

Safeguarding children, young people and adults at risk policy and procedures

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1. Contacts

Please find below contact numbers for Company and Local Authority Safeguarding referrals and assistance. Where there is a risk of immediate significant harm to a child or young person at risk a referral should be made to Children's Social Care Services. Anyone can make a safeguarding referral at anytime.

Contacts WS Training	
24 Hour Safeguarding Phone Line	01473 601155
Designated Safeguarding Lead (DSL)	Charlotte Woolcock. Based at the Supported Learning Centre. Tel: 01473 220230 Safeguarding Mobile 07841996141 Email CWoolcock@wstraining.co.uk
Deputy Safeguarding Lead (DDSL)	Emily Bockle-Gordon. Based at Colchester. Tel: 07831 914201 Email EBockle-Gordon@wstraining.co.uk
Deputy Safeguarding Lead (DDSL)	Chloe Barnett. Based at the Supported Learning Centre. Tel: 01473 220230 Email CBarnett@wstraining.co.uk
Safeguarding Officer (SO)	Deanna Bentley. Based at Hair Academy. Tel: 01473 211094 Email: DBentley@wstraining.co.uk
Safeguarding Officer (SO)	Jane Barber. Based at Manor Barn. Tel : 01284 788005 Email: JBarber@wstraining.co.uk
CEO	Ms. Kirstie Wright- CEO Phone 01284 788005 Mobile 07889 700746 Email: Kwright@wstraining.co.uk
Safeguarding Board Advisor	Prof Dave Muller Email: davemuller01@btinternet.com

Local Authority Contacts	
Suffolk County Council Safeguarding Board	01473 265359
Local Authority Designated Officers for Child Protection (LADO)	03001232044 Email: LADOCentral@suffolk.gov.uk
Multi-Agency Safeguarding Hub (MASH) – Advice Line	0345 606 1499
Suffolk Children’s Social Care Services Referral Team (CSC)	Customer First 0808 8004005
Suffolk Services Social Care Services Team out of Hours.	Customer First 0808 8004005
Essex Children’s Social Care Services Referral Team (CSC)	<p>https://www.essexeffectivesupport.org.uk/ If you are concerned that a child or young person is being harmed or neglected, or is at risk of this you should go to the <u>Essex Effective Support</u> website.</p> <p>If the child is at immediate risk of significant harm, then call the Children and Families Hub on 0345 603 7627 and ask for the Priority Line.</p> <p>Out of hours (Monday - Thursday 5.30pm - 9am. Friday and Bank Holidays 4.30pm - 9am) 0345 606 1212</p> <p>Email: emergency.dutyteamoutofhours@essex.gov.uk</p> <p>If there is an immediate risk of harm to a child then contact the police.</p> <p>The Children and Families Hub continue to offer a consultation line for professionals providing advice and guidance. This can be accessed by calling 0345 603 7627 and asking for the Consultation line.</p>
Police Emergency/ Non Emergency	999/151
Prevent/Channel Referrals	https://www.suffolk.org/assests/safegurading-Topics/Prevent/2017-01-19-VTR-Referral-Process-Flowchartpdf .
Whistle blowing Helpline	0800 028 0285

Child Protection and Safeguarding Policy.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfill this responsibility effectively, all professionals should make sure that their approach is child centered. This means that they should consider, **always**, what is in the **best interests** of the child.

(Keeping Children Safe in Education 2019)

Ethos

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children, young people and adults at risk. We aim to provide a safe and welcoming environment, underpinned by a culture of openness where children, young people and adults at risk feel secure. Where they are able to raise concerns and believe they are being listened to and that appropriate action will be taken to keep them safe.

2. Introduction

This policy has regard to the statutory guidance contained within, Keeping Children Safe in Education (KCSiE 2019), Working Together to Safeguard Children (2018) and locally agreed inter-agency procedures put in place by Suffolk Safeguarding Partnership (SSP), Essex Safeguarding Children Board (ESCB) and Essex Safeguarding Adults Board (ESAB).

We expect all staff, volunteers and partners to endorse and practice this duty at all times. We have a zero tolerance approach to abuse and other harmful behaviour. Safeguarding, child protection and promoting the welfare of children, young people and adults at risk is everyone's responsibility, everyone who comes into contact with children, young people and adults at risk, their families and carers has a role to play in safeguarding.

This policy will be reviewed annually, as a minimum, and will be made available public via the company website or on request.

Safeguarding and promoting the welfare of children and young people and adults at risk is defined as: protecting children and young persons and adults' at risk from maltreatment; preventing impairment of children's, young people's or adults at risks' health or development; ensuring that children, young people and adults at risk grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children, young people and adults at risk to have the best outcomes.

This policy forms part of the child protection and safeguarding arrangements for our company and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the company. In particular, this policy should be read in conjunction with the company's Staff Code of Conduct Policy (including Acceptable Use of ICT), Safer Recruitment Policy, E-Safety Policy, Bullying and Harassment Policy and Whistle Blowing Policy.

The aim of this policy is to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people and adults at risk
- Ensure that they understand and meet their statutory responsibilities;
- Ensure consistent good practice across the company.

The board expects that all staff will know and understand this child protection and safeguarding policy and their responsibility to implement it. Staff must, as a minimum, have read and understand Part One of KCSiE. The Board will ensure that they have read and understand **Part's One** and have access to part two of KCSiE 2019.

The board will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated.

Compliance with the policy will be monitored by the Board, CEO and Designated Safeguarding Lead (DSL)

3. Purpose

At WS Training we are committed to safeguarding and promoting the welfare of all learners, staff, volunteers, visitors, contractors and partners. Any reference in the policy to a child, young person or learner applies to all those aged under 18. Our legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone aged 18 or over who may for a variety of reasons be in need of community services and/or unable to protect him or herself from harm, significant harm or exploitation.

WS Training has developed procedures in line with, and taking account of, guidance issued by the Department for Education, Leaders in Safeguarding and other relevant bodies. We operate in line with the requirements of the Suffolk Safeguarding Partnership.

Whilst overall responsibility for safeguarding children, young people and adults at risk is vested in the Chief Executive Officer; WS Training has a named Designated Safeguarding Lead (DSL), Deputy DSL Staff (DDSL) and Designated Safeguarding Officers who are responsible for ensuring compliance to this policy and its procedures. The contact details of the DSL / DDSL's and DSO's can be found above.

4. Scope

This policy applies to all learners and particularly children, young people and adults at risk who may need support and all staff, volunteers, partners and families visiting and working at our center's, other external facilities, in the workplace, distance learning and subcontractors.

In order to help ensure that children, young people and adults at risk are protected from abuse all complaints, allegations or suspicions will be taken seriously and in accordance with this policy detailed herein.

WS Training has incorporated child protection into the whole organisational approach to safeguarding and the term safeguarding is deemed to include child protection in all our policies and procedures.

The legal framework for the role of WS Training is as follows:

The Education Act 2002 - Section 157 & 175

Requires local authorities and governing bodies of further education institutions to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children, young people and adults at risk. In addition they should have regard to any guidance issued by the Secretary of State in considering what arrangements they may need to make.

Keeping Children Safe in Education (2019)

Sets out the safeguarding statutory responsibilities of schools and colleges, as well as good practice recommendations in relation to children. This covers the relevant legislation; the responsibilities of Governing Bodies and Principals; safer recruitment practice; dealing with allegations of abuse or misconduct against staff; and also checklists, flowcharts and examples.

Working together to Safeguard Children 2018

Provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children/young people. In addition it sets out the framework for the formation of Local Safeguarding Children Boards and details the allegation management process. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Access is allowed for children's

social care from the local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Suffolk Safeguarding Partnership (SSP).

Safeguarding Vulnerable Groups Act 2006

Introduces a vetting and barring scheme to identify those who are permitted to work with children, young people and adults at risk. Implementation began in Autumn 2008. There will eventually be a single list for children and young people, and an aligned but separate list for adults, replacing the Protection of Children Act (PoCA) list, the Protection of Adults at risk (PoVA) list, List 99 and the Court Disqualification Order scheme. A remodeling review was undertaken following ministers decision in June 2010. The review that was published in February 2011 and recommended merging the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) into a new non-departmental public body that could administer a proportionate central vetting service. The new scheme would retain the best features of the vetting and barring service, but would not require registration or monitoring, and would only cover those who have regular or close contact with vulnerable groups, defined as ‘regulated activity’ in legislation.

The Disclosure and Barring Service (DBS) has been introduced to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

DFE Statutory Guidance (2014)

Provides guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004. The guidance plays an important role in embedding this responsibility in the work of key agencies which have contact with children and young people. It reflects the recognition that protecting children from harm cannot be separated from policies to improve children’s lives as a whole.

Protection of Freedoms Act (2012) Part 5 - Safeguarding vulnerable groups, criminal records etc.

Covers the reduction in scope of the definition of regulated activity, new services provided by the DBS, and disregarding convictions and cautions for consensual gay sex.

Mental Capacity Act (2005)

Provides a way in which people who may need help to make decisions can get that help from someone who can be trusted to act in their best interests. Mental Capacity under the Act means being able to make your own decisions. The Mental Capacity Act and its Code of Conduct contain a set of rules, procedures and guidance. The Act applies in full to those aged 18 or over, the entire Act except making Power of Attorney or Making a Will applies to 16 and 17-year olds. The Act only applies to those under 16 in very limited circumstances and these would have to be determined by a court.

This policy should be read in conjunction with the Bullying Policy and Staff Code of Conduct, the Behaviour Policy, E Safety Policy including Acceptable Use Policy and Safer Recruitment Policy, Whistle Blowing Policy.

5 Definitions and Concepts

5.1 Child

Within the context of this policy a “child” is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002). Further, the additional duties regarding support, protection and safeguarding also extends to learners within the 14 to 16 age range from local schools.

5.2 Adult at Risk

An adult at risk, as defined by the Care Act of 2014 and adopted by the Suffolk Safeguarding Partnership is defined as an individual who meets the following three criteria:

- has a need for care and support (whether or not the Local Authority is meeting any of those needs.)

and

- where there is reasonable cause to suspect that there is a risk of, or experiencing abuse and / or neglect

and

- as a result of those care and support needs is unable to protect themselves from either the risk of or experience of abuse and / or neglect.

Individuals who meet the above criteria may need to rely on individuals outside of their immediate family to care for their personal hygiene, or daily nutrition. They may be reliant on individuals outside the immediate family to order their finances including daily expenses. They may rely on individuals outside of their immediate family assist them in their mobility including accessing travel provision. Please refer to the Suffolk Safeguarding Partnership (SSB) <https://www.suffolkas.org>

Whilst not definitive, the main categories of people who may be covered by the definition of “adult at risk” include those who:

- have a learning disability
- have a physical or sensory impairment
- have a mental illness including dementia
- are old and frail
- may be liable to neglect and self neglect.
- are detained in custody or under a probation order
- are experiencing homelessness.
- are considered at risk and who may experience abuse due to problems with alcohol or drugs
- experiencing illness.
- at risk due to other circumstances such as being an asylum seeker.

5.3 Children in Need of Protection and early help statutory assessments.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process

Where local authorities believe a young person is suffering, or likely to suffer, harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person. This can be done through contacting the local authority early help team to share concerns and ensure the early identification of needs within families.

5.3.1 Children in Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

5.3.2 A child at risk of significant harm.

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the police to take emergency action to protect a young person from significant harm.

5.3.3 Looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. We will ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. The appropriate staff will have the information they need in relation to a child’s looked after

legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated teacher/person for looked after children will ensure that the designated safeguarding coordinator will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

5.3.4 Private Fostering.

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break. Exemptions to this definition are set out in Schedule 8 to the Children Act 1989. Private fostering arrangements can be a positive response from within the community to difficulties experienced by families. Nonetheless, privately fostered children remain a diverse and potentially vulnerable group.

The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard his welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.

Under the Children Act 1989, private foster carers and those with Parental Responsibility are required to notify the local authority of their intention to privately foster or to have a child privately fostered, or where a child is privately fostered in an emergency.

Once the notification has been made to the authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carer's household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Other professionals, for example GPs surgeries and schools, those working with children and young people also have a responsibility to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. (See 'Replacement paragraph 2.6) This allows the local authority to check the arrangement is suitable and safe for the child.

6. Safeguarding Responsibilities

6.1 The role of the WS Training Safeguarding Board

The WS Training Safeguarding Board Headed by the CEO and containing all those with named safeguarding roles is committed to ensuring that WS Training:

- raises awareness of issues relating to safeguarding and promotes the welfare of all
- provides a safe environment for children, young people and adults at risk
- ensures that it's legal responsibility to make sure that policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote the well being of children, young people and adults at risk is met.
- works in compliance with the multi – agency procedures developed by Suffolk SSP/ Essex SSCB which can be found on their website. <https://www.suffolkscb.org.uk/> / <http://www.esccb.co.uk/> as

required by Working Together to Safeguard Children.

- takes into account the procedures and practice of the locally agreed multi agency safe-guarding arrangements in place.
- works to ensure that it identifies those who are suffering or at risk of suffering harm and takes appropriate action to ensure they are kept safe
- ensures that staff are aware of the additional safeguarding challenges faced by SEN children, young people and adults at risk and has strategies in place such as extra support for these cohorts. Please refer to the SEND Policy.
- has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers including members of the WS Training Safeguarding Board and CEO
- ensures that procedures are in place to make referrals to the Disclosure and Barring service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- operates safer recruitment procedures
- designates a member of staff with sufficient authority to take a lead role for safeguarding
- has a designated teacher for looked after and previously looked after children who promotes the educational achievement of these students.
- remedies any weaknesses and areas for improvement relating to safeguarding that are brought to their attention
- ensures all staff members receive appropriate child protection and safeguarding training which is regularly updated.
- Ensures all staff have read and understood Part One of KCSiE 2019.

6.2 Designated Safeguarding Lead

There is a designated member of staff with lead responsibility for safeguarding issues including on line safety. This is explicit in the job description. The key responsibility of the DSL is to lead on raising staff awareness concerning all issues relating to safeguarding and child protection, including online safety. The DSL will promote WS Training as a safe environment for learning and being cared for.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role. This training will be updated every two years. The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. The DSL will be available and be allocated sufficient time to fulfill the role.

The Designated Safeguarding Lead (DSL) is responsible for all areas outlined in Annex B of Keeping Children Safe in Education including:

- Overseeing the referral of cases of suspected abuse or allegations to the local authority children's social Care, Adult Social Care as required.
- Being available to support staff in carrying out their safeguarding duties.
- Support staff who make referrals to the local authority children's / adult social care services.
- Refer cases to the Channel Programme where there is a radicalisation concern as required.
- Support staff who make referral to the Channel Programme.
- Refer cases where a person is dismissed or left due to risk/harm to a child or vulnerable adult to the Disclosure and Barring service as required.
- Assists HR in referring cases where a crime may have been committed to the Police as required
- Maintaining and storing a secure and proper record of any safeguarding referral, concern or complaint in accordance with GDPR regulations.
- Giving advice and support to staff on matters relating to safeguarding.
- Ensuring that parents/carers of children, young people and adults at risk are aware of the safeguarding policy

- Liaising with other agencies as necessary.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate.
- Liaising with secondary schools sending learners to ensure that appropriate arrangements are made for them
- Ensuring there is liaison with employers and training organisations providing learners with placements to ensure proper safeguarding arrangements are in place
- Ensuring that all staff receive training about safeguarding matters and the procedures
- Providing an annual report to the Safeguarding Board
- Reporting any flaws in procedure to Safeguarding Board as soon as possible
- Recording rigorous reports and/or statements

In the absence of the DSL the DDSL's will carry out the same responsibilities. The DSL and/or a deputy should always be available during working hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for information regarding out of hours assistance to be given to all learners.

In the absence of the above the CEO / CEO Deputy will carry out their responsibilities.

6.3 The CEO

The CEO/Deputy CEO will ensure that the policies and procedures adopted by the WS Training Safeguarding Board are fully implemented and that sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities fully. All staff will receive training to familiarise them with safeguarding issues and the policy procedures.

The CEO/ Deputy CEO will liaise directly with the staff member with lead responsibility for safeguarding and child protection within the company.

6.4 All Staff

All staff has a responsibility to provide a safe environment in which children, and young adults including adults at risk can learn.

All staff must be familiar with the role of the DSL (including the identity of the DSL and any DDSL's and Safeguarding Officers (SO)).

All staff must read and ensure they understand fully Part One of KCSIE and have an understanding of Part Two.

All staff must ensure they are familiar with the systems within WS training which support safeguarding and child protection including the safeguarding policy and all associated company policies listed above.

They must also understand and implement the safeguarding response to children who go missing from education

All staff should be aware of the types of abuse and neglect so that they are able to identify cases of children, young people or adults at risk who may be in need of help or protection.

All staff should know what to do if a child, young person or adult at risk tells them he/she is being abused or neglected.

All staff should be aware of the process for making referrals to children's social care and for Statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with The role they might be expected to play in such assessments.

All staff should be aware of the early help process and understand their role within it. This includes providing support as soon as a problem emerges, liaising with the DSL and sharing information with other professionals in order to support early identification and assessment, focusing on providing interventions to avoid escalation of worries and needs. In some cases, staff may be asked to act as the lead

professional in undertaking an early help assessment.

All learners may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child, young adult or vulnerable adult who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing / goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, young adult or adult at risk. such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

Knowing what to look out for is vital to the early identification of abuse and neglect. If the staff are unsure, they should always speak to the DSL (or DDSL). If in exceptional circumstances, the DSL (or ASL) is not available, this should not delay appropriate action being taken. Staff should consider speaking to the CEO or and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

The Safeguarding board will ensure that all staff receive appropriate safeguarding and child protection training which is regularly updated and in line with advice from SSP. In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the company's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to children who go missing from education, and the role of the designated safeguarding lead as well as any other related policies. Copies of the company's policies, procedures and Part One of KCSIE will be provided to new staff at induction.

7 Recognising concerns - signs and indicators of abuse and neglect.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

7.1 Abuse:

Is defined as a form of maltreatment of a child young person or adult at risk. Somebody may abuse a child young person or adult at risk by inflicting harm or by failing to act to prevent harm. They may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children, or young person or adult at risk. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding.

The following indicators listed under the categories of abuse are not an exhaustive list:

Physical: this may involve hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inflicting inappropriate physical sanctions, or

otherwise causing physical harm to a child, young person or adult at risk including fabricating the symptoms of, or deliberately causing the individual ill health (DfE 2014, DoH 2000).

Emotional/Psychological: this is the persistent emotional ill-treatment of a child, young person or adult at risk such as to cause severe adverse effects on their emotional development. It may involve conveying to a child, young person or adult at risk that they are worthless or unloved, inadequate or valued in so far as they meet the needs of another person. It may include not giving the child, young person or adult at risk opportunity to express their views, deliberately silencing them or “making fun” of what they say or how they communicate. This may involve the imposition of age or developmentally inappropriate expectations. This may include interactions that are beyond a child’s, young person’s or adult at risk’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child, young person or adult at risk participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve threats of harm or abandonment; humiliation; blaming; intimidation; coercion; harassment; verbal abuse, bullying (including cyberbullying) and being prevented from receiving services or support. (DoH 2000). It may involve causing the child, young person or adult at risk frequently to feel frightened or in danger, or the exploitation or corruption of child, young person or adult at risk. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child, young person or adult at risk is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children, young person or adult at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging children, young person or adult at risk to behave in sexually inappropriate ways, or grooming a child, young person or adult at risk in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children, young people or adults at risk. The sexual abuse of children, young people and adults at risk by other children, young people and adults at risk is a specific safeguarding issue.

Neglect the persistent failure to meet a child’s, young person’s or adult at risk’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s, young person’s or adult at risk’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. After a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child young person adult at risk from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s, young people or adult at risk’s basic emotional needs. (Source Keeping Children Safe in Education 2019)

Financial or Material: this may include theft, fraud, and exploitation, pressure in connection with money or material possessions. This may also include loss of jewelry or personal property, loss of money from a wallet or purse (DoH 2000).

Discriminatory: this may include abuse, bullying and harassment based on the individual’s age, sex, disability, religion, race or sexual orientation (DoH 2000).

8 Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children, young people and adults at risk of harm. Behaviours linked to issues such as of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children young people and adults at risk in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals

All staff should be clear about the company's policy and procedures with regards to peer on peer abuse.

Safeguarding incidents and/or behaviours can be associated with factors outside the company and/or can occur between children young people and adults outside the company. All staff, especially the DSL (or DDSL), should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. Assessments of children, young people and adults at risk should consider whether wider environmental factors are present in a child's, young person's or adult at risk's life that are a threat to their safety and/or welfare. It is important that staff provide as much information as possible as part of the referral process.

8.1 Technology

The use of technology has become a significant component of many safeguarding issues, for example, technology often provides the platform that facilitates child sexual exploitation, radicalisation and sexual predation.

There are three categories of risk:

- Content: being exposed to illegal, inappropriate or harmful material, for example, pornography, fake news, racist or radical and extremist views;
- Contact: being exposed to harmful online interaction with other users, for example, commercial advertising as well as adults posing as children or young people; and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images, or online bullying.

WS training has had due regard to the additional information and support set out in KCSiE and will ensure that the company has a consistent organisational approach to online safety and has a clear policy on use of communications technology across the company.

Company staff can access resources, information and support as set out in Annex C of KCSiE.

8.2 Peer on Peer abuse including Sexual violence, Sexual Harassment and Upskirting

In most instances, the conduct of children, young people and adults at risk towards each other will be covered by the behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. The company is clear that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" or "boys will be boys".

Peer on peer abuse can manifest itself in many ways and may include sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexting (also known as youth produced sexual imagery), initiation/hazing type violence and rituals.

Upskirting is described in the following way by KCSiE: "Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm". Under the Voyeurism Act, upskirting offenders can now be arrested, face up to two years in prison and having their name placed on the sex offenders' register. This includes instances where culprits say the images were taken "just for a laugh". In KCSiE 2018 we saw a need for schools to adapt and extend their child protection policies to refer to peer-on-peer abuse. Now there is an additional requirement to include reference specifically to upskirting.

What young people may say is harmless fun can have deeper consequences for both the victim and the perpetrator and everyone should be made aware of this?

Any incidents of peer on peer abuse will be managed according to company procedures which detail measures to minimise the risk of peer on peer abuse, how allegations of peer abuse will be recorded, investigated and dealt with, and processes for how victims, perpetrators and any other child young person and adult at risk affected by peer on peer abuse will be supported. Please see the Behaviour Policy.

8.2.1 Sexual violence and Sexual Harassment between children, young people and adults at risk.

Sexual Violence and harassment can occur between peers of any age and sex. It can also occur through a group of children, young people or adults at risk sexually assaulting or sexually harassing a single child or group of children, young people or adults at risk.

Children, young people and adults at risk who are victims of peer on peer abuse including sexual violence and sexual harassment.

Children young people and adults at risk who are victims of sexual violence and harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur off line and online (both physical and Verbal and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows that girls, children with SEND and LGBT are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and harassment is not acceptable, will never be accepted and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh”
- Challenging behaviours (potentially criminal in nature), such as grabbing parts of the anatomy, lifting clothing etc. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual Violence.

It is important that staff are aware of sexual violence and the fact that children, young people and adults at risk can and sometimes do abuse their peers in this way. When referring to sexual violence we are referring to sexual offences as in the Sexual Offences Act 2003, as described below. If a member of staff receives a report of sexual violence or suspects or witnesses any level of sexual violence occurring then this must be referred to the DSL/ASL and reported in line with paragraph 23 of KCSIE 2019 Part 1, Working together to safeguard children and criminal law.

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (KCSIE 2019 direct copy from)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. (KCSIE 2019 direct copy from)

Sexual harassment is any behaviour that consists of “unwanted conduct of a sexual nature” that can occur

off line and online. When we are discussing sexual harassment in this context we are doing so in the context of peer to peer sexual harassment between children, young people and adults at risk. Sexual harassment is likely to: violate their dignity and /or make them feel intimidated, degraded or humiliated and/ or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include;

- sexual comments, such as :telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual jokes or taunting
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, please be aware that some of these actions may overlap with sexual violence, -- it is important to listen and respond to the experience of the victim and consult with the DSL.
- the displaying of pictures, photos or drawings of a sexual nature.
- online sexual harassment. This may be a single or multiple incidents and again can overlap with sexual violence. The DSL must be consulted at all times. This may include: Non consensual sharing sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, including on social media and sexual exploitation, coercion and threats.

If a member of staff receives a report of sexual harassment or suspects or witnesses any level of sexual harassment occurring then this must be referred to the DSL/DDSL and reported in line with paragraph 23 of KCSIE 2019 Part 1.

The initial response to a disclosure of sexual violence or harassment is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment. Nor should a victim ever be made to feel ashamed for making a report.

8.3 Radicalisation and Acts of Terrorism

The Counter Terrorism & Security Act (2015) & The Prevent Duty.

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

This Act places a duty on specified authorities including skills training, further and higher education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

WS Training is committed to supporting vulnerable students through its safeguarding policies and procedures and recognises that this can support the contribution to the Prevent duty

All senior staff are aware of their duties under the Prevent Duty and have consulted the Revised Prevent duty guidance for England and Wales, especially paragraphs 57-76 which are specifically related to FE. The guidance is set out in four General themes, Risk assessment, working in partnership, staff training and IT Policies.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Offices uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- funding a specialist police unit which works to remove online content that breaches terrorist legislation

- supporting community based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

Children, young people and adults at risk are vulnerable to extremist ideology and radicalisation.

Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies supported by terrorist groups.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. The DFE has issued additional guidance Prevent duty guidance for FE institutions in England and Wales and HMG has launched a further website entitled Educate against Hate which gives access to training resources and curriculum materials which will assist in the recognition and prevention of extremism and radicalisation. <https://www.gov.uk/government/publications/prevent-duty-guidance>

There is no single way of identifying whether or not a child, young person or adult at risk is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's, young people or adult at risk's vulnerability. Similarly, radicalisation can occur through many different settings such as on the internet or via social media.

However it is possible to protect children, young people and adults at risk from ideology and intervene to prevent those at risk, all staff should be alert to changes in behaviour which may indicate that a child, young person or adult at risk is in need of help or protection. Staff should use their judgement in identifying children, young people and adults at risk of radicalisation and act proportionately which may include the DSL or DDSL making a referral to the Channel Programme.

8.3.1 Channel.

Channel is a programme which focuses on providing support at an early stage to those who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on channel is available at channel guidance. <https://www.gov.uk/government/publications/channel-guidance>

The DSL and any deputies should be aware of all local procedures for making a Channel referral. Staff may be asked to attend a Channel panel to discuss the individual referred to determine whether or not they are vulnerable to being drawn into terrorism and consider the appropriate support required.

This Act places a duty on specified authorities including skills training, further and higher education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

WS Training is committed to supporting all students through its safeguarding policies and procedures and recognises that this can support the contribution to the Prevent duty

8.4 Children and the Court.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are guides available to support children aged 12-17. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the court room structure and the use of video links is explained. For those children involved with the family courts following separation or other matters this can be very stressful and information for parents/ carers regarding dispute resolution services is available via the online Ministry of Justice website titled the child arrangements information tool.

8.5 Children missing from Education

All staff should be aware that children, young people and adults at risk going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to a conflict zone, risk of Female Genital Mutilation (FGM) or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of the child, young person or adult at risk going missing in future. Staff should be aware of any unauthorised absences and children missing in education procedures. (See appendix 13.5)

8.6 Children with family members in prisons.

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

8.7 Child Sexual exploitation; is a type of abuse where children are sexually exploited for money, power or status. (NSPCC 2015) It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under 18 into sexual activity (a) in exchange for something the victim wants or needs and or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears to be consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

- like all forms of sexual exploitation can:
- affect any child or young person, either male or female, under the age of 18 years, including 16 and 17 year olds who can legally give consent to have sex.
- can still be abuse even if the sexual activity appears consensual.
- can include both contact (penetrative and non penetrative acts) and non contact sexual activity.
- can take place in person or via technology, or a combination of both.
- can involve force and or enticement based methods of compliance and may, or may not be accompanied by violence and threats or violence.
- may occur with or without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media.)
- can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one off occurrence or a series of incidents over time, and range from opportunistic to complex organized abuse.
- it is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious imbalance, this power imbalance can also be due to a range of other factors including gender, sexual activity, cognitive ability, physical strength, status, access to economic and other resources.

Some of the following signs may be indicators of child sexual exploitation.

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation.
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant.
- children who suffer from changes in emotional well being
- children who misuse drugs or alcohol
- children who go missing for periods of time or regularly come home late:
- children who regularly miss courses, appointments, work placements or do not take part in education.

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

8.8 Criminal exploitation: county lines.

Criminal exploitation of children and young people and adults at risk is a geographically widespread form of harm that is a typical feature of criminal lines activity: drug networks or gangs groom and exploit children, young people and adults at risk to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying the potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation can:

- Effect any could or young person, either male or female, under the age of 18 years.
- Can affect any adult at risk over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and or enticement based methods of compliance and is often accompanied by violence and threats or violence.
- Can be perpetrated by individuals or groups, males or females and young people or adults.
- It is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious imbalance, this power imbalance can also be due to a range of other factors including gender, sexual activity, cognitive ability, physical strength, status, access to economic and other resources.

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

8.9 Domestic abuse

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and or violence can have long lasting emotional and psychological impact upon children, young people and adults at risk. In some cases a child, young person or adult at risk may have to leave the family home as a result. Domestic abuse affecting young people and adults at risk can also occur within their relationships, as well as in the context of their home life.

Advice on identifying children, young people and adults at risk who are affected by domestic abuse and how they can be helped is available at.

NSPCC- UK domestic abuse Signs and symptoms.

Refuge what is domestic violence/effects of domestic violence on children

Safelives: young people and domestic abuse.

8.10 Homelessness.

Being homeless or at risk of being homeless presents a real risk to the welfare of a child, young person or adult at risk. The DSL and DDSL's need to be aware of contact details and referral routes in to the Local Housing Authority so that they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti social behavior as well as being asked to leave a property. Whilst referrals and or discussions with the Local Housing Authority should be progressed as appropriate a referral must be made to social services where a child, young person or adult at risk has been harmed or is at risk of harm.

The Homelessness Reduction Act places a new legal duty on English Councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalized housing plan and work to help them retain their accommodation or find a new place to live. The emphasis is on early intervention and to encourage those at risk to seek support as soon as possible, before they are facing a homeless crisis. Homelessness Factsheets are available to assist staff in providing the latest information to all those who they suspect of being homeless or at risk of becoming homeless.

In most cases staff will be considering homelessness in the context of children, young people or adults at risk who are living with their families. However, in some cases children, young people and adults at risk, of age 16 and over, could be living independently from their family home and will require a different level of intervention and support. Children's and Adult Social care agencies will be the lead agencies for these individuals and the DSL / DDSL should ensure that appropriate referrals are made based on individual circumstances. The department and Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16-17 year olds who may be homeless and or require accommodation.

8.11 So called "honour based violence" (including female genital mutilation and forced marriage)

So called "honour-based" violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of a family / community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network or family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding to take. All forms of HBV are abuse (regardless of the motivation) and should be dealt with and escalated as such. Professionals in all agencies and individuals and groups in relevant communities need to be alert to the possibility of a child, young person and adult at risk being at risk of HBV, or already having suffered HBV.

ACTIONS: If staff have a concern regarding a child, young person or adult at risk who might be at risk of HBV or who has suffered from HBV, they should speak to the DSL / DDSL. As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi agency liaison with police and children's social care / adult social care services. Where FGM has taken place, since October 31 2015 there has been a mandatory reporting duty in place that requires a different approach. Please see below.

<https://www.cps.gov.uk/legal-guidance/honour-based-violence-and-forced-marriage>

8.12 FGM

FGM comprises all procedures and involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM Mandatory reporting duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2016) places a statutory duty upon teachers (Under section 5B(11)(a) of the Female Genital Mutilation

Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 20023 (persons employed or engaged to carry out teaching work at colleges and other institutions in England.) along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under the age of 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see such evidence and they should **NOT** be examining learners, but the same definition of what is meant by “to discover that an act of FGMM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Statutory information on when and how to make a report can be found on the DFE/ Home Office and Foreign and Commonwealth Office website.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the DSL / DDSL or in the absence of the former CEO or Deputy CEO, in the absence of the CEO and children’s social care as appropriate. The duty does not apply in relation to risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. Please refer to the enclosed Safeguarding Referral Flowchart for further references to information on the reporting of FGM.

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

8.13 Forced marriage:

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities for example.) Nevertheless, some communities use religion and culture as a way by which to coerce a person into marriage. WS training has an important role to play in assisting in the safeguarding of children, young people and adults at risk from forced marriages. The Forced Marriage Unit has published statutory guidance and multiagency guidelines, with pages 35-36 of which that focus on the role of FE Providers and learning skills providers. Staff can contact the Forced Marriage Unit if they need advice and information: Contact 0207 7008 0151 or email fm@fco.gov.uk

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

8.14 ‘fabrication or induced illness in a child’

Fabricated or induced illness (FII) is a rare form of **child** abuse. It occurs when a parent or carer, usually the **child's** biological mother, exaggerates or deliberately causes symptoms of **illness** in the **child**.

If, as a result of a carer’s behavior, there is concern that the child is or is likely to suffer harm staff should report their concerns to the DSL / DDSL.

There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- **fabrication** of signs and symptoms. This may include fabrication of past medical history.
- **fabrication** of signs and symptoms and **falsification** of hospital charts and records and of bodily fluids. This may also include falsification of letters and documents.
- **induction** of illness by a variety of means

Please refer to the chart below for further guidance on fabricated or induced illness

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Specific Issues and Further Information: specific advice should also be sought in relation to specific situations. Please see the table below from KSIE 2019.

Abuse or Safeguarding issue	Advice and Guidance Available	Source
Abuse	What to do if you are worried a child is being abused.	DFE advice
	Domestic abuse and guidance	Home Office.
	Faith based abuse: National action plan	DFE advice
	Relationship abuse: Disrespect nobody.	Home Office. Website
Bullying	Preventing Bullying including Cyber Bullying	DFE advice
Children and the Courts	Advice for 12-17 year old witnesses in criminal courts	MOJ Advice
Children missing from education home and care	Children missing in education	DFE Statutory Guidance
	Children missing from home or care	DFE Statutory Guidance.
	Children and adults missing strategy	Home office strategy
Children with family members in prison.	National Information Centre on Children of Offenders.	Barnado's in partnership with HM Prison and Probation Service advice.
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults.	Home Office Guidance
	Child sexual exploitation: advice for practitioners.	DFE
	Trafficking : safeguarding children	DFE and Home Office Guidance
Covid-19	Coronavirus (COVID-19): safeguarding in schools, colleges and other providers	Gov.Uk
Drugs	Drugs advice.	DFE and ACPO guidance
	Drugs Strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for covering drug and alcohol prevention	Website. Mentor UK
So- called "Honour based violence"	Female genital mutilation: information and resources.	Home office
	Female genital mutilation: multi agency statutory guidance.	DFE, Department of Health and Home Office statutory guidance.
	Forced marriage: information and practice guidelines.	Foreign and Commonwealth and Home Office guidance.
Health and wellbeing	Fabricated or induced illness: safeguarding children	DFE, Department of Health and Home Office.
	Rise above: Free PSHE resources on health, well being and resilience.	Public Health England resources.
	Mental health and behaviour	DFE advice
Homelessness	Homelessness: How local authorities should exercise their functions.	HCLG

Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety.
Private Fostering	Private Fostering: local authorities	DFE Statutory Guidance
Radicalisation	Prevent duty guidance	Home Office Guidance
	Prevent duty advice.	DFE advice
	Educate against hate website	DFE and Home Office Guidance
Violence	Gangs and youth violence: for schools and colleges.	Home Office advice
	Ending violence against women and girls 2016-2020 strategy.	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office Guidance
	Sexual violence and sexual harassment between children in schools and colleges.	DFE advice
	Sexual violence strategy	Home Office strategy
Upskirting	Peer on Peer Abuse and New law introduced April 2019.	DFE, Gov.uk

9. Reporting and Managing Disclosures and Concerns.

9.1 Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

A member of staff may suspect that a learner is being abused or is at risk of harm. A learner may disclose to a member of staff that s/he is being abused.

In these circumstances the following procedure should be followed.

9.1.1 Significant concerns

If a member of staff has concerns about a learner but does not believe that they are being abused or are at risk of immediate harm, the member of staff should:

- Speak to the learner about the concerns
- Speak to a Designated Safeguarding Lead who will consider and advise whether WS Training should register the concern.

9.2 Disclosure of Abuse

What to do if you are concerned.

If a child, young adult or adult at risk makes an allegation or disclosure of abuse against an adult or other child or young person or adult at risk, it is important that you:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the child/young person or adult at risk to talk freely – do not interrupt or put words in the child/young person's mouth;
- Only ask questions when necessary to clarify, do not investigate or ask leading questions;
- Reassure the child, young person or adult at risk but don't make promises which it might not be possible to keep;
- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record, which should be signed and include the time, date and your position in school;
- Do not include your opinion without stating it is your opinion;

- Pass the information to the DSL or alternate without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing

9.3 Reporting to designated staff

Staff should report concerns, suspicions or disclosures of abuse immediately to the DSL. If they are not available the report should be made to the Designated Safeguarding Officer/ ASL.

9.4 Reporting to the DSL

If reported to: the Designated Safeguarding Officer / DDSL member of staff must notify the DSL who would then notify the CEO as soon as possible and always within 24 hours of a serious disclosure or suspicion being raised.

9.5 Contact with external services

The DSL or CEO (Deputy CEO) must report the matter to children's social care/ adult services or the police by phone immediately, followed up by written confirmation or email within 48 hours. Where a request for service form or an early help assessment is completed and sent via email to children's social care, staff can expect a response via email within 48 hours.

A written record of the date and time of the report must be made and the document should include the name and position of the person to whom the matter is reported. The telephone contact must be confirmed in writing using the appropriate local authority form within 24 hours.

The designated member of staff should note down the detail of the discussion about action to be taken to inform the parents/carers, depending on the circumstances. The process for keeping WS Training informed of further action should also be discussed.

10. WST Worry boxes

Worry boxes can be found located at IP City, Ipswich Hair Academy and Ipswich Central for any learners or staff to add any concerns if they wish to raise them.

11. Procedure for managing allegations of abuse against staff

WS Training is required to comply with the detailed local safeguarding children's board procedure for managing allegations against staff. These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. Allegations against staff who no longer work for WS Training should be referred to the police. Historical allegations of abuse should also be referred to the police.

All members of staff that have a concern that a colleague or volunteer might pose a risk to children, young people or adults at risk have a duty to report these.

11.1 Introduction

In rare instances, the staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people and adults at risk, staff may have allegations of child abuse made against them. WS Training recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and procedures are thorough and not subject to delay.

WS Training recognises that the Children Act 1989 states that the welfare of the child young person is the paramount concern. We apply this paramountcy to adults at risk as well. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within WS Training will do so with sensitivity and will act in a careful, measured way.

11.2 Receiving an allegation

All members of staff that have a concern that a colleague or volunteer might pose a risk to children, young people or adults at risk have a duty to report then:

- this should be referred to the CEO
- where there are concerns/allegations about the CEO, this should be referred to the chair of the board.
- in the event of concerns/allegations about the CEO, where the CEO is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. (LADO).The corporate director of Health and Children's services, has identified dedicated staff to undertake the role of LDO. Lado's can be contacted directly via email / phone via the details provided in the contacts section of this policy.

11.3 Initial Assessment by the CEO.

The CEO should make an initial assessment of the allegation.

An allegation is information which indicates that a person who works with a child, young person or adult at risk has:

- Behaved in a way that has harmed or may have harmed a child or young person, adult at risk.
- Possibly committed a criminal offence against or related to a child or young person, adult at risk
- Behaved towards a child or young person or adult at risk in a way that indicates s/he is may pose a risk of harm to children, young people or adults at risk.

It is important that the CEO or, in the event of the allegation being about the CEO the Chair of the Board, does not investigate the allegation. The initial assessment should be on the basis of the information received.

"The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services In these cases, local arrangements should be followed to resolve cases without delay. The LADO should be informed of all allegations that come to a school's or college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate."

KCSIE 2019

If the assessment of the allegation is that it requires further then a then procedures will be initiated in accordance with the WS Training's disciplinary policy and also in accordance with the SSP Arrangements for manging Allegations of Abuse Against People Who Work With Children or Those in a Position of Trust.

11.4 Enquiries and Investigations

Child protection enquiries by Social Services or the police are not to be confused with internal, disciplinary enquiries by WS Training. WS Training may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct WS Training to act in a particular way however, WS Training will assist the agencies with their enquiries.

WS Training will instigate its own internal enquiries regardless of any formal police or social services investigations but will ensure that this will not prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the CEO or in the event of the allegation being about the CEO, the Chair of the Board, should normally be involved in, and contribute to, the inter- agency strategy discussions. The CEO or in the event of the allegation being about the CEO the Chair of the Board is responsible for ensuring that WS Training gives every assistance with the agency's enquiries.

He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The CEO or, in the event of the allegation being about the CEO the Chair of the Board shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

The CEO or in the event of the allegation being about the CEO the Chair of the Board will consult with Social Services, the police or the Children's Integrated Services Safeguarding Team, particularly in relation to timing and content of the information to be provided, and shall:

- inform the learner or parent / carer making the allegation that the investigation is taking place and what the likely process will involve.
- ensure that the parents / carer's of the learner making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- inform the member of staff making the allegation that the investigation is taking place and what the likely process will involve.
- inform WS Training Safeguarding Board of the allegation and the investigation.

The CEO or, in the event of the allegation being about the CEO the Chair of the Board shall keep a written record of the action taken in connection with the allegation.

11.5 Suspension

Suspension should not be automatic. In respect of staff, other than the CEO or senior post holders, suspension can only be carried out by the nominated member of the senior management team. In respect of senior post holders, suspension can only be carried out by the CEO.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- where a learner is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, this will be conducted in accordance with the existing WS Training disciplinary procedures.

11.6 The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the existing WS Training disciplinary procedures.

11.7 Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Children's Integrated Services Safeguarding Team in order that other agencies may act upon the information.

The CEO or, in the event of the allegation being about the CEO the Chair of the Board, shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence. Inform the parents/carers of those involved that the allegation has been made and of the outcome.
- where the allegation was made by a learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner.
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no

foundation and confirming that the above action had been taken.

- in some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

11.8 Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about WS Training's statutory duty to notify the Disclosure and Barring Service.

11.9 Confidentiality

WS Training will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a learner from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions will apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions will also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

12. Whistle Blowing

The CEO and Safeguarding Board recognise that children cannot be expected to raise concerns in an environment where the staff fail to do so.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider WS training community) raises a concern about danger or illegality that affects others, for example, students in the Company or members of the public.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions/inactions of colleagues, poor or unsafe practice and potential failures in the college's safeguarding arrangements.

The CEO and Safeguarding Board would wish for everyone in Company to feel able to report any child protection/safeguarding concerns through existing procedures within the Company, including the whistleblowing procedure adopted by CEO and Safeguarding Board where necessary. Please refer to the Company Whistle blowing Policy in Appendix. However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: help@nspcc.org.uk Please also refer to the Contacts section at the beginning of this policy.

13. Safer recruitment and selection procedures

WS Training has in place robust recruitment procedures which ensure that care is taken to protect young or vulnerable learners. The procedures apply to all staff and volunteers and they are reviewed regularly to take account of following principles:

- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants.
- Requirement of documentary evidence of academic and vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history including the explanation of any gaps.

Please refer to the Recruitment and Selection Policy for further details.

14. Teaching Learners about Safeguarding

WS Training will teach learners about safeguarding, including online, through teaching and learning opportunities as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE) and/or through sex and relationship education.

15. Dissemination

The DSL will ensure this policy is known and used appropriately:

- the policy will be reviewed annually
- the procedures and implementation will be updated and reviewed regularly
- the policy will be available publicly and parents will be made aware of the fact that referrals about suspected abuse or neglect may be made and the role of WS Training
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Should learners leave WS Training, if appropriate; their child protection file will be copied for any new school, college or training provider as soon as possible but transferred separately from the main learner file.

16. Links to other policies

The policies below can be made available:

- Safer Recruitment Policy
- Staff Disciplinary Policy and Procedures
- Anti-bullying Policy
- Equality and Diversity Policy
- E-safety Policy
- Prevent Policy
- Whistle Blowing

17. Monitoring Compliance With and the Effectiveness of Policy Documents

17.1 Process for monitoring compliance and effectiveness of dealing with disclosure of abuse and procedure for reporting concerns

Monthly: The Safeguarding Board will receive a report on safeguarding incidents and reports.

Termly: The Senior Management Team and Safeguarding Board will receive a report on Safeguarding incidents and reports.

Annually: The DSL and Safeguarding Board will review the safeguarding policy and produce a report that will be presented to the SMT and CEO.

17.2 Process for monitoring compliance and effectiveness of dealing with allegations against a member of staff

Where an allegation has been made against a member of staff, the DSL and safeguarding Board including the CEO and Director of Human Resources, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the procedures and/or policies and/or which should be drawn to the attention of the Children's Integrated Services Safeguarding Team. Consideration should also be given to the training needs of staff learning opportunities as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE) and/or through sex and relationship education.

Where an allegation has been made against a member of staff, the DSL and safeguarding Board including the CEO and Director of Human Resources, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the procedures and/or policies and/or which should be drawn to the attention of the Children's Integrated Services Safeguarding Team. Consideration should also be given to the training needs of staff

18 Appendices

Appendix 18.1 – Safeguarding Statement Appendix

Appendix 18.2 – Report a Concern

Appendix 18.3 – Safeguarding Flowchart

Appendix 18.4 – Protocol for reporting missing learners

Appendix 18.5 – Safeguarding away from the Group Premises

Appendix 18.6– Safeguarding Guidelines for Work placements

18.1 SAFEGUARDING STATEMENT

WS Training is committed to protecting young people and adults at risk from harm.

As a Safe Organisation:

We ensure that all our employees, subcontractors, agency staff and volunteers are aware of their responsibilities to safeguarding children and adults at risk.

We do this by:

- The promotion of a culture of safeguarding throughout the company.
- Adopting safer recruitment practices when employing staff to work with young people and adults at risk.
- Thorough induction systems and ongoing training/updates for staff on safeguarding young people and adults at risk.
- Clear expectations of staff about personal conduct and responsibility to promote the wellbeing of young people and adults at risk at all times.
- Adherence to GDPR regulations, information sharing and referral procedures.
- A team of named staff including managers trained to provide access to specialist advice on child protection and the protection of adults at risk.
- Ensuring all staff have access to and understand information and guidance on procedures for child protection and protection of adults at risk.
- Listening to the concerns of young people and vulnerable adults with an open mind.
- Referring Safeguarding concerns to the DSL/DDSL'S/Safeguarding Officers in line with the company Safeguarding Policy.
- Regular reporting of safeguarding incidents to the Senior Management Team.
- A clear and accessible complaints procedures where there are concerns to be raised.
- Clear procedures for investigating allegations of harm to young people or adults at risk by persons in positions of trust within the company, including independent advice and referral to the police as necessary.

Appendix 18.2 – How to report a concern

The screenshot shows the 'My Concerns' dashboard for 'WS Training Ltd (SuFWSTrail)'. The user is logged in as 'Charlotte Woolcock'. The dashboard includes navigation links for 'My Concerns', 'Dashboards', 'Profiles', 'Audit Trail', 'Resources', 'Admin', 'Reports', and 'Help'. A prominent red button labeled 'Report a Concern' is located in the top right corner. Below the navigation, there are tabs for 'My Concerns', 'My Team Concerns', 'My Team Profiles', 'My Tasks', and 'My Cases'. The 'My Team Concerns' tab is active. A search bar is present with a 'Filter By' dropdown. Below the search bar is a table header with columns: 'Concern ID', 'Concern Summary', 'Case Owner', 'Categories', 'Location', 'Reported By', 'Reported At', 'Occurred At', 'Associated People', 'Owning Group', and 'Status'. A message in the center of the table states: 'There are no results available for this query'. Below the table are 'Previous' and 'Next' navigation buttons and a status indicator 'Showing 0 to 0 of 0 results'. The footer of the dashboard includes social media icons for Facebook, Twitter, and LinkedIn, and a copyright notice '© 2019 One Team Logic'. The Windows taskbar at the bottom shows the Start button and various application icons, with the system clock displaying '13:22 20/11/2019'.

The screenshot shows the 'Report a Concern' form. The title 'Report a Concern' is displayed at the top. The form consists of three main sections:

- Name(s) of Person(s):** A search bar with a magnifying glass icon and an 'Add Person' button. Below the search bar, a message reads: 'Please add the Person(s) who are the subject of this concern and add any other Person(s) you want associated to it.'
- Concern Summary:** A text input field containing the example text: 'e.g Andrew has exhibited signs of substance misuse.'
- Concern Date/Time:** A text input field with a placeholder 'DD/MM/YYYY HH:mm'.

The dashboard navigation and user information from the previous screenshot are visible at the top of this page. The Windows taskbar at the bottom shows the system clock displaying '13:23 20/11/2019'.

Report a Concern | MyConcern x +

myconcern ! WS Training Ltd (SuFWSTrail) Charlotte Woolcock

My Concerns Dashboards Profiles Audit Trail Resources Admin Reports Help

Details of Concern

There is no need to repeat the Concern Summary.

Location of Incident

Not Applicable

Is this Concern urgent?

Action taken

Start

13:24 20/11/2019

Report a Concern | MyConcern x +

myconcern ! WS Training Ltd (SuFWSTrail) Charlotte Woolcock

My Concerns Dashboards Profiles Audit Trail Resources Admin Reports Help

Is this Concern urgent?

Action taken

Attachment

Select File

Please attach any media that is relevant to this concern.

Submit Concern

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Start

13:24 20/11/2019

Stage One

You are concerned that a young person or adult at risk has been abused because:

- You have seen or heard something
- They have disclosed to you that they have been abused or are being abused
- Somebody has told you they have a concern
- Someone has made an allegation against a member of staff
- Someone has reported an anonymous allegation
- An adult has disclosed they are abusing a child or adult at risk
- An adult has disclosed they were abused as a child

You must follow the WS Training Flow Chart for Raising Concerns about a Young Person or Adult At Risk on the following page.

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A YOUNG PERSON or ADULT AT RISK AT WS TRAINING

Designated Safeguarding Lead(s):
 Charlotte Woolcock – **Lead**
 Chloe Barnett – **Deputy**
 Emily Bockle-Gordon – **Deputy**

Tel Number: 01473 220230
Safeguarding Mobile: 07841996141

Link Board Member:
 Kirstie Wright - **CEO**
 Dave Muller – **Board Member**

Should you have a concern please use the MY Concern online safeguarding system.
<https://www.myconcern.educ>

The local authority Designated Officer for concerns about adults is:

Dian Campbell
 Rennie Everett

Contact details:
LADOCentral@suffolk.gcsx.gov.uk
 LADO central telephone number:
0300 123 2044

Designated Safeguarding Lead reviews concern and makes a decision about next steps

Decision made to monitor the concern.

Monitor

Staff Member asked to monitor the concern and feedback to the Designated Safeguarding Lead within an agreed timescale

Decision made to discuss the concern informally with the parents/carers/Social Care/MASH

Discuss

Once discussed Designated Safeguarding Leads will decide whether further advice is needed, whether a referral is to be made or the concern needs to be monitored.

Monitor

Refer

Decision made to refer the concern to customer service

Refer

Referral made to customer first either by phone or by the online portal



Contact Details:
 MASH consultation line: **0345 606 1499**.
 Customer First: 0808 800 4005.
 Website:
<https://earlyhelpportal.suffolk.gov.uk/web/portal/pages/marf#h1>
 Prevent/Channel Referrals:
<http://www.suffolkscb.org.uk/assets/Safeguarding-Topics/Prevent/2017-01-19-VTR-Referral-Process-Flowchart.pdf>

Record

Designated Safeguarding Lead or staff member assigned to concern updates information through MY Concern.

Anyone may report concerns directly to the MASH team/Customer first.

Whistleblowing Helpline
 0800 028 0285

Appendix 18.4 - Protocol for reporting missing learners

Rationale:

This protocol is designed to provide an effective response in the event of a learner going missing.

This is an essential part of our responsibility to:

- Safeguard learners
 - Ensure that there are no barriers to punctuality and attendance
- Definition of Missing:

“Anyone whose whereabouts is unknown whatever the circumstances of disappearances they will be considered missing until located and their well being established” (Ref: *The association of chief police officers (ACPO)*).

When discovering a missing learner: Inform your line manager Line manager should:

- Find learner contact details and contact directly if possible – locate learner and arrange safe return to the centre or home. To liaise with the DSL to identify any possible safeguarding concerns and ensure appropriate contact is made.

If this is not possible (if no contact can be made), the manager should:

- Ascertain when the learner was last seen (keep a note of any witness statements including names and course details)
- Ascertain what course the learner is on and the timetable for that day
- Establish if anyone knows where the learner intended to go
- Searches, where appropriate, of relevant areas
- Contact the parent/carer as appropriate (there should not be a long gap – parents/carers do not want to hear that their son/daughter has been missing for several hours) and give the facts:
- When the learner was last seen
- How we discovered he/she was missing
- What we have done to date

If there is cause for concern and in consultation with the parent/carer:

- Report to police or relevant authority (collect and record incident number)
- Ask the parent/carer to stay in touch if they hear anything
- Maintain contact with parent/carer until the learner is found (parents/carers need to know that we are doing everything in our power to find the learner).
- Report incident to CEO.

Investigation / report records:

Identifying why a learner has gone missing can be a key part of reducing the likelihood of it happening again and safeguarding that learner. The learner needs to be spoken to about their actions and rationale and any risks they were exposed to. This conversation may reveal the need for ongoing additional support.

- When the situation has been resolved the DSL should:
 - Carry out a full investigation
 - Establish why the situation occurred
 - Work with the course tutor and parent/carer/learner support team if appropriate to establish a safe system of supervision in the future
 - Provide a written report for the learner file (be aware of confidentiality and GDPR regulations).
 - Ensure that a letter is written to the parent/carer, to confirm any new arrangements, including responsibilities to be assumed by external Parties.

Information Sharing

If there is a concern about a learner's safety or well-being it may be necessary to share information with other agencies. Their safety and well-being of the child must be the primary considerations when making such a decision.

Sharing of information must be in line with the confidentiality, GDPR protection and human rights legislation and guidance. Information shared will need to be carefully recorded. In most circumstances consent from a parent/carer/learner would need to be gained to share information; however there are some circumstances in which sharing information without consent will be normally justified. These are:

- When there is evidence or reasonable cause to believe that a child is suffering, or is at risk of suffering significant harm; or
- When there is evidence or reasonable cause to believe that an adult is suffering, or is at risk of suffering, serious harm; or
- To prevent, detect or to support the prosecution of serious crime.

The police response

Where a missing person report is made, the police have an obligation to take action, within their powers, to safeguard the rights of individuals who may be at risk. Those under 18 will not be considered 'low risk'. Where a missing person has been identified as high or medium risk, positive action becomes an obligation at every stage of the missing person investigation.

18.5 Safeguarding away from WS Training Premises.

Introduction

Any learner under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidance (Working Together to Safeguard Children 2018). Some individuals over the age of 18, because of their needs and circumstances are considered to be at risk.

Incidents of child abuse are not common but any child aged between the ages of 0 and 18 must be considered as vulnerable to abuse whether this is in the home, in school or college, in the work place or in some other place. Any individual over the age of 18 who is at risk, due to their needs and circumstances is also considered vulnerable.

Child abuse can take many forms but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that children and young people are protected from any form of harm.

Guidance

Schools, colleges and training providers organising work placements and other activities must ensure that policies and procedures are in place to protect children and young people from harm, focusing greatest emphasis on settings in which children may be most at risk, for example where children, young people and adults at risk, will be placed for long periods in one to one situations with an adult.

These can be considered where the placement is as follows:

- for more than one day a week
- for longer than one term per academic year
- aimed at those children who may be vulnerable e.g.: those who are aged under 16 or have special needs
- where the workplace supervisor or colleague will have substantial unsupervised access to the child, young person or adult at risk, because of the nature of the business
- long-term extended work placements must include arrangements for DBS Disclosures for example when Young Apprentices are in a placement.

It is essential that the key supervisor of the learner, if not under the direct responsibility of a member of WS Training staff, is aware of their responsibilities with respect to child protection, including referral routes and those within WS Training with Designated Responsibility for Safeguarding and Child Protection.

18.6 Safeguarding guidelines for work placements.

Schools, colleges and training providers organising work placements must ensure that policies and procedures are in place to protect young people and adults at risk from harm.

It is essential that the key supervisor of the learner is aware of the procedures in place to ensure the safety of the young person and adult at risk.

Introduction

Any young person under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidelines (Working Together to Safeguard Children 2018). Some adults due to their needs and circumstances are considered to be at risk and are also covered by this policy.

Incidents of child abuse are not common BUT any child aged between the ages of 0 and 18 must be considered as vulnerable to abuse whether this is in the home, in school or College, in the work place or in some other place. Any adult at risk due to their needs and circumstances must also be considered as vulnerable.

Child abuse and the abuse of adults at risk, can take many forms but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that children young people and adults at risk are protected from harm.

Procedure

1. All complaints, allegations or suspicions of abuse must be taken seriously.
2. If an allegation is made that a learner has been abused or if there is a suspicion that a student has been abused this should be reported to the DSL as per the WS training Safeguarding Policy Flow Chart.
3. Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured.
4. If the complainant is the learner, 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 following court proceedings.
5. 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 other present
 - the name of the complainant and, where different, the name of the student who has allegedly been abused
 - the nature of the alleged abuse
 - a description of any injuries observed
 - the account which has been given of the allegation that should be signed and dated by the person completing the report

Please note: Some learners with learning disabilities may need different treatment to others e.g. in the way their physical/mental condition might mask possible abuse.

Apprentices

- Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding.
- Placement Officers/Assessors will carry out risk assessments and include safeguarding discussion as part of workplace reviews with students.
- Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details.
- When dealing with a disclosure, follow referral procedure as outlined in the WS training Safeguarding Policy. If you are in any doubt at all as to how to proceed contact the DSL / DDSL immediately

