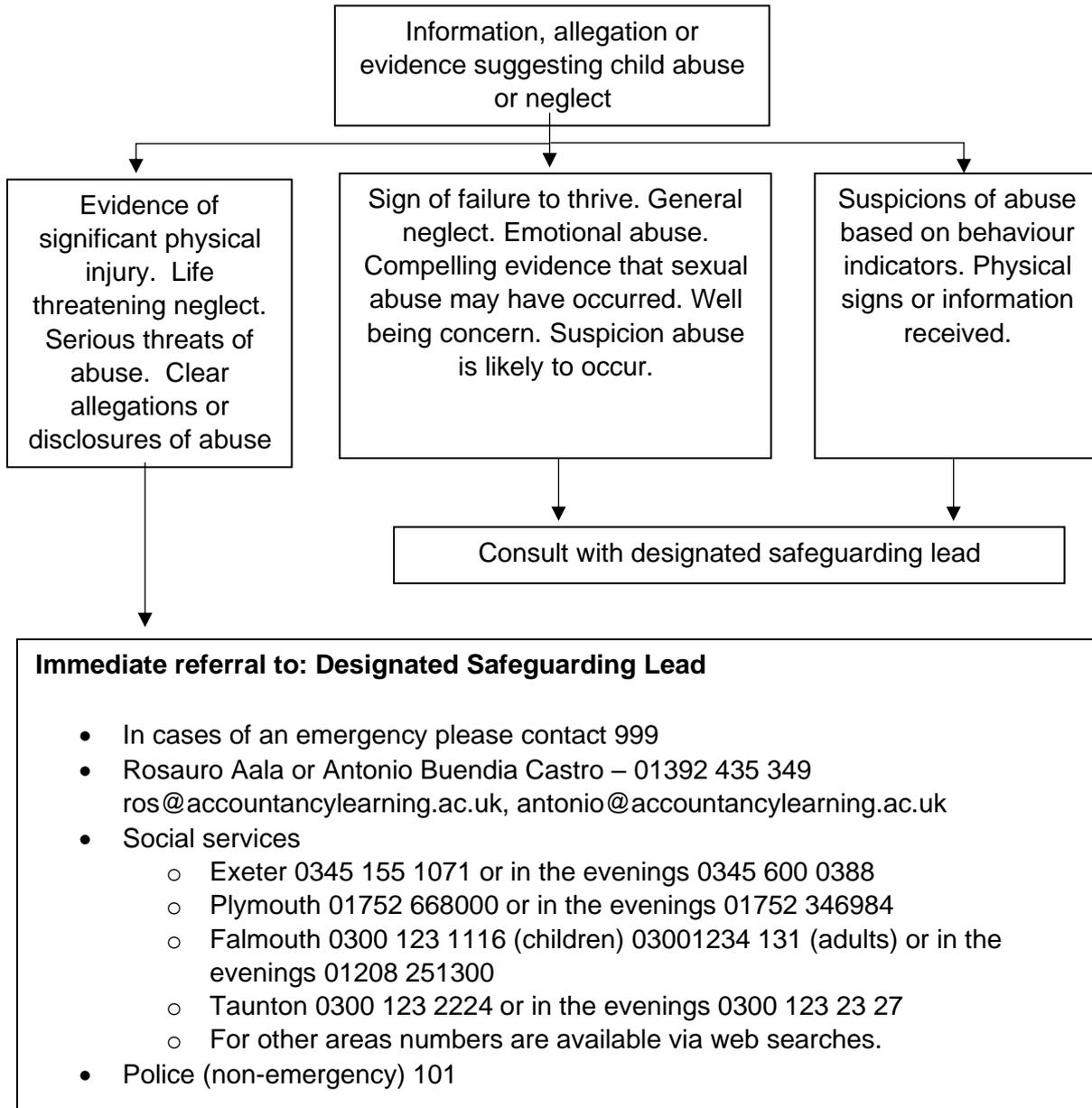
- **Stop other activity and focus on what you are being told, or have just seen.** Responding to suspicion of abuse takes immediate priority.
- **Do not promise confidentiality** or agree to 'keep it a secret'. Explain clearly to the person raising the concern about what you expect will happen next. You can assure them that you will only tell those you have to tell to try to get the matter dealt with. You can and should express support and reassurance to the person giving you the information, particularly if it is a child, young person or vulnerable adult, that the matter will be dealt with quickly and appropriately.
- **Avoid asking leading questions** - Leading questions and anything likely to suggest ideas or interpretations could jeopardise subsequent investigations or criminal proceedings.

**In all cases you should inform the Designated Safeguarding Lead of the circumstances and the action you have taken or will be taking next as soon as you practically can and within 48 hours at the latest.**

- Complete an incident report form available on the safeguarding area of the server. Written reports should be clear and unambiguous since any evidence, including written reports any notes or other information, are open to disclosure in any subsequent proceedings. Send to the Designated Safeguarding Lead who will store it in a folder of the server only accessible by the Designated Safeguarding Leads.
- If no further action is being taken the Designated Safeguarding Lead will advise you if this is the case.
- **The Designated Safeguarding Leads are the managers to whom all allegations or concerns that a member of staff may have abused a child should be reported. If the Designated Safeguarding Lead is not available, report to a director. If there is an allegation about a Designated Safeguarding Lead then a report should be made to the other Designated Safeguarding Lead.**

## Supervision of children or young people

Some apprenticeship activities may expose children to adults who have not received safeguarding checks, e.g. working in their office and at the premises of clients. In these cases apprentices must be reminded of the care to take and staff must ensure apprentices are **supervised** at all times.



The designated safeguarding lead will make a referral to the learner’s local authority (MASH/MARU) as appropriate or support the learner’s tutor to do so if more relevant. Referrals are made on a case by case basis depending on the individual circumstances.

## Appendix 1 – types of abuse

We note that types of abuse can apply to children, young people and vulnerable adults but all to varying extents.

### Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

### Signs and indicators

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

### Types of domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional.

See guidance about: [Recognising domestic abuse](#)

### Signs and indicators

- Low self-esteem
- Feeling that the abuse is their fault when it is not

- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

### **Types of sexual abuse**

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

### **Signs and indicators**

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude

- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

### **Types of psychological or emotional abuse**

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

### **Signs and indicators**

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

### **Types of financial or material abuse**

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home

- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

### **Signs and indicators**

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

### **Types of modern slavery**

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

GOV.UK has more information on [identifying and reporting modern slavery](#)

### **Signs and indicators**

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others

- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

### **Types of discriminatory abuse**

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as '[protected characteristics](#)' under the [Equality Act 2010](#))
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

### **Signs and indicators**

- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

### **Types of organisational or institutional abuse**

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately

- Interference with personal correspondence or communication
- Failure to respond to complaints

### **Signs and indicators**

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

### **Types of neglect and acts of omission**

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

### **Signs and indicators**

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

## **Types of self-neglect**

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Also see: [Self-neglect at a glance](#)

### **Signs and indicators**

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury