Peak Accountancy Training
Safeguarding Policy

Maintaining this document is the responsibility of Clive Pauling

This document will next be reviewed on: May 2027

Copies of this document can be found:
Peak Accountancy Training SharePoint

Contents

Section	Page Number
Policy statement	3
Safeguarding, Equality, Diversity and Inclusion	8
Scope	9
Legislation and guidance	10
Organisational structure at Peak and Key Contacts	11
Promotion and commitment	13
Class attendance process	14
Mandatory reporting child sexual abuse	15
Reporting of abuse	18
Raising a safeguarding concern	20
Assessing a safeguarding concern	22
Internal documentation and reporting	24
Allegations against a member of staff	25
DBS Checks	26
IT monitoring	26
Safer recruitment practice	26
Confidentiality	28
Appendices	30
Version control	37

Policy Statement

Safeguarding is everyone's responsibility! Everyone has a role to play in relation to protecting and safeguarding children, apprentices, young people and vulnerable adults.

All Peak staff must be prepared to be open to the fact that the unthinkable could happen. It is not a matter that because nothing has happened in the past this will be true of the future. Safeguarding risks can affect anyone and at any time.

Peak recognise that all of our learners have a fundamental right to be protected from harm and exploitation and that apprentices/learners cannot learn effectively unless they feel and are safe.

This policy relates to all apprentices/learners and potential apprentices/learners embarking on or enrolled onto a programme with Peak.

The overall responsibility for safeguarding sits with the Owners and the Peak Advisory Board. Policy and culture are developed and embedded throughout Peak from Board level.

Peak's safeguarding team led by the Designated Safeguarding Lead are responsible for Peak's safeguarding culture and embedding safeguarding into every aspect of Peak's work. This involves policy formulation, processes, training and reporting. The Safeguarding Team, Advisors, Tutors, Business and Funding Operations staff together with our employers are in the best position to identify any concerns and to intervene in order to provide support and guidance to help prevent any risks from escalating.

This policy is made available to employers and apprentices from sign up and responsibilities are highlighted. The policy is reinforced to all employees through planned CPD, and safeguarding discussion is embedded within every apprentice review.

Safeguarding is defined by Keeping Children Safe in Education 2025 as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Peak recognise the new safeguard additions relating to early help, wider maltreatment, and the online threats to all our learners.

Safeguarding for adults is defined in The Care Act 2014, as:

- Protecting the rights of adults to live in safety, free from abuse and neglect
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- People and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

Categories of abuse:
The following categories of abuse can be used to help identify the range of potential safeguarding concerns that may impact on our apprentices / learners.

Children (under 18)

Physical abuse
Emotional abuse
Neglect
Sexual abuse

Adults (over 18)

Physical abuse
Emotional abuse
Neglect
Sexual abuse
Self-neglect
Domestic abuse
Financial abuse
Psychological abuse
Discriminatory abuse
Slavery
Organisational abuse

Peak recognise that additional safeguarding considerations should be given to vulnerable groups of apprentice/learners in every aspect of their training and working life. This includes but is not exclusive to:

- Vulnerabilities associated with age – apprentice/learners under 18 years of age
- Vulnerabilities associated with Special Educational Needs or Disabilities including those eligible for an Education, Health & Care (EHC) plan (up to 25 years)
- Vulnerabilities associated with being in care or being a care leaver
- Vulnerabilities for adults over 25

Peak recognise that any child/young person may require early help, but also recognise that colleagues should be alert to the potential need for early help where young people:

- Have a mental health need
- Are a young carer
- Are frequently missing/goes missing from care or from home
- Are at risk of modern slavery, trafficking, sexual or criminal exploitation
- Are at risk of being radicalised or exploited
- Have a family member in prison or is affected by parental offending
- Have challenging family circumstances such as drug or alcohol misuse, adult mental health, and domestic abuse
- Are misusing drugs or alcohol themselves
- Are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Are persistently absent from education, including persistent absences for part of the day

Peak recognise the importance of being aware of categories of harm for adults under the Care Act 2014, as listed above. Peak's Safeguarding policy relates to all apprentices and learners embarking on or enrolled onto a programme with Peak.

Safeguarding is not just about protecting children, young people, and vulnerable adults from deliberate harm. It also relates to the broader aspects of care and education for all Peak learners including:

- Apprentice/learner's health and safety and emotional well-being, and their mental and physical health or development
- Meeting the needs of apprentices/learner with special educational needs and/or disabilities
- Meeting the needs of apprentices/learners with medical conditions
- Providing first aid
- Intimate care
- Emotional wellbeing
- Educational visits and off-site education
- Online safety and associated issues
- Appropriate arrangements to ensure site security, considering the local context
- Keeping apprentices/learners safe from risks, harm, and exploitation
- Ensuring the best possible outcomes for all apprentices/learners

Safeguarding can involve a range of potential issues such as:

- Physical abuse, emotional abuse, neglect, and sexual abuse (PENS)
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying
- Domestic abuse
- Peer on peer abuse
- Racist, disability-based, homophobic, bi-phobic, or transphobic abuse
- Gender based violence/violence against women and girls
- Extremist behaviour and/or radicalisation

- Child sexual exploitation, human trafficking, modern slavery, and exploitation

The impact of new technologies (Artificial Intelligence [AI], algorithms etc.), including 'sexting', accessing pornography Use of Artificial Intelligence Policy June 2026.pdf

- Child on child sexual violence and sexual harassment
- Issues which may be specific to a local area, for example gang activity, knife crime, youth violence, Criminal Child Exploitation (CCE) and county lines
- Family circumstances which present challenges for the student, such as drug and alcohol misuse, adult mental health issues
- Risk from serious violence and violent crime
- Issues affecting apprentices/learners including domestic abuse and violence, Female Genital Mutilation (FGM)and 'honour'-based abuse and forced marriage
- 'Upskirting' and 'down blousing'- upskirting, is a criminal offence and reportable by all staff
- Financial abuse
- Organisational abuse
- Self-neglect
- Psychological abuse
- Risk of abuse/grooming/scamming in the 'online world'
- Learners absent from education

Peak recognise the link between abuse, neglect and exploitation as per KCSIE 2025.

Peak have a statutory responsibility to:

- At all times, seek to create a safe environment for the apprentices/learners in their training and at work. On sites, this includes using and evaluating the effectiveness of appropriate filters and monitoring systems to ensure maximum levels of online safety
- Ensure that any safeguarding concern is swiftly referred as appropriate, with non-emergency referrals to be communicated to partner agencies within one working day of disclosure
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse
- Operate the policy to specifically encompass children, young people, vulnerable adults, and adults who may be temporarily vulnerable
- Acknowledge that abuse may take many forms, for example, physical, sexual, financial, and material, emotional, neglect, sexual exploitation, human trafficking, female genital mutilation, forced marriage, hate crime, radicalisation, extremism, and risk to self and/or others.
- Comply with statutory safeguarding legislation including the Prevent Duty, which is covered in the separate PREVENT policy
- Work with external agencies, such as Local Safeguarding Partnerships and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken
- Ensure employers and other partners are aware of the safeguarding duties and receive timely information and support to promote these duties to apprentices/learners in the workplace
- Educate and support apprentices/learners in relation to staying safe and being healthy including healthy relationships

- Ensure that any child, young person or individual with additional needs going missing either from education, home, or care home, particularly if repeated, is reported to the appropriate authority
- Apprentices/learners who are regularly absent from training or work may be vulnerable and at potential risk. All Peak staff will follow procedures for dealing with apprentices/learners who are absent/ go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future
- Encourage an atmosphere in which apprentices/learners find all Peak staff approachable to enable communication of any problems which may be affecting their lives
- Provide opportunities for apprentices/learners in need of additional support to identify themselves through the process of applications, enrolment, and initial assessment, and for this to be ongoing throughout their training/learning
- Provide appropriate mandatory training and development as part of the CPD programme and induction, raising awareness of all staff and board members of the need to safeguard children, young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse
- Provide environments where everyone feels valued, safe and respected where individuals are encouraged to talk and are listened to. This will be achieved through the on-going promotion of fundamental British Values and enhancement activities.

Safeguarding and Equality, Diversity and Inclusion (EDI)

Peak place inclusivity at the heart of their practice. Keeping Children Safe 2025 identifies the significance of the Equality Act 2010 to school safeguarding, that schools and colleges:

- Must not unlawfully discriminate against learners because of their protected characteristics
- Must consider how they are supporting learners with protected characteristics
- Must take positive action, where proportionate, to deal with the disadvantages these learners face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment
- Foster good relations between those who hold various protected characteristics

Learners and staff should expect an inclusive and supportive learning/working environment whatever their background according to the Equality Act 2010.

There is an acknowledgment that those from different minority communities are more likely to be at risk of suffering from wider mental wellbeing, notably 'People of Colour' communities, LGBTQ+, women, deaf people, those with disabilities, young and older adults, and those with mental ill health diagnosis (Source: Centre for Mental Health, Mental Health inequalities factsheet, 2020).

Our approach will challenge our biases, assumptions and values when supporting staff and learners from an EDI perspective, promoting equality and equity in support for those with mental wellbeing issues. This will be the case for both learners and staff. Colleagues will be supported to work to the concept of 'cultural humility' when addressing the mental wellbeing needs of learners and support to colleagues.

Scope

This policy covers the safeguarding of Children and adults amongst Peak Apprentices, and all Peak Learners.

This Policy applies to all those working in, learning at, or visiting Peak, including apprentice/learners, staff, Owners and Advisory Board members.

- A 'child' is defined as a person under the age of 18.
- An 'adult' is defined as a person aged 18 and over.
- 'Care Leavers' and apprentices/learners with special educational needs up to age 25 may also need additional services, assistance, protection, and consideration.
- An adult at risk is a person aged 18 years or over who is, or may be in need of, community care services, by reason of mental or other disability, age, or illness; and who is or may be unable to take care of themselves or is unable to protect themselves against significant harm or exploitation. It may also include adults who are vulnerable for some other reason, for example those who have caring responsibilities, special educational needs, addiction, or who have suffered abuse or trauma.

This policy is published on Peak's website and on Peak's SharePoint. The policy is shared with all colleagues through induction training and mandatory yearly update training. Updates to policies are also communicated through email communications, team meetings. This policy is reviewed annually and in response to updates and changes to relevant legislation and guidance.

Legislation and Guidance

This policy has regard to the following pieces of legislation and guidance, to ensure practices meet legislative requirements and best practice. (Note this is not an exhaustive list).

- Children Act 1989
- Children Act 2004
- The Care Act 2014
- Working together to safeguard children 2023
- Keeping Children Safe in Education 2025
- Information sharing 2024
- Children and Social Work Act 2017
- Children Missing Education statutory guidance 2016.
- Education Act 2002 (Amended 2011)
- Safeguarding & Vulnerable Groups Act 2006
- Sexual Offences Act 2003 (Amended 2018)
- Counter Terrorism Act and PREVENT Duty 2015 (PREVENT 3 updated 2018)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2021)
- Guidance for Educational Providers on Youth Produced Sexual Imagery (2016, updated 2021)
- General Data Protection Regulations (GDPR) 2018
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents, and carers (2018)
- Mental Capacity Act 2005
- Mental Health Act 1983 (original)
- The Rehabilitation of Offenders Act 1974
- Domestic Abuse Act 2021 Relevant Policies:

The 'Keeping children safe in education 2025 publication is available online at: Keeping children safe in education 2025

Organisational structure at Peak Accountancy Training and key contacts

Owners: Caroline Pauling and Clive Pauling

Advisory Board members: Paul Boardman

Designated Safeguarding Lead – Caroline Furniss caroline.furniss@peakaccountancytraining.co.uk safeguarding@peakaccountancytraining.co.uk safeguarding mobile: 07943 965287

Deputy Safeguarding Lead – Caroline Pauling caroline@peakaccountancytraining.co.uk mobile: 07527 292064

Deputy Safeguarding Lead – Clive Pauling clive@peakaccountancytraining.co.uk mobile: 07837 712510

General Safeguarding Contact - safeguarding@peakaccountancytraining.co.uk

The Designated Safeguarding Lead reports directly to the Advisory Board in respect of safeguarding and safeguarding concerns at their quarterly meetings and works with Caroline and Clive Pauling (Owners) and the safeguarding team in respect of any ongoing safeguarding concerns.

The Designated Safeguarding Lead is the lead for all learner and staff safeguarding concerns. There are 2 deputy safeguarding leads who can deputise for Caroline Furniss in her absence.

Other Key Contacts and Useful Links

Cheshire West and Chester Safeguarding Children Partnership
https://www.cheshirewestscp.co.uk/
Integrated Access & Referral Team I-ART 0300 123 7047
Emergency Duty Team (out of hours) 01244 977 277
Cheshire Police 0845 458 0000

Cheshire East Safeguarding Children's Partnership
Cheshire East Safeguarding Children's Partnership (CESCP)

Liverpool Safeguarding Children Partnership
www.liverpoolscp.org.uk
Careline 0151 233 3700

Cheshire West and Chester Adult Safeguarding
Local Safeguarding Adults Board (LSAB) | Cheshire West and Chester Council
Community Access Team 0300 123 7034 (or out of hours: 01244 977277)

Cheshire East Adult Safeguarding
Cheshire East Safeguarding Adults Board - Stop Adult Abuse
Telephone: 0300 1235010 or out of hours Telephone: 0300 1235022

Liverpool Adult Safeguarding Board
Home - Liverpool Safeguarding Board (liverpoolsab.org)

For other areas this link can be used to find the relevant contact numbers by entering the learner's postcode: Report child abuse to a local council - GOV.UK (www.gov.uk)

Department for Education Counter Extremism Helpline: 0207 340 7264

Action Counters Terrorism Website
Report terrorist or extremist content online – Action Counters Terrorism

Prevent online Learning:
https://www.etflearners.org.uk/

Promotion and Commitment

Peak takes seriously its duty of pastoral care and will be proactive in seeking to prevent young persons and vulnerable adults becoming the victims of abuse or neglect. It will do this in a number of ways:

- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds

- By identifying a Designated Safeguarding Lead who will lead and have overall responsibility for safeguarding young people supported by Peak staff who will have all received training in this field and who will share advice and support.

- By informing young people of their rights to be free from harm and encouraging them to talk to Peak staff if they have any concerns

- Through the apprenticeship program and an on-going program of support, at an appropriate level, to promote self-esteem, social inclusion and address the issue of safeguarding children and young people in the wider context. Safeguarding discussions are included in each apprentice review. Safeguarding training is set at each first apprentice review and followed up by a quiz on the second review to confirm their understanding.

- By including discussion of safeguarding in all team meetings

- By including discussion of safeguarding in all monthly catchup discussions between the work-based advisors and the funding manager

- Periodically the DSL produces and distributes to all apprentices a safeguarding newsletter on safeguarding issues relevant to Peak apprentices. The intention is to inform, educate and stimulate debate. Promoting discussion and debate helps to safeguard or apprentices and learners.

Class attendance process

For classes held in Chester and Liverpool any non-arrival of students without prior notice of lateness or absence should be reported to Peak's business operations team:

- Tutor will put a notification of absence in the student attendance chat within Teams.
- Business Operations will monitor the student attendance chat and ring the student
- If the student is unavailable the advisor will attempt to contact the student or if no response the employer will be contacted.
- If the employer is also unavailable the advisor will contact the student's emergency contact if the student is under the age of 18.
- If the advisor is unavailable through holiday or sickness or the student is not an apprentice then business operations will contact the employer and if no response the students emergency contact if the student is under the age of 18.

If the student subsequently arrives the tutor will inform business operations via the student attendance chat..

For classes held live online a member of business operations will:

- Log into the class 15 mins before the class start-time.
- Any student not logged on will receive a phone call from business operations.
- If the student does not respond, business operations will log a message in the student attendance chat on Teams.
- The advisor will then contact the student.
- If the student is unavailable the advisor will contact the employer.
- If the employer is also unavailable the advisor will contact the students emergency contact if the student is under the age of 18.
- If the advisor is unavailable through holiday or sickness or the student is not an apprentice then business operations will contact the employer and if no response the students emergency contact if the student is under the age of 18.

Mandatory Reporting Child Sexual Abuse

Under the new crime and policing bill there is a mandatory requirement for individuals to report child sexual abuse. The requirement covers all persons aged 18 or over working in a regulated activity. Regulated activity includes the work of Peak as it includes working or volunteering with children including teaching and training. Whilst the bill relates to mandatory reporting for England only Peak staff should follow general guidance for the reporting of abuse below.

Child Sexual Abuse must be reported if:

- Child Sexual Abuse is witnessed
- A disclosure of child sexual abuse is received from a child
- A disclosure of child sexual abuse is received from an adult
- There is a discovery of child sexual abuse material

Child Sexual Abuse covers sexual offences stated in the Sexual Offences Act 2003 Sexual Offences Act 2003

Mandatory reporting is not required if:

- Each person involved in the suspected offence was a child aged 13 and over, **and**
- Gave consent, **and**
- Has freedom and capacity to give consent, **and**
- The reporter is satisfied that reporting is not appropriate

Definitions of sexual consent:

- Freely given
- Reversable
- Informed
- Enthusiastic
- Specific

Who to report to:

- Local Safeguarding Children's Board
- Police

How to report:

Any suspicion, allegation or incident of abuse must be reported to a Peak designated person with responsibility for safeguarding as soon as possible and in any event within two hours.

If after careful assessment the designated person considers that there is reasonable cause to suspect abuse they must, as a matter of urgency, discuss the matter with the Social Services, the Duty Social

Worker or the Police Service Child Protection Unit to determine whether it is a child protection matter. In making the assessment the designated person should refer to the guidance.

In the case of a safeguarding issue with a child the designated person shall discuss with the Social Services department what action should be taken to inform the parents of the student or child, unless to do so would put the young person or child at risk. A note of that conversation should be made.

Where in exceptional circumstances a member of staff deems there to be an immediate risk to a young person and it is not possible to contact a Peak designated person or one of the owners within the same day, they shall report the matter – normally by telephone directly to the local Social Services Department, Duty Social Worker or Police Service Child Protection Unit. The staff member shall notify Peak Accountancy Training designated person as soon as possible and normally within one working day of the action taken and submit a written report of that action and the circumstances leading to it.

A detailed reporting procedure is described below and should be followed by the member of staff:

If a safeguarding issue, allegation or suspicion of abuse is discovered or disclosed by a student, then they should inform a member of staff as soon as possible. The member of staff will then follow the process detailed below.

A member of staff discovering a safeguarding issue, allegation or suspicion of abuse will, similarly, follow the process detailed below.

The following procedure should be followed:

- If a child or young person has approached you, make sure they know they have done the right thing.

- If a student/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the student to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to: The scale of the abuse, the risk of harm to others, the capacity of the student to understand the issues of abuse and consent.

- Listen carefully to their story and respect their rights.

- Notify the child or young person that only the people who need to know will be informed.

- Don’t try to solve the situation yourself or confront anyone.

- Remember to take all claims seriously.

- Complete a Peak Disclosure Reporting Form. Write up their narrative, giving as much detail as possible. Remember to include date and time, what was said and any names and locations.

- Don’t disclose any information to non-relevant parties.

- The member of staff should email the report to the Designated Safeguarding Lead using the email

safeguarding@peakaccountancytraining.co.uk. The safeguarding lead will discuss the matter with the member of staff and carry out a risk assessment to decide on the most appropriate course of action. This would include contacting the local children's safeguarding partnership, adult safeguarding board, or the police. The written record will be stored safely within the Peak SharePoint.

- If the DSL is unavailable contact the deputy DSL.

- If neither are available and you believe the situation to warrant further action, contact a child protection agency, adult safeguarding board, or the police.

If there is any doubt about whether or not to report an issue to Social Services, then it should be reported.

In emergency situations (e.g., where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted. Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

Reporting of Abuse

Any suspicion, allegation or incident of abuse must be reported to a Peak designated person with responsibility for safeguarding as soon as possible and in any event within two hours. If after careful assessment the designated person considers that there is reasonable cause to suspect abuse they must, as a matter of urgency, discuss the matter with the Social Services, the Duty Social Worker or the Police Service Child Protection Unit to determine whether it is a child protection matter. In making the assessment the designated person should refer to the guidance.

In the case of a safeguarding issue with a child the designated person shall discuss with the Social Services department what action should be taken to inform the parents of the student or child, unless to do so would put the young person or child at risk. A note of that conversation should be made.

Where in exceptional circumstances a member of staff deems there to be an immediate risk to a young person and it is not possible to contact a Peak designated person or one of the owners within the same day, they shall report the matter – normally by telephone directly to the local Social Services Department, Duty Social Worker or Police Service Child Protection Unit. The staff member shall notify Peak Accountancy Training designated person as soon as possible and normally within one working day of the action taken and submit a written report of that action and the circumstances leading to it.

A detailed reporting procedure is described below and should be followed by the member of staff:

If a safeguarding issue, allegation or suspicion of abuse is discovered or disclosed by a student, then they should inform a member of staff as soon as possible. The member of staff will then follow the process detailed below.

A member of staff discovering a safeguarding issue, allegation or suspicion of abuse will, similarly, follow the process detailed below.

The following procedure should be followed:

- If a child or young person has approached you, make sure they know they have done the right thing.

- If a student/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the student to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to: The scale of the abuse, the risk of harm to others, the capacity of the student to understand the issues of abuse and consent.

- Listen carefully to their story and respect their rights.

- Notify the child or young person that only the people who need to know will be informed.

- Don’t try to solve the situation yourself or confront anyone.

- Remember to take all claims seriously.

- Complete a Peak Disclosure Reporting Form. Write up their narrative, giving as much detail as possible. Remember to include date and time, what was said and any names and locations.

- Don't disclose any information to non-relevant parties.

- The member of staff should email the report to the Designated Safeguarding Lead using the email safeguarding@peakaccountancytraining.co.uk. The safeguarding lead will discuss the matter with the member of staff and carry out a risk assessment to decide on the most appropriate course of action. This would include contacting the local children's safeguarding partnership, adult safeguarding board, or the police. The written record will be stored safely within the Peak SharePoint.

- If the DSL is unavailable contact the deputy DSL.

- If neither are available and you believe the situation to warrant further action, contact a child protection agency, adult safeguarding board, or the police.

If there is any doubt about whether or not to report an issue to Social Services, then it should be reported.

In emergency situations (e.g., where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted. Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

Raising a Safeguarding Concern

In the event of any safeguarding concern that may have arisen as a result of: (not exhaustive)

- Direct disclosure from a learner
- Indirect disclosure from a 3rd party (employer, colleague, another learner)
- Concerns arising from patterns of behaviour
- Concerns arising from appearance
- Concerns arising from attendance
- Concerns arising from performance
- Concerns arising from communications
- Concerns arising from health

Concern should be raised with the Designated Safeguarding Lead or in their absence a member of the Peak Safeguarding team as soon as possible.

Any concern should be documented using the Peak Disclosure Reporting form, completion of this should not hinder the timely reporting of the concern to the Safeguarding team but should be completed as soon after reporting the concern as possible.

When faced with a suspected safeguarding issue staff should adopt an approach of 'professional curiosity' this means:

Professional:

- Follow procedure
- Be aware of boundaries
- Share information on a need-to-know basis
- Be aware of personal bias and competency and adopt an approach of 'Cultural competence'
- Be respectful

Curiosity:

- Active listening and looking
- Do not jump to assumptions
- Be respectively nosey
- Ask open questions such as, who, what, why?
- Remember it is not our role to investigate our role is to fact find.

Staff are encouraged to adopt the 'TED' approach

- **T**ell me what happened
- **E**xplain what you mean by that
- **D**escribe the concern

The following procedure should be followed:

- If a child or young person has approached you, make sure they know they have done the right thing.

- If a student/staff member has been told about the safeguarding issue in confidence, they should attempt to gain the consent of the student to make a referral to another agency / party. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to: The scale of the abuse, the risk of harm to others, the capacity of the student to understand the issues of abuse and consent.

- Listen carefully to their story and respect their rights.

- Notify the child or young person that only the people who need to know will be informed.

- Don't try to solve the situation yourself or confront anyone.

- Remember to take all claims seriously.

- Complete a Peak Disclosure Reporting Form. Write up their narrative, giving as much detail as possible. Remember to include date and time, what was said and any names and locations.

- Don't disclose any information to non-relevant parties.

- The member of staff should email the report to the Designated Safeguarding Lead using the email safeguarding@peakaccountancytraining.co.uk. The safeguarding lead will discuss the matter with the member of staff and carry out a risk assessment to decide on the most appropriate course of action. This would include contacting the local children's safeguarding partnership, adult safeguarding board, or the police. The written record will be stored safely within the Peak SharePoint.

- If the DSL is unavailable contact the deputy DSL.

- If neither are available and you believe the situation to warrant immediate action as there is a serious risk to the learner, contact a child protection agency, adult safeguarding board, or the police.

If there is any doubt about whether or not to report an issue to Social Services, then it should be reported.

In emergency situations (e.g., where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted. Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

Assessing a Safeguarding Concern (DSL)

The DSL should make an assessment of the safeguarding concern based on the completed disclosure form and conversations with the reporter of the concern. The assessment will form the basis of any action to be taken.

Where the concern is more complex, then, the Peak safeguarding policy is aligned with the Cheshire East Safeguarding Children's Partnership. The CESCP has a multi-agency threshold of need guidance document including triage tool to provide a framework for professionals who are working with children, young people and families, and aims to help identify circumstances when children may need additional support to achieve their potential.

The stepped approach provides information on the levels of children's needs and gives examples of some of the factors that may indicate when a child or young person needs additional support or protection.

There are four different levels of need:

- Universal services
- Extra help
- Targeted help
- Statutory / Specialist help

This multi-agency threshold framework is a guidance tool that all agencies, professionals and volunteers can use to consider how best to meet the needs of individual children and young people. This support can be provided on a single agency basis or a multi-agency basis. The stepped approach aims to reduce risk and vulnerability and meet needs at the appropriate level of support and/or intervention. Access to effective early intervention and prevention services is essential to achieving this. It is only a guide and should be used in conjunction with other assessment tools and in consultation with children, families and other professionals.

The Cheshire East Safeguarding Children's Partnership threshold document and triage tool can be found here: multi-agency threshold framework Please note that any child or young person assessed as requiring upper tier targeted help will require the involvement of children's social care under the Children's Act 1989.

Note parental consent is required at levels 1, 2 and 3 all referrals should be discussed with parents / carers unless in so doing the learner is put at risk of harm. If unsure contact Cheshire East consultation service 0300 1235012 or out of hours on 0300 1235022. If the apprentice falls under a different region use the search tool in the key contacts section to identify the relevant contact numbers and threshold documents if needed.

In the case of adults, no threshold document or criteria exist. An adult safeguarding risk would include adults:

- Who have care or support needs
- Are subjected to or at risk of abuse and / or neglect
- Are unable to protect themselves from abuse or neglect

Referral of an adult at risk should be to the residing adult safeguarding board.

The DSL is not expected to make decisions on safeguarding action alone and should refer matters to the owners.

Internal documentation and monitoring

Any learner under the age of 18 should be placed on the Peak risk register as a precautionary measure even if there is no safeguarding concern. The learner to be regularly monitored.

Any safeguarding concern raised about a Peak learner regardless of age where it is identified that there is a genuine ongoing concern should be entered onto the Peak risk register and regularly monitored.

A separate folder should be opened for any learning with a safeguarding concern and documentation / evidence should be saved in chronological order.

The DSL is responsible for reporting on safeguarding to the board at its regular quarterly meetings.

The Peak disclosure reporting document can be found within SharePoint. Peak disclosure recording form V3 04032026.docx

Data retention:

Where a safeguarding disclosure has been made information should be kept for a minimum of;

- In the case of a disclosure made in respect of a learner under the age of 18 kept until the apprentice's 25th birthday
- In the case of a disclosure made in respect of an adult learner, kept until a period 6 years after the end of the last programme contact.

Allegations against a member of staff

Record in full, as soon as possible, the nature of the allegation and any other relevant information.

Report the allegation/incident to the Designated Safeguarding Lead or in their absence the deputy designated safeguarding lead as soon as possible and within two hours.

Ensure the safety of the young person in question and any others who may be at risk.

Report the matter to social services and follow guidance from the Cheshire East Children's Safeguarding Board or Cheshire East Adult Safeguarding Board. Consideration will be given by the owners as to whether the member of staff should be suspended on full pay pending the investigation.

The Owners of Peak will be responsible for any decisions on suspension. Any suspension will follow Peak procedures. The length of any suspension will be in line with Peak policies and will be as short as is possible while ensuring the safety of the child or adult. Suspension should not necessarily be an automatic response to an allegation, and all allegations should be dealt with quickly, fairly and consistently.

DBS checks

Currently all existing, newly recruited staff and volunteers who have contact with students are subject to an Enhanced DBS check with the services being provided by SVS screening. On receipt of their first check, all staff are asked to enrol into the annual refresh which auto renews the enhanced DBS check each year.

IT Monitoring

IT equipment provided to both staff and learners is subject to monitoring through the use of NextDNS. In addition to monitoring, filters are applied to Peak Accountancy Training systems which will restrict access to harmful content. A log will be kept and reviewed to enable patterns of inappropriate access to be identified and challenged. Attempted access to blocked content is reviewed weekly and reports are kept and filed on Peak SharePoint. The reports are overseen by the Owners.

Safer recruitment practice

Peak follow safer recruitment practice which includes that:

- No position is formally offered until 2 adequate references are received.
- No position is formally offered until a successful enhanced DBS check has been carried out. This is regardless of an existing in date enhanced DBS check
- All gaps in CV's are followed up
- Nationality and right to work in the UK are checked prior to offering any position

Checking a person's right to work:

If a British or Irish citizen, proof of right to work can be:

- a British passport, or
- an Irish passport or passport card

The British or Irish passport or passport card can be current or expired.

If the applicant does not have a passport or passport card, proof or their right to work can be:

- a UK birth or adoption certificate
- an Irish birth or adoption certificate
- a certificate of registration or naturalisation as a British citizen

In this instance the applicant must also provide an official letter or document from a previous employer or a government agency.

For example, a letter from HM Revenue and Customs (HMRC), the Department for Work and Pensions (DWP) or the Social Security Agency in Northern Ireland.

The letter must show name and National Insurance number.

If the applicant is not a British or Irish citizen

Right to work can be proved by:

- a share code – this can be obtained online get a share code online or,
- eligible immigration documents

The applicant can choose which option to use.

For applicants with a right of abode in the UK, People with the right of abode are:

- British citizens
- some Commonwealth citizens

A certificate of entitlement can be used to prove right to work, if there is one. This can be:

- a vignette sticker in the passport
- a digital certificate in the UKVI account – the applicant will need to get a share code online

In the event that the applicant cannot prove their right to work, then, If they are not a British or Irish citizen, checks can be made through the employer checking service.

Confidentiality

Peak has due regard to GDPR and Information sharing:

In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners:

- When information must be shared with Police and the Multi-Agency Safeguarding Hub (MASH) where a child or young person is / may be at risk of significant harm.
- When the child or young person's and/or parent's confidentiality must not be breached
- That information is shared on a need-to-know basis.

Colleagues are reminded to work within the principles of information sharing. That information is:

- Necessary
- Relevant
- Proportionate
- Adequate
- Accurate
- Timely
- Secure

Once a disclosure and referral have been made, information is assessed for indications that the person is at risk of harm from others or to themselves. Information will be shared with the DSL (or Safeguarding Team) and/or other agencies/professionals who are able to take protective action.

All information regarding child protection issues will be kept in secure electronic files in the Safeguarding library within SharePoint which has restricted access to the safeguarding team and owners.

Peak are obliged to work and share information with external agencies charged with the protection of children, young people and adults. This includes Social Services, the police, local schools, LADO, the Multi Agency Safeguarding Hub (MASH), based on the 'need to know' principle.

Peak works with the area Prevent team and through them refers to the Channel process when necessary. Prevent Policy V10 Jan 26 revised.pdf

Note: ‘confidentiality’ is often misunderstood. An over emphasis on confidentiality can leave young people or vulnerable adults in danger of harm. If something is confidential, this does not mean that it cannot be shared. GDPR should be no barrier to information sharing about a person in need, as long as appropriate protocol is followed. However, it is important to:

- Share only what it is necessary to share to protect a child, young person or a vulnerable adult.
- Record what is shared, and with whom.
- Record reasons for sharing

The DSL will work in conjunction with the owners to minimise risks to data confidentiality, and safe usage. Peak will work with apprentices/learners to encourage them to give consent to sharing information with parents / carers where possible. Peak staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy.

Appendices

Digital Safeguarding

All Peak staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic* messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Being online is an integral part of apprentice/learner's daily lives and the benefits of accessing the virtual world are vast. Peak understand the need to ensure safety online so apprentices/learners can benefit fully from the use of technology, enhancing learning and their educational experiences. We expect the same standards of behaviour and conduct from Peak staff and apprentices/learners in the online / digital world as we do in face-to-face situations. Peak are aware that any behaviour acceptable or unacceptable can be translated to the online world and we recognise that our policies and procedures are equally relevant in the virtual world as they are to the physical environment.

Peak operate both classroom and live online learning. For live online learning sessions Peak operate a camera on policy during online sessions and apprentice reviews. All apprentices / learners are asked for their consent to the use of cameras and recordings of classroom sessions.

For Peak staff a personal device must never be used for any learning or communication with apprentices/learners or employers.

Child on child sexual violence and harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

Staff working with children (under 18 years) should maintain the attitude 'it could happen here'. Children's sexual behaviour exists on a wide *continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice.

HSB can occur online and/or face-to-face and can also occur simultaneously. between the two. HSB should be considered in a child protection context. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood,

adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Schools and colleges should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college.

Dos and don'ts

DO – make it clear that Peak have a zero-tolerance approach to sexual violence and sexual harassment – it is NEVER acceptable.

DO – be quick to challenges inappropriate language and inappropriate physical behaviour.

DO – emphasise / educate though appropriate opportunities within the curriculum or through conversations, healthy relationship, and appropriate respectful behaviour.

DO – discuss concerns with relevant Designated People or the Designated Safeguarding Lead or Deputies.

DO – report all incidents to the safeguarding team, concerns relating to sexual violence or sexual harassment (no matter how small, harmless this may appear)

DO – remain vigilant, listen to concerns and take any allegation seriously.

DO – understand that behaviours can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why education and challenge are so important in building an effective safeguarding culture.
DO – access support from wider local and national agencies as well as the safeguarding team.

DO NOT – feel alone when dealing with sexual harassment or sexual violence, contact a member of the safeguarding team who will be able to help and who will be able to provide advice and guidance in relation to the appropriate actions to be taken and support available.

DO NOT – promise confidentiality.

DO NOT – investigate the incident, listen, use appropriate questions (TED technique)

DO NOT – dismiss low level behaviour as "banter" "just having a laugh" "part of growing up" "boys will be boys".

Support available:

- The NSPCC provides a helpline for professionals at 0808-800-5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies).
- Support from specialist sexual violence sector organisations such as 'Rape Crisis' or 'The Survivors Trust'. The 'Anti-Bullying Alliance' has developed guidance for schools about Sexual and sexist bullying.

Sharing images under 18

Taking, making, sharing and possessing indecent images and pseudo-photographs of people under 18 is illegal. pseudo-photograph is an image made by computer-graphics or otherwise which appears to be a photograph. This can include:

- photos
- videos
- tracings and derivatives of a photograph
- data that can be converted into a photograph.

Definitions of some of the terms used in the legislation are:

- 'indecent' is not defined in legislation but can include penetrative and non-penetrative sexual activity.
- 'making' can include opening, accessing, downloading and storing online content.
- 'sharing' includes sending on an email, offering on a file sharing platform, uploading to a site that other people have access to, and possessing with a view to distribute.

Indecent photographs of children:

- under the Protection of Children Act 1978 (as amended), the UK has a strict prohibition on the taking, making, circulation, and possession with a view to distribution of any indecent photograph or pseudo photograph of a child and such offences carry a maximum sentence of 10 years' imprisonment.
- section 160 of the Criminal Justice Act 1988 also makes the simple possession of indecent photographs or pseudo photographs of children an offence and carries a maximum sentence of 5 years' imprisonment.

there are defences for those aged over the age of consent (16) who produce sexual photographs for their own use within a marriage or civil partnership; these defences are lost if such images are distributed.

The term 'making' could include:

- opening an attachment to an email containing an image
- downloading an image from a website onto a computer screen
- storing an image on a computer
- accessing a website in which images appeared by way of an automatic "pop up" mechanism.

Types of examples covered by these laws could include the following:

- a person under the age of 18 who creates, possesses and/or shares sexual imagery of themselves with a peer under the age of 18 or adult over 18.
- a person under the age of 18 who possesses and/or shares sexual imagery created by another

person under the age of 18 with a peer under the age of 18 or an adult over 18.

- a person over the age of 18 who creates, possesses and/or shares sexual imagery of a person under the age of 18.

It is important that learners are advised of the legislation and consequences of sharing and/or making images in line with the sentences described above. Sessions should be carried out with learners as part of the general safeguarding culture within teaching and learning environment, one to ones, reviews, assessments, and any other opportunities where interaction takes place between the learning coach and the learner.

Dos and Don'ts:

DO - Report it to your Designated Safeguarding Lead (DSL).

DO – record the incident as soon as possible following the incident.

DO - explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

DO NOT - view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.

DO – report (as soon as possible) to the DSL and seek support, if you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to)

DO NOT - delete the imagery or ask the young person to delete it.

DO NOT - ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

DO NOT - share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers. (In most cases parents will need to be informed but advice needs to be sought from the DSL or deputy).

DO NOT- say or do anything to blame or shame any young people involved. I

If you have any suspicion or concerns that a child may be at risk, always contact the police. If a child is in immediate danger, dial 999 and ask to speak to the police.

Sources:

[Withdrawn] Indecent images of children: guidance for young people - GOV.UK

Sharing nudes and semi-nudes: how to respond to an incident (overview)

Sources of support:

Eliminating Child Sexual Abuse Online | Internet Watch Foundation IWF

Welcome to Marie Collins Foundation

CEOP Safety Centre

Samaritans | Every life lost to suicide is a tragedy | Here to listen

NSPCC | The UK children's charity | NSPCC

Stop It Now - Preventing child sexual abuse

Other Definitions

Definitions of types of abuse:

Physical abuse
A form of abuse that may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Psychological or emotional abuse
The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. This includes domestic abuse (Home Office Definition, 2013) 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.

Sexual abuse
This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, or non-contact activities, which also includes grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. All adults can also commit acts of sexual abuse, as can other children.

Neglect
The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. This includes the failure to provide adequate food, clothing and shelter (including exclusion from home or abandonment) or to protect a child from physical and emotional harm or danger.

Financial abuse
Financial abuse is defined as "The unauthorised and improper use of funds, property or any resources belonging to an individual." This includes, for example, theft or exerting improper pressure to sign over money from pensions or savings.

Discriminatory abuse
The principles of discriminatory abuse are embodied in the Equality Act 2010. Discriminatory abuse links into all other forms of abuse. Discriminatory abuse exists when values, beliefs, or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals.

Institutional Abuse
Learners that may be looked after or in semi-independent living arrangements. Institutional abuse is abuse that arises from an unsatisfactory regime. It occurs when the routines, systems and norms of an institution override the needs of those it is there to support. Such regimes compel individuals to sacrifice their own preferred lifestyle and cultural diversity in favour of the interests of those there to support them, and others Repeated instances of poor care may be an indication of more serious problems.

Children and young persons

In terms of this policy, 'child, children and young people' mean those under the age of 18 as defined by the Children Act 1989. This policy applies to students in this age group attending a further education course and young people.

Vulnerable adults

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This may include, but is not limited to a person who:

- Is elderly and frail.
- Has a mental illness including dementia.
- Has a physical or sensory disability.
- Has a learning disability.
- Has a severe physical illness.
- Is a substance misuser.
- Is homeless.

This also applies to temporary conditions.

Version control:

DOCUMENT CONTROL			
VERSION	**DATE OF ISSUE**	**DATE OF REVIEW**	**DATE OF NEXT PLANNED REVIEW**
1	June 2018	June 2018	June 2019
2	June 2019	June 2019	January 2020
3	January 2020	January 2020	January 2021
4	January 2021	January 2021	January 2022
5	July 2021	July 2021	January 2022
6	December 2022	December 2022	January 2023
7	January 2023	January 2023	January 2024
8	January 2024	January 2024	January 2025
9	January 2025	January 2025	January 2026
10	May 2025	May 2025	May 2026
11	Jan 2026	Jan 2026	May 2026
12	May 2026	May 2026	May 2027