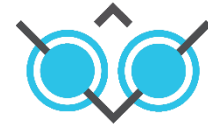




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**NORTHWEST**  
EDUCATION & TRAINING

Northwest Education and Training

# SAFEGUARDING POLICY

## **PURPOSE**

The purpose of this policy is to provide a framework that informs procedures related to Northwest Education & Training's (The Company) legal obligation to protect children and vulnerable adults who are suffering forms of abuse as defined in the Children's Act 1989 and the Protection of Vulnerable Adults Scheme 2004. Working together to safeguard children 2018 and KCSiE 2019 underpin this policy which is available on our website.

## **SCOPE**

This policy applies to all staff and others who work in direct contact with learners. This also includes sub-contractors delivering programmes on behalf of The Company. Abuse may take place anywhere; everyone who is part of the company is responsible for safeguarding, promoting and protecting the welfare of children and vulnerable adults.

## **LEGAL FRAMEWORK**

Anyone supplying education or training has a duty, under the Protection of Vulnerable Adults Scheme 2004, to promote and safeguard the welfare of vulnerable adults. The Children Act 2004 requires agencies to work co-operatively to protect the welfare of children. Guidance published following Lord Laming's report into the death of Victoria Climbié made it clear that all those who come into contact with children and young people have a duty to promote and safeguard children.

The Company is committed to the government national framework for change outlined in Every Child Matters: Change for Children.

The Company adheres to national best-practice guidelines.

### **See also:**

- Data Protection and Data Access Policy
- Disability Policy
- Equality and Diversity Policy
- Health and Safety policy

## **PRINCIPLES**

The Company recognises that for people who have been abused, or who are being subjected to abuse, we may be the only stable and secure element in their lives. The Company's Safeguarding policy and procedure is based on the following principles:

- an ethos that promotes a positive, supportive and secure environment where learners feel valued and safe

- liaison with other internal and external agencies that support learners, such as social/children's services, Housing Trusts
- all allegations and suspicions of abuse taken seriously, and responded to swiftly and appropriately by trained and experienced staff

**There are five main elements to the policy:**

1. ensuring The Company practices safe recruitment in checking the suitability of learners who are enrolled onto its programmes and staff who work with young people
2. raising awareness of protection issues and their effective handling amongst staff
3. developing and implementing procedures for identifying and reporting cases or suspected cases, of abuse
4. supporting effectively and in a timely manner the young person who has been abused
5. establishing a safe and welcoming environment in which young people can learn and develop, where they are able to talk and be listened to

**DEFINITIONS**

The following definitions apply throughout the Safeguarding policy and associated procedures:

**Child or Children:**

The Children Act 1989 defines a child as a person under eighteen for most purposes.

**Vulnerable Adult or Adults:**

The Protection of Vulnerable Adults Scheme (PoVA 2004) defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs
- a significant reduction in physical or mental capacity

**Forms of abuse:**

The Children Act 1989 defines four types of abuse: physical, emotional, sexual and neglect.

**Physical Abuse:**

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

**Emotional Abuse:**

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- imposing developmentally inappropriate expectations
- causing the child or vulnerable adult to feel frightened or in danger – e.g. witnessing domestic violence
- exploitation or corruption of children or vulnerable adults

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

### **Sexual Abuse:**

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative (i.e. vaginal or anal rape or buggery) and non-penetrative acts.

It may also include non-contact activities, such as looking at, or being involved in the production of pornographic materials, watching sexual activities or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

### **Neglect:**

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

## **RESPONSIBILITIES -NWEAT APPROACH TO SAFEGUARDING**

NWEAT not only ensures whether arrangements for Safeguarding learners are appropriate and effective (Ofsted EIF Sep 2019) but we have also implemented outstanding measures to ensure that safeguarding policy and procedures are fully embedded into the learning journey whether the learner has employed (apprentices) or non- employed status and we work closely with employers to ensure the most effective systems are in place.

NWEAT ensures reflection on and learning from best practice in safeguarding through the Local Children's Safeguarding Board's performance framework. All NWEAT Safeguarding policies, which is in accordance with LSCB arrangements and procedures, links to other relevant policies within the setting to ensure awareness of specific safeguarding issues and how to respond across the education setting's community: staff, parents and learners. These details are outlined and described in Keeping Children Safe in Education Sep 2019 (KCSiE).

The policy must be read by all staff members and evidence of this kept on staff files and made available to learners/ parents (if appropriate).

In order to support effective practice, the corporate NWEAT safeguarding policy template has been adapted and expanded to meet the requirements of KCSiE, whilst retaining its structure.

The statutory role of Designated Safeguarding Lead (DSL) in education settings is identified and outlined in KCSiE 2019. Please see DSL JD – Appendix 1

NWEAT approach to safeguarding all of our learners is founded on the nature of our relationships. We prioritise assessing and managing the needs of our services users and have a dynamic approach to the identification, assessment and response to risk. We have a commitment to ensuring that during all staff and learner induction, Health and Safety, Safeguarding, Prevent, Whistleblowing and Complaints procedures are fully covered.

As well as initial induction we ensure that all staff have annual refresher training on both Safeguarding and Prevent to promote our commitment to keeping learners safe.

Our organisational structure and approach places emphasis on collaborative relationships with our learners and our partners in delivery. This means our response to need and risk is timely and effective. We ensure that we work together to learn the lessons from our practice and use them to inform our safeguarding.

Our staff are informed in terms of the indicators of possible harm and possible vulnerabilities. Staff know what to do when possible abuse or neglect is suspected or disclosed and are skilled in a range of interventions to prevent further or future risk to our learners.

Our goal is to enable the learner. This means that we focus on supporting them in finding their own solutions to challenges that pose a risk to their well-being, empowering them to make positive sustainable changes to their lives.

This policy outlines our organisational standards in safeguarding - NWEAT uses these standards to measure our performance and achievements in safeguarding within all our education provision. We also outline a range of behaviours that we encourage staff to embed in their approach to safeguarding that in turn, we believe, supports effective safeguarding practice and the prevention of harm. This policy references key legislation and statutory guidance and outlines how we approach safeguarding at local delivery level. It addresses the need to safeguard in all our practice contexts.

<b>Name and contact details of Designated Safeguarding Officer</b>	Stan Hicklin - 0151 526 4949 07764292825
<b>Name and contact details of Deputy Designated Safeguarding Officer</b>	Angela Owens – 0151 526 4949 07926986868

<b>Local Authority contact information:</b>	0151 233 3700
<b>For under 18 s (and those up to 24 with an EHCP- education and health care plan)</b>	0151 233 3800
<b>For over 18 s without an EDCP, identified as vulnerable – Social Care</b>	For all other regions please refer to NHS SG App for numbers and contacts.
<b>In emergencies</b>	Call 999

**Worried about Exploitation? Call the NSPCC Exploitation Helpline 0808 800 5000**

### **Why is safeguarding necessary for employed learners i.e. apprentices?**

Providers of government funded training have a duty to safeguard their learners and to take such steps that try to ensure the safety of its learners at all times. As part of that duty, we ensure employers and other stakeholders are aware of their commitment in safeguarding their staff and to ensure that learners are not exposed to threats or dangers. Our Safeguarding Policy is available to all stakeholders and is available on our website.

### **What are the responsibilities of an Employer?**

- To understand what is meant by safeguarding and promote the welfare of learners
- Be aware of your statutory duties towards the welfare of children and vulnerable adults
- Be familiar with our guidance, in particular, the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside learners are free from convictions and of sound character and judgement and will not pose as any threat or danger to learners. We will ensure all employers receive a copy of our policy.

### **What do I do if my learner/ apprentice discloses information to me?**

- Re-assure the learner that they have done the right thing
- Record what the learner said, using their words where possible. Sign and date the record
- Inform our Designated Person or deputy as soon as possible and pass on the written

record

- Maintain confidentiality and do not discuss with others
- Listen without making judgements
- Stay calm
- Try not to ask questions, but if you must, make sure they are open-ended questions to clarify
- understanding and not to probe or investigate
- Don't give an opinion or offer advice
- Don't promise confidentiality - explain you may need to talk to a DSO

Employees working closely with children or vulnerable learners should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice.

If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact the Designated Safeguarding Team.

Any concern must be documented and emailed to the Designated Safeguarding Officer. Unless in immediate harm, where the relevant authorities will be contacted immediately.

In this situation ensure that the learner is accompanied and kept safe until the relevant authorities arrive.

If you have any concerns about an apprentice, then please do not hesitate to contact one of NWEAT designated safeguarding lead/ deputy in the absence of the Lead.

## **HONOUR-BASED VIOLENCE WHICH INCLUDES FGM AND FORCED MARRIAGE**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The

duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information- explain that you are making a report under the FGM mandatory reporting duty:

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding officer is kept updated as appropriate.

In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means.

Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

Forced marriage is an abuse of human rights, a form of violence against women and men, where it affects children, child abuse and where it affects those with disabilities abuse of vulnerable people. A forced marriage is one in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental incapacity, cannot) consent to the marriage and violence, threats, or any other form of coercion is involved. Coercion may include emotional force, physical force or the threat of physical force, and, financial pressure. In



an arranged marriage, both parties have consented to the union but can still refuse to marry if they choose to.

*FGM and forced marriage is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.*

### **Grooming- What does the term grooming mean?**

- Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

### **What is sexual online grooming?**

- Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so
- The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks
- Online groomers will tend to use chatrooms, which are focused on young people. There are countless teen chat rooms on the internet
- Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming
- Grooming online is anonymous and children find it easier to trust an online 'friend' than
- someone they have met 'face to face'

### **How do you know if a child is being groomed online?**

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

### **Grooming – In Person**

- Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust
- They may try to gain the trust of the whole family to allow them to be left alone

with a child or vulnerable adult

**Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues.**

**To gain trust, groomers will:**

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation
- Take them on trips, outings or holidays

**Children or vulnerable adults may not speak out about their situation because they:**

- Feel ashamed
- Feel guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

### **Contextualised Safeguarding**

All staff, but especially the designated safeguarding officer (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Contextual Safeguarding helps focus on the fact that people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

"Contextual Safeguarding, therefore, expands the objectives of child protection systems, beyond focusing on families in recognition that young people are vulnerable to abuse in a range of social contexts." (KCSiE extract)

### **Keeping Yourself Safe**

To maintain yours and the learner's safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers

- Visit learners at home
- Do not use sarcasm, insults or belittling comments towards learners
- Personal relationships with learners

You will naturally build a rapport with learners/ apprentices and they may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on NWEAT's behalf. Be respectful and appreciate you are in a position of trust.

- Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/examination ensure a member of the site staff is aware where you are and monitors this
- Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting)
- If at any point, you feel unsafe in a learner's company inform the site manager, your line manager, the DSL and leave the premises

#### **All staff:**

All staff that come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults. Staff will be trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. All staff are expected to:

- attend safeguarding training as required
- familiarise themselves with the Safeguarding policy and associated procedures
- safeguard and promote the welfare of children and vulnerable adults and
- alert the Designated Safeguarding Officers if they have concerns about a child or vulnerable adult

#### **Tutors and Assessors:**

All staff is responsible for ensuring that their learners are aware of the services they can approach for support.

**Designated Safeguarding Officer** Stan Hicklin is designated as responsible for safeguarding children and vulnerable adults and dealing with safeguarding issues.

Stan Hicklin acts as the Company's source of support, advice and expertise on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend training as appropriate, liaise with, and where necessary, make referrals to external agencies. Other aspects of their role include:

- obtaining information from staff, children, parents or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information
- assessing information quickly and carefully and asking for further information where appropriate
- consulting with a statutory child protection agency e.g. the local social services department, to clarify doubts or worries
- making referrals to statutory child protection agencies or the police without delay
- initiating relevant internal support mechanisms

### **The Managing Director:**

Is responsible for ensuring that:

- the Company's Safeguarding policy and procedures are fully implemented and followed by staff
- all programme leaders take strategic decisions in relation to safeguarding
- all programme leaders have sufficient time and resources to carry out their roles
- all staff feel able to raise concerns about the safety of children and vulnerable adults
- such concerns are dealt with sensitively, effectively and in a timely manner

### **The Board of Directors:**

Are responsible for ensuring that:

- the Company has a safeguarding policy and procedures in place, which includes safe recruitment and dealing with allegations of abuse against members of staff
- the Company has an appointed Designated Safeguarding Officer.

New KCSiE guidance 2019 identifies Maintained school governors (pages 173-174) should carry out section 128 checks on their governors. However, associate members appointed by the Governing Body has been identified as enhanced DBS checks are not mandatory for these post holders.

*Read more about [section 128 checks](#).*

### **I.T. and Internet Safety**

The internet is used in NWEAT to raise educational standards, to promote learner achievement, to support the professional work of staff and to enhance the school's management functions. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our learners with all the necessary I.T skills that they will need in order to enable them to progress confidently in their educational careers and onward towards their working environments when they leave education.

There's now a link to new DfE guidance on [teaching online safety in schools](#) in the new updated KCSiE 2019.

*For parents (learners under 18 and those identified as vulnerable)*

Communication between NWEAT and parents/carers may be through e-mail and telephone messages. This form of contact can often be considered to be more effective, reliable and economic. Text messages and letters will also inform parent/carers of details relating to attendance, behaviour and other appropriate matters.

## **SAFE RECRUITMENT OF STAFF**

The Company undertakes to ensure that all staff are fit to work with children and vulnerable adults. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

The Company has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made on appointment:

- a minimum of two references, satisfactory to the Company, one of which should be from a previous employer
- documentary evidence checks of identify, nationality, residency and “right to work” status
- standard or enhanced DBS Disclosure\*
- a check under Section 142 of the Education Act 2002 (formally known as List 99)
- documentary evidence of qualifications
- satisfactory completion of the probationary period
- The Company carries out Standard Enhanced Disclosure for all staff that are in contact with learners For individuals who have lived outside of the UK, further checks are carried out, where appropriate, if a DBS Disclosure is not felt to be sufficient to establish suitability to work with children, young people or vulnerable adults.

In accordance with the Regulations, records of all checks carried out are kept centrally in the Human Resources files.

## **STAFF DEVELOPMENT AND TRAINING**

All staff undergo a mandatory induction programme, an element of which is safeguarding training. The Company's Safeguarding policy, procedure and accompanying guidance will be issued to all new staff as part of their induction.

## **SAFE RECRUITMENT OF LEARNERS**

The Company undertakes to ensure that its learners are suitable to study. It also reserves the right to refuse entry to any applicants whom it has a reasonable belief may pose a risk to learners. To ensure this is addressed appropriately the company has:

- signed declarations by all learners upon enrolment
- risk assessment of vulnerable learners
- risk assessment of identified ex-offenders

## **WHAT TO DO IF YOU SUSPECT SOMEONE IS BEING ABUSED**

All staff working in direct contact with learners must be alert to the signs of abuse. Anyone who suspects that abuse is taking place, or to whom a learner discloses issues relating to safeguarding, should contact the Designated Safeguarding Officer immediately.

### **The Lead Designated Safeguarding Officer is:**

Stan Hicklin – Managing Director

Tel: 0151 526 4949

Staff who are approached with concerns about a child or vulnerable adult, must bring the concerns raised to the attention of the Designated Safeguarding Officer immediately.

All staff to whom a learner discloses issues that may be related to safeguarding must keep written records of concerns. Such records must be kept securely, separate from the main learner files and in locked locations.

The Designated Safeguarding Officer will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or vulnerable adult protection matters, including attendance at case conferences.

## **ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF:**

Allegations of abuse, or concerns raised against members of staff, will always be treated seriously. The allegation must always be referred to the Designated Safeguarding Officer who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations.

The Designated Safeguarding Officer will take the appropriate steps to ensure the safety of the child or vulnerable adult, and any others who may be at risk. The Designated Safeguarding Officer will also inform the board of directors, in order that Company procedures may be followed, and an Investigation is carried out. If the allegation or concern is against the Designated Safeguarding Officer, it should be reported to the Board of Directors. This may result in possibly criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services.

## **REPORTING CASES TO THE DISCLOSURE AND BARRING SERVICE**

The Company has a statutory duty to make reports and provide relevant information to the Disclosure and Barring Service (DBS) where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the DBS lies with the Managing Director.

The Disclosure and Barring Service make barring decisions for Section 142 of the Education Act (formally known as List 99), The Protection of Children Act List (PoCA) and the Protection of Vulnerable Adults List (PoVA).

## **RESIGNATIONS**

If, during an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, the Company is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

## **Multi-agency working**

Changes to this section in the KCSiE update 2019 are to clarify the expectations for all agencies and education providers, in the context of the phasing out of local safeguarding children boards (LSCBs)- specifically to be aware of and follow these new local arrangements, this includes our senior leadership team, DSL and governing board.

As a reminder, our 3 safeguarding partners are:

- Local authority (LA)
- Clinical commissioning group within the LA
- police

## **Cyberbullying**

Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs

Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications

*Who is most at risk?*

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

### Definitions of cyberbullying

<b>Flaming</b>	Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
<b>Denigration</b>	Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
<b>Exclusion</b>	Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
<b>Outing</b>	Sharing secrets about someone online including private information, pictures, and videos.
<b>Impersonation</b>	Tricking someone into revealing personal information then sharing it with others.
<b>Harassment</b>	Repeatedly sending malicious messages to someone online.
<b>Cyberstalking</b>	Continuously harassing and denigration including threats of physical harm.

### Upskirting (is now a form of peer-on-peer abuse in KCSiE 2019)

It's a criminal offence and is now listed in paragraph 27 of the new 2019 KCSiE guidance.

**Definition:** upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

### Serious violent crime (pages 29-30 KCSiE 2019)

The recent update states that all staff need to know the indicators that may signal that children and vulnerable adults are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school/ training
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

### Data Protection (please also see Data Protection policy)



All details and actions taken are recorded on the personal file of the learner. There may be different recording requirements dependent on the context of your work, however, to remind you, here are the key principles:

- Be clear
- Ensure you include the key details of the learner and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

*What happens to the recording of the disclosure and other information gathered?*

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally, the NWEAT reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure.

## **WHISTLEBLOWING**

The Company has an established Whistleblowing procedure for enabling staff to share, in confidence, concerns they may have about instances of suspected malpractice. Malpractice can include fraud and financial irregularities, criminal offences being committed, that have been committed or that are likely to be committed, endangering the health or safety of individuals, and can also include concerns around the protection of children or vulnerable adults. The procedure is intended to provide safeguards to enable members of staff to raise concerns without fear of adverse repercussions. The Company recognises that it may be difficult to express concerns about colleagues and is fully supportive of Whistleblowing for the sake of a child or vulnerable adult and will provide support and protect those who “blow the whistle”. This procedure is, accordingly, intended to provide safeguards to enable members of staff to raise concerns about malpractice in connection with the company. The aim is to provide a rapid mechanism under which genuine concerns can be raised internally, and, if necessary, externally without fear of adverse repercussions to the individual. It is also intended to promote a culture of openness and a shared sense of integrity by inviting all to act responsibly in order to uphold the reputation of the company and maintain public confidence.

## **SUPPORT FOR STAFF**

The Company is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with the Designated Safeguarding Officer.

## **EQUALITY OF OPPORTUNITY**

All children and vulnerable adults have the right to be safeguarded from harm and exploitation whatever their race, religion, gender, sexuality, age, or disability. This policy relates to the Company's legal obligation to protect children who are suffering forms of abuse as defined in the Children Act 1989 and is therefore in line with the Company's equality and diversity policies.

**If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding.**

### **Key National guidance and legislation**

There are numerous publications and evidence around best practice in safeguarding in education

These include:

- Keeping Children Safe in Education (KCSiE) 2019
- The Children Act 1989
- The Children (Northern Ireland) Order 1995
- The Human Rights Act 1998
- The Data Protection Act and 1998
- The Female Genital Mutilation Act 2003
- The Children Act 2004
- The Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012
- Female Genital Mutilation mandatory reporting 2015 –Procedural Information
- Channel Duty Guidance 2015 and the Prevent Duty for Schools and Childcare Providers 2015
- Working Together to Safeguard Children 2018

### **Appendix A- DSO JD**

The designated safeguarding officer should take lead responsibility for safeguarding and child protection including vulnerable adults.

The DSO will have the appropriate status and authority within the company to carry out the duties of the post.

They will be given the time, funding, training, resources and support to provide advice and support to other staff on child/ vulnerable adult welfare and child/ vulnerable protection matters.

Whilst the activities of the designated safeguarding lead can be delegated to the deputy, the ultimate lead responsibility remains with the designated safeguarding lead; this lead responsibility will not be delegated.

Key areas of responsibility:

- Takes part in strategy discussions and interagency meetings
- Support other staff in information, advice and guidance including annual refresher training
- Complete a monthly Safeguarding Progress report
- Ensure Incident Report forms are password protected, completed timely in line with policy and that part 3 (follow up) is completed within 7 days
- Contribute to the assessment of children and vulnerable adults
- Liaise with the appointed deputy designated safeguarding officer who will be trained to the same standard as the designated safeguarding officer
- Refer cases of suspected abuse to the local authority children's or adult social care as required
- Be the point of contact to monitor and give advice on lone working
- Support staff who make referrals to local authority children's and adult social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required
- To liaise with the M.D. to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Liaise with the "case manager" and the designated officer(s) at the local authority for child or vulnerable adult protection concerns (all cases which concern a staff member)
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for staff
- Undergo training to provide them, and the deputy DSL with the knowledge and skills required to carry out the role- this training should be updated at least every 3 years
- Undertake Prevent awareness training and ensure all staff are safeguarding and Prevent compliant. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as

early help assessments

- Are able to keep detailed, accurate, secure written records of concerns and referrals and use the required policy and procedures to ensure best practice
- Review safeguarding Policy and Procedures including Prevent annually and ensure clear guidelines and information is cascaded to the team
- Ensure all staff, read and understand key update including KCSiE 2019 and sign to say they have read this ensure all policies and procedures are followed
- In exceptional circumstances arrange adequate and appropriate cover arrangements for any out of hours support
- And any other duties as is reasonable

Reviewed –2 Sept 2019

Board sign off – 10<sup>th</sup> Sept 2019

Policy signed off  
by the board.