Safeguarding and Prevent Policy

1. Introduction and Policy Statement

Skills People Group consists of the following companies.

- *Construction Skills People*
- *C&G Assessments and Training Ltd*
- *Training Futures UK Ltd*

The company recognise its statutory duties towards safeguarding the welfare of Young People (children) and Adults at Risk from any form of abuse whilst undertaking learning programmes. The company will ensure that arrangements are in place to create and maintain a safe working and learning environment. An environment where all reasonable measures are taken to ensure that risks of harm are minimised where concerns are identified, and actions are taken to address them where appropriate.

The company will ensure that all staff and self-employed partners are aware of and understand their statutory responsibilities with respect to safeguarding and are trained in recognising and reporting safeguarding issues.

The company is committed to safeguarding and aims to create a culture of vigilance.

2. Scope

Safeguarding is everyone's responsibility. This policy applies to all staff and self-employed partners conducting onsite and offsite activities with learners, regardless of position, role and responsibilities.

This policy deals with the protection of Young People (children) and Adults at Risk. *For the purpose of clarity, **any person under the age of 18 is deemed a child**, and an **adult at risk** replaces the previously used term 'vulnerable adult' as set out in the governments 'No Secrets' guidance 2010. The Care Act 2014 defines an **adult at risk** as a person who has care and support needs and/or is at risk of, being abused or neglected and unable to protect themselves against the abuse or neglect or risk of it because of those needs.*

Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Source: No Secrets Guidance

3. Objectives

The company aim to ensure that: Appropriate action is taken in a timely manner to safeguard and promote staff and the learner's welfare.

The company will appoint and train a senior board level designated safeguarding lead (DSL) to take leadership responsibility on all safeguarding arrangements (including Prevent).

This policy will be reviewed annually by the designated safeguarding lead and/or deputy lead in line with changes or new legislation and/or regulations.

This policy is to be read in conjunction with the Lone Working, Equality & Diversity and Health & Wellbeing policies.

4. Safeguarding Adults

The Care Act 2014 defines safeguarding as "protecting an adult's right to live in safety, free from abuse and neglect." The duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support.

Types of Abuse and Neglect - Adults

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; and 'honour' based violence (HBV) is a form of domestic abuse which is perpetrated in the name of so called 'honour-based' violence.

- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

- **Financial abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Doorstep crime is also a common form of financial abuse.

- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion

- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect also includes not being provided with enough food or with the right kind of food or taken proper care of.

- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

Source: Care Quality Commission (CQC) https://www.cqc.org.uk/

5. Safeguarding Young People (children)

A **child** is someone who has not yet reached their 18th birthday. Once they turn 18, they are legally an adult.

Indicators of Abuse and Neglect - Children

- **Abuse** is a form of maltreatment of a child. 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, 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 by another child or children.

- **Physical abuse** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or 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.

- **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 or unloved, 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 from 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.

- **Sexual abuse** 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, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women 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. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **Serious Violence** may signal that children are at risk from or are involved with serious violent crime. These may include: increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Source: Keeping Children Safe in Education (KCSIE) 2021

- **Peer on Peer Sexual Abuse** sexual violence, such as rape, assault by penetration and sexual assault. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse. Upskirting, which typically involves taking a picture under a person's clothing without them knowing. Sexting (also known as 'youth-produced sexual imagery'). Peer on peer does not only refer to sexual abuse, but also to other forms of child-on-child abuse, such as bullying. (Source: GOV.UK – Review of sexual abuse in schools and colleges - June 2021)

- **Harmful Sexual Behaviour** sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult. (DfE definition)

The company recognise that learners with **special educational needs (SEN) and disabilities** can face additional safeguarding challenges and as such additional barriers can exist when recognising abuse and neglect within this group.

6. So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

There are four main types of FGM:
- Type 1 (clitoridectomy) – removing part or all of the clitoris.
- Type 2 (excision) – removing part or all of the clitoris and the inner labia (lips that surround the vagina), with or without removal of the labia majora (larger outer lips).
- Type 3 (infibulation) – narrowing of the vaginal opening by creating a seal, formed by cutting and repositioning the labia.
- Other harmful procedures to the female genitals, including pricking, piercing, cutting, scraping or burning the area.

Signs, Symptoms and Effects of FGM

A girl or woman who has had FGM may;

- Have difficulty walking, sitting or standing;
- Spend longer than normal on the bathroom or toilet;
- Have unusual behaviour after an absence;
- Be particularly reluctant to undergo normal medical examinations;
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

What to look out for before FGM happens

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about;

- Being taken 'home' for a visit;
- A special occasion to 'become a woman';
- An older female relative visiting the UK.

If the delivery/enrolment team in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the police.

The practice is illegal in the UK and is classed as child abuse. It is also illegal to arrange for a young person to be taken abroad for FGM to find out more about Female Genital Mutilation: https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/

FGM helpline – the NSPCC have a 24-hour dedicated **FGM helpline** offering information, advice and guidance **Tel**: 0800 028 3550 or **email** fgmhelp@nspcc.org.uk
Source: Female genital mutilation (FGM) - NHS.UK

Forced Marriage

Forced marriage is a marriage performed without the full and free consent of one or both parties. Emotional, financial, physical and sexual threats and abuse, as well as notions of 'honour', can all be used to force someone to marry. Forced marriage can lead to physical violence, rape and even murder. https://www.gov.uk/guidance/forced-marriage

The pressure put on people to marry against their will may be:

- **Physical** – for example, threats, physical violence or sexual violence.
- **Emotional and psychological –** for example, making someone feel like they are bringing 'shame' on their family.

Forced Marriage Unit

Contact the Forced Marriage Unit (FMU) if you're trying to stop a forced marriage or you need help leaving a marriage you've been forced into.

If you're trying to stop a forced marriage or you need help leaving a marriage you've been forced into **Call** 999 in an emergency
Tel: 020 7008 0151, Out of Hours Tel: 020 7008 1500 (Global response centre) or,
email: fmu@fco.gov.uk

Source: Forced marriage – GOV UK https://www.gov.uk/stop-forced-marriage

7. Domestic Abuse

The Company is committed to developing a safe workplace and learning environment by implementing a culture in which there is zero tolerance for abuse and which recognises that the responsibility for domestic abuse lies with the perpetrator. The Company is also committed to ensuring that any employee who is the victim of domestic abuse has the right to raise the issue in the knowledge that they will receive appropriate support and assistance. This policy also covers the approach we will take where there are concerns that an employee may be the perpetrator of domestic abuse.

By increasing awareness and implementing a strong supportive culture, we will create a safer workplace and learning environment for both staff and learners.

In line with the Company policies, Skills People Group will not discriminate against anyone who has been subjected to domestic abuse in terms of current employment or future development and seeks to benefit the welfare of individual members of staff; retain valued employees; improve morale and performance.

Under the Health and Safety at Work Act (1974) and the Management of Health and Safety at Work Regulations (1992), we recognise our legal responsibilities in promoting the welfare and safety of all staff.

Definitions

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Signs

Whilst it is important for the individual themselves to recognise they are a victim of domestic abuse, there are signs which may indicate an employee may be a victim. These may include;

Psychological signs

- Personality changes (eg an outgoing person becomes withdrawn)
- Obsession with time
- Anxious at work
- May exhibit fearful behavior such as startled reactions
- References to partner's anger

Physical signs

- Frequent and / or sudden / unexpected medical problems / sickness absences
- Change in the way the employee dresses (i.e excessive clothing in the summer)
- Unexplained injuries

Other signs

- Avoiding lunch breaks
- Frequent isolation at work

Managers and Team Leaders are responsible for conducting regular 1-2-1 meetings with staff and return to work interviews when an employee returns to work following a period of sickness. Managers who have direct reports of staff members who are either working from home or remotely are to have regular contact with their staff in line with the Lone Working policy and are to report any signs / disclosures in line with this policy.

Managers / Supervisors who support staff in such matters should address the issue positively and sympathetically ensuring that the employee is aware that support and assistance can be provided.

Disclosure & Support

Skills People Group recognise that developing a life free from abuse is a process not an event and we will provide ongoing support for employees who disclose abuse. The level of support required will be discussed and reasonable adjustments will be made accordingly. Other existing external provisions (including occupational health and independent counselling services) will also be signposted to staff as a means of support.

All disclosures / concerns of domestic abuse made by an employee to another employee and / or their line manager are to be referred to a Safeguarding Officer and / or a Mental Health First Aider for support and subsequently the HR Team. Actions will be taken to increase their personal safety

at work and at home as well as address any risks there may be to colleagues.

All disclosures / concerns of domestic abuse made by a learner to a member of staff or another learner are to be referred to a Safeguarding Officer so actions can be taken to increase their personal safety.

Contact information of Mental Health First Aiders and Safeguarding Officers are detailed in this policy.

Perpetrators of domestic abuse

Domestic abuse perpetrated by employees will not be condoned under any circumstances. Staff members are expected at all times to present high standards of personal integrity and conduct that will not reflect adversely on the organisation and its reputation. If an employee approaches a colleague or line manager about their own abusive behaviour, HR are to be subsequently informed. Information about services and support available will be made accessible.

We will treat any allegation, disclosure or conviction of a domestic abuse related offence on a case by case basis with the aim of reducing risk and supporting change.

There may be signs that an employee is perpetrating domestic abuse. These may include:

- Uncharacteristic late/absent behaviour with no explanation
- Repeated injuries/scratches/bite marks/bruised knuckles/injuries to wrists and forearms
- Uncharacteristic moods and depression
- An obsession with time and an avoidance of socialising
- Constant text messaging or telephoning a partner
- Jealousy or possessiveness

- Increase in substance use/dependence

In cases where both the victim and the perpetrator of domestic abuse work in the organisation, the Company will take appropriate action. In addition to considering disciplinary action against the employee who is perpetrating the abuse, measures may need to be taken to ensure that the victim and perpetrator do not come into contact in the workplace. Please refer to the Company's disciplinary policy for further details.

8. Specific Safeguarding issues

Safeguarding issues can manifest themselves via peer on peer abuse. Staff should be aware that learners are capable of abusing their peers. This is most likely to include, but may not be limited to:

- **Bullying** (including cyberbullying);
- **Physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- **Sexual violence** such as rape, assault by penetration and sexual assault;
- **Sexual harassment,** such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- **Upskirting**, which typically involves taking a picture under a person's clothing without them knowing. It is now a criminal offence.
- **Sexting** (also known as youth produced sexual imagery) and;
- **Initiation/hazing** type violence and rituals.

Peer to peer abuse is unacceptable and will be recorded and investigated accordingly in line with this policy. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

The company is committed to responding to all concerns about staff and learners in relation to any form of abuse or welfare concerns. This includes any form of peer to peer abuse, harassment or bullying, including cyber bullying.

9. Contextual Safeguarding

Safeguarding concerns, incidents and/or behaviours can be associated with factors outside of the company. Staff must consider the wider context in which incidents and behaviour occurs. This is known as contextual safeguarding, which means that assessments of learners must consider wider environmental factors that are present in the learners' life that are a threat to their safety and welfare.

10. Online Safety

The use of technology has become a significant component of many safeguarding issues. Child exploitation; radicalisation; sexual predation; technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;

- **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults;

- **Conduct**: personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images or online bullying.

Worried about online sexual abuse or the way someone has been communicating to you online?

Make a report to CEOP's Child Protection Advisors https://www.ceop.police.uk/safety-centre CEOP helps any child or young people under the age of 18 who is being pressured, forced or tricked into part in sexual activity of any kind. This can be something that has taken place either online or in 'the real world', or both. The CEOP Safety Centre has clear information and advice on what can be reported to CEOP, the reporting process and what will happen if you do decide to make a report.

11. Prevent

The Prevent statutory duty requires local authorities, schools, colleges, higher education institutions, health bodies, prisons and probation, and the police to consider the need to safeguard people from being drawn into terrorism. It sits alongside long-established duties on professionals to safeguard vulnerable people from exploitation from a range of other harms such as drugs, gangs and physical and sexual exploitation.

Protecting learners from radicalisation is part of the wider safeguarding duties of teachers, tutors and academics.

The Governments Counter Terrorism Strategy CONTEST' overarching aim is to reduce the risk to the UK and its Citizens and interests overseas from terrorism, so that people can go about their lives freely and with confidence.

The governments **approach** to the CONTEST strategic framework is made up of the four 'P' approach:

- **Prevent:** to stop people becoming terrorists or supporting terrorism
- **Pursue**: to stop terrorist attacks
- **Protect:** to strengthen our protection against a terrorist attack
- **Prepare**: to mitigate the impact of a terrorist attack

Of the four Ps' approach **Prevent** is at its heart to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism.

The objectives of Prevent are to:

- **Tackle the causes of radicalisation** and respond to the ideological challenge of terrorism.
- **Safeguard and support** those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to **disengage and rehabilitate.**

The government expects educational institutions to encourage learners to respect other people with particular regard to understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity.

The Prevent statutory duty encourages free speech and open debate as one of our most powerful tools in promoting critical thinking and preventing terrorist and extremist narratives taking hold.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

The company recognises that any learner in danger of radicalisation or demonstrating extremist tendencies (violent or non-violent) is deemed to be vulnerable and appropriate support under the PREVENT strategy or through CHANNEL will be sought.

Prevent is an integral part of the Safeguarding and should be must be reported in accordance with this procedure.

For immediate terrorist threats: Call 999 or the police anti-terrorist hotline 0800 789 321

Source: Keeping Children Safe in Education, Counter-terrorism strategy (CONTEST), Channel guidance – GOV.UK and Prevent Duty Guidance

Definitions

- **Safeguarding** in terms of Prevent is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorist related activity.

- **Vulnerability** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **Ideology** is a set of beliefs

- **Extremism** The government defines extremism in the 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 different faiths and beliefs. the strategy also include in the definition of extremism calls for the death of members of our armed forces", whether in this country or overseas.".

- **Prevent** is an integral part of the government's counter-terrorism strategy, CONTEST. Prevent tackles non-violent extremism where it creates an environment conductive to terrorism and popularises ideas that are espoused by terrorist groups.

- **Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by: identifying individuals at risk. assessing the nature and extent of that risk.

12.   Approach

The company take all reasonable measures to ensure that risks of harm to Young People and Adults at Risk's welfare is minimised by appropriate:

- Staff selection, recruitment, induction and training
- Risk Assessment
- Health and Safety Procedures
- Effectively respond to referrals

13.   Implementation

At least one person on any interview panel will have undertaken safer recruitment training.

The company will ensure that all new staff are subject to a Disclosure and Barring Service (DBS) check. The level of DBS check will depend on the role that is being offered and duties involved.

The Safeguarding Team will be trained to Level 3 in Safeguarding and undertake refresher training at least every two years, attend Prevent group meetings, attend the Workshop to Raise Awareness of Prevent (WRAP) and undergo regular CPD events to keep updated with legislation and refresh knowledge.

All staff are required to refer safeguarding (including prevent) incidents to the safeguarding team within 24 hours of disclosure.

Staff are required to:

- Complete Safeguarding, Prevent, GDPR and Equality and Diversity training during their induction.
- Undertake refresher training for Safeguarding and Prevent annually, other as required.
- During induction new staff involved in delivery (including IQA's) are required to read part one of Keeping Children Safe in Education. Managers and staff who work directly with young people are also required to read Annex A of the statutory guidance.

In order for visitors to feel safe and be able to recognise individuals who can offer support on behalf of the company staff are required to wear their official DBS badge at all times.

The curriculum enables learners to build on knowledge of: Safeguarding including: Prevent, Online Safety, Equality and Diversity, British Values during induction and Equality and Diversity during learning sessions.

During learner enrolment, should a learner disclose a mental health condition and/or social emotional difficulties, an unspent criminal conviction or been convicted of terrorism related offences. A risk assessment will be completed by a member of the safeguarding team.

'Hot Topics' are distributed via internal communications to raise awareness and promote discussion around the wider safeguarding agenda including areas such as: British Values, Radicalisation, Mental health issues, positive relationships, Staying Safe Online, Health and Safety, Equality and Diversity and Health and Wellbeing.

Safeguarding, Equality and Diversity, Data Security and Health and Safety remain a fixed agenda item at meetings.

In order to stay safe online all staff are required to read and follow ICT policies.

14. Safeguarding and Welfare Responsibilities

- **Directors** fulfil statutory responsibilities, directors will ensure that arrangements are in place to create and maintain a safe learning environment and ensure that policies, procedures and practices comply with the law.

- **The Designated Safeguarding Lead (DSL)** will take lead responsibility for safeguarding and child protection, be aware of and follow new local arrangements and, be prepared to supply information as requested by the three safeguarding partners.(safeguarding partners include: the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) The activities of the designated safeguarding lead may be delegated to the appropriately trained deputy lead however, the ultimate lead responsibility for safeguarding and child protection, remains with the designated safeguarding lead. The designated safeguarding lead will, as required, refer cases:

  - Of suspected abuse to the appropriate agencies as required;
  - Support staff how make referrals to local authority children's social care;
  - To the Channel programme where there is a radicalisation concern as required;
  - Support staff who make referrals to the Channel programme;
  - Where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service (DBS); and
  - Where a crime may have been committed to the police as required
  - Act as a source of support, advice and expertise for all staff

- **The Deputy Designated Safeguarding Lead** and **Safeguarding Officers** are responsible for the day to day operational management of safeguarding issues. The safeguarding team will deal with employee concerns over learner's welfare, signpost, offer guidance and liaise with the safeguarding lead for concerns requiring referral to external agencies. When the designated safeguarding lead is absent, the deputy lead will act as cover.

- **Staff** are required to raise safeguarding concerns in line with this policy.

- **The following actions are strictly prohibited by staff and self-employed partners:**

  - Engage in personal relationships with learners beyond that appropriate for a learner /tutor relationship
  - Abuse their position of trust under section 16 of The Sexual Offices Act 2003 http://www.legislation.gov.uk/ukpga/2003/42/section/16

- Befriend learners on social media sites
- Distribute personal telephone numbers
- Visit learners at home
- Transport learners to and from locations (this includes travelling in the car with a learner driving)
- Use sarcasm, insults or belittling comments towards learners
- Making sexual suggestive comments

Staff must always act professionally and any employee who breach the above may be subject to the disciplinary procedure.

15. Reporting Safeguarding Concerns (Including Prevent and online safety)

If a member of staff or self-employed partner is unsure if their concern is safeguarding, they are required to seek advice from a member of the safeguarding team.

Help and advice between Monday-Friday 8am – 5pm contact a member of the Safeguarding team

Email safeguarding@skillspeoplegroup.com

Concerns about a child's welfare must be reported immediately to the designated safeguarding lead or deputy lead (refer to the process on page 15 for further information about referrals outside the organisation)

Designated Safeguarding Lead (Strategic Lead) Sacha McCarthy; Group Head of Quality & Performance Tel: 01246 589444 Mobile: 07976 744655	**Deputy Designated Safeguarding Lead** Perry Adams; HR Advisor Tel: 01246 589501 Mobile: 07860 917688
Safeguarding Officer Alan Briggs, South Yorkshire Skills Academy Manager Tel: 01246 589444 Mobile: 07908598732	**Safeguarding Officer** Kelly Kirk, Nottingham Skills Academy Manager Tel: 01246 589444 Mobile: 07495 681473

Mental Health First Aiders:

- Perry Adams (HR Advisor) - 01246 589501 / 07860 917688
- Kelly Kirk (Nottingham Skills Academy Manager) - 07495 681473

Reporting Process:

- Complete a Safeguarding and Prevent Disclosure Form *located on the companies Intranet*

- Reports must contain as much detail as possible:
    - *Contain factual evidence*
    - *Use the persons own words and phrases.*
    - *Report all feelings and suspicions, but clearly separated from the factual evidence.*
    - *Describe the circumstance in which the disclosure came about.*
    - *Include information about the setting and anyone else who was there at the time.*
    - Submit the disclosure form within **24 hours of disclosure**
    - Submit to safeguarding@skillspeoplegroup.com
    - A member of the safeguarding team will log the concern/disclosure information within a secure folder located on the server. **Due to the sensitivity of this information this log, and reporting forms are only accessible by the Safeguarding team.*
    - All follow ups must be reported within 24 hours to a member of the safeguarding team
    - The safeguarding team must be informed when a learner, where there has been a safeguarding concern, is withdrawn from the programme and why.

If you are in doubt about recording requirements, staff are required to speak to a member of the safeguarding team.

If the concern is identified as not being safeguarding, seek guidance in line with the Information Advice and Guidance Policy.

If you suspect a member of staff or self-employed partner is abusing a learner or breaching their position in a safeguarding capacity it is your responsibility to whistle blow and report the allegation in line with this procedure

16. Escalation

If a disclosure is made but is not resolved to your satisfaction, then you have the right to escalation. The issue should be raised to the designated safeguarding lead unless your concern is about them when you should raise this with a member of the Board.

17. External Agencies: Information, Advice and Guidance

Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

- General guidance on whistleblowing can be found via https://www.gov.uk/whistleblowing

    and

- the NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

- **Safeguarding Children** - Sheffield Safeguarding Hub Office hours are from 8.45am to 5.15pm (Monday to Thursday) and 8.45am to 4.45pm (Friday) at all other times including Bank Holidays, calls will be responded to by the Emergency Duty Service.

  Tel: **01142734450** email: sscb@sheffield.gov.uk

  https://www.safeguardingsheffieldchildren.org/sscb

- **Personal safety:** contact the Police 999 or 101

- **Health and Wellbeing** contact your out of hours Doctors or call the Hospital on 111

- **Abuse of an older person:** call 999 to report a crime that is in progress or if someone is in **immediate danger**

- **Reporting abuse**: contact the local police https://www.police.uk/ if you think a crime has been committed or contact the local council https://www.gov.uk/find-local-council if you think someone is at risk of being abused.

- **Concerns about the quality of care** contact the Care Quality Commission (CQC) customer Service on 03000 616161 https://www.cqc.org.uk/contact-us

- **Care homes and home carers**: contact the local council if you are concerned about: someone not being treated properly in a care home or someone is being mistreated by a carer.

- **Help and advice** – if you want to discuss concerns and get some advice, contact Action on Elder Abuse helpline on 0800 808 8141

- **18 or under** call the NSPCC on 0800 1111. call or email the NSPCC helpline on 0808 800 5000 or email help@nspcc.org.uk

- Contact your local Authority Out of Hours Social Care number for any concerns relating **to a child (under 18),** which you can find by putting in the postcode here https://www.gov.uk/report-child-abuse-to-local-council

- **Helping children stay safe online** https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/

- **Freephone National Domestic Abuse Helpline, run by Refuge**
  0808 200 0247
  www.nationaldahelpline.org.uk

- **Men's Advice Line**
  0808 801 0327
  www.mensadviceline.org.uk

- **Galop** (for lesbian, gay, bisexual and transgender people)
  0800 999 5428
  www.galop.org.uk

- **Rape Crisis (England and Wales)**
  0808 802 9999
  www.rapecrisis.org.uk

18. Inspecting Safeguarding

From September 2019, Ofsted's inspections of early years, schools and post-16 provision will be carried out under: https://www.gov.uk/government/publications/education-inspection-framework . Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective. In addition to the Framework and Inspections Handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills

19.   Confidentiality and Information Sharing

Staff must maintain confidentiality by not discussing their concern with anyone other than the Safeguarding Team.

Staff must be aware that they cannot promise to keep secrets which might compromise a learner's safety or wellbeing.

- **Safeguarding Young People (children**) statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm. Such concerns will be referred into Children Social Care and the Police if appropriate.

- **In relation to learners 18 years and over**, and classed as an adult in law, the company has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act (including DoLs) 2005 and the Human Rights Act 1998.

The Safeguarding Team have a professional responsibility to share relevant information with other agencies to safeguard within the boundaries of the Data Protection Act 2018 and General Data Protection Regulation (GDPR) which as such does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

20.   Monitoring

Compliance with this procedure will be monitored by the Safeguarding Team.

An annual report will be produced for the Board of Directors to include:
- Legislative changes
- Outcomes of the policy review
- Company training requirements
- Number of disclosures for the current academic year (not detailed or identifying to individuals)
- Any changes required to current practice.
- Allegations against staff
- Recommendations that the board must endorse

Any questions or concerns about the operation of this policy, or if you consider that this policy has not been followed, you should raise the matter with the designated safeguarding lead or deputy lead.

21. Related Policies and Supporting Information

- Modern Slavery Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- Grievance Policy
- Data Protection Policy
- Data Classification Policy
- Acceptable use Policy
- IT Policies

Keeping children safe in education
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Education Act 2002 – Legislation http://www.legislation.gov.uk/ukpga/2002/32/contents

Working together to safeguard children
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

The Prevent duty in further education and Skills providers
https://www.gov.uk/government/publications/the-prevent-duty-in-further-education-and-skills-providers
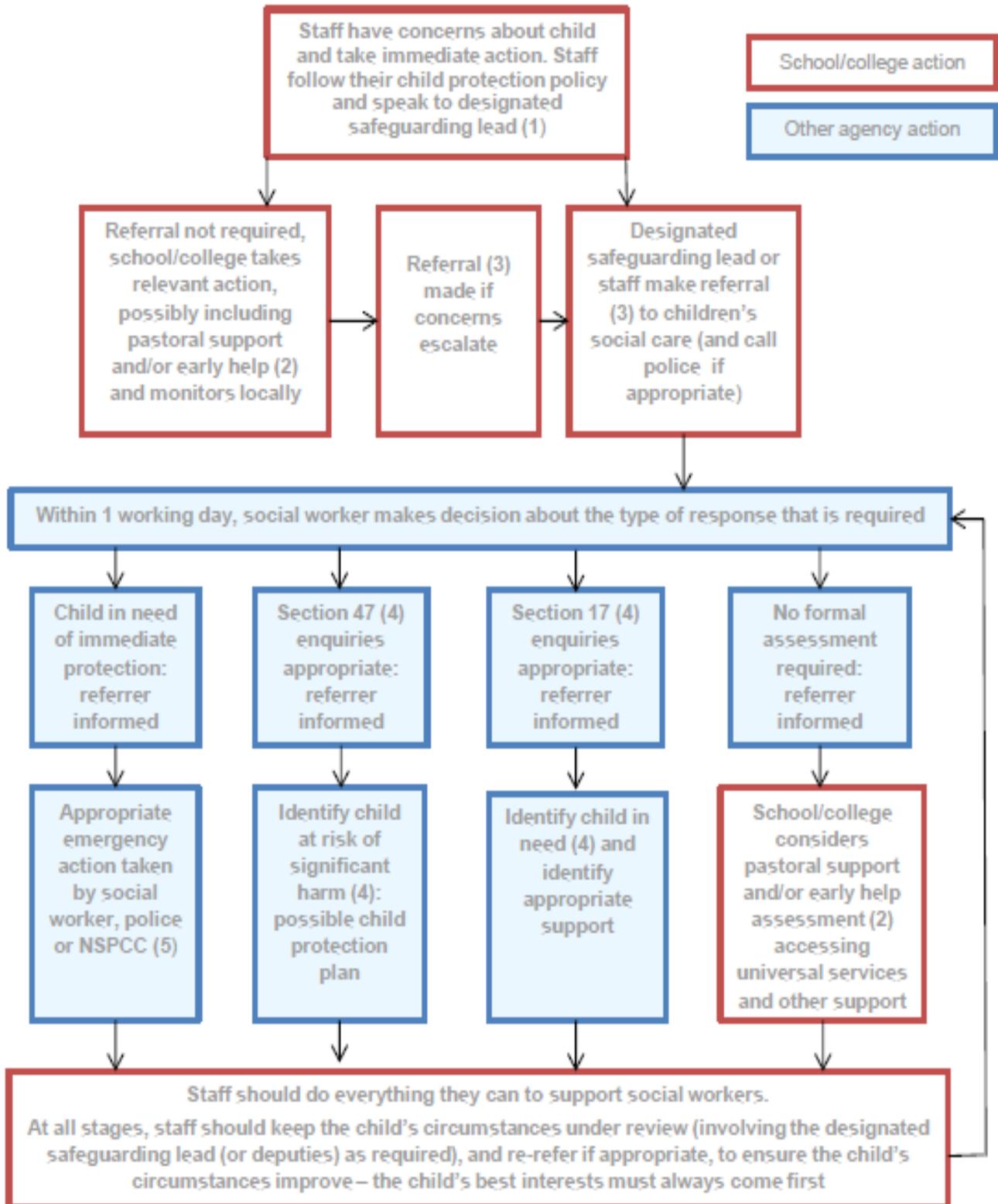
The Prevent duty guidance – GOV UK
https://www.gov.uk/government/publications/prevent-duty-guidance

Counter-terrorism strategy (CONTEST) – GOV UK
https://www.gov.uk/government/collections/contest

Actions where there are concerns about a child

```
                    Staff have concerns about child
                    and take immediate action. Staff              ┌─────────────────────────┐
                    follow their child protection policy          │   School/college action │
                    and speak to designated                       └─────────────────────────┘
                    safeguarding lead (1)                         ┌─────────────────────────┐
                                                                  │   Other agency action   │
                                                                  └─────────────────────────┘
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Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead (1)

School/college action

Other agency action

Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help (2) and monitors locally	Referral (3) made if concerns escalate	Designated safeguarding lead or staff make referral (3) to children's social care (and call police if appropriate)

Within 1 working day, social worker makes decision about the type of response that is required

Child in need of immediate protection: referrer informed	Section 47 (4) enquiries appropriate: referrer informed	Section 17 (4) enquiries appropriate: referrer informed	No formal assessment required: referrer informed
Appropriate emergency action taken by social worker, police or NSPCC (5)	Identify child at risk of significant harm (4): possible child protection plan	Identify child in need (4) and identify appropriate support	School/college considers pastoral support and/or early help assessment (2) accessing universal services and other support

Staff should do everything they can to support social workers.

At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

Document Control

Date of change	Version	Overview of amendment	Amended by / Job title	Approved by	Approval date
22-02-18	3	Policy reviewed	Sharon Lawrence (Quality Manager)	Director	22-02-18
12-10-18	4	Policy revision to bring in line with 2018 changes to legislation	Julie Lawton (Quality Manager)	Director	12-10-18
06-02-19	5	Full policy review and restructure	Julie Lawton (Quality Manager)	Amanda Warham (Director)	12-02-19
23-09-19	6	**Section 5** • Page 4– new paragraph added on abuse • Page 5 – new paragraph added on serious violence **Section 6** • Page 6 – header of So-called 'honour-based' violence has been added to FGM and Forced Marriage. **Section 7** • Page 6 – new paragraph added on upskirting (this is now a criminal offence) **Section 9** • Page 7 – new paragraph added on inline safety **Section 12** • Page 9 – includes staff obtaining an awareness of the statutory guidance of 'Keeping Children Safe in Education' **Section 13** • Page 10 – abusing a position of trust under section 16 of The Sexual Offences Act 2003 has been added to actions which are strictly prohibited **Section 14** • Page 11 – update to the Safeguarding team (Nadine Fowler has been added as a Safeguarding Officer) **Section 16** • Page 12 – update to NSPCC and Whistleblowing channels **Section 17** • Page 13 – new paragraph added on Inspecting Safeguarding **Annex 1** • Page 15 – Process added on the actions to be taken where there are concerns about a child	Julie Lawton (Quality Manager)	Amanda Warham (Director) and SMT	SMT approval 23-09-19
19-11-19	7	**Section 5 –** page 5 - SEND included **Section 14 -** page 11 – update to the Safeguarding team (Stuart Brown has been added as a Safeguarding Officer) **Section 16** –page 12-13 links to supporting information added	Julie Lawton (Quality Manager – Deputy Safeguarding Lead)	Amanda Wareham (Operations Director / Safeguarding Lead)	19-11-19

Date of change	Version	Overview of amendment	Amended by / Job title	Approved by	Approval date
06-10-20	8	Policy reviewed **Objectives** Page 2 – added staff and 'This policy is to be read in conjunction with the Lone Working, Equality & Diversity and Health & Wellbeing policies.' **Section 7** Page 6 – Added section on Domestic Abuse following rise in cases owing to Covid-19 **Section 13** Page 12 – included that refresher training for Safeguarding and Prevent is to be undertaken annually. **Section 15** Page 13 – removed Amanda Warham, Julie Lawton and Nadine Fowler and replaced with Sacha McCarthy, Kelly Kirk and Chris Clark Page 14 – Added MHFA contact details **Section 17** Page 15 – Added additional external support agencies for domestic abuse Reporting process link to S Drive removed, storage of policy and disclosure document will be on the intranet	Sarah Booth (HR Assistant) and Sacha McCarthy (Group Head of Quality & Performance)	Sacha McCarthy (Group Head of Quality & Performance and SMT)	23-10-20
14/09/21	9	**Section 5** Page 5 – Changed Source: Keeping Children Safe in Education 2019 has been changed to Keeping Children Safe in Education 2021. Added definition for peer on peer sexual abuse and definition for harmful sexual behaviour. **Section 15** Page 13 - Sarah Booth, Chris Clark and Stuart Brown removed from Safeguarding contacts. Perry Adams added as Deputy Designated Safeguarding Lead. Alan Briggs added as Safeguarding Officer. Page 14 – Sarah Booth removed from Mental Health First Aiders.	Brendan Knowles Head of Quality & Performance	Brendan Knowles Head of Quality & Performance	14/09/21