

Safeguarding

Policy for safeguarding young people and vulnerable adults

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1. Statement of Policy

1.1 Introduction

Steve Willis Training regards the health, safety and welfare of all young people and vulnerable adults engaged in apprenticeships, courses, and other activities, as one of its highest priorities. The company recognises and fully accepts its moral and statutory duty to safeguard and promote the welfare of young people and vulnerable adults and its duty to protect staff from unfounded allegations of abuse.

This Safeguarding Policy should be read in conjunction with our Policy for Preventing Extremism and Radicalisation, Health and Safety Policy, Staff Code of Conduct, Apprenticeship Handbook and Managing Allegations Against Staff Policy.

This policy applies to all staff, including senior managers and directors, paid staff, consultancy staff, volunteers and sessional workers, agency staff, apprentices or anyone working on behalf of Steve Willis Training Centres.

1.2 Principles of Safeguarding at Steve Willis Training

We will ensure:

- A safe environment for all learners and staff
- Those suffering or at risk of suffering significant harm or abuse are identified and referred to the necessary agencies as appropriate
- All apprentices learn about safeguarding, the safeguarding procedures at our centres and how to keep themselves and others safe

We will do this by:

- Appointing and training a team of safeguarding leads and officers to ensure full staff compliance
- Raising awareness of issues relating to the welfare and safeguarding of children, young people and vulnerable adults
- Promoting a safe learning environment in our centres and in the workplace
- Having a zero tolerance approach to all forms of bully and harassment including sexual harassment.

- Engaging with employers to assure their commitment to safeguarding in the workplace
- Ensuring staff recognise the signs of abuse or that an individual may be at risk of significant harm
- Working with other agencies as appropriate (e.g. Safeguarding Partners) where an individual is being, or at risk of being, significantly harmed
- Providing a framework for reporting and dealing with concerns and disclosures
- Embedding safeguarding in the delivery of learning and in assessments.
- Establishing clear procedures for the reporting and handling of allegations of abuse against staff
- Requiring staff to undertake mandatory training on entry, with annual updating

1.3 Legislative Frameworks

The legislative frameworks around our policy are:

- **Working Together to Safeguard Children 2018** reaffirms safeguarding as everyone's responsibility and the sharing of information between agencies.
- **Keeping Children Safe in Education 2022** requires all staff to read and understand their responsibilities if engaged in 'regulated' activities with young people.
- **The Prevent Duty 2015** requires specified authorities, including education, in the exercise of their functions to have due regard to the need to prevent people from being drawn into terrorism.
- **Children's Act 2004**, which is fundamental to people working with children and young adults in the UK
- **Education Act 2002** requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people
- **Sexual Offences Act 2003** makes it is an offence for a person over 18 (e.g. a lecturer or other member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-

time education and the person work in the same establishment as the child, even if s/he does not teach the child.

- **Safeguarding Vulnerable Groups Act 2006** sets out the type of activity in relation to children and adults at risk for which employers and individuals will be subject
- **Protection of Freedoms Act 2012** which changed the definition of Regulated Activity including who is eligible for a barred list check.

2. Definitions

2.1 Definitions of Abuse

The following are recognised as definitions of abuse, although any act which harms a child, young person or vulnerable adult should also be considered:

Physical Abuse - may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent an injury occurring

Neglect - the persistent or severe failure to meet a child's, young person's or vulnerable adult's physical and/or psychological needs, which may result in serious impairment of their health or development

Sexual Abuse involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity of any kind. Any apparent consent or awareness is irrelevant

Emotional Abuse – persistent emotional ill treatment or rejection; includes abusive or offensive electronic communications. This causes severe and adverse effects on behaviour and emotional development, resulting in low self-esteem. Some degree of emotional abuse is present in all forms of abuse.

Financial Abuse - in intimate or parental relationships is a way of controlling a person's ability to acquire, use, and maintain their own money and financial resources

Significant Harm – The Children's Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best

interest of the children. Some children may be in need of help because they are suffering or likely to suffer significant harm

Extremism and Radicalisation – Extremism is defined 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; and/or calls for the death of members of our armed forces, whether in this country or overseas.” Radicalisation is defined as “the way in which a person comes to support terrorism and encourages other people to believe in views that support terrorism”

Child Sexual Exploitation - Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

Criminal Exploitation - Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Child-on-Child Abuse - Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment including the sharing of youth produced sexual imagery; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; and initiating/hazing type violence and rituals.

Domestic Abuse - Any incident or pattern of incidents of controlling, coercive, 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.

Modern Slavery and Child Trafficking – defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion abuse or vulnerability, deception or other means for the purpose of exploitation.

Forced Marriage – describes a marriage in which one or both of the parties are married without their consent or against their will. Different from an arranged marriage, in which both parties' consent

Female Genital Mutilation - all procedures involving partial or total removal of the external female genitalia for nonmedical reasons. FGM is illegal in England and Wales under the FGM Act 2003

Mental Health - all staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

2.2 Other definitions

Safeguarding – protecting children, young people and vulnerable adults from maltreatment, preventing impairment of their physical and mental health or development and ensuring they are growing up in circumstances consistent with the provision of safe and effective care

Child Protection – any activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm

Child/Young Person – anyone under the age of 18

Vulnerable Adult – for the purposes of this policy, an individual under the age of 25, with specific personal or situational needs, which increase their risk of suffering significant harm

3. Roles & Responsibilities

Safeguarding is everyone's responsibility and all staff involved in the delivery and support of apprenticeships have a role to play. All staff employed by Steve Willis Training will undergo safeguarding training at induction, advanced training (as appropriate) and will take part in the annual CPD programme where safeguarding updates/refreshers will be programmed.

3.1 Designated Safeguarding Lead (DSL)

The DSL is **JAKE GIBBONS (APPRENTICESHIPS MANAGER)**

Responsibility for:

- Managing the referral of cases of suspected abuse or allegations to the relevant agencies
- Providing advice and support to staff who have made referrals to other agencies
- Keeping detailed, accurate, secure written records of concerns and referrals
- Referring cases to the Channel programme via the MASH team where there is a radicalisation concern
- Maintaining a proper record of any child protection referral, complaint or allegation
- Requesting child protection information from schools for apprentices under the age of 18.
- Attending case conferences and review meetings as appropriate
- Communication of the policy and arrangements to all relevant parties including but not limited to children, young people and vulnerable adults, their parents and families, centre staff and apprentice employers
- Engaging with local authorities and other agencies as appropriate ensuring that staff receive safeguarding training appropriate to their roles and regular updates as appropriate
- Safety of all apprentices, including when a young person or vulnerable adult is absent or missing, without explanation
- Providing regular reports to the board about safeguarding incidents or referrals as well as policy implementation
- Act as a source of support, advice and expertise for staff

3.2 Senior Safeguarding Lead (SSL)

The SSL is **GERRY PAPWORTH**

Responsibility for:

- Ensuring the organisation's policies reflects prevailing legal and contractual requirements
- Full compliance of the legislative duties
- Assuring the implementation plan proposed by the DSL
- Apprising the board of policy implementation and effectiveness

3.3 Designated Safeguarding Officers (DSOs)

The DSOs are various members of staff within the apprenticeship team including **CURRICULUM LEADERS & RECRUITMENT COORDINATORS**

Responsibility for:

- Day to day implementation of the policy
- Providing advice and guidance to other staff who express concerns or seek advice
- Ensure that accurate records are made of all disclosures and contact with individuals
- Making an appropriate referral to outside agencies
- Listening to young people and vulnerable adults who want to talk
- Act in the absence of the DSL as above

4. Staff

4.1 Safer Recruitment of Staff

Steve Willis Training operates safer recruitment and employment practices. Staff checks and critical process undertaken include:

- Enhanced Disclosure and Barring Service (DBS) check (required prior to working in 'regulated' activity with children, young people or vulnerable adults)

- Where a conviction is recorded, the DSL and SSL will carry out a risk assessment and decide whether to confirm or reject the individual's appointment. (Anyone that is barred from working with children or vulnerable adults will NOT be appointed)
- Two employment/education references including the most recent employment
- Prohibition from teaching check
- Evidence of identity is obtained, including the right to work in the UK
- Qualifications are checked and verified with original certificates
- Areas of concern in the CV or application will be addressed during the interview, including any unexplained gaps in employment
- Applicants sign the application form to declare the information they have provided is true.

This information will be held on a single central record held by the HR department.

4.2 Allegations Against Staff

The primary concern in the event of an allegation is to ensure the safety of the young person or vulnerable adult. In all cases, action will be taken quickly, confidentially and professionally, with all parties clear that suspension is not an indicator of guilt, but a required part of a process.

In the event that a member of staff suspects any other member of staff of abusing a student, it is their responsibility to report these concerns to the DSL (or Deputy), except when they are the person against whom the allegation is being made. In this instance the report should go to the Designated Safeguarding Director.

The DSL will contact the Local Authority and seek the advice of the Designated Officer in all situations where a member of staff has been accused of or is suspected of abuse. The DSL will also contact the DBS to advise them of any subsequent dismissals, regardless of prosecution.

A separate procedure details the steps to be taken following receipt of an allegation against a member of staff.

5. On-Line Safety

The DSL and SSL will regularly review the effectiveness of IT filters and monitoring systems. They will ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

Staying safe online will also be embedded into the curriculum so that apprentices are aware of the risks and know what to look out for and who to go to if they are worried.

SWT's IT partner, Boundary IT, have put various control measures in place to prevent access, via the internet or SWT equipment, to inappropriate web sites. Access is monitored by Boundary IT on an ongoing basis with any breaches or deviations notified to the Managing Director (who would inform the DSL).

Control measures include:

- All SWT computers (running a Windows operating system) have ESET web filtering installed.
- The guest network is controlled and filtered through Draytek & Cisco routers.
- The SWT network blocks web traffic on a keyword web filter rule and only allows requested sites to be whitelisted.
- The guest network password is changed monthly.
- Staff lock PC's when they are unattended (desk-based PC's & laptops auto- lock when left unattended as an additional control measure).
- Our Chrome Books can only access the internet via our Draytek & Cisco routers.
- Firewalls are in place and network traffic is constantly monitored in real time by Boundary IT.

6. Useful Contacts

IF A CHILD OR YOUNG PERSON IS IN IMMEDIATE DANGER, ALWAYS CALL 999

West Sussex Children's Services

To raise a concern about the welfare of a child, or young person, if you think they are being harmed, abused or neglected – and not in immediate danger

Email: mash@westsussex.gov.uk

Call: 01403 229900

Multi Agency Safeguarding Hub
Fourth Floor
County Hall North (Parkside)
Chart Way
Horsham
West Sussex RH12 1XH

Brighton & Hove Children's Services

If you have concerns about a child or young person, use the online report form, accessed by clicking on the Contact Front Door for Families link on this webpage:

<https://www.brighton-hove.gov.uk/content/children-and-education/front-door-families/information-professionals-who-work-families>

East Sussex Children's Services

If you're worried about a child or teenager who might be at risk of harm or in danger

Email: 0-19.SPOA@eastsussex.gov.uk

Call: 01323 464222 (Monday to Thursday 8.30am to 5pm, Friday 8.30am to 4.30pm) OR 01273 335906/335905 out of these hours

Hampshire Children's Services

If you have any concerns because you think that a child is being abused or has been abused in the past

Call: 0300 555 1384 Monday to Friday, 8.30am to 5pm OR 0300 555 1373 out of hours.

Flowchart of Procedure for Reporting Safeguarding Concerns

Safeguarding concern arises from information which indicates that an individual has or may have:

- Suffered or may be at risk of suffering harm, e.g. abuse or neglect;
- Behaved in a way that harmed (or may have harmed) a child, young person or adult at risk;
- Possibly committed a criminal offence against or relating to a child, young person or adult at risk;
- Behaved towards a child, young person or adult at risk that indicates they are unsuitable to work with children, young people or adults at risk.

Contact Designated Safeguarding Lead, Deputy Safeguarding Lead or Safeguarding Director to seek advice on further action. If unavailable, contact Safeguarding Consultant - Gill Sommers, 07879 844769

Safeguarding Lead makes a decision on further action required.

Referral required

DSL will either call or use other referral process to report matter to;

- Police (if emergency)
- Safeguarding Board (staff allegations)
- Children's Services
- Adult Services

Safeguarding Report recorded securely and retained.

No referral is required

- Consider internal support, e.g. assessor, tutor, welfare team,
- Consider advising parents and/or employer,
- Monitor the situation with follow up,
- Make referral if situation does not improve/escalates,

Safeguarding concern to be recorded securely and retained.