

Safeguarding Policy

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Approved by	Amerjit Singh & Board
Position	Managing Director
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Signed	
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1. Introduction

Skills4 is the trading name of I & F limited. Skills4 is a niche training provider offering apprenticeship training programmes to community pharmacies, hospitals, hubs and primary care networks.

Skills4 is committed to providing a safe and secure environment in which both Learners and Staff can flourish, and this is reflected in our Safeguarding Framework. This policy has been written to provide sufficient guidance to ensure that this commitment is embedded into the culture and ethos of the company. It is thus essential that all staff are aware of their duties regarding safeguarding and report any concerns promptly.

We believe that it is always unacceptable for a child or adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and adults at risk will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy and Social Inclusion Strategies. We recognise that 'Safeguarding' is equally applicable to both children and vulnerable adults and unless specifically indicated makes no differentiation between them.

This policy has been developed to describe the responsibilities of everyone for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified.

Therefore, the aim of this policy is to ensure that we fulfil its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

Senior Safeguarding Lead is referred to as SSL and Designated Safeguarding Lead is known as DSL within this procedure.

This policy has been agreed, sponsored, and approved by the Skills4 Board and Safeguarding Sub-Committee.

Name	Role
Amerjit Singh	MD with overall accountability for Safeguarding and Prevent
Gail Crossman	Chair of Safeguarding Sub- Committee (SSC)
Sam Collins	Senior Safeguarding Lead (SSC member)
Judi Oliver	Designated Safeguarding Lead (SSC member)
Claire Chidlow	Designated Safeguarding Lead (SSC member) and Prevent Co-Ordinator

Applies to:

This Policy applies to all Skills4 Staff, Associates and Volunteers, (for the purpose of this procedure we will use the term staff).

Within Skills4 the term Learner will relate to all individuals undertaking a course of study irrespective of whether they are a child or adult.

Skills4 recognises that any member of staff irrespective of role can be the first point of disclosure for a Learner. Therefore, all staff should::

- Be aware of the signs that a learner has been neglected or abused
- Listen to learners who tell them about abuse
- Report concerns effectively and in line with Skills4 Safeguarding procedure.

Reason for policy:

Skills4 acknowledges that children are amongst the most vulnerable in society. Therefore, adults in positions of trust have a duty to ensure that the rights of children and young people to protection from abuse are taken seriously and effective action is taken in response to any signs or abuse or neglect. This policy forms part of our Safeguarding framework and is in place to ensure that anybody who has cause to encounter any of our learners who may be at risk knows what is expected of them and can safeguard others.

Skills4 has a legal duty of care for the health, safety, security and wellbeing of their Learners and staff always when in the respective workplaces. This duty of care incorporates the duty to safeguard all Learners from subjection to any form of harm, abuse, or nuisance. It is the responsibility of the Senior Management to ensure that this duty is always discharged.

Context:

- All complaints, allegations or suspicions of abuse or any disclosures must be taken seriously, and all colleagues must adopt a 'could happen here approach.'
- Absolute promises of confidentiality must not be given as the matter may develop in such a way that these might not be able to be honoured. This must be made clear at the outset to the individual who is making the disclosure, with reassurance that they are doing the right thing and information will only be passed on to those who need to know this to safeguard them and others.

If the complaint/allegation or disclosure comes directly from a learner, questions should be kept to a minimum necessary to understand what is being alleged. Leading questions must also be avoided.

2. Policy Statement

We are fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the wellbeing and safety of its learners.

We recognise our responsibility and acknowledge that it is the duty of our workforce in its entirety to uphold British Values and Safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation. Therefore, employees, apprentices, volunteers and contractors will show respect and always understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values, and cultures of our organisation.

They will also be aware of and follow current legislation regarding the safeguarding of all learners. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

It is our intention to:

- Recognise that each provision may provide the only stability in the lives of Learners who have been abused, or who are at risk of harm.
- Provide a nurturing environment where self-esteem and self-assertiveness are promoted for all Learners including those that are vulnerable.
- Establish and maintain an ethos where Learners feel secure and are encouraged to talk and are listened to.
- We will adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities within Skills4.
- We will ensure that relevant employment and security checks are undertaken within our safer recruitment procedures, that all adults within Skills4, who have access to learners, have been checked as to their suitability in line with statutory requirements and as outlined in KCSIE 2023 Part Three: Safer Recruitment. This will support in creating a culture that is safe and safeguards the welfare of learners.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct.
- Ensure that appropriate supervision is given, where required.
- Ensure that all stakeholders are protected from abuse, regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity, or because someone is married or in a civil partnership.

- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk.
- To help promote an understanding that a Learner who is abused or who witnesses violence may be deeply affected and this may manifest itself in a number of ways and linked to Adverse Childhood Experiences (ACEs).
- Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration.
- Develop and promote effective working partnership with other agencies and in accordance with organisations' procedures, where required, including: Designated Person/s in Local Authority, Safeguarding Partners, Safeguarding Adults Boards, and the Channel multi-agency panel, the Police and Children's Services
- Regularly review and monitor our policies and procedures to ensure our legal, moral, and social responsibilities are met.
- Comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments.
- Have designated staff who support the safeguarding of learners within each region these are known as Designated Safeguarding Leads (DSL), they are in place to advise on and manage any concerns and referrals made and learners know there are responsible adults within Skills4 whom they can approach if they are worried or in difficulty.
- Ensure that all personal information is confidential and should only be shared with the permission of the individual concerned, (and/or those with parental responsibility), unless the disclosure of confidential information is necessary to protect a child or adult at risk from serious harm or to promote their welfare. In circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict "need to know" basis.
- All staff and Directors believe that Skills4 should provide a caring, positive, safe, and stimulating environment, which promotes the social, physical, and moral development of the individual learner.
- Everyone who works in or Skills4 have a responsibility to safeguard and promote the welfare of our learners and respond to concerns, incidents, or disclosures and should speak with their Designated Safeguarding Lead to inform them of any safeguarding or child protection concerns without delay.

If our learners feel safe and supported under the coaching and mentoring of Skills4 colleagues it will help their development in ways that will foster security, confidence, and independence as they continue to progress and achieve.

Signed



Amerjit Singh Managing Director

3. Policy

Statutory Obligations

Skills4 has a statutory duty under the following;

- Section 175 of the Education Act (2002)
- The Care Act (2014).
- The Prevent Duty 2015
- Working Together to Safeguard Children 2018 (England) (updated December 2023)
- Keeping Children Safe in Education as amended versions (2023).

Skills4 must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of children, young people and adults who may be at risk of harm or abuse. This policy sets out a framework for those arrangements and should be read in conjunction with the associated Skills4 policies and procedures listed, the web links provided, and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures.

This policy considers, amongst others, the following publications, including recent/ relevant guidance and legislation in this area:

Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2023) Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (His Majesties Government, last updated, December, 2023) Available at:

https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police, and other partner organisations. (Department of Health and Social Care, 2014) Available at:

https://www.legislation.gov.uk/ukpga/2014/23/pdfs/ukpga_20140023_en.pdf https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/365345/Making_Sure_the_Care_Act_Works_EASY_READ.pdf

The Prevent Duty: Safeguarding learners vulnerable to radicalisation. (Department for Education, September 2023) Available at: <https://www.gov.uk/government/publications/prevent-duty-guidance/revisedprevent-duty-guidance-for-england-and-wales>

Prevent guidance: England and Wales (2023). (Home Office, December 2023). Updated December 2023 Available at:

<https://www.gov.uk/government/publications/prevent-duty-guidance/revisedprevent-duty-guidance-for-england-and-wales>

Prevent duty guidance: for FE institutions in England and Wales (2015). (Home Office, 2015). Updated December 2023. Available at:

<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-dutyguidance-for-further-education-institutions-in-england-and-wales>

Meeting digital and technology standards in schools and colleges. (Department for Education, January 2024) Available at: <https://www.gov.uk/guidance/meetingdigital-and-technology-standards-in-schools-and-colleges>

Policy Principles

We endeavour to safeguard learners at risk by:

- Valuing, listening to and respecting them.
- Adopting policies, guidelines, a code of conduct and behaviour for employees, volunteers.
- Sharing information about concerns with agencies which need to know and involving parents and children appropriately.
- Ensuring that the DBS, in accordance with their guidelines, checks all staff and volunteers with responsibilities for young people and adults at risk, including relevant non-delivery roles.
- Recruiting staff, associates, volunteers and contractors who are aware of our Safeguarding policy and procedures.
- Providing all staff and volunteers with safeguarding training.
- Ensuring that all learners at risk, their parents and carers are aware of our Safeguarding policy and procedures.
- Ensuring that all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding.
- We are committed to be alert to a learner who:
 - Is disabled and has specific additional needs.
 - Has special educational needs (whether they have a statutory Education, Health, and Care Plan)
 - Is a young carer.

- Is a Looked After Child (LAC).
- Is an apprentice.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organized crime groups.
- Is frequently missing/goes missing from care or from home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalised or exploited.
- Is in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

We are committed to reviewing our policies and good practice at least annually, unless there is a change to legislation, or if there has been a meaningful change within the organisation. The SSL is responsible for updating the policy with support from the Safeguarding Sub-Committee.

We operate a culture of openness and transparency and embeds the principles of the '4 R's' across all our services, ensuring that all staff, volunteers and contractors understand their responsibilities with regards to safeguarding.

Responsibilities

Senior Safeguarding Lead (SSL) and DSLs (Designated Safeguarding Leads) and the Safeguarding Sub-Committee.

We have a Lead and a Safeguarding Sub-Committee who have overall responsibility for issues related to safeguarding young people and vulnerable adults and are supported by a team of DSLs. The DSL is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within the organisation and for liaising with health, children's service, adult services, and other agencies about suspected or actual causes of abuse. The SSL will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff who are as part of their role carrying out the role of DSL have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of young people and adults at risk and the promotion of a safe environment for learners.

The Safeguarding Sub-Committee has governance over safeguarding and Prevent matters across the business, reporting to Skills4 board and the MD has overall responsibility for safeguarding and Prevent at Board level. The MD will ensure that resources, support, and all relevant training are available and in place for staff. The MD will support the Safeguarding and Prevent Team in meeting their responsibilities and will ensure that we meet these commitments. There is a clear and robust job description for the SSL and DSL, the SSL is responsible for reviewing the Safeguarding policy

annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding policy and processes and procedures that support the embedding and working practices of this policy.

The Board

The Skills4 Board are responsible for ensuring we safeguard our learners in accordance with the statutory guidance set out in Part Two of KCSIE (2023) and related guidance or legislation. This includes that:

- A member(s) of the Board is appointed to oversee safeguarding matters and undertakes appropriate training in this, supported by another member of the Board to act as their deputy.
- Skills4 has a Safeguarding policy and associated procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- Effective training is in place for all staff, appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance.
- The Board receives and considers regular safeguarding update reports.
- Skills4 operates 'safer recruitment procedures' in accordance with statutory requirements and guidance.
- Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures.
- Skills4 contributes to multi-agency working in line with statutory guidance.
- Ensure that staff have the skills, knowledge and understanding to keep our vulnerable learners safe.

Designated Safeguarding Leads

Members of staff who are also DSLs receive training in safeguarding children and adults at risk and interagency working as required by the Local Safeguarding Partners. They also receive refresher training annually as required by us. The team are required to keep up to date with developments in safeguarding children and adults at risk.

The appropriate DSL must be informed immediately in the following circumstances if:

- a) Suspicion that a learner is being harmed.
- b) There is evidence that a learner is being harmed.

The SSL will ensure records of concerns raised are recorded and supervise and support any referrals to Local Safeguarding Partners, Children's Services Social Care/Police if necessary.

Any member of staff or anyone who has knowledge of, or a suspicion that a learner is or has been suffering significant harm, or is at risk of significant harm, should discuss their concern with their DSL or the SSL. There should be no delay in communication once suspicion arises. The sharing of relevant information at the earliest opportunity within an environment of strict confidentiality is essential. All information from parents, members of the public and any of an anonymous nature must be acted upon and recorded appropriately.

- The DSL team/manager is responsible for ensuring the Safeguarding policy is available publicly and to parents and carers, that parents and carers are aware that suspected abuse referrals may be made, and our role in this.
- The DSL team will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a learner.
- Being aware of how to make referrals to safeguarding partners, children's social care and adult's social care for statutory assessments via the local authority multi-agency
- safeguarding units, along with the role they might be expected to play in such assessments.
- The DSL team will alert the police when a crime may have been committed.
- All DSLs foster strong links with Safeguarding Partners and Designated Local Authority Person.
- The DSL team refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority adult's social care.
- Whenever possible the issue should be discussed with parents/carers except where to do so would jeopardise future enquiry or would not be conducive to the learners' welfare.
- If it is agreed that the issue puts the learner at risk of significant harm it must be reported directly to the SSL/DSL or in the case of an emergency to the Police.
- The SSL/DSL will refer to the ESFA or Local Authority as required should we be subject to an investigation regarding our safeguarding practices.
- The learner should be kept informed of actions taken at all stages of the procedure and maximum support offered/provided to them. Where the learner is competent to give consent, their agreement to the referral should be sought.
- If consent is refused the referral should still be made if it is considered necessary to protect the learner from significant harm.
- A written report of all discussions and action must be recorded and all referrals and subsequent documents/files will be retained securely by the DSL in the Skills4 Safeguarding Referral Logs folders
- All DSLs liaise with senior management to inform them of issues, especially ongoing enquiries, and police investigations.
- All DSLs maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral.
- All DSLs act as a source of advice, support, and expertise to staff on matters of safety and safeguarding.

- All DSLs liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved. DSLs ensure that we work with employers and other training organisations that provide apprenticeships and or work placements for children or adults at risk, to ensure that appropriate safeguarding's are in place.
- Referrals to Statutory Agencies, including verbal referrals should be followed up with a completed referral form within 24hrs of the original contact.
- The Safeguarding Sub-Committee ensures that all staff, associates and volunteers receive training in safeguarding children and vulnerable adults, are aware of procedures for protecting children and adults at risk and that refresher training takes place annually.
- The SSL provides information monthly to the Board setting about how we have discharged our duties. The SSL is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.

All Employees/volunteers are responsible for:

- All staff, supply staff and volunteers must have a full and active understanding of KCSIE 2023 Part One and or Annex A and all sections of the Skills4 Safeguarding policy - concerning child protection procedures, definitions, impact, indicators of abuse and referrals - in order to safeguard children at Skills4 effectively.
- All staff, teaching, supply, support staff and volunteers will be required to read the full Skills4 Safeguarding policy. All staff will be informed of the procedures in place to address and manage any safeguarding concerns, allegations about staff members including low-level concerns and recording of these.
- All Senior members and staff who work directly with young people should also read Part Five and Annex A.
- Providing a safe environment in which learners at risk of harm, abuse or neglect can learn in a safe environment.
- Being prepared to identify learners at risk of harm, abuse, or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.
- Any concerns - whether about a child, young person, family, colleague or another professional, must be shared with the SSL
- All staff have a duty to assist in the assessment of possible child abuse by sharing information and reporting concerns as outlined in this policy. Staff may have the one key piece of information that will help Children's Services,
- Safeguarding Partners make the best decision about a child.
- When concerned about the welfare of a child, staff should always act in the 'best interests of the learner'.
- Doing nothing is not an option.

- In the event of a disclosure being made an immediate verbal referral to relevant Children Service can be made. This will then be followed by a written referral within 24 hours.
- Never promise a Learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe.
- It may be difficult or upsetting to report a concern and it is sometimes hard to accept that a child is being harmed, particularly if there is an existing relationship with the family or professional concerned. However, the needs of the child must always come first. It is the role of the DSL to support and listen to concerns.

If a learner tells you something that causes you concern:

- Listen to the learner
- Never promise learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe
- Encourage the learner to talk, but do not prompt, or put words into their mouths, and do not ask leading questions
- Do not ask the learner to repeat again and again
- Explain what action you must take in a way that is age appropriate
- As soon as you are able, write down what the learner has told you. Use the learner's exact words if possible. Record the date, time and place and any other people present at the time
- Report concerns without delay to the SSL
- Do not worry you may be mistaken; it is better to discuss your concerns with someone who has the experience and the responsibility to make an assessment
- Do not confront an alleged abuser
- Try to remain calm and not to appear shocked by what they are telling you;
- A learner, parent, caregiver, or member of the public who tells staff their concerns about a child's welfare must never be expected to be asked to make a self-referral to social services or police.

If you have concerns about the behaviour of another colleague, do not dismiss these concerns. Action should be taken in accordance with the appropriate Skills4 policies. It is particularly important not to ignore or dismiss suspicions about another professional or colleague but approach the SSL with your concerns:

- Reporting to the SSL or the Managing Director any concerns they may have about the conduct of colleagues in relation to Safeguarding and/or professional staff code of conduct.
- If a learner discloses a matter of concern to you it can be very upsetting, try not to take these feelings home with you. Talk to the SSL it is important not to ignore these feelings and to offload.

Following the framework described in the Safeguarding referral procedure, know where to go and what to do if they have any safeguarding concerns.

- Attending safeguarding and child protection training and updates as required, on induction and an update at least once every year.
- Reading and familiarising themselves with associated policies via the Skills4 website.
- Reading safeguarding newsletters, hot topics and associated guidance when published.
- Promoting awareness of safeguarding issues/support amongst learners, colleagues, and other stakeholders.
- Protecting themselves by being familiar with and adhering to the Staff professional code of conduct, safer working practice and other key safeguarding standards.
- Wearing their staff ID badge always when working on or off Skills4 sites.
- Reporting to a DSL any learner welfare concerns that they may have or may need support with.
- Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals.

Learners

Learners are responsible for:

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers, and others on site.
- Reporting any concerns to a member of staff or directly to a DSL with whom they feel comfortable discussing these concerns.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

Safer recruitment and Training for Staff

Skills4 will select and recruit in accordance with the statutory guidance set out in Part 3 of KCSIE (2023), which details Safer Recruitment pay due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedom Act 2012. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in Skills4, including staff, volunteers and staff employed by external partners/contractors. The SSL will ensure that a single central record is maintained of all pre-appointment checks.

DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. In addition, as part of the shortlisting process we will carry out an online search as part of their due diligence on the shortlisted candidates. This will help identify any incidents or issues that have happened, and are publicly available online, which we may wish to explore with the applicant at interview. We inform shortlisted candidates that online searches will be done as part of due diligence checks.

Newly appointed staff will have a job role induction in line with our probation policy over a 6-month period. We ensure that all employees are made aware of the standards expected of them and implement the appropriate support, training feedback to achieve these standards. Employees will not be made aware of the relevant Safeguarding and Prevent procedures as part of that induction program and will have access to our Safeguarding Policy through our shared drives.

Individual/Group	Training	Frequency
All new staff and annual updating	<ul style="list-style-type: none"> • Safeguarding and Prevent Duty • Policy review (internal and external) Identified essential reading (KCSE part 1) • Hot topics, Newsletter, videos and CPD training events by the DSL team. 	At induction and annual updating or at time of changes.
Designated Safeguarding Leads (DSL)	<ul style="list-style-type: none"> • Identified essential reading • Specialism divided by the team to ensure full coverage • Designated Safeguarding • Lead Training (2 years). 	Complete and appropriate updating.
Board and Senior Managers	<ul style="list-style-type: none"> • Annual training and updating 	Annual and where required (e.g. legislation updates).
Staff Recruiters	<ul style="list-style-type: none"> • Safer recruitment practices 	Annual and where required (e.g. legislation updates).

Confidentiality

The Data Protection Act (2018) and General Data Protection Regulations (GDPR) do 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 welfare and protect the safety of children, young people, and adults at risk of harm, abuse, or neglect.

Colleagues should never promise that they will not tell anyone about an allegation or disclosure, as this may not be in the best interests of the child, young person, or adult at risk of harm or abuse. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018), following government advice and guidance.

- Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately
- Consider safety and well-being:
 - base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
 - ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Learner Recruitment

When joining a programme, a detailed record of learner needs will be kept, and an Individual Learning Plan (ILP) prepared to ensure all the needs are planned for. All learners receive a learner handbook, detailing our support policies and key contacts. There is also follow up review points to capture their journey and do their needs are being met. Delivery staff will work closely with the designated employer contact ensuring a triparty support system is in place.

The safety of all our learners is paramount and where a learner wishes to join a course from a referral agent or has disclosed behaviours that may be as a concern a risk assessment will be complete to assess course suitability and if the required support plan can be put in place prior to a course offer.

External Speakers and Events

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with us, or one of its contracted partners, who has been invited to speak to staff/learners.

The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events
- Processes or protocols to demonstrate how information about the speaker is used to decide about whether to allow their event to take place or not (risk assessed)
- A requirement for speakers to sign up to the organisation's equality and diversity policy.

- Evidence of the final decision made about whether to allow the speaker into the organization, including the mitigation measures put in place.

Safeguarding Code of Conduct

- We follow Part one of Keeping Children Safe in Education 2023, this code of conduct should be read in the context of your agreed job description, appropriate professional standards and internal policies and procedures. It details how individuals can protect themselves against
- allegations of abuse, avoid personal and social contact with learners, and seek to minimise the risk of any situation arising in which misunderstandings can occur.

You SHOULD:

- Be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSL's.
- Treat all learners equally and listen to them, avoiding favouritism and gossiping
- Ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to learners on social media/network sites. Always use professional language when writing, phoning, emailing, or using social media/network to communicate with them.
- Immediately report concerns relating to the welfare of a learner at risk in your care, whether these concerns are about actions/behaviours of another colleague or based on any conversation with the learner, particularly when they make an allegation.
- Act as a role model.
- Set and monitor appropriate boundaries and relationships when working with learners, based on openness, honesty, and respect for them.
- Respect a learners' right to personal privacy but never agree to keep any information relating to their risk of harm confidential. Provide support to anybody making a complaint.
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSLs without delay and record all the facts.
- Ensure that if a distressed learner needs comfort, that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive.

You should NOT:

- Engage in flirting or innuendo, make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.

- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person, even when the young person is aged 16 or over and therefore legally able to consent.
- Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material that has inappropriate content for young children.
- Invite or allow a learner who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in or tolerate any inappropriate physical activity involving young people.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for children or adults at risk that they can do for themselves.
- Dismiss an allegation of any sort relating to a learner's, apprentice or adults at risk's welfare or delay the reporting of an allegation.
- Discourage anyone from reporting concerns or ask individuals to keep secrets.
- Make promises to keep secrets, keep any disclosure confidential, overreact or be judgmental, should you suspect abuse.
- Spend excessive amounts of time alone with children or vulnerable adults, away from others
- Make unnecessary physical contact with children or vulnerable adults. However, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports, etc. in all cases, contact should only take place with consent of the child or the vulnerable adult.
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes or e-cigarettes to/ from a young person or their families. • Smoke/vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.
- Share, steal or otherwise disclose personal data relating to a learner to any other member of staff or learner.

Upon induction to the programme, the child, young person, or adult at risk must be given a copy of our Code of Conduct and our colleagues will go through this document with them to ensure they understand their responsibilities. If a child, young person, or adult at risk feels that there has been a breach of the Code of Conduct, they should report this breach by following the internal complaints procedure. The complaint will be fully investigated as per the policy/ process and actions will be taken to ensure the individual making the complaint is fully supported. If the complaint is regarding another child, young person or vulnerable adult, there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of Code of Conduct may need the intervention of the DSL team, and the safeguarding procedures should be followed.

All learners should be treated with respect and our Code of Conduct has been written with respect, dignity, and safety for every individual in mind. However, staff understand that learners can abuse their peers. Peer abuse can take many forms, such as sexting, bullying, physical and emotional abuse, and inappropriate banter. We work with all Subcontract Partners to enrich their own approach to safeguarding, sharing information and policy. Guidance is cascaded to all Subcontract Partners.

Wellbeing and Learners Safety while Remove Learning

We will abide by Government guidance relating to learner's safety and measures that need to be taken to minimise the risk of infection during pandemics. We will be vigilant to the mental health and wellbeing of learners during the time of any isolation and provide a support plan for regular contact where attendance is not a normal indicator of engagement. Learners will also be provided with guidance on safe home working. See our 'Planning for and Management during a Pandemic Policy'.

Anti-Bullying and Harassment

Our policy on bullying and harassment is set out in a separate policy Learner Antibullying and Harassment Policy and acknowledges that allowing or condoning bullying or harassment may lead to consideration under safeguarding learners. All incidents of bullying and harassment, including cyber-bullying, racist, homophobic, and gender-related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that Learners at risk with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in our programs. Our policy on bullying and harassment is explained at the induction process for new learners and their parents and carers.

Communications

- When communicating with learners online, observe the same rules of behaviour as if speaking with them in person by being professional: polite, respectful, not swearing or saying anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination
- Ask yourself whether the content of any online communication has a clear work purpose.
- Do not use any text speak abbreviations or symbols/emoticons, even if you ordinarily use these in your personal life
- Never disclose non-public and confidential information about us, our staff, associates, volunteers, or the young people with whom we are working
- Do not say anything or re tweet any posts that could be deemed offensive, controversial, or socially inappropriate in any way
- Contact with young people or adults at risk online should only be a recognized element of your work and done strictly for business purposes

- Do not send any illegal or inappropriate content (written, images or icons), including sexting via mobile phones.

Openness and Scrutiny

- Always communicate with learners in a way that is open for others to see
- Do not use private messaging facilities on social networks or apps; if it needs to be private, then do this email exchange or phone and note the conversation afterwards
- Ensure there is always a record of such communication that would be open for others to check, if necessary
- It should always be clear who the communication is from when we are communicating with a learner
- There should be no use of anonymous apps, where the sender can remain anonymous.

Learning Environment

- The safeguarding of learners is paramount and takes precedence over all
- Identify a suitable environment for the call. Discourage, where possible, pupils from making video calls from their bedroom
- Ensure appropriate clothing for all participants
- No personal items are to be visible in the background
- Minimisation of distractions and disturbances
- Preferred use of a headset or headphones
- Cameras preferred
- Adherence of all to relevant behaviour and conduct policies
- Maintain a central register of all lessons, including the link used to access them
- Ensure all learners are aware of lessons being recorded
- Be conscious of confidentiality when working online.

Recording

- Only use social media and apps where there is a permanent record of what has been said and sent, thereby being open to scrutiny, e.g., the use of Snapchat is not appropriate.

Consent and Storage of Images

- If a learner or parent do not give permission for photographs/videos to be taken, we will abide by this and we will not exclude a learner from completing activities if we do not have consent. All learners will be asked to have a parent sign a consent form to give permission.
- All photographs and images of children taken will be stored securely under our Data Protection Policy. If we keep hard copies of images, these will be stored securely in a locked cabinet or electronically in a restricted access folder.

Use of Equipment

- Our IT equipment (including computers, laptops, mobile phones, PDAs, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content, including abusive images of children or young people.
- Learners use their own equipment and networks; however, we are aware of the Digital and Technology standard regarding the expectations regarding online safety and web filtering.

4. Definition

Term	Explanation
Children/Young People	Any person up to the age of 18 years.
Adult at Risk	Those aged 18 years and over who: are unable to safeguard their own wellbeing, property, rights, or other interests.
SSL	Senior Safeguarding Lead.
DSL	Designated Safeguarding Lead.
Harm	Harm includes ill treatment (including sexual abuse, exploitation and forms of ill treatment which are not physical); the impairment of health (physical or mental) or development (physical, intellectual, emotional, social, or behavioural); selfharm and neglect; unlawful conduct which adversely affects a person’s property, rights, or interests (for example, financial abuse).
Radicalisation	The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
Extremism	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.
Exploitation	Exploitative situations, contexts, and relationships where a person or persons receive ‘something’ (e.g., food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) because of them

	completing a task on behalf of another individual or groups of individuals.
Victimisation	The action of singling someone out for cruel or unjust treatment.
Welfare	The health and happiness of a person or group.
Abuse	The violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act.
Data Protection	Legal control over access to and use of stored data.

5. Related Policies

The following policies demonstrate and support a shared commitment to safeguarding and promoting the welfare of its stakeholders.

- Bullying and Harassment
- Code of Conduct
- Grievance
- Data Protection (GDPR)
- Equality and Diversity
- E-Safety
- Public Interest Disclosure (Whistleblowing)
- Recruitment and Selection
- Learner Behaviour
- Lone Working
- Complaints
- IT Security and Information Policies.