

## ABA Procurement Safeguarding and Prevent Policy

### Policy Statement

ABA Procurement is both legally obliged and committed to safeguarding and promoting the welfare of those who are under 18 years of age, or who are adults at risk, within our community. These obligations extend to all who participate in our services whether they are staff or students.

This policy sets out the legislations that establishes our statutory obligations, the measures, procedures, and governance structures we have in place to meet those requirements and the procedures underpinning our approach to safeguarding.

This policy aims to:

- protect and promote the welfare of the children, young people and vulnerable adults who engage with us
- communicate our approach to safeguarding in a clear and transparent way
- demonstrate compliance with relevant statutory guidelines
- ensure that safeguarding responsibilities are clear and that people understand how to report concerns they may have about a child, young person or vulnerable adult

This policy is also our response to Prevent, part of the Government's counter-terrorism strategy. We understand the need to safeguard our learners from harm and the risk from radicalisation of any type is no different. We recognise our responsibility to participate in such work and to safeguard the welfare of people by committing to practice in a way which prevents and protects people from being drawn into terrorism. ABA Procurement reserves the right to modify this policy from time to time at its discretion and in line with legislation.

### Scope

This policy applies to all employees, volunteers, workers, visitors and all other third parties who, through their involvement with ABA Procurement work with children, young people or vulnerable adults.

### Related Legislation

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2023)
- The Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act (SVGA) 2006
- SET procedures for Children and Young People
- SET guidelines for Safeguarding Adults
- Counter-Terrorism and Security Act 2015
- Prevent duty guidance: for further education institutions in England and Wales April 2021

**Related Policies, Procedures, and Templates**

- Recruitment Policy
- DBS Policy

**Responsibilities**


The Directors - responsible for the policies and procedures that govern the work at ABA.

All employees and volunteers - To follow policies and procedures, promote best practice and report any concerns as appropriate.

The **Designated Safeguarding Lead** is Director – Lu Hales-Greer  
Telephone: 01603 251754  
Email: Lu@aba-procurement.com

**Policy Review**

This policy will be reviewed on an annual basis with changes being communicated to all staff

Version / Date	Approved / Signature	Changes	Next Review
Version 5 – 10/23	 Lu Hales-Greer- Director	Updated legislation Updated responsibilities	November 2024

## 1. Principles

### 1.1 Safeguarding

- We all have a shared responsibility to identify children and young people who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. This is an inherent part of ABA Procurement's culture, as we adopt a "culture of vigilance" in relation to all of our stakeholders and the communities that we engage with.
- We aim to embed a culture of safeguarding across ABA Procurement by communicating practical guidelines to support the principles and aims of this policy, reinforced by eLearning training for all employees and volunteers to ensure that our approach is robust and reflects best practice standards. Everyone should aim to ensure the welfare of children, young people and vulnerable adults first and foremost, checking your approach with Designated Safeguarding Lead if you are unsure how to handle a safeguarding issue.

### 1.2 Prevent

- Preventing people from being drawn into terrorism, extremism and radicalised ideology has never been more important. As a provider of education and training programmes for people, particularly young people, from ethnically diverse, and socially and economically disadvantaged areas it is essential that ABA Procurement is involved in the Prevent Strategy. ABA understands that we have a legal responsibility to fulfil the prevent duty statement and take this responsibility very seriously.
- ABA Procurement will promote and reinforce values of openness and respect, tolerance, cohesion and equality of opportunity and treatment by:
  - creating space for free and open debate; and by listening, valuing and respecting the learner voice
  - breaking down barriers and supporting inter-faith and inter-cultural dialogue and understanding and by engaging all learners in playing a full and active role in wider engagement in society
  - making sure that ABA Procurement is free from bullying, harassment and discrimination
  - providing support for learners who may be at risk by providing appropriate sources of advice and guidance
  - making sure that staff and learners are aware of their roles and responsibilities in preventing violent extremism
  - promoting British values
  - Being vigilant in ensuring apprentices and employees are resilient to extreme narratives and identifying changes in behaviour
  - Promoting and embedding British Values into the organisation's procedures and

curriculum.

As part of our Prevent Strategy, ABA Procurement:

- Protect apprentices and employees from radicalising influences.
- Ensure apprentices and employees are resilient to extreme narratives
- Through student, apprentice, and staff training we will highlight knowledge and awareness of risks. We will also provide confidential support.
- For apprentices and students, Prevent discussions will form part of our Development Coach review sessions, giving students a space to raise concerns and questions.
- Discuss extremism openly with staff, students, and apprentices, ensuring all feel safe to voice views, and develop knowledge of what extremism is.

### ABA Procurement recognises:

- The welfare of any child, young person or vulnerable adult is paramount and to ensure that all feel safe
- We aim to create a culture of vigilance in relation to our safeguarding approach, while continually developing our knowledge and practice accordingly
- Everyone, regardless of their age, background, ability, culture, disability, gender, language, religious beliefs and sexual identity has the right to protection from abuse
- We will take all suspicions and allegations of abuse and/or poor practice seriously and will respond to them swiftly and appropriately
- Where there is a possibility of abuse or neglect by a person or persons, everyone has a responsibility to report their concerns to the appropriate person
- It is not the responsibility of anyone working/volunteering at ABA Procurement to decide whether or not abuse has taken place; it is their duty to act on any concerns by reporting them to the appropriate person
- We will support people who report their concerns about abuse in good faith and will investigate their concerns, referring to the appropriate people where necessary
- We will take all actions within our power to enable any child, young person or vulnerable adult to have the best outcomes
- We recognise that safeguarding is not just about protecting any child, young person or vulnerable adult from deliberate harm and neglect, but also about broader aspects of care and education such as well-being (including mental health), first aid, special educational needs and/or disabilities, educational visits and online safety.

## 2. Key Definitions

### 2.1 Safeguarding

- Keeping Children Safe in Education (DfE, 2023) describes abuse as:  
“Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children”

Keeping Children Safe in Education refers to four categories of abuse:

- Physical
- Emotional
- Sexual
- Neglect

Possible indicators of abuse or neglect:

**Neglect:** The persistent failure to meet a student or apprentice's basic physical and psychological needs, likely to result in the serious impairment of their health or development.

**Emotional Abuse:** The persistent emotional ill-treatment of a student or apprentice such as to cause severe and persistent adverse effects on their emotional development.

**Physical Abuse:** Actual or likely physical injury to a student or apprentice, or failure to prevent physical injury or suffering to a student or apprentice including deliberate poisoning, suffocation or inducing or fabricating illness (formally known as "Munchausen's syndrome by proxy").

**Sexual Abuse:** Involves forcing or enticing a student or apprentice to take part in sexual activities, whether or not the student or apprentice is aware of what is happening. Includes Child Sexual Exploitation.

**Financial Abuse** - financial abuse takes many forms, from denying someone access to funds, to making someone solely responsible for money while the other person is handling money irresponsibly. Money becomes a tool by which the abuser can further control the victim.

### **Contextual Safeguarding**

Safeguarding incidents and behaviours can be associated with factors outside of ABA. This is referred to as contextual safeguarding. Staff are alert to look out for wider factors that may be in a child's or adult at risk's life that could be a threat to their safety and / or welfare. To this end, we will consider relevant factors when gathering information of any risk to a child or adult at risk and share it with other agencies to support better understanding of the child or adult at risk.

## 2.1 Prevent

- Extremism is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of difference faiths and beliefs. The definition in HM Government Prevent Duty Guidance includes calls for the death of members of our armed forces, whether in this country or overseas.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
  - Some possible signs of radicalisation include:
  - increasingly extreme views about another section of society or government policy
  - downloading, viewing or sharing extremist propaganda from the internet
  - becoming withdrawn and/or increasingly intolerant of more moderate views

- changes in appearance or health (including mental health) and becoming isolated from family, friends, peers or social groups
  - expressions of a desire/intent to take part in or support extremist activity
- Terrorism is defined in the Terrorism Act 2000 (TACT 2000) as an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
  - British values are defined as democracy, the rule of law, individual liberty and mutual respect.

### 3. Process for Raising, Recording, and Investigating Concerns for Safeguarding and Prevent

- Process for members of ABA who are concerned about a child or at risk adult:
  - Remain calm and reassure the person that they have done the right thing by speaking up
  - Listen carefully and give the person time to speak
  - Explain that only the professionals who need to know will be informed, but never promise confidentiality
  - Act immediately, and do not try to address the issue yourself
  - Write a statement, giving as much detail as possible; date & time, what was said, how you acted, any names / parties mentioned
  - Report to your line manager who is then responsible for contacting the LSO. It is the duty of anyone working with children to report disclosure or harm
  - Remember that it is not for you to decide whether or not a suspicion or claim is true; all instances must be taken seriously
- Please see Flow Chart (appendix 1) for chart of what to do in the event of an allegation/suspicion of harm

### 3. Training and Support

- Training on Safeguarding and Prevent will be delivered for all staff, volunteers and self-employed contractors annually.
- Ongoing support will also be provided to make sure that staff are informed and confident to take appropriate preventative and responsive steps. Information, advice and guidance for staff will be available and regularly updated through briefings at staff meetings and training interventions.

### 4. Guest Speakers

- ABA Procurement believes that guest speakers can enrich our education programmes and other areas of our business by adding depth and breadth on a range of subjects.
- This can especially help to prepare our learners and all young people we engage with for life in modern Britain and to further extend their employability and vocational skills.
- In relation to this, it is ABA Procurement's policy that guest speakers should:

- follow the same signing in procedures as other visitors
- not be left alone with learners, children, young people or vulnerable adults unless they have a current DBS which we have had sight of and logged
- have their views countered and balanced by our employees, self-employed contractors or volunteers should they have any extreme views, whether political or religious.

## 5. Roles & Responsibilities

- All employees are required to familiarise themselves with this policy and procedure and follow this at all times
- If you have concerns about the welfare of a child, young person or vulnerable adult and believe that they may be at risk of, you must share that concern confidentially with a local safeguarding lead immediately
- Any information shared should always be accurate, up to date and shared appropriately and securely with only the person or people who need to know and limited to information relevant for the purpose. If you have any doubts about when to share safeguarding information, discuss the situation with a safeguarding lead

### 5.1 Senior Team

- the Senior Team are responsible for understanding the nature of the threat and the risks of extremism and radicalisation within ABA Procurement
- They will ensure that ABA Procurement effectively manage risks and is able to deal appropriately with issues of radicalisation and extremism by:
  - creating an ethos which upholds core values of shared responsibility and wellbeing for all, while promoting respect, equality and diversity and understanding
  - adopting stringent and transparent safeguarding/prevent duty practices which recognise, support and protect individuals who might be susceptible to radicalisation
  - sharing information about safeguarding/prevent duty and good practice with other key stakeholders and external agencies
  - providing training opportunities for staff and volunteers to enable them to continually update their safeguarding and prevent knowledge
  - sharing information and concerns with agencies who need to know and ensuring we involve learners, parents, staff and others in an appropriate way
  - providing effective management for staff and volunteers through supervision, support and training

### 5.2 Training and Learning Staff

- Teaching and learning staff will be involved in the delivery of a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, promote British values and enable them to challenge extremist views. This will include:
  - embedding equality, diversity and inclusion, wellbeing and community cohesion
  - promoting wider skill development such as social and emotional aspects of learning and the strengthening of critical thinking skills
  - recognising local needs, challenging extremist narratives, stereotypes and anti-social behaviour and by promoting universal rights
  - encouraging active citizenship and participation

- promoting values of openness and respect and facilitating opportunities to contribute, challenge and debate
- responding appropriately to events in local, national or international news that may impact on learners and communities
- making sure that learners are supported and listened to and are helped to access support internally and/ or through community partner.

## 6. Recruitment and DBS checks

ABA requests a DBS check in accordance with the Safeguarding Vulnerable Groups Act 2006 for job roles or courses that include regulated activity, and for other positions where it is appropriate and legal to do so. This forms part of the safer recruitment process and ensures that all staff and students engaged in with ABA are suitable to do so.

## 7. Escalation of Concerns

Information for anyone who wishes to:

- make an allegation against a member of the ABA community;
- make a safeguarding disclosure; and/or
- express a cause for concern about the welfare of a member of the ABA community is available in the Student and Staff Handbooks.

Where a safeguarding concern is raised, ABA initiates its procedures in accordance with an annually reviewed process.

Process for members of ABA who are concerned about a child or at risk adult:

- Remain calm and reassure the person that they have done the right thing by speaking up
- Listen carefully and give the person time to speak
- Explain that only the professionals who need to know will be informed, but never promise confidentiality
- Act immediately, and do not try to address the issue yourself
- Write a statement, giving as much detail as possible; date & time, what was said, how you acted, any names / parties mentioned
- Report to your manager who is then responsible for contacting the DSL. It is the duty of anyone working with children to report disclosure or harm
- Remember that it is not for you to decide whether or not a suspicion or claim is true; all instances must be taken seriously

See appendix 1 for full process for reporting and recording.

## 8. Confidentiality and Records

Where a member of the ABA community wishes to raise a concern, they may seek to do so in confidence, by contacting our designated safeguarding officer. While ABA seeks to promote an environment in which concerns can be raised confidentially, where it is believed that a person



poses a risk to themselves or others, it is the responsibility of the person receiving the information to escalate it to a safeguarding officer, and at the time the concern is being raised make it clear that they have a duty to report the concern and to whom, noting that this may include reporting the concern to external agencies if required.

The processing of sensitive data will be in accordance with the ABA GDPR policy.

## **9. IT, photography, and social media**

### **9.1 IT**

In accordance with GDPR, the ABA recognises that a child aged 13 or over can consent to the processing of their own data for an online service or activity which is provided by ABA. Consent must be provided by a parent or guardian for children under the age of 13.

The potential risks from internet use can be classified as:

Content: being exposed to illegal, inappropriate or harmful material;

Contact: being subjected to harmful online interaction with other users; and

Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

For this reason, ABA Procurement operates a highly secure web filtering system for any device using the wireless internet at our training centre. Students bring their own devices to the training sessions, this means that it safeguards internet use on every mobile phone, tablet and computer using the Wi-Fi network.

### **9.2 Photography**

In accordance with GDPR, photographs are personal data and should be treated accordingly. Where photographs are taken for the explicit purposes of publication, consent should be granted by those whose pictures will be taken. Where pictures are not directed at any one individual, consideration should be given to safeguarding and treated with the same care as that of any one person.

### **9.3 Social Media**

Considerations relating to safeguarding are as applicable to processing data for social media as they are to any other form of interaction between those who are in a position of trust, and those within their care, or who are deemed vulnerable.

Thought should be given to the duty of care when publishing photographs, comments and personal data on the web, including on all social media site

## **10. Employer's Duty**

Apprentice employers, who work with ABA, have a duty to comply with UK legislation and statutory responsibilities. Employers are expected to take responsibility for an apprentice's welfare in the workplace and seek appropriate advice when they feel an apprentice may be at risk in their personal lives.

Appendix 1

