

SB Skills Solutions Safeguarding Policy (SFP)

This Policy should be read in conjunction with other Safeguarding Governance Policies and related Codes of Practice (CoPs) including:

Safeguarding Policy
Code of Practice S1 Prevent
(Challenging Radicalisation, Extremism and Terrorism)
Code of Practice S2 British Values

Other Relevant Policies

Please refer to the following policies for further guidance:

Other Policies:

- Equality and Diversity
- Health and Safety
- Whistle blowing Policy
- Learner Code of conduct
- Staff Code of conduct

Designated Safeguarding Lead: **Stephen Maddocks**

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1. Purpose and Scope

All providers of adult, community and work-based learning in England are required by the Safeguarding Vulnerable Groups Act 2006 to secure the safety of children, young people and vulnerable adults who are their learners. As a provider of further education, SB Skills Solutions, is committed to ensure all learners are kept safe so that they can learn and thrive. The drive for 'Inclusive Learning' has succeeded in bringing into the system learners with a wide range of needs, including many who can now be deemed 'vulnerable'.

The term vulnerable is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness: and who is or may be unable to care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health 2000)

The term vulnerable may also apply to people at increased risk of abuse or mistreatment due to some of the following factors:

- They may be unaware of their rights;
- They may be socially isolated;
- They may not know how to complain or who to complain to;
- They may have communication difficulties in making decisions;
- They may have low self-esteem;
- They may be discriminated due to age or disability;
- They may not have access to healthcare;
- They may be dependent on others for their basic health care needs.

At SB Skills Solutions this may apply to a colleague or a learner you work with.

A child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people'. The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection under the Children's Act 1989.

Essential Appendix documentation for safeguarding policy:

- Appendix 1 Safeguarding Children & Vulnerable Adults Flowchart
- Appendix 2 Safeguarding Incident report Form

2. Compliance

The key guidance and legislation for the safeguarding of children responsibilities for SB Skills Solutions are contained within:

- The Children Act 1989
- The Victoria Climbié Inquiry Report by Lord Laming; 2003
- Every Child Matters Green Paper 2003
- Every Child Matters 'Change for Children' 2004
- National Service Framework for Children, Young People and Maternity Services 2004
- The Children Act 2004
- Working Together to Safeguard Children 2006
- Safeguarding Vulnerable Adults Act 2006
- Safeguarding Children and Safer Recruitment in Education 2007
- Vetting and Barring Scheme 2009
- Rehabilitation of Offenders Act 1974
- Education Act 2002

- DfE Guidance - Keeping Learners Safe in Education, 2014
- DCSF Resources - Learning Together to be Safe
- Prevent: Resources Guide
- Tackling Extremism in the UK”
- DfE's - Teaching Approaches that help Build Resilience to Extremism among Young People
- Peter Clarke's Report of July 2014
- Prevent' strategy in 2011
- Equalities Act (2010)

3. Safeguarding Strategy

The safeguarding strategy sets out the strategic approach to strengthening our arrangements for safeguarding across the company. SB Skills Solutions is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult (hereinafter referred to as learners). The emphasis of our safeguarding strategy and action plan is to focus on all the people who use our services. This will be a further demonstration of our organisational vision and value base. In order to meet the company vision and values to treat people well and keep people safe we need to demonstrate our effectiveness in safeguarding adults and children from abuse or the potential of abuse of any kind to enable people and children to feel safe.

The Aims of the Safeguarding Strategy:

- To ensure that all staff understand safeguarding is everyone's business.
- To keep children, young people and vulnerable adults safe;
- To raise and maintain awareness regarding Safeguarding, Health & Safety, and Equality and Diversity across the company;
- To ensure that we work in partnership and contribute to the safeguarding work with the relevant Stakeholders and Boards;
- To learn the lessons and good practice from serious case reviews, local and national enquires.

We shall achieve our objectives by carrying out the following strategic activities:

3.1 Planning and Management

- By ensuring that safeguarding is embedded within our strategic and operational planning processes;
- By reviewing this strategy and associated policies as part of the annual Self-assessment review;
- By implementing an annual Quality Improvement Plan (QIP) to address our areas for improvement and build on our strengths so that our safeguarding arrangements continue to improve;
- By ensuring all personal data will be processed in accordance with the requirements of the GDPR (General Data Protection Regulation) 2018;
- By highlighting in job descriptions, staffs' responsibilities in relation to safeguarding;
- By giving staff opportunities to propose ideas and to share best practice through regular staff meetings, training and awareness sessions and through staff surveys;
- By continuing to work with employers to benchmark their current safeguarding practice and work collaboratively to support improvement;

- By monitoring the development of all learning materials and establishing standardised best practice;

3.2 Staff Recruitment

- SB Skills Solutions has a rigorous staff recruitment and selection process to ensure their suitability to work with learners – Safe Recruitment;
- All applicants have a robust telephone interview to check suitability for the role, along with a face to face interview with 2 managers. Role play activities and presentations also form part of the selection process, depending on the role;
- All recruiting managers are required to complete Safer Recruitment e-learning as part of their recruitment training;
- By undertaking thorough risk assessments to ensure that all relevant staff and service providers are subjected to the relevant DBS check.

3.3 Induction and Training

- By providing a thorough induction to both staff and learners to raise awareness and understanding of safeguarding arrangements, the standards expected and their responsibilities in relation to these;
- SB Skills Solutions' Learner Management System displays our Safeguarding policy;
- All staff will complete online learning in Safeguarding on an annual basis;
- All staff will attend a Safeguarding & Prevent workshop;
- By educating and empowering learners to take responsibility for their own safety and wellbeing and that of others.

4. Safeguarding Protocol

The term 'Safeguarding' describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children and young people from any potential harm or damage.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices and procedures around the learner for them to succeed.

Safeguarding must be the informed responsibility of all staff, senior management, volunteers and board members to ensure the learning environment is safe and secure for all. In order to do so they will need to consider and act on the following basis:

4.1 Identify

The ability to identify and recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on our premises, in the home or in any other setting in which the learner may find themselves, all those playing a role in meeting learners' needs should be aware and informed so that possible abuse can be recognised, investigated and acted upon effectively. Signs and symptoms of abuse of young people and/or vulnerable adults may include direct disclosure to any member of staff. All staff should be trained to understand signs of possible abuse and know how, where and to whom to report concerns. Staff must be able to recognise signs of abuse, know how to respond to learners, how to use appropriate questioning and how to record information accurately.

4.2 Respond

Appropriate response by our staff and managers is vital. No report of or concern about possible abuse should ever be ignored. Staff are trained how to determine the most appropriate response and to clarify precise details. They are aware of the correct protocol, i.e.:

- Do not lead or probe with questions;
- Remain calm and demonstrate interest and concern while investigating;
- Do not agree confidentiality, this may restrict you from taking any action later;
- Reassure that they have done the correct thing in reporting their concerns and that everything possible will be done to help;
- Record any disclosures;
- Keep copies of any notes taken and please sign and date them accordingly.

4.3 Report

Any disclosure, incident or suspicion should be reported by the member of staff or manager to the Designated Safeguarding Lead or assistant officers.

Training and support have been provided to ensure these roles are carried out effectively.

During both staff and learner inductions the Designated Safeguarding Lead will be identified.

Our safeguarding policy is embedded in all our courses and is displayed in the Learner Handbook, and on our intranet system to inform learners and staff.

Procedure:

Report your concern or allegation to the Designated Safeguarding lead or member of staff with specific designated responsibility for dealing with issues relating to safeguarding your centre.

The Designated Safeguarding Lead will take responsibility from this point forward.

No one other than the Designated Safeguarding Lead should mount an investigation into complaints, allegations or suspicions of abuse. If actions are carried out by someone other than the designated person or deputy it could be seen as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

All allegations against people who work with children and that meet the specific criteria below should be reported by the employer within one working day to Local Authority Designated Officer (LADO) e.g.

- Staff who have behaved in a way that may have harmed a child/vulnerable person;
- Staff who have possibly committed a criminal offence related to a child/vulnerable person;
- Staff who have behaved towards a child/vulnerable person in a way that indicates that he/she is unsuitable to work with them.

4.4 Record

Designated staff should record precisely what has been alleged, using the words of the complainant. Records should include accurate quotation. It should also, if felt appropriate, include factual observations about the observable physical and emotional state of the individual sharing their concerns with you.

Staff are trained to ensure allegations are recorded precisely on the Safeguarding Children/Vulnerable Adult Incident Report form which can be found in Appendix 1 of this policy.

Please use the words of the complainant and include accurate quotation. This can include observations about the physical and emotional state of the individual sharing their concerns.

Information is recorded and stored securely, confidentially and only accessible to those who need to access it as part of the action taken to resolve the complaint or allegation.

4.5 Investigation

Only the Designated Safeguarding Lead can mount an investigation into complaints, allegations or suspicions of abuse. An investigation may include questioning staff or learners. Actions of these sorts carried out by someone other than the Designated Officer could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

The decision to refer a complaint or allegation lies with the Designated Safeguarding Lead and assisting officers/managers, having gathered and examined all relevant information. No one else will investigate such a situation. Investigation will involve questioning colleagues, learners, carers, parents, learners, assessors and the complainant. Designated Safeguarding Officers will have access to organisations and websites in order to seek guidance and help for learners.

5. Responsibilities and Training

5.1 Learners

All learners will be introduced to their rights and responsibilities with regards to Safeguarding through their induction and initial assessment. Learners will go through a thorough sign up procedure with a member of staff, where any special needs will be determined, logged and appropriately dealt with. All Learners in work based learning will have their place of work vetted by a trained assessor for Health and Safety purposes. Learners who work in places deemed medium or high risk will be revisited at regular intervals. Reviews with learners include specific safeguarding questions, covering areas including Health & Safety and Equality and Diversity; these reviews are carried out regularly. Learners have direct access to their Training Advisor at all times and use this person as their first point of contact if they have any concerns.

5.2 Staff Training

All new employees will be introduced to their rights and responsibilities with regards to Safeguarding at their initial induction. The relevant policies are available to all employees. All staff in contact with learners who are under 18 or vulnerable adults will receive appropriate safeguarding training and regular safeguarding updates. Effective training is the key to carrying out our responsibilities of promoting and safeguarding children and young people. Staff will need to be trained on how to identify a learner in need, and what subsequent action to take. Training will take place on a variety of levels and will depend upon the needs of the staff concerned. All staff will have a basic induction which will include how to report safeguarding concerns. The Designated Safeguarding Lead and assisting officers/managers will undertake regular inter-agency training and refresher training every 3 years.

5.3 ICT Training Facilities

Cyber bullying is the act of communicating harmful, violent and/or malicious words and or pictures through the means of technology.

Cyber bullying is the term used to refer to bullying and harassment by use of electronic devices though means of e-mail, instant messaging, text messages, blogs, mobile phones, pagers and websites. No longer does bullying transpire only on school/training grounds. The cyber world has allowed for children and vulnerable adults to be vulnerable to bullying in the safe haven of their home. This new ability to socially network in the cyber world is rapidly expanding the harmful effects learners suffer from being bullied and must be monitored in the same way as other forms of abuse.

5.4 Identifying Abuse

- Physical Abuse - may involve hitting, shaking, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as factitious illness by proxy or Munchausen's by proxy.
- Emotional Abuse – is the persistent emotional ill treatment of a child that causes severe and persistent side effects on the child's emotional development. It may involve conveying to the children that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all types of ill treatment of a child, though it can still occur alone.
- Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or nonpenetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging children to act in sexually inappropriate ways.
- Neglect - is the persistent failure to meet a child's or vulnerable adults basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect the child or vulnerable adult from physical harm or danger, or failure to ensure access to medical care or treatment. It may also be neglect of or unresponsiveness to the child's emotional needs

6. Safeguarding Guidelines

6.1 Good practice ideas:

- Always work in an open environment avoiding private or unobserved situations and encouraging open communication;
- Treat all learners equally with respect and dignity always putting the welfare of each learner first;
- Maintaining a safe and appropriate distance with learners;
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of learners;
- Be aware of the effect that your words and actions may have;
- Assessments should be scheduled to be within the normal working day of the institution;
- Ensure employers and work experience providers are fully briefed on Safeguarding issues and that they agree to a Safeguarding policy or appropriate control measures;

6.2 Practices to be Avoided.

- Spending excessive amounts of time alone with learners away from others;
- Straying from the task in the specification or assignment;
- Being unnecessarily inquisitive – only ask for what is necessary to fulfil the requirements of the assessment or matter in hand;
- Saying anything that might make the learner feel uncomfortable or debased;
- Saying anything that could be interpreted as aggressive, hostile or impatient;
- Being drawn into personal conversations or introducing personal subjects;
- Sitting or standing too close to the learner;
- Standing over the learner or otherwise making the learner feel pressured;
- Meeting other than at the pre-arranged venue;
- Exchanging personal contact details;

6.3 Practices never to be Sanctioned

You should never:

- Allow or engage in any form of inappropriate touching;
- Allow children or vulnerable adults to use inappropriate language unchallenged;
- Make sexually suggestive comments to a child or vulnerable adult, even in fun;
- Reduce a child or vulnerable adult to tears as a form of control;
- Allow allegations made by a child or vulnerable adult to go unchallenged, unrecorded or not acted upon;
- Promise a child or vulnerable adult that their confidences will be kept secret.

7. Staff Management

SB Skills Solutions' recruitment policy acknowledges our responsibility for protecting young people through safe recruitment practices. When recruiting we will consider whether a role is regulated or controlled and whether any safeguarding measures are needed.

- Regulated activities - are activities that involve contact with children or vulnerable adults frequently, intensively and/or overnight.
- Regulated activity is frequent (once a month or more) or intensive (takes place on three or more days in a 30-day period).
- Controlled activities - frequent or intensive support work in further education. A controlled activity is when this type of activity is frequent (once a month or more) or intensive (takes place on three or more days in a 30-day period).

Disclosure and Barring Service (DBS)

All staff that have regular unsupervised contact with learners are subject to a DBS check. The period condition for 'regular unsupervised contact' is to teach, train or instruct learners as per a period condition as stipulated below:

- Once a week or more;
- 4 or more days in a 30-day period;
- Overnight between 2am-6am and the opportunity for face-to-face contact.

When an individual is offered a position with SB Skills Solutions their offer is subject to receiving a clear enhanced DBS certificate. SB Skills Solutions will arrange for a DBS check to take place using a third-party organization.

The following roles are regulated:

- Teaching or training anyone who is under 18 years old or a vulnerable adult;
- Care of anyone who is under 18 years old or a vulnerable adult;

- Supervision of anyone who is under 18 years old or a vulnerable adult;
- Advice to anyone who is under 18 years old or a vulnerable adult;
- Transport of anyone who is under 18 years old or a vulnerable adult.

The following roles are controlled:

- Anyone with access to children's or vulnerable adult's details.

However, this list of controlled and restricted roles is not exhaustive.

Please refer to our HR department for further information on safeguarding actions in the recruitment process.

8. Radicalisation and British Values

8.1 Radicalisation

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members groups and organisations or, increasingly, through the internet. This can put a person at risk of being drawn into criminal activity and has the potential to cause significant harm.

Potential diagnostic indicators identified include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an ideology

The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional Judgement, seeking further advice as necessary.

Please see our Code of Practice S1 - Challenging Radicalisation, Extremism and Terrorism

8.2 British Values

SB Skills Solutions actively promotes British Values to all learners across their delivery and provision – See Code of Practice S2 – British Values

9. Staff Roles and Responsibilities

Overall responsibility for implementing this strategy and monitoring safeguarding lies with the Designated Safeguarding lead (DSL) reporting to the Board of Directors.

The DSL with support from the Senior Management Team (SMT) and Heads of Department (HODs) acting as Assistant Safeguarding officers as required, is responsible for:

- the development and maintenance of safeguarding policies, strategies and operating procedures;
- acting as a source of advice and support in relation to safeguarding and protecting learners, and promoting good practice;
- co-ordinating action within the company on receipt of any concerns or referrals;
- ensuring relevant awareness and other practical training is provided for all managers, staff and learners;

Delivery staff (with support from the DSL and Assistant Officers) are responsible for promoting and ensuring that the safeguarding standards set by SB Skills Solutions are applied to their provision. All operational staff job descriptions will include general responsibilities relating to safeguarding.

10. Review and Policy Awareness

- All Safeguarding Policies and Codes of Practice are reviewed and up-date annually or as a result of the application of new regulations or guidelines and are signed-off for publication, application and training at Board level.
- All Staff must evidence their reading and comprehension of all relevant Policies and CoPs as denoted in their Policy Review and Awareness training at induction and yearly thereafter.
- Completion of standard quarterly refresher/clarification training relating to these policies and CoPs is mandatory for all staff.
- Specific training for all staff and managers to ensure they are fully aware of their particular Safeguarding responsibilities and duties forms an integral part of the regular in-house monthly training schedule for staff at all levels.

Should you have any queries, questions, or have knowledge of any incidents or suspected violations of safeguarding or prevent polices please speak to your Head of Department, or a member of the Senior Management Team, or contact:

Designated Safeguarding Lead – Stephen Maddocks

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Email: steve@sbskills.co.uk

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Comments

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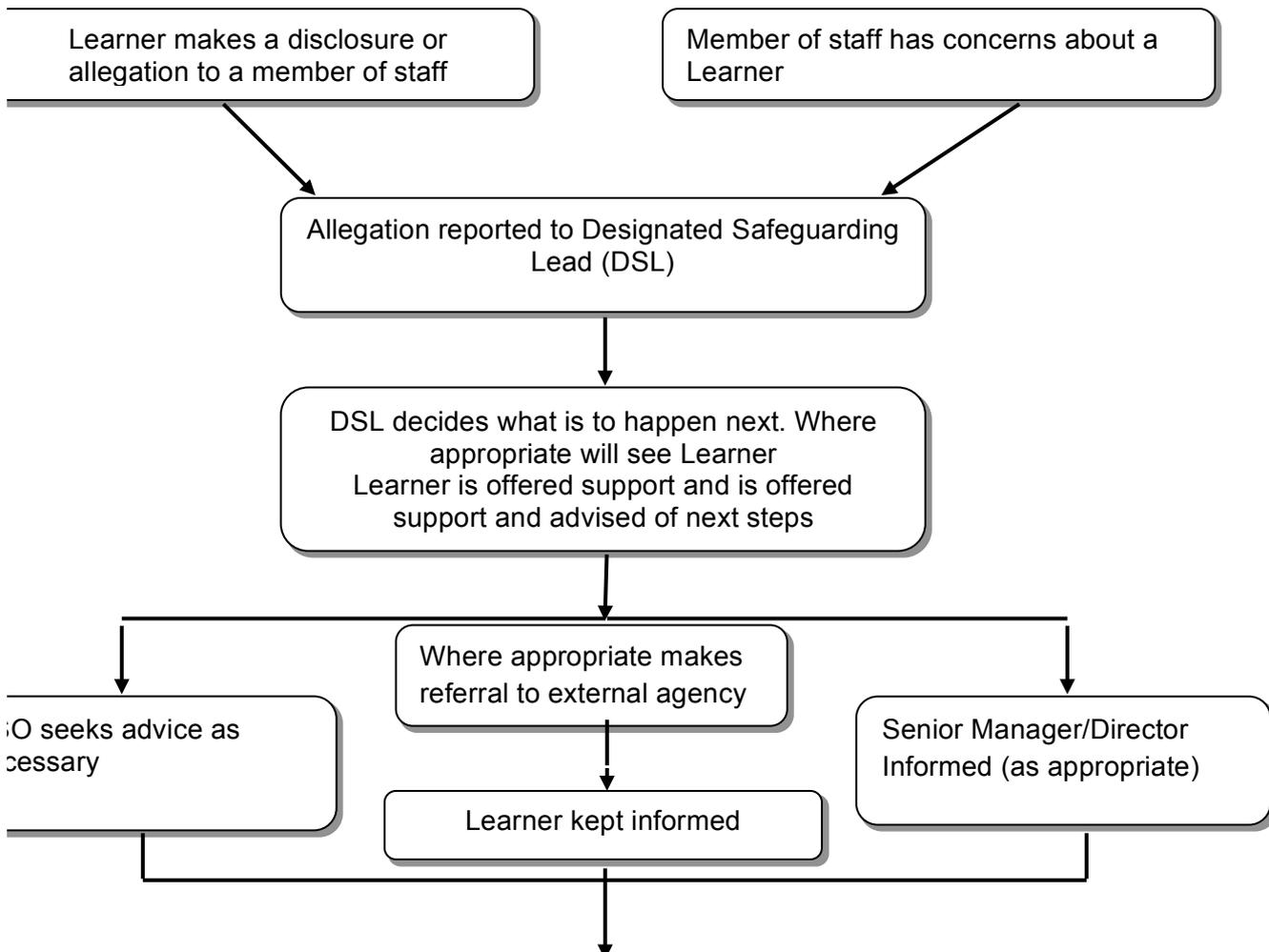
Next Review January 2022

Appendix 1 Flowchart

SB Skills Solutions Safeguarding Vulnerable Children, Young People and Adults Policy and Procedures to be followed:

If someone discloses or makes an allegation

- Listen, do not ask questions
- Do not promise confidentiality
- Write down the details but pass all notes and records to the Safeguarding Lead
- Do not make promises you cannot keep
- Do not take the matter further yourself. Refer all disclosures to the Safeguarding Lead



Learner is informed of any action taken internally or externally and offered any additional support. Member of staff is given some feedback.

Appendix 2
Safeguarding Children/Vulnerable Adult Incident Report

Record No:	Safeguarding Incident Report
Your Name	
Your Position	
Learner Name	
DoB	
Address	
Parent or Carer Name and Address	
Date and Time of alleged Incident	
Exactly what the Child/Vulnerable adult said and what you said (use separate sheet if necessary. Remember, do not lead the Child/Vulnerable adult, record actual details)	
Action taken so far (separate sheet if necessary):	
Details of any witness to incident/conversation including names:	
Your observations (e.g. signs of physical abuse):	
External agencies contacted (date & time)	
Police: Yes/no (circle) If yes provide name and contract No below.	Advice Given
Social Services: Yes/no (circle) If yes provide name and contract No below.	Advice Given
Local authority: Yes/no (circle) If yes provide name and contract No below	Advice Given
Other (e.g. NSPCC): Yes/no (circle) If yes provide name and	Advice Given



contract No below	
Name	
Signature	
Date	
Other Relevant Data	
Action Taken	