



Process Map

Not required.

Purpose

All organisations that work with or come into contact with young people/apprentices should have safeguarding policies and procedures to ensure that every young person/apprentices, regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, has a right to equal protection from harm.

Setting up and following good safeguarding policies and procedures means young people are safe from adults and other young people who might pose a risk. This includes private sector providers, as well as schools, hospitals and sports clubs.

Scope

The procedure will cover how to recognise forms of abuse , how to record the relevant information and what to do with that information. It will also look at how to deal with allegations against staff and the Government policies the procedure relate to.

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Procedure

1. Safeguarding Learners

a. Altrad takes their responsibility to safeguard learners very seriously, and the purpose of this document is to outline the procedure in responding to concerns regarding the safeguarding and protection of all learners.

b. Induction of Learners and Vulnerable Adults

All new learners will be issued with information to raise awareness in the following topics during their induction. These are shown in Appendix 1:-

- Types of abuse
• Prevent
• Possible outcomes of reported incidents
• Reporting mechanism for safeguarding

c. Definitions of abuse (Working Together 2018)

Abuse are forms of maltreatment - a person may abuse an apprentice by inflicting harm, or by failing to act to prevent harm. All the forms of abuse can be inflicted on apprentice by an adult, a fellow employee or apprentice.

Physical abuse is deliberately physically hurting an apprentice. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating.

Emotional abuse is the persistent emotional maltreatment of an apprentice. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects.

Sexual abuse is a sexual act without the consent of the apprentice. Sexual abuse can have a long-term impact on mental health and can include sexual harassment, sexual violence, sexting and harmful sexual behaviour.

d. Recognise the possible signs or indicators of abuse

Some of the following signs may be indicators of physical abuse:

- Frequent injuries;
- Unexplained or unusual fractures or broken bones; and
- Unexplained:
  - bruises or cuts;
  - burns or scalds;

Some of the following signs may be indicators of emotional abuse:

- Apprentice who are excessively withdrawn, fearful, or anxious about doing something wrong;

Some of the following signs may be indicators of sexual abuse:

- Apprentices who ask others to behave sexually or play sexual games; and
- Apprentices with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.
- Apprentices becoming withdrawn
- Apprentices feeling angry, upset, stressed, worried, scared and confused, and having:
  - flashbacks;
  - difficulty sleeping and night terrors;
  - anxiety;
  - difficulty concentrating;
  - blocking out the memory and/or avoiding remembering what happened;
  - being unable to remember exactly what happened;
  - difficulty in trusting people;
  - thinking that no one else understands them;
  - reliving the experience of sexual abuse.

Staff must be aware that when an apprentice discloses anything to them, they must make it clear to the learner/s involved that they cannot guarantee confidentiality due to legal safeguarding obligations. All staff should inform learners that they cannot guarantee to consult particular individuals (i.e. parents) first, or to keep learner's concerns confidential, as referral may be required by law to relevant safeguarding authorities.

A sheet giving advice for talking and listening to Learners and Vulnerable Adults and Record Keeping is shown in Appendix 2.

e. Prevent

This also comes under safeguarding and if changes in an apprentice's personality characteristics are noted then this could be a sign of extremism, radicalisation etc. and should be referred through the company procedures (Prevent Strategy Implementation Procedure AIMS-SOP-03-17)

2. Confidentiality and information sharing

a. If Altrad has concerns about the welfare or safety of an apprentice (e.g. concern about a physical injury) or concerns about the behaviour of an employee or volunteer (e.g. if they hurt an apprentice, breach the code of conduct or do something considered to be poor practice) it is vitally important to record all relevant details, regardless of whether or not the concerns are shared with either the police or children's social care. An accurate record should be kept of:

- date and time of incident/disclosure
- parties who were involved, including any witnesses to an event
- what was said or done and by whom
- any action taken by the organisation to investigate the matter
- any further action taken
- Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency
- any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such
- name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details
- The record should be signed.

b. Once Altrad has created a record about a child or adult it has a policy/procedure in place regarding the retention and storage of that information (Data Protection AIMS-SOP-12-19). The adult/apprentice whom it concerns are to be advised at the outset about the fact that Altrad hold such records and their purpose.

c. In order to determine how long records should be kept there are a number of guiding principles:

d. The Data Protection Act 2018 requires that personal information should be:

- adequate, relevant and not excessive for the purposes(s) for which they are held (third principle)
- accurate and where necessary kept up to date (sixth principle)
- not kept for longer than is necessary for its purpose(s) (fifth principle).

e. The implication of these principles is that Altrad Babcock have procedures to cover the review of personal/sensitive information held on files. Essentially it means that Altrad must assess how long they need to keep the information for, the purpose for which they are holding it and when it will be destroyed.

f. Making Referrals

Concerns about an apprentice's behaviour but with no disclosure about any abuse.

The signs of abuse might not always be obvious, and an apprentice might not tell anyone what is happening to them. Staff should therefore question behaviours if something seems unusual and try to speak to the apprentice, alone, if appropriate, to seek further information. Concerns about an apprentice's welfare can vary greatly in terms of their nature and seriousness, how they have been identified and over what duration they have arisen. If staff have concerns about an apprentice, you should ask for help.

In the event that a learner should confide in a member of staff any incident(s) of abuse or welfare issue(s), then it is the responsibility of that staff member to advise the learner that he/she is duty bound to report the information to a Designated Safeguarding Officer (DSO), within either the Training Department or relevant business unit.

The Company has three Appointed Designated Safeguarding Officers:

Christine McLackland (Selby):	01757 293312
Susan Parker (Tipton):	0121 530 5169
Phil Carruthers ( Site)	07795358422
Jon Davies (Tipton)	0121 530 5166
Matt Smallwood (DSL, Tipton)	07817086109
Dave Whitehouse (Tipton)	07508809295

The DSL will first determine whether the reported matter is indeed a safeguarding issue or some other issue.

The DSL may decide further investigation is needed and organise a meeting with any appropriate parties such as learners, parents, trade unions representatives, assessors or the complainant. Once a disclosure has been made and on completion of any additional investigation taking place, a further meeting will be held to identify the final outcome. The DSL will suitably record matters in either case whether it transpires as a safeguarding issue or not.

It is important that Altrad keep a clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved, and of any action taken and decisions reached. These are kept in a safeguarding confidential file. Such information will be retained on file, including for people who leave the organisation. The records relating to a safeguarding incident will be kept separate from the individual apprenticeship or employee files under lock and key. The referral will be acknowledged in writing by children's social care and this is kept in the safeguarding file. Records should be kept for 6 years after the last contact with the service user.

Note: In the event of a true safeguarding issue the DSL or their deputy is / are duty bound to make referrals to the Independent Safeguarding Authority or Local Authority Designated Officer (LADO).

### 3. Dealing with allegations against staff/volunteers

- a. If staff have concerns about another staff member who may pose a risk of harm to an apprentice, then:
  - This should be referred to the DSL or training management;
  - Where there are concerns/allegations about one of the training management, this should be referred to other members of the management team or DSO's; or to the designated officer(s) at the local authority.
  - Where there are concerns/allegations about a DSL, this should be referred to other members of the management team or other DSO's; or to the designated officer(s) at the local authority.  
(Keeping Children Safe in Education, section 38 [2021])

- b. Altrad have a duty of care to their employees and ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.
- It is essential that any allegation is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.  
(Keeping Children Safe in Education, Section 208 [2021])

- c. All options to avoid suspension should be considered

- If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that employee is entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour (S.193).
- Where it is clear that an investigation by the police or children’s social care services is unnecessary, the designated officer(s) should discuss the next steps with the case manager (S.194)  
(Keeping Children Safe in Education [2021])

- d. Further Policies to consider

**Education and Training (Welfare of Children) Act 2021** to impose duties on certain education and training providers in relation to safeguarding and promoting the welfare of children. The safeguarding duties are:

- (a) a duty to make arrangements to ensure that the proprietor’s functions relating to the conduct of the institution are exercised with a view to safeguarding and promoting the welfare of children receiving education or training at the institution, and  
(b) a duty to have regard to any guidance given from time to time by the Secretary of State in considering what arrangements are required.”

**Domestic Abuse Act 2021** is set to provide further protections, where the apprentice sees or hears, or experiences the effects of, the abuse and is related to the victim or the perpetrator;

- e. For adult’s safeguarding reporting to the local authorities (over 18 years of age):

In an emergency call the police on 999.

To report suspected abuse contact Sandwell Council’s Enquiry Team on 0121 569 2266 between 9am and 5.30pm Monday to Thursday, and 9am to 5pm on Fridays.

Email: [Sandwell\\_enquiry@sandwell.gov.uk](mailto:Sandwell_enquiry@sandwell.gov.uk) or write to Sandwell Council Enquiry Team PO Box 15825, Oldbury B69 9EL; or ring the Emergency Duty Team on 0121 569 2355 out of normal office hours. [sandwell\\_assist@sandwell.gov.uk](mailto:sandwell_assist@sandwell.gov.uk)

NSPCC Helpline: 0808 800 5000

- f. For children’s safeguarding reporting to the local authorities (under 18 years of age):

Multi Agency Safeguarding Hub (MASH) 0121 569 3100 (24hrs)

LADO - 0121 569 4770 (office hours)

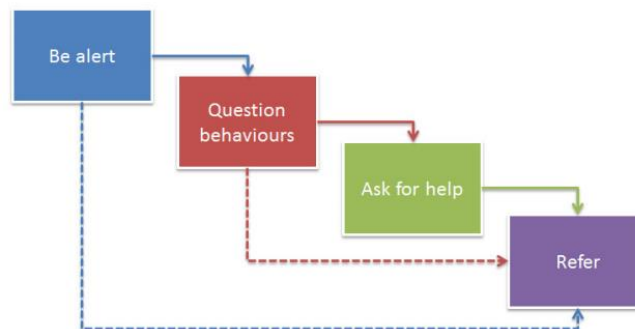
NSPCC Helpline: 0808 800 5000

If you're worried about a child, you can contact the helpline for advice and support.

The possible outcomes of reported concerns are:-

- No action - in the event of concerns not falling within the definition of safeguarding
- Referral to internal HR Department - in the event of some other matter of concern excluding safeguarding
- Inform Independent Safeguarding Authority - Only in the event of a true safeguarding concern

#### 4. What to do if staff are worried about a child's behaviour but they haven't actually disclosed any abuse



- The signs of abuse might not always be obvious, and an apprentice might not tell anyone what is happening to them. You should therefore question behaviours if something seems unusual and try to speak to the apprentice, alone, if appropriate, to seek further information. Concerns about an apprentice's welfare can vary greatly in terms of their nature and seriousness, how they have been identified and over what duration they have arisen. If you have concerns about an apprentice, you should ask for help.

#### 5. What to do where there is a serious and immediate threat to an apprentice.

- Sharing information is an intrinsic part of any frontline practitioners' job when working with apprentices. The decisions about how much information to share, with whom and when, can have a profound impact on individuals' lives. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet.
- Every practitioner must take responsibility for sharing the information they hold and cannot assume that someone else will pass on information, which may be critical to keeping a child safe.
- If there is a serious and immediate threat to an apprentice then the police or the LADO should be contacted immediately under Section 47 - Child at Risk of Significant/In Need of Protection, (the DSO should also be informed.). This places a statutory duty on the local authority: Where a local authority have reasonable cause to suspect that an apprentice who lives, or is found, in their area is suffering, or is likely to suffer, significant harm, the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.

#### 6. Significant Harm

- Harm means ill-treatment or the impairment of health or development, including, for example impairment suffered from seeing or hearing the ill- treatment of another

- b. Development means physical, intellectual, emotional, social or behavioural development
- c. Health means physical or mental health
- d. Ill treatment includes physical & sexual abuse and forms of ill treatment which are not physical

**7. What to do if an apprentice is in need of additional support services but they are not at risk of harm**

- a. If an apprentice is not in immediate risk, then staff need to report their concerns to the DSO, or manager, who would then inform the local authority under Section 17 - Child in Need under the Children Act (2004) where an apprentice is considered to be in need of additional support if:
  - He or she is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the Local Authority
  - His or her health or development is likely to be significantly impaired, or further impaired, without the provision of such services.

**8. Historical abuse**

- a. A disclosure of historical abuse should still be reported to the DSO, or manager, who would then inform the police and the local authority under Section 17 - Child in Need under the Children Act (2004) where an apprentice is considered to be in need if:
  - He or she is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the Local Authority
  - His or her health or development is likely to be significantly impaired, or further impaired, without the provision of such services.
- b. The Training Managers, are responsible for ensuring that government regulatory changes to safeguarding processes are cascaded to all members of staff responsible for training delivery of learners within the organisation as and when they occur or on a two yearly basis organise refresher workshops to refresh delivery and administrative staff of the company procedure and their responsibilities. All new delivery and administrative staff will be inducted in the Training Departments Safeguarding Policy.

**9. Recruitment, supervision and training for staff**

- a. Altrad Limited ensures that Disclosure and Barring Service check (DBS) are undertaken in line with HR policy that references are taken up and obtained and that qualifications are verified for all members of staff in day to day contact with learners and vulnerable adults.
- b. Newly appointed staff within the Training Department will have initial training in Safeguarding including Prevent, as part of their induction programme, and given a copy of the company Safeguarding and Prevent Policy.
- c. New staff will also attend the Level 1 Safeguarding and Promoting the Welfare of Children and Young People training programme (or current equivalent).
- d. Site based personnel responsible for managing apprentices on a site placement will attend online Safeguarding and Prevent training as part of the promotion of Safeguarding to the wider business



## 10. IT Monitoring

Altrad is committed to implementing and maintaining robust information security measures to protect student data and ensure safe digital environments. This includes developing clear information security policies, managing access rights to sensitive data, enforcing strong authentication and access control measures, and utilising encryption to safeguard the confidentiality and integrity of the data. Additionally, these controls involve regular monitoring and auditing of IT systems to detect and respond to potential security incidents, along with providing annual awareness and training to staff on safe IT practices. At Altrad, we strive to create a secure digital ecosystem that supports the educational objectives whilst prioritising the safety and privacy of its employees/students.

### ISO 27001

- **AIMS-SOP-12-01 - Information Security Policies (Clause 5.1.1):** This section ensures the establishment of an overarching set of policies to guide the organisation in managing its information security risks.
- **AIMS-SOP-12-15 - Asset Management (Clause 8):** This involves identifying information assets and defining appropriate protection responsibilities, which is key in protecting student data.
- **AIMS-SOP-12-08 - Access Control (Clause 9):** This is critical in safeguarding information. It includes managing access to various systems and ensuring that students and staff have appropriate access rights.
- **AIMS-SOP-12-03 - Cryptography (Clause 10):** Protecting sensitive information, especially when it concerns vulnerable individuals, through encryption.
- **AIMS-SOP-12-26 - Supplier Relationships (Clause 15):** Managing suppliers to ensure that they too protect any student or educational establishment information they access.
- **AIMS-SOP-12-16 - Information Security Incident Management (Clause 16):** Establishing mechanisms to report and manage breaches in security, which is very important in an educational environment.

### Part of Information Security Management System, but not Information Assurance owned policies:

- **AIMS-SOP-00-16 - Information Security Aspects of Business Continuity Management (Clause 17):** Making sure that in the event of an incident, the site can continue to operate and safeguard its students' information. (this sits in Quality, so not sure if we need to include it)
- **Human Resource Security (Clause 7):** This section emphasises the importance of ensuring that employees and contractors understand their responsibilities and are suitable for the roles they are considered for, which is very important in an educational setting. (*This is a HR policy, so am not sure if this is something that we need to include from our side*)
- **Physical and Environmental Security (Clause 11):** Ensures the protection of physical IT infrastructure and data from unauthorised access and damage. (*this is a facilities SOP - not sure if it needs including, although it is part of the ISMS*)

### Cyber Essentials (CE+)

- **Secure Configuration:** Ensures systems are configured securely to prevent unauthorised access.
- **User Access Control:** Managing user access to systems, particularly important for systems holding sensitive student information.
- **Malware Protection:** Implementing measures to protect against software threats.
- **Firewalls and Internet Gateways:** These provide a basic level of protection against external threats.
- **Patch Management:** Keeping software up to date to protect against known vulnerabilities.

## 11. Procedure Review

This procedure will be reviewed on an annual basis for procedural and Government legislation changes.

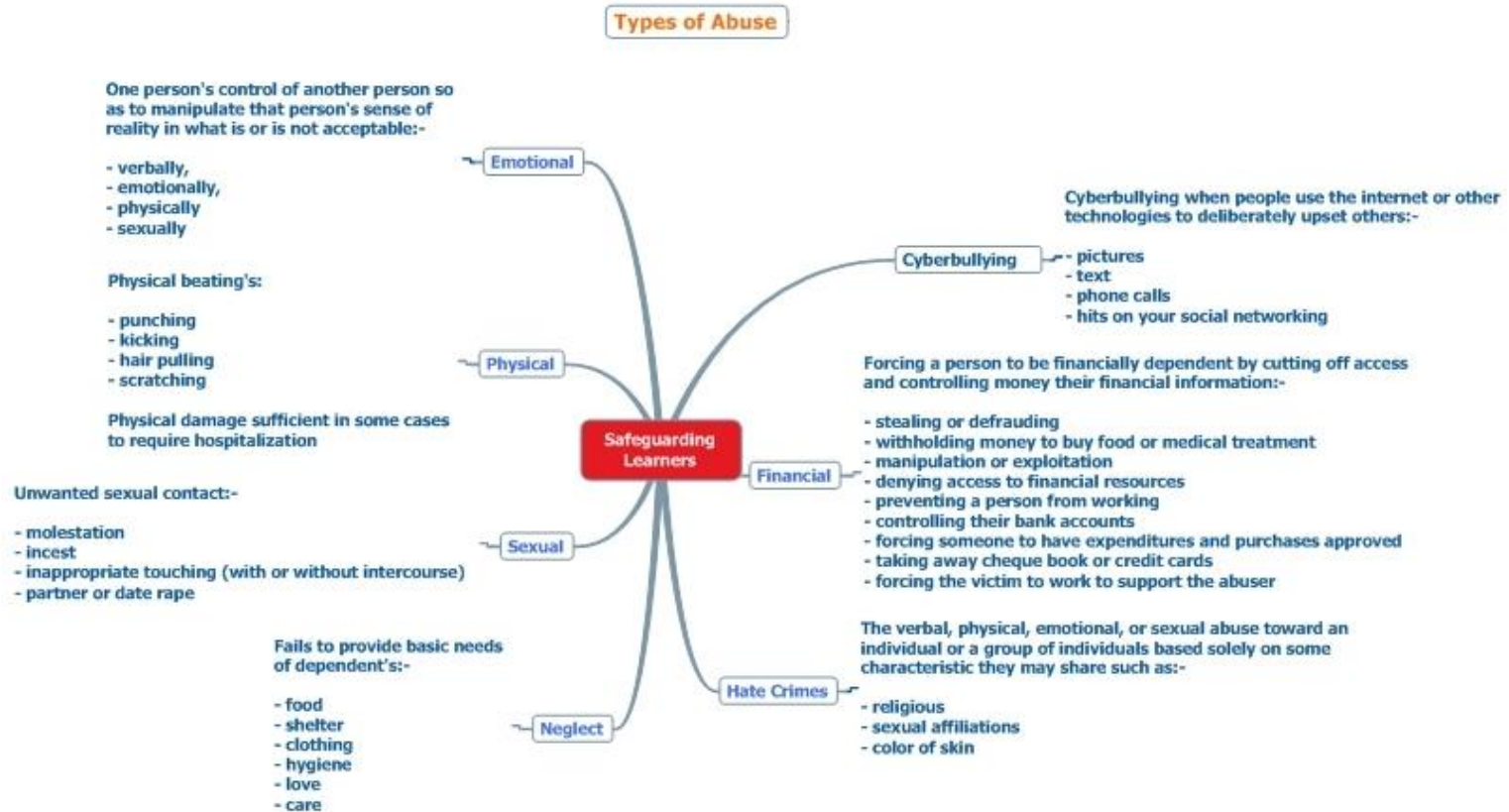




**Key Related Documents**

Reference Number	Document
AIMS-SOP-03-17	Prevent Strategy Implementation Procedure
AIMS-SOP-12-19	Data Protection

### Appendix 1: Types of Abuse



Contact Numbers:-  
 Victim Support:- Tel 0845 30 30 900  
 Rape Crisis:- Email info@rapecrisis.org.uk  
 NCPCC:- Tel: 0808 800 5000 or e-mail: help@nspcc.org.uk  
 Childline:- Tel 0800 1111

## Appendix 2: Talking to and Listening to Learners

If a learner chooses to disclose, you SHOULD:

- Be accessible and receptive;
- Listen carefully and uncritically at the learner's pace;
- Take what is said seriously;
- Reassure the learner that they are right to tell;
- Tell the learner that you must pass this information on;
- Make a careful record of what was said.

You should NEVER:

- Take photographs or examine an injury;
- Investigate or probe aiming to prove or disprove abuse- never ask leading questions;
- Make promises to learners about confidentiality or keeping 'secrets';
- Assume that someone else will take the necessary action;
- Jump to conclusions or react with shock, anger or horror;
- Speculate or accuse anybody;
- Confront another person (adult or learner) allegedly involved;
- Offer opinions about what is being said or about the persons allegedly involved;
- Forget to record what you have been told;
- Fail to pass the information on to the correct person;
- Ask a learner to sign a written copy of the disclosure.

For learners with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other learners.

### Record Keeping

Well kept records are essential in situations where it is suspected or believed that a learner may be at risk from harm. (See SG1 Form below)

Records should:

- State who was present, time, date and place
- Use the learner's words wherever possible
- Be factual/state exactly what was said
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation
- Be written in ink and signed by the recorder



**SAFEGUARDING INCIDENT REPORT  
FORM - SG1**

This form is to be used to record basic information in the light of an allegation, suspicion or disclosure of a potential safeguarding concern. **Completing this record should not stand in the way of contacting Police or Social Services in the event of an emergency or urgent safeguarding incident.**

Name of the person completing this form (YOU)
Date and time of completing this form:
Your position or relationship to who your safeguarding concern is about
Your telephone number:
Your Address:
Name/names of person/s the safeguarding concern or incident is about:
Address (if known) of person the safeguarding concern is about:
Telephone number (if known) of the person the safeguarding concern is about:
Name and Address of Parent, carer or guardian of alleged victim:
Telephone Number:
Age and Date of Birth of alleged victim (if known):
Date and time of any incident:
What have you seen or heard?
Has the alleged victim said anything to you? (do not lead or investigate - Just record actual details) - Continue on another sheet if required



Any other relevant information:	
Action taken so far:	
ACT NOW - SEE "REPORTING CONCERNS" TEMPLATE IF YOU ARE UNSURE WHAT TO DO	
DSO	Name and contact number:  Details of advice received:
External agencies contacted - See Essential Contacts	
Police - 999 yes/no	Name and contact number:  Details of advice received:
Social services yes/ no	If yes - which: Name and contact number:  Details of advice received:
Local Authority yes/no	If yes - which: Name and contact number:  Details of advice received:
Other (e.g. NSPCC, NGB, OFSTED?)	Which: Name and contact number:  Details of advice received:

Signature:

Do not discuss this incident with anyone other than those who need to know.