



KEIR TRAINING  
& RECRUITMENT

# Safeguarding Policy

Version 11

Validated by name:	Keziah Ampofo
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This policy will be reviewed annually or earlier if changes are necessary. Keir Training and Recruitment reserves the right to amend this policy at any time, following consultation, where appropriate.

Date created:	September 2022
Date of last review:	March 2022
Date of next review:	September 2023

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## 1. Introduction

Keir Training & Recruitment provides opportunities for young people and adults to learn new skills gain confidence and maximise their potential. The learning programmes we deliver help young people and adults prepare for the world of work and give many adults employed in elementary positions their first formal qualifications. Promoting safe working practices and an understanding of rights and responsibilities at work are key components of all learning programmes.

Working Together to Safeguard Children (2021) defines safeguarding as

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Full DFE guidance on this can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1021914/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf)

All Keir Training and Recruitment staff, governing body, associates, third-party providers, employers and volunteers have a duty of care to safeguard and promote the welfare of learners.

Everyone working with learners, vulnerable adults and their families should be familiar with this document and with their role in reporting any safeguarding concern to the relevant local authority and also within Keir Training and Recruitment's internal recording procedure.

This policy is also available to learners and other stakeholders at the initial point of their engagement with Keir Training and Recruitment, is readily available to all staff, learners and stakeholders during annual review and a copy can be requested from Keziah Ampofo It is also available on our website at <https://www.keirtraining.com/about-us/#policies>

Keir Training and Recruitment's approach to safeguarding all of our learners are 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 - Keir Training and Recruitment uses these standards to measure our performance and achievements in safeguarding within all of 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 of our practice contexts.

Key Themes	Evidence of standards
<p><b>1. Good Leadership and Accountability</b></p>	<ul style="list-style-type: none"> <li>• A clear commitment to the safeguarding of all learners</li> <li>• A clear line of accountability within the organisation for safeguarding and promoting welfare</li> <li>• Leadership which ensures a dynamic and responsive approach to need and risk in safeguarding, so that we achieve positive outcomes for our learners</li> <li>• A shared strategic approach to safeguarding with our partners, through engagement in the activity of strategic partnerships</li> </ul>
<p><b>2. Clear and embedded Policies and Procedures</b></p>	<ul style="list-style-type: none"> <li>• A clear priority to safeguard all learners: we have defined outcomes for them, explicitly stated in contractual and delivery documentation and demonstrated through the impact of local delivery and individual outcomes.</li> <li>• We provide information and training and access to local procedures for safeguarding that staff are clear on their role and responsibilities in reporting abuse and neglect and on their involvement in safeguarding responses which prevent and protect.</li> <li>• We ensure that our policies and procedures are in accordance with national statutory guidance</li> </ul>
<p><b>3. Best practice in safeguarding children and vulnerable adults 'at risk'</b></p>	<ul style="list-style-type: none"> <li>• We ensure that our local practice that reflects our organisational approach and we monitor how this leads to positive outcomes for service users.</li> <li>• We support our staff in making effective and proportionate responses to specific safeguarding concerns that have the learner at the centre.</li> <li>• We prioritise effective multi-agency work with our partners in delivery to prevent harm and protect learners from risk, operating at the centre of local arrangements.</li> </ul>

	<ul style="list-style-type: none"> <li>We prioritise outcomes for learners which evidence the reduction of risk; the minimisation of the impact of harm; their access to criminal, civil or social justice; and successful resolution and recovery.</li> </ul>
<b>4. A commitment to all staff, prior to access with learners having a DBS check and registered on the updating service, including safe recruitment and selection practices</b>	<ul style="list-style-type: none"> <li>We have a Safer Recruitment policy and human resources management procedures that take account of the need to safeguard children and young people and adults at risk that include arrangements for appropriate checks as well the participation of staff and learners in the recruitment of new staff and volunteers.</li> <li>We have clear procedures and practice that ensure an effective response to allegations of abuse or neglect against professional Keir Training and Recruitment staff/associates/volunteers.</li> </ul>
<b>5. A robust learning organisation</b>	<ul style="list-style-type: none"> <li>Keir Training and Recruitment has a learning culture that acts upon the lessons from reporting, auditing and reviewing and ensures feedback into practice to ensure that improvements are made.</li> <li>Our performance management framework ensures that the organisational centre understands safeguarding risks and the response at local delivery level to these risks.</li> </ul>
<b>6. Staff Induction, Training and Development</b>	<ul style="list-style-type: none"> <li>All staff, including associates, temporary staff and volunteers who work with Keir Training and Recruitment learners, are made aware of the organisational approach to safeguarding from induction onwards.</li> <li>A robust initial induction for each staff member ensures that all Keir Training and Recruitment staff undertake appropriate training to equip them to carry out their safeguarding responsibilities effectively, and keep this up-to-date with annual CPD for all staff i.e. by refresher training at regular intervals</li> <li>That staff supervision and development addresses the workforce's role in safeguarding and reviews workforce performance. This ensures reflecting upon practice to ensure that the safeguarding behaviours are evident.</li> </ul>
<b>7. Listening to Learners</b>	<ul style="list-style-type: none"> <li>A commitment to co-design in safeguarding practice and delivery through a culture of listening to, and engaging in dialogue with learners, seeking learner's views. We take account of those views in individual decisions to inform the establishment or development of services.</li> </ul>

*Keir Training and Recruitment Safeguarding behaviours*

Keir Training and Recruitment believes that meaningful relationships make a difference in people's lives. Key aspects of these relationships are trust and empathy but with clear boundaries. Our priority is to be more human – building relationships with learners and partners that offer help and the prospect of positive change. This is supported by a commitment to the following Keir Training and Recruitment behaviours in safeguarding practice, which we believe contribute to the prevention of harm

- **Confidence** in practice – knowing when to report and refer, seek consent, ask for assistance and information, being a source of expertise
- **Curiosity** in our relationships with learners, whilst being respectful of their rights
- **Committed** to productive partnerships with professionals whilst being able to make professional **challenges** and **escalate** concerns in practice
- Keeping the **learner as the focus** of their practice and supporting them through their involvement in safeguarding processes
- Being **aware and informed** of both the harmful and positive aspects of **risk**

## 2. Staff Induction, Training and Development

The expectations of staff training as outlined in detail throughout Keeping Children Safe in Education have been summarised and shared within the policy and procedures. This will be updated if and when further updates are made. There is a mandatory safeguarding training offer for all staff within Keir Training and Recruitment, for new staff and annual refresher training.

All Keir Training and Recruitment staff must complete an appropriate safeguarding course at foundation level and DSL must complete the appropriate DSL qualifications and renewal.

There are detailed requirements for safer recruitment outlined in KCSiE. These include specific requirements for education settings include keeping a Single Central Record (single check register) of the staff recruited and the required checks (i.e. DBS) that have been undertaken by the school. Please also refer to our Safer Recruitment Policy.

All staff have enhanced disclosure as working with under 18s and vulnerable groups form part of our education offer.

For our staff - It is important that you:

- Take up the mandatory training and development opportunities that Keir Training and Recruitment offer you as a volunteer or member of staff in an education setting (including Prevent/ FGM at gov.uk)
- Familiarise yourself with local opportunities for multi-agency safeguarding training and other opportunities in developing safeguarding practice (mentoring, shadowing)
- Through the supervision and Contribution Review process with your line manager and other opportunities, consider and examine what knowledge and skills and behaviours you need to carry out your role in safeguarding properly in your education setting
- Seek out and reflect upon any feedback from colleagues, peers and learners about what you do in practice
- Identify if there are new and different ways that Keir Training and Recruitment could improve their offer to you in your safeguarding role as DSL

Keir Training and Recruitment have a clear commitment to ensure that the Central Record is up to date in order to evidence the gaps in vetting; references and DBS check with automatic annual renewal on the updating service, ensuring it is clear to all staff that learners are protected from unsupervised contact with who have not be subject to the required checks.

We have developed a '*what to do approach*' for staff across all Keir Training and Recruitment. The implementation and embedding in practice of the content of this document form part of a learning outcome for our basic mandatory safeguarding training.

All staff in the role of Designated Safeguarding Lead (DSL) in Keir Training and Recruitment education settings, will attend mandatory annual training awareness and the Home Office Prevent awareness training.

Keir Training and Recruitment staff are also trained in the internal Keir Training and Recruitment safeguarding reporting procedure and this is implemented both during staff induction and on an annual basis as mandatory.

We not only ensures whether arrangements for Safeguarding learners are appropriate and effective but we have also implemented outstanding measures to ensure that safeguarding policy and procedures are fully embedded into the learning journey and we work closely with employers to ensure the most effective systems are in place.

<https://www.gov.uk/government/publications/education-inspection-framework>

The Keir Training and Recruitment Safeguarding policy 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 (KCSiE)  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

This policy and guidance is read (and signed) 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 Keir Training and Recruitment safeguarding policy template has been adapted and expanded to meet the requirements of KCSiE, whilst retaining its structure.

All staff and volunteers have a legal duty to report in strict confidence to their safeguarding officer if they have cause for concern and believe that an individual (employed, volunteer, learner, visitor or anyone else at the company) for whatever reason:

- Harmed a child or vulnerable adult or is doing so
- Caused a child or vulnerable adult to be harmed
- Put a child or vulnerable adult at risk of harm

- Attempted to harm a child or vulnerable adult
- Incited another person to harm a child or vulnerable adult
- Is a victim of abuse

### 3. What is Safeguarding?

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances.

The Safeguarding Agenda includes a wide range of potential risks (See decision making tool for help with indicators of Safeguarding concern)

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated and induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting
- Teenage Relationship abuse
- Trafficking and modern slavery
- Breast ironing
- Mental health concerns
- Missing children in education

### 4. Definitions

**A Child** is defined as anyone under the age of 18.

**An adult at risk** (or vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance.

Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care



- Receiving a welfare service in order to support their need
- Receiving a service due to their age or disability
- Living in residential accommodation as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mothers living in residential care
- Persons under supervision of the probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill or specific learning need
- Unsupportive home environment
- English not the first language
- Unsupportive employer
- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

<b>Safeguard</b>	Protect from harm or damage with an appropriate measure
<b>Vulnerable</b>	Exposed to the possibility of being attacked or harmed, either physically or emotionally
<b>A vulnerable adult</b>	Is in need of special care, support, or protection because of age, disability, or risk of abuse or neglect
<b>Safeguarding</b>	Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity
<b>Vulnerability</b>	Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation

#### *What is 'risk'?*

'Risk' is the future possibility that someone may be harmed due to a range of unwanted or neglectful behaviours. We work to reduce the likelihood of harm to our learners and to mitigate the impact of that harm in terms of its' severity.

'Harm' is sometimes 'significant' to a child or young person (Children Act 1989). The definitions of emotional, physical and sexual abuse and neglect describe categories of 'harm'

and can be found in the document Working Together 2018 and more recently KCSiE. 'Harm' is described as the "ill-treatment or the impairment of health or development".

'Development' means physical, intellectual, emotional, social or behavioural development.

'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another". This is useful when considering harm arising from domestic abuse.

The abuse and neglect (i.e. harm) to an adult can take many forms - these are listed below as defined in the Care Act 2014:-

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

## **5. Our Responsibility**

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help.

We ensure all concerns are dealt with timely and appropriately and we also have a responsibility to minimise the risk of allegations against our staff.

All staff are expected to comply with any DBS check request and to have a good understanding of what constitutes a safeguarding or welfare concern and how to provide support, guidance, and the channels for escalating a concern.

To assist staff in this, on-going training and awareness, as well as continuous information, advice and guidance are provided to help staff to feel confident in proactively promoting safeguarding and understanding their individual responsibilities.

The responsibilities of particular individuals are detailed below:

**Our Directors** and Governing Bodies - ensure that **all** governors receive appropriate safeguarding and child protection (including online) training at induction. This training

should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

KCSiE 2022 also states“ Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 <sup>21</sup>, the Equality Act 2010 <sup>22</sup>, (including the Public Sector Equality Duty <sup>23</sup>), and their local multi-agency safeguarding arrangements <sup>24</sup>. “

Directors and Governors also ensure effective policies, and these are implemented and followed and ensure enough time and resources are allocated to employees to carry out their responsibilities.

- **Designated Safeguarding Lead** - To maintain links with Local Safeguarding Boards and Prevent Coordinators, inform and advise all parties on legislation changes and current safeguarding themes, plan and implement training for all employees including CPD, quality assurance and standardisation for the designed safeguarding officer team.
  - To carry out investigations, where appropriate, into welfare concerns reported and liaise with external bodies such as safeguarding boards where appropriate.
  - Support and escalation processes.
  - Overall management of safeguarding issues reporting to board on any issues that arise.
  - Review procedures and policies on a timely basis.
  - Maintain own CPD to ensure their role can be fulfilled competently.

#### **DSL and deputy DSL details/ contact information:**

*Our DSL is:*

Millicent Danso  
[millicent@keirtraining.com](mailto:millicent@keirtraining.com)  
 01375 379665

*Our deputy DSL is:*

Veronica Bankah  
[veronica@keirtraining.com](mailto:veronica@keirtraining.com)  
 01375 379665

- **Our Regional Trainers/Tutors –**
  - To check safety and welfare with all learners at each visit/communication, ensuring learners complete all safety related learning activities within their programme.

- Be aware of the indicators that there may be a safeguarding issue and use the chart for reporting issues. Report in a timely and appropriate manner (see Decision Chart for support on this).
- **Support Team –**
  - Be mindful of indicators that there may be a safeguarding issue, should you meet a learner or potential learner.
  - Follow the Decision Chart for reporting issues that concern them or are reported to them in a timely manner.

Abuse can take many forms including:

- Physical abuse
- Sexual abuse
- Emotional / psychological abuse
- Neglect
- Physical and mental health

The above can also include child on child, formally peer on peer abuse.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

In addition to the above, vulnerable adults may also be subject to:

- Financial and material abuse
- Self-neglect

It is important that vulnerable people are protected from any form of harm. As such all complaints, allegations or suspicions must be taken seriously.

The following procedure must be followed whenever an allegation is made that a person has been abused or when there is a suspicion that abuse may be taking place.

Harming activities by other persons who are not employed staff or volunteers will be dealt with using normal company procedures for incident management. The police and the local safeguarding boards may nevertheless be involved.

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

To support the safeguarding agenda, it may on occasion be necessary to refer to other company policies and procedures on Prevent, Health & Safety, Harassment and Bullying, Grievance. In all cases safeguarding will take precedent over other policy and procedure areas.

Allegations of abuse are serious. Where a claim of abuse made against a member of staff is not substantiated and is found to have been malicious in intent, this would be dealt with through the company's learner or staff disciplinary procedure.

We are committed to training all staff to work within the local safeguarding procedures and operational safeguarding arrangements.

There are detailed requirements for safer recruitment outlined in KCSiE. These include specific requirements for education settings include keeping a Single Central Record (single check register) of the staff recruited and the required checks (i.e. DBS) that have been undertaken including the registration on the updating service.

*Please also refer to our Safer Recruitment Policy.*

All staff have enhanced disclosure as working with under 18s and vulnerable groups form part of our education offer.

## **6. KCSiE.**

KCSiE sets out the legal duties that you **must** follow to safeguard and promote the welfare of children and young people, under the age of 18, or those up to 24 with an Education and Health Care Plan.

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Additional information added to KCSiE 2022- sharing low - level concerns

### *Sharing low-level concerns*

“Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values champion)), or with the headteacher/principal is a matter for the school or college to decide. If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.”

See page 101/ 102 of new guidance for further information.

*Children who are lesbian, gay, bi, or trans (LGBT)* – page 50 of the new updated 2022 guidance identifies risks and how to mitigate risks and further reading.

**Further reading and information from 2022 update:**

<b>Part five</b>	<b>Child-on-child sexual violence and sexual harassment</b>
Throughout the guidance	Content from the 'Sexual violence and sexual harassment between children in schools and colleges' advice has been incorporated within the main body of KCSIE.
Paragraph 469	Added paragraph to highlight the importance of ensuring children understand the law on child-on-child abuse. Has been added to protect them rather than criminalise them.
Paragraphs 483	Added a bullet point to emphasise the importance of understanding intra familial harms and any necessary support for siblings following incidents.
Paragraphs 493	Paragraph added to emphasise the need for schools and colleges as relevant agencies and should take part in the discussion with statutory safeguarding partners.
Paragraph 534	Paragraph added to explain that children who have experienced sexual violence display a very wide range of responses to their experience.
Paragraph 558	Added information to raise awareness of patterns identified and may also be reflective of the wider issues within a local area.
Forced Marriage	Added link to 'The right to choose: government guidance on forced marriage'.
Operation Encompass Abuse	Added contact details.
Abuse	Added link to CSA centre of Expertise on Child Sexual abuse – free resources
Farrer & Co – Addressing child on child abuse	Link added to resource for schools and colleges
Working with others	Added reference and link to the Statutory guidance PACE Code C 2019 – Appropriate adult.

The following resources, plus many more listed in Annex B, may also help schools, providers and Colleges understand and teach about safeguarding:

UK Council for Internet Safety (UKCIS) guidance:

<https://www.gov.uk/government/publications/education-for-a-connected-world>

UKCIS guidance: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

The UKCIS *external visitors guidance* will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

<https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>

National Crime Agency's CEOP education programme: *Thinkuknow*

<https://www.thinkuknow.co.uk>

Public Health England: *Every Mind Matters*

<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

*Harmful online challenges and online hoaxes* - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. <https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

### *Mental Health*

Identifying schools and colleges having an important role in supporting the mental health and wellbeing of learners. Recognising that in some cases, mental health is an indicator of a child suffering or is at risk of abuse, the KCSIe guidance helps staff connect mental health concerns with safeguarding. 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 day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. This also applies to vulnerable adults.

Resources to support Mental Health include:

- MindEd - which includes e-learning modules about young people's mental health
- the Every Mind Matters platform - which has specific advice for adults and young people on maintaining good mental wellbeing.
- free apps available on the NHS App Store for mental health and wellbeing support
- Digital Wellbeing of Students guide from Jisc, which curates a number of resources and guides
- the Samaritans' website provides guidance on how to prepare for and respond to a suspected suicide in FE.

Consider supporting learners with their mental health and wellbeing through:

- remote one to one counselling
- encouraging young people to identify their own self-care strategies during this uncertain time, online resources can help with this
- completing welfare checks at the start of each lesson to ensure that all students are engaged and supported
- personal, social, health and economic (PHSE) lessons focused on topics including mental health awareness, healthy living and online safety

- encouraging participation in sport, AOC Sport promotes and supports sports in further education.

## 7. Multi-agency working

The 3 safeguarding partners are:

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

## 8. The Role of the DSL

The DSL (nominated person) holds ultimate accountability for ensuring safeguarding arrangements for both learners including learners, staff and associates.

The nominated **Designated Safeguarding Lead** ensures that safeguarding matters are central to the strategic management of Keir Training and Recruitment. The **DSL** is an experienced and qualified practitioner. The role of the DSL is key in ensuring that operational safeguarding in the service-specific contexts is effective. The DSL will also ensure that local delivery staff develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the children and young people that Keir Training and Recruitment works with.

Designated Safeguarding Lead job description is available to view in Annex A <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> (page 92)

Every member of staff or volunteer has a responsibility for ensuring that learners are safeguarded while they are using Keir Training and Recruitment services.

Keir Training and Recruitment organisational safeguarding standards recognise that we safeguard in a wide range of contexts with a diverse group of learners. Therefore, managing the risk to learners in these contexts can require different sets of knowledge and skills, and different responses, some of which are driven by statute and legislation.

Our safeguarding standards and behaviours seek to underpin safeguarding in all of our practice and are derived from section 11 of the Children Act (2004) and the Care Act (2014) as well as best practice guidance such as "Working Together to Safeguarding Children" <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

*Line Management:* every staff member must ensure that disclosures are reported to the DSL immediately. In consultation with the staff member, the DSL will decide as to whether a referral is necessary/ will take place.

**All reported disclosures regardless of outcome must also be reported internally**



**within Keir Training and Recruitment through the completion of the 'Safeguarding Incident form'** in conjunction with the written referral to the appropriate local authority safeguarding team.

The form has 3 parts:

- Part 1 outlines the basic details of the referral and part 2 the details of the incident being reported. Both part 1 and 2 must be completed at the same time following the disclosure.
- The form must then be anonymised by removing the person's personal details and password protected and sent by email to the DSL
- Part 3 of the form must be completed within 7 days subsequent to the submission of Parts 1 and 2 once the outcome of the referral is known and resubmitted as detailed above.

**Ensure Contract compliance to report all Safeguarding concerns- please ensure contract compliance at all times.**

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.

What do I do if my learner 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 DSL

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 Lead. 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 Keir Training and Recruitment designated safeguarding lead/deputy in the absence of the Lead.

### **9. 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.

<https://www.gov.uk/female-genital-mutilation-help-advice>

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.

If you think you are dealing with such a case, it is a mandatory requirement to inform your designated safeguarding lead, as soon as practicable.

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 and provide:
  - 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).

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

<https://www.gov.uk/guidance/forced-marriage>

## **10. 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'

### **11. Contextualised Safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **12. County lines drug trafficking**

In the United Kingdom, county lines drug trafficking is the practice of trafficking drugs into rural areas and smaller towns, away from major cities. Traffickers recruit vulnerable children, including children in pupil referral units who have been excluded from school, as drug dealers. Some young people are recruited via "debt bondage", whereby they enter county lines to pay off drug debts. Others take part of their own volition, owing to boredom and a lack of legitimate opportunity.

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines#:~:text=County%20Lines%20is%20where%20illegal%20drugs%20are%20transported,people%20who%20are%20coerced%20into%20it%20by%20gangs.>

### **13. Child-on-child abuse, formally peer on peer abuse**

Includes, but is not limited to:

- physical and sexual abuse
- sexual harassment and violence
- emotional harm
- on and offline bullying
- teenage relationship abuse

It can even include grooming children for sexual and criminal exploitation. It's hard to say just how widespread a problem it is. But we know that there's extensive evidence of child-on-child abuse in the context of both sexual and criminal exploitation.

*What should schools and other providers be doing about it?*

Unfortunately, peer-on-peer abuse can and does happen in a whole range of settings that children attend. However, it often goes unseen. It might take place online, for example-training for professionals to help them recognise the signs, and know what to do, is essential.

For schools and colleges, there's detailed Department for Education [advice](#) on what to do if a child is sexually harassed or experiences sexual violence. This expands on the principles set out in the statutory guidance '[Keeping children safe in education](#)'.

We expect all staff at a provider to be familiar with this guidance and to apply it. Staff should understand child protection policies and use them: there's no point to a policy that is not put into action. It should be clear that peer-on-peer abuse will never be accepted or dismissed as 'children being children'.

We expect all staff to know what to do if they come across, or are worried about, peer-on-peer abuse. They should know who to speak to and what action to take to make sure children are safe.

#### **14. Internet Safety, IT, Cyber Security and virtual lessons (also see our I.T User and E- Safety Policy)**

The internet is used in Keir Training and Recruitment to raise educational standards, to promote learner achievement, to support the professional work of staff and to enhance our 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.

Online education should follow the same principles set out in your organisation's staff behaviour policy (sometimes known as a code of conduct). Keeping teachers safe when providing remote education is also essential. Remote education is a new experience for both staff and learners, so it's important training providers understand how to approach safeguarding procedures online.

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

<https://www.gov.uk/government/publications/online-safety-in-schools-and-colleges-questions-from-the-governing-board>

From [2020/2021](#) academic funding year, it is mandatory to hold the Cyber Essentials certificate to access any delivery funding.

Learn more:

[www.esfa-cyber-essentials.com](http://www.esfa-cyber-essentials.com)

It is important that staff and volunteers are alert to potential risks vulnerable people may be exposed to, and that steps have been taken to mitigate the risk of this occurring, with specific reference to:

*Content* - e.g. exposure to age inappropriate material, inaccurate or misleading information, socially unacceptable material (e.g. inciting violence, hate or intolerance) and illegal material (including images of child abuse);

*Contact* - e.g. grooming using communication technologies leading to inappropriate behaviour or abuse;

*Commerce* - e.g. exposure to inappropriate advertising, online gambling, identity theft and financial scams;

*Culture* - e.g. bullying via websites, mobile phones or other communication technologies, or inappropriate downloading of copyright materials (i.e. music, films, images); exposure to inappropriate advertising, online gambling and financial scams

*Social Media* - e.g. Twitter, Instagram, Facebook, and other social media sites can also include and be used for bullying, coercion and grooming and as a point of exposure for extremism, sexual misconduct and scamming (e.g. financial schemes)

*Phishing* - the fraudulent practice of sending emails purporting to be from reputable companies in order to induce individuals to reveal personal information, such as passwords and credit card numbers. "an email that is likely a phishing scam"

<https://apwg.org/>

Addressing these issues through training for staff and volunteers, and awareness raising with service users, or members of the community, will be undertaken by the Company. If there is any indication that a vulnerable person is experiencing difficulties in this area (for instance if they are reported to be spending long periods of time using a PC on their own or if they appear unnecessarily defensive, secretive or anxious about their PC use), then this must be taken seriously. We have actively improved our on-line safety training and education throughout the pandemic to include education and training, monitoring of I.T usage to ensure the safety of all stakeholders, as well as use of appropriate firewalls.

#### *Monitoring I.T usage*

There are circumstances where Keir Training and Recruitment may monitor or record communications made using its computer and telecommunication systems, or examine material stored on those systems.

This document includes our policy in respect of such activity. It is important to be aware of the distinction made between:

- intercepting information in transit - email messages being sent, for example, or watching the web pages visited - here the relevant law is found in the Regulation of Investigatory Powers Act 2000 (RIPA) and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBPR);
- examination of material stored on a computer - the law applicable here may vary according to variables such as who owns the computer, what material is being examined, and how the material is examined.

The part of this policy covering the interception of information applies to any communication on or through our computer systems - the latter term being taken to include all components of the network as well as the computers (whether or not they are owned, attached to it).

This policy concerned with the examination of stored material applies to any computer facility provided by Keir Training and Recruitment.

Keir Training and Recruitment recognises that it has a duty under Section 26 of the Counter-Terrorism and Security Act (2015) to have due regard to the need to prevent people from being drawn into terrorism and to promote and safeguard the welfare of children and vulnerable adults (Education Act 2002, Working Together to Safeguard Children 2018 and KCSIE).

Managers are responsible for the well-being of the employees and learners and must ensure appropriate material only is accessible through its resources and networks. Any employees who feels someone is showing an interest in extremist, abusive or inappropriate material should report this to the Safeguarding Lead in the first instance. Any employees who believes learners have access to inappropriate material should report this.

All serious e-safety incidents will be logged. The M.D has responsibility for the implementation and annual review of this policy and will consider the record of e-safety incidents and new technologies with the Safeguarding Lead, where appropriate, to consider whether existing security and e-safety practices and procedures are adequate.

Please see our separate I.T User and E- Safety Policy.

A copy of the I.T. user agreement within our I.T. policy can also be found in the Appendix within this policy.

#### *Virtual lessons and live streaming*

Should schools, colleges and work based learning providers choose to provide remote education using live streaming or pre-recorded videos, guidance from the National Cyber Security Centre (NCSC) on [which video conference service is right for your school](#) and [using video conferencing services securely](#) could help to set up video conferencing safely, if this is the chosen approach.

In addition, [guidance from the UK Safer Internet Centre on safe remote learning](#) includes detailed advice on live, online teaching.



Teaching and assessing from home is different to teaching in the classroom. Tutors/ Assessors should try to find a quiet or private room or area to talk to learners, parents or carers. When broadcasting a lesson or making a recording, consider what will be in the background.

*Cyber security* - how individuals and organisations reduce the risk of cyber-attack. Cyber security's core function is to protect the devices we all use (smartphones, laptops, tablets and computers), and the services we access - both online and at work - from theft or damage. It is also about preventing unauthorised access to the vast amounts of personal information we store on these devices, and online.

Cyber security is important because smartphones, computers and the internet are now such a fundamental part of modern life, that it's difficult to imagine how we'd function without them. From online banking and shopping, to email and social media, it's more important than ever to stake steps that can prevent cyber criminals getting hold of our accounts, data, and devices.

Cybercriminals don't care that the world is going through a Pandemic- the risk and likelihood of a Cyberattack during these times has never been higher.

Action Fraud is the UK's national reporting centre for fraud and cybercrime and monitors and investigates cyberattacks. They have reported a 400% increase in reported cyberattacks, including phishing attacks on hospitals during Covid.

Cyber criminals exploit weaknesses in software and apps to access your sensitive personal data, but providers are continually working to keep you secure by releasing regular updates. These updates fix weaknesses, so criminals can't access your data. Using the latest versions of software, apps and operating system on your phone, tablet, or smart device can immediately improve your security. Remember to update regularly, or set your phone, tablet or smart device to automatically update so you don't have to think about it. Ensure all devices are running Malware and Anti-virus software, change passwords regularly and don't share these or input passwords in public places, ensure you reduce Permissions to a 'Need'.

## **15. Cyberbullying?**

Cyberbullying involves the use of electronic communication devices to bully people. These include:

- mobile phones
- tablets
- iPods
- laptops
- 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

## **16. Upskirting (is now a form of peer-on-peer abuse in KCSiE 2020) and Sexting**

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.

It's a criminal offence to create or share explicit images of a child, even if the person doing it is a child. <https://learning.nspcc.org.uk/research-resources/briefings/sexting-advice-professionals>

## **17. Child exploitation**

These are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Save the Children states child exploitation refers to the "use of children for someone else's advantage, gratification or profit" often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development.

[Child exploitation disruption toolkit - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

## **18. Serious violent crime**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school/college, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children and vulnerable have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults.

## **19. Risk Assessment (see Health and Safety Policy for further detail)**

The company uses risk assessment to inform the planning of safeguarding activities. This takes place at a number of levels:

- Cross company risk register – explicit section on Safeguarding

- Staff safeguarding risk assessment – considering safeguarding measures to be put in place for various groups of staff
- Hazardous activity risk assessments – in line with the company health and safety policy
- Individual learner risk assessments – where the needs or circumstances of the individual dictate that completion of a risk assessment would be beneficial

Risk assessments are reviewed and updated on a regular basis as needs demands and at least once every year.

## **20. Raising Awareness of Safeguarding Procedures and mitigation of risk**

It is important that all members of the company recognise the role they play in safeguarding.

All staff, volunteers and contractors, if relevant, are trained in and receive regular updates in e-safety and recognising and reporting concerns.

We will abide by Government guidance relating to learners 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/ learning. See our Covid Response Plan.

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. It is paramount that Safeguarding measures are in place including ensuring a reasonable notice period for checks to be made.

Our policies recognise that Internet Safety is a whole team/organisation responsibility which includes learners and their parents and carers. Learners including adults at risk may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. We therefore recognise our responsibility to educate all learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the learner journey, within relevant policies and procedures and with parents and carers for under 18's.

We will ensure filters are in place to prevent access to unsuitable sites and we will monitor and report monthly on the use of the network and internet to ensure that any learner, staff, associate, volunteer or contractor attempting to access inappropriate, harmful or indecent images are found, then the police will be informed immediately, and we will fully support their investigation.

If involving a staff member/volunteer, immediate suspension, in line with the disciplinary process, will immediately take effect and the managing safeguarding and prevent allegations procedure may need to be instigated by the DSL. We will take the police advice when learners are involved as to whether the relevant commissioner should be informed.

Photographs - the welfare and protection of our children and adults at risk is paramount and consideration should always be given as to whether the use of photography will place them at risk. Images may be used to harm children or adults at risk, for example as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

Recording of learner assessment is in line with awarding body regulation.

We are aware of the Safeguarding Partners escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

Safeguarding must be a topic covered within the induction of every member of the company community whether they are learners, staff or employers used by the company for work experience purposes.

**Learners:** Within the induction programme learners will be made aware of the following:

- What constitutes abuse under Safeguarding, including risks from remote/ on-line learning
- The reporting procedures for self-referral or reporting suspected abuse of a friend or colleague
- To whom the referral should be made
- The responsibility each learner has for another

**Staff:** Within the staff Induction programme employees will be made aware of the following:

- The procedure for reporting issues associated with safeguarding including risks from remote/ on-line learning
- The key company personnel to whom the report should be made
- The responsibility of members of staff under the Safeguarding Policy and other associated policies
- Newly appointed staff will have a job role induction (JRI) in line with the our Probation policy over a 6-month period. A robust induction into the safeguarding of children, young people and adults at risk procedures is provided when they join the organisation, this includes mandatory reading of the internal and external policies and legislation.

- All new staff will complete Child Protection and Vulnerable Adult Awareness training

As well as during induction the following is implemented:

- ✓ Policy will be reviewed annually or sooner if changes in legislation occur
- ✓ Safeguarding refresher training also completed annually for all staff
- ✓ Each learners' journey and learner surveys will incorporate the Safeguarding and Prevent agenda
- ✓ Learner reviews will incorporate both Safeguarding and Prevent agenda (with employers present)
- ✓ Staff and SLT meetings will have Safeguarding and Prevent on the agenda as mandatory
- ✓ Staff supervision meetings will have Safeguarding and Prevent on the agenda as mandatory

**Employers:** Any employer working with a learner must be given training on the Keir Training and Recruitment Safeguarding Policy and Procedures by the learner's Tutor or nominated representative prior to the learner embarking upon the experience or placement. The Tutor and employer must:

- Identify a key employee who will act as the main contact for the learner on experience or placement for the purposes of child protection
- Instruct that key employee on the company's Safeguarding policy and Procedures and identify who their key point of contact is within company for any referrals for suspected abuse under Safeguarding
- Sign a declaration that appropriate training has taken place and that the employee is fully aware of their responsibility and the reporting process (appropriate notes and procedures will be left with the employee for reference purposes).

#### *Keeping Yourself Safe- Safeguarding Code of Conduct*

You will naturally build a rapport with learners/ learners and they may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on Keir Training and Recruitment'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.

### **21. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns**

**Note 1:** Promises of confidentiality must not be given as the matter may develop in such a way that these promises cannot be honoured.

**Note 2: Learning Difficulties and / or Disabilities:** Some people with learning difficulties and/or disabilities may need different treatment to other persons e.g. in the way their physical/mental condition might mask possible abuse.

**Note 3: Forced Marriage:** If there are concerns that a vulnerable person (male or female) is in danger of a forced marriage, you should contact the company nominee for safeguarding who will contact the Forced Marriage Unit (FMU) (020 7008 0151) or by visiting the [FMU page](#) of the Foreign and Commonwealth Office website. The police and Children's Services will also be contacted. You can also call 101 for advice and guidance.

If the complainant is the person being abused, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided.

The use of leading questions can cause problems for the subsequent investigation and any court proceedings.

A full record shall be made as soon as possible of the nature of the allegation and any other relevant information including:

- ✓ the date
- ✓ the time
- ✓ the place where the alleged abuse happened
- ✓ your name and the names of others present
- ✓ the name of the complainant and, where different, the name of the young person who has allegedly been abused
- ✓ the nature of the alleged abuse
- ✓ a description of any injuries observed
- ✓ an account of the allegation that should be signed and dated by the person completing the report

Any suspicion, allegation or incident of abuse must be reported to the DSL (or deputy DSL in their absence) as soon as possible and at least within two hours.

The DSL shall telephone and report all allegations and incidents of abuse to either the Children Services department duty social worker, or the adult safeguarding duty team before the end of the company day. A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant department within 24 hours.

The DSL should discuss with the social services department what action will be taken to inform the parents of the young person and a note of that conversation should be made.

If the DSL cannot be contacted within 2 hours of the allegation or observation, the person making the report must notify the local Children Services department of the issue and inform the company's nominated member of staff, as soon as possible, about the action taken.

The nominated member of staff must notify the Directors of any allegation or incident as soon as is practicable and in any event within 24 hours of the initial concern arising.

*Written records.*

The DSL shall retain a copy of:

- ✓ The report
- ✓ Any notes, memoranda or other correspondence dealing with the matter
- ✓ Any other relevant material

Copies of reports, notes etc. should be kept securely locked at all times. Ensure Data Protection compliance.

## **22. Reporting and Dealing with Allegations of Abuse against Members of Staff**

Where an allegation of abuse is made, and it involves a member of Company staff the Company will comply at all times with guidance Safeguarding Children in Education: Dealing with Allegations of Abuse Against Teachers and Other Staff.

[Allegations of abuse against teachers and non-teaching staff - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Allegations against a staff member who is no longer teaching or employed by Keir Training and Recruitment should be referred to the police. Historical allegations of abuse should also be referred to the police.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Allegations against staff should be reported to the M.D.. The M.D. will then consult with the DSL. The M.D. may delegate the task to the Director(s) who will inform the accused person.

Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children/ vulnerable adults at college or whether alternative arrangements can be put in place until the allegation or concern is resolved.

Any suspicion, allegation or actual abuse of a young person by a member of staff must be reported to the nominated member of staff as soon as possible and at least within two hours. If within 2 hours of the initial concern it has not been possible to contact the nominated member of staff the matter must be reported to the M.D.

Full records must be made about the alleged incident/s as described above.

Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of under 18's or vulnerable adult involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

The Company will, as deemed appropriate through the investigation, co-operate fully with the Police, Social Services and other external organisations in the execution of their duties within the investigation.

The M.D./ Directors with senior responsibility for Safeguarding will be kept informed of any situation where the investigation of an alleged incident under the Safeguarding Policy and Procedure is necessary.

Parents or carers of a young person or vulnerable adult involved should be told about the allegation as soon as possible if they do not already know of it (subject to discussion with the relevant authority). They should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

If the designated safeguarding lead is the subject of the allegation or complaint, the matter must be reported directly to the M.D.

### **23. Confidentiality**

It is extremely important that when an allegation is made, that providers make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.



Parents and carers of under 18's should also be made aware of the requirement to maintain confidentiality about any allegations made against staff or stakeholders whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 213-214).

If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

KCSiE identifies GDPR and withholding information:

'Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.'

## **24. Safer Recruitment and Selection (see our Safer Recruitment Policy)**

The Company pays full regard to safer recruitment processes and best practice:

<https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>

We ensure that all appropriate measures are applied in relation to everyone who works in the Company e.g. volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining references satisfactory to the Company, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews, reference checks and undertaking Disclosure and Barring Service (DBS) checks and ensuring staff are registered on the updating service.

No new member of staff is to be employed without an enhanced DBS check.

Statutory changes, underpinned by regulations, are that:

- ✓ A DBS Enhanced Disclosure is obtained for **all** new appointments to the Company's workforce.
- ✓ The Company will keep a single central record detailing a range of checks carried out on staff.
- ✓ All new appointments to the Company workforce who have lived outside the UK are subject to additional checks as appropriate.
- ✓ The Company will satisfy itself that supply/temporary staff have undergone the necessary checks.
- ✓ Identity checks must be carried out on all appointments to the workforce before the appointment is made.

*Single Central Record* - the Company maintains a single central record of all checks on Company staff and, where appropriate, governors, volunteers and other people who may come into routine contact with vulnerable learners through the course of their studies.

## **25. Monitoring and Review**

This policy will be reviewed as deemed necessary through changes in law and/or good practice but at least annually.

## **26. Data Protection (please also see Data Protection policy for further detail)**

"It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information."

<https://ico.org.uk/for-organisations/>

In deciding what information to disclose, careful consideration should be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

- 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 Keir Training and Recruitment reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure which includes review of best practice.

## **27. Whistleblowing and Complaints (please also see associate policies)**

*"What do I do if I am worried that another member of staff is acting in a way that may be unsuitable in practice, or may be causing harm to another person or even committing a criminal offence against another person?"*

Where an allegation is made against a staff member, either employed or associate, the matter is reported immediately to the M.D. in line with this policy and KCSiE guidance. The

M.D. will inform the Director (s) as appropriate and the incident will be dealt with under Keir Training and Recruitment Policy in line with KCSiE guidance.

Allegations of a safeguarding nature may constitute one or all of the below:

- A concern which may mean the employee is not suitable to practice with children, young people and vulnerable adults
- A concern which has led to the possible harm to a learner
- A safeguarding concern which may be criminal in its nature or intent

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

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

### **28. Safeguarding and Ofsted (Extract taken from the Inspection Handbook).**

As part of assessing safeguarding, inspectors will consider how colleges and providers have learners who are children handle concerns about harmful sexual behaviour towards or between learners who are children and young people (including sexual harassment and violence and online sexual abuse). This includes considering whether the college or provider has followed the relevant DfE guidance about peer-on-peer abuse between children, and whether:

- the provider has appropriate provider-wide policies and procedures in place that make it clear that all harmful sexual behaviour is unacceptable and that assume that sexual harassment and online sexual abuse are happening in the provision, even when there are no specific reports
- the provider's policies are reflected in their curriculum, which specifically addresses sexual harassment and violence, online sexual abuse and language and consent
- all staff are clear as to the provider's relevant policy and procedures, and this is supported by relevant training
- all learners are supported to report concerns about sexual harassment and violence and online sexual abuse
- concerns are taken seriously and dealt with swiftly and appropriately, and learners are confident that this is the case
- comprehensive records of concerns are kept
- the provider has taken into account the findings and recommendations of Ofsted's review of sexual abuse in schools and colleges

Inspectors will also look at how providers work to prevent sexual harassment and violence and online sexual abuse between learners using a whole-provider approach that includes an effective behaviour policy, pastoral support and a carefully planned curriculum with respect to relationship and sex education. Inspectors will expect providers to be alert to factors that increase the vulnerability or potential vulnerability of learners, such as mental ill health, domestic abuse, children with additional needs, and learners from groups at greater risk of harm (including vulnerable adults). Inspectors will also seek to understand how any barriers that could prevent a learner from making a disclosure, for example communication needs, are identified and addressed.

Further education and skills inspection handbook - GOV.UK ([www.gov.uk](http://www.gov.uk))

*Sources of evidence specific to leadership and management*

Inspectors will gather a range of evidence from meetings with leaders, managers and governors and first-hand evidence of their work across the provider, including in subcontracted provision.

Inspectors will use documentary evidence that the provider supplies to evaluate the impact of the work of leaders, managers and governors, both currently and over time. They will use this in conjunction with first-hand evidence. This includes, but is not limited to:

- meetings with leaders and those responsible for governance, to evaluate how well they fulfil their statutory duties with respect to equality and safeguarding
- documentary evidence that demonstrates the effectiveness of the provision for all learners and its continuous and sustainable improvement
- interviews with staff and learners to evidence how well leaders have created a positive culture
- first-hand evidence gathered during the inspection
- responses to the staff, learner, employer and parent/carer questionnaires. These will be particularly useful for judging the culture that leaders and managers have established
- any evidence the provider has from surveying the staff and the way in which leaders and managers have responded to concerns raised by staff, parents or employers
- considering the overall aims of bodies giving strategic direction to providers on skills and economic needs, such as mayoral and combined authorities for devolved adult education
- records and analysis of safeguarding concerns, including those relating to sexual harassment and violence and online sexual abuse

## 29. Related policies

There are other specific policies that have our approach to safeguarding embedded within them. These include:

- Prevent
- Whistle Blowing
- Bullying and Harassment
- Health and Safety Policy
- I.T. User
- E- Safety Policy

### Appendix 1: I.T. Acceptable Use Agreement Version 1 (For over 18s only)

I understand that I must use Keir Training and Recruitment systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users.

#### For my own personal safety:

- I understand that Keir Training and Recruitment will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

#### I understand that everyone has equal rights to use technology as a resource and:

- I understand that the systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the systems or devices for online gaming, online gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube) unless I have the permission of a member of staff to do so.

#### I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or

- otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

**I recognise that Keir Training and Recruitment has a responsibility to maintain the security and integrity of the technology it offers me**

- I will only use my own personal devices (mobile phones / USB devices etc) if I have permission and I understand that, if I do use my own devices, I will follow the rules set out in this agreement, in the same way as if I was using Keir Training and Recruitment equipment.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software; however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any Keir Training and Recruitment device, nor will I try to alter computer settings.
- I will only use social media sites with permission and at the times that are allowed

**When using the internet for research or recreation, I recognise that:**

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download copies (including music and videos)
- I understand that Keir Training and Recruitment also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of education and where they involve my membership of the education community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action.

**Please complete the section to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to systems and devices.**

I have read and understood the above and agree to follow the policy.

Name of learner: .....

Course: .....

Signed: ..... Date: .....

**Appendix 2: Parent / Carer I.T Acceptable Use Policy and Agreement For Under 18's only**

Digital technologies have become integral to the lives of children and young people, both within schools and work-based learning and outside. These technologies provide powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy and agreement is intended to ensure:

- that Keir Training and Recruitment as a duty of care to Safeguard learners
- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school, colleges and work-based learning and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their online behaviour

Keir Training and Recruitment will ensure that *learners* will have good access to digital technologies to enhance their learning and will, in return, expect the *learners* to agree to be responsible users. A copy of the Learner Acceptable Use Policy is attached to this permission form so that parents/ carers will be aware of Keir Training and Recruitment expectations of the young people in their care.

**Parents are requested to sign the permission form below to show their support of Keir Training and Recruitment in this important aspect of learner safety.**

Parent / Carers Name: .....

Learner Name: .....

As the parent/carer of the above *learner*, I give permission for my son/daughter to have access to the internet and to ICT systems with Keir Training and Recruitment.

*I know that my son/daughter will sign the Acceptable Use Agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of education*

I understand that Keir Training and Recruitment will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that Keir Training and Recruitment cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's / daughter's activity on the systems will be monitored and that Keir Training and Recruitment will contact me if they have concerns about any possible breaches of the Acceptable Use Policy. I will ensure my child adopts the safe use of the internet and digital technologies at home and will inform Keir Training and Recruitment if I have concerns over my child's online safety.

Signed: ..... Date: .....

### **Appendix 3 - I.T. Acceptable Use Agreement (For learners under 18)**

I understand that I must use Keir Training and Recruitment systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users.

#### **For my own personal safety:**

- I understand that Keir Training and Recruitment will monitor my use of the systems, devices and digital communications and have a responsibility to keep me safe under legislation including Keeping Children Safe in Education
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- If I arrange to meet people off-line that I have communicated with online, I will do so in a public place.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

#### **I understand that everyone has equal rights to use technology as a resource and:**

- I understand that the systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the systems or devices for online gaming, online gambling, internet



shopping, file sharing, or video broadcasting (e.g. YouTube) unless I have the permission of a member of staff to do so.

**I will act as I expect others to act toward me:**

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

**I recognise that Keir Training and Recruitment has a responsibility to maintain the security and integrity of the technology it offers me**

- I will only use my own personal devices (mobile phones / USB devices etc) if I have permission, I understand that, if I do use my own devices, I will follow the rules set out in this agreement, in the same way as if I was using Keir Training and Recruitment equipment.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software; however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any Keir Training and Recruitment device, nor will I try to alter computer settings.
- I will only use social media sites with permission and at the times that are allowed

**When using the internet for research or recreation, I recognise that:**

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

**I understand that I am responsible for my actions, both in and out of Keir Training and Recruitment:**

- I understand that Keir Training and Recruitment also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the education community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action which may result in termination of my learning programme.

**Please complete the section to show that you have read, understood and agree to**

**the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to systems and devices.**

I have read and understood the above and agree to follow the Policy and Agreement

Name of learner: .....

Course: .....

Signed: .....

Date: .....