

Safeguarding Policy for All Learners and Staff

Named staff/personnel at City Training Services with specific responsibility for Safeguarding.

Designated Safeguarding Officer (DSO)	-	Nicola Simpson
Named Person	-	Simon Hinchliffe
DSO – (delivery partners)	-	Guy Howarth
Named Person	-	Michael Frost
Named Person	-	Kevin Burnitt
Named Person	-	Michael Jowett
Named Person	-	Elizabeth Gobbi

1 Policy Statement

City Training Services (CTS) is fully committed to practices that protect Young People and Vulnerable Adults from abuse, exploitation, bullying, neglect and self-harm in relation to training provision. CTS has to protect and prevent learners from radicalisation and extremism in response to the Prevent Duty requirements and promote British Values throughout all teaching and learning activities.

CTS ensures the Board of Directors, Senior Managers, Staff and Delivery Partners recognise and accept their responsibility to develop the awareness of the risks and issues involved in safeguarding and are clear on how to identify and report any incidents.

CTS is committed to working with local safeguarding organisations such as the Local Child Safeguarding Board (LCSB), local authorities, Police, Prevent Co-ordinators and other Community referral groups to ensure the safeguarding of all learners.

CTS recognises its duty in relation to the Counter Terrorism and Security Act 2015, a duty to ensure all learners, staff and volunteers are advised on how to keep safe and within the law. The Prevent Duty Section 26 contained within this legislation does not prevent learners and staff from having political or religious views and concerns, but contains details on how they use these concerns or act on them in non-extremist ways. (see *BC Prevent Strategy*)

Three main elements to our Safeguarding Policy are:

1.1 **Prevention:**

By creating a positive atmosphere and promoting effective teaching and pastoral support to learners

1.2 **Protection:**

By following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Safeguarding concerns

1.3 **Support:**

To learner(s) and staff who may have been abused, neglected or at risk of radicalisation

This policy applies to all staff at City Training Services and to those partners who actively work alongside our learners.

City Training Services will therefore establish and maintain an ethos where people feel secure and are encouraged to talk, and are listened to.

This will be achieved by:

- Implementing City Training Service's agreed mission, vision and values at all levels of our operation
Ensuring safer recruitment practices are upheld for all staff
- Ensuring appropriate risk assessments are conducted for all activities fully embracing the 'Working together to Safeguard Children Act 2013 and Keeping Children Safe in Education Act 2014'.
- Ensure that learners know that there are people at City Training Services who they can approach if they are worried or in difficulty
- Ensuring all learners are allocated a training co-ordinator/assessor as their first point of contact
- Providing appropriate professional development to allow key staff to carry out their roles effectively
- Providing support networks for staff and learners
- Issue of the 'safeguarding learner information card'
- Include in the induction, activities and opportunities which equip learners with the skills and knowledge they need to stay safe from abuse, neglect and risk of radicalisation.

City Training Services will ensure that wherever possible every effort will be made to establish effective working relationships with other agencies.

This will be achieved by:

- Using our close links with agencies to share information which will help support learners at risk
- Liaising with the Local Child Safeguarding Board (LCSB) and following all recognised reporting systems

2 Process

Where it is believed that a learner is suffering from, or is at risk of significant harm, City Training Services will follow the process set out in the Bradford Local Children Safeguarding Board.

This requires that:

- Learners are always listened to and informed supportively that information may need to be shared
- All suspicions should be reported to a Designated Safeguarding Officer (DSO)/Named Person (s) (*it is not the responsibility of general staff to investigate suspected cases of abuse*)
- The DSO/Named Person (s) is responsible for making the judgement as to whether a concern constitutes a Safeguarding, Prevent or Child Protection issue.

City Training Services will ensure that the DSO and the Named Person (s) nominated for Safeguarding/Prevent/Child Protection will attend training relevant to their role

- The DSO will also attend Inter Agency Child Protection training
- All staff are issued with and must carry the safeguarding information cards which are written guidelines to help them meet their responsibility in safeguarding the welfare of apprentices
- In addition, training will be provided internally and will include relevant and mandatory training
- New staff will receive appropriate guidance at induction
- Learners will be made aware of the City Training Services' procedures at induction; induction programmes will be designed to provide related education and training for apprentices in line with Safeguarding requirements and 'Keeping Children Safe in Education Act 2014'
- Guidelines, and updates, will be available for learners via our website and staff via Click into Quality (CiQ).
- British Values will be promoted throughout all curriculums

Confidentiality is an issue which needs to be discussed and fully understood by all those working with learners, particularly in the context of safeguarding and/or child protection.

- The only purpose of confidentiality in this respect is to benefit the learner
- Child Protection legislation overrides data protection rules where the safety of the learner(s) is judged to be at risk. Responsibility for this judgement lies with the DSO/Named Person (s)
- Learners need to be aware that staff cannot guarantee confidentiality and must be advised that information may need to be shared with others.
- Wherever possible, consent should be obtained before sharing personal information with third parties
- In some circumstances, consent may not be possible or desirable but the safety and welfare of an learner (s) dictate that the information should be shared
- They also need to know that they will be kept informed at all times
- Information about learners at risk will only be shared on a 'need to know' basis
- Liaison with other agencies will only be conducted by the DSO/Named Person (s) to ensure that all processes are followed.

Well-kept records are essential to good safeguarding/Prevent/child protection practice. City Training Services is clear about the need to record any concerns held about a learner (s) within our establishments, the status of such records, and when these records should be passed over to other agencies.

- Every effort will be made to work with schools to ensure City Training Services is aware of learners joining us who may already be at risk to ensure that proper support is in place as soon as possible after enrolment
- Similarly, City Training Services will seek to pass on records of any learners under 18yrs who move onto another provider
- Any concerns raised in relation to safeguarding our learners should be recorded in writing and passed to the DSO/Named Person (s) for consideration; discussions should be noted and any actions recorded

All records will be kept securely in an agreed place and only made available to other senior designated staff

- Normally personal information should not be held longer than 7 years after the learners' last contact with City Training Services. Exceptions to the 7 year period will occur when records:
 - Need to be retained because the information in them is relevant to legal action that has been started
 - Are required to be kept longer by law
 - Are archived for historical purposes (e.g. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority). Where there are legal proceedings it is best to seek legal advice about the retention period of your records
 - Are held in order to provide, for the learner, aspects of his/her personal history (e.g. where the learner might seek access to the file at a later date and the information would not be available elsewhere)
- When records are being kept for more than the 7 year period, files need to be clearly marked and the reasons for the extension period clearly marked.

The City Training Services DSO/Named Person (s) will attend child protection conferences, if required.

City Training Services recognises that learners who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This may be the only stable, secure and predictable element in the lives of young people at risk. Whilst at City Training Services, their behaviour may still be challenging and defiant and there may even be moves to consider suspension or

exclusion from City Training Services. It is also recognised that some learners who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the apprentice (s) can receive appropriate help and support.

Allegations against staff:

- City Training Services have procedures for dealing with allegations against staff (Complaints or Grievance Procedure)
- All concerns must be raised through the DSO/Named Person (s) and the City Training Service's complaints or grievance procedure will be followed
- City Training Services are required to report to in the first instance to the Local Child Safeguarding Board (LCSB) if a person ceases to work in an educational setting and there are grounds for believing s/he may be unsuitable to work with learners, or may have committed misconduct
- If required, following any investigation, a referral may have to be made to the Disclosure and Barring Service (DBS) who are responsible for deciding whether to prohibit a person from working with learners in the future or place restrictions on their employment in educational establishments. This is carried out via the 'Duty to Refer' obligations.

3 Accountability & Responsibility

CTS ensure delivery partners who deliver services to learners have trained safeguarding personnel and a designated safeguarding person within their organisation. CTS have also set out a minimum requirements standard for delivery partners in order to ensure that they are at or above the required threshold in relation to meeting the needs of safeguarding.

CTS DSO/Named Person (s) are also the Prevent lead for the company and delivery partners. CTS take the responsibility to ensure all staff, delivery partners and learners are supported in Prevent, through appropriate training, awareness sessions, teaching and learning materials and resource development.

The CTS Board take overall responsibility for safeguarding and Prevent and a Prevent lead on the board supports CTS. A list of cases is presented to the Board at regular meetings which includes ongoing cases and those with satisfactory outcomes.

4 Training

CTS ensure that all staff and delivery partners have adequate safeguarding training and awareness and the safeguarding officers are qualified to the required level. CTS requests that every delivery partner has a safeguarding officer and Prevent lead. These persons are communicated with and met with regularly from the CTS safeguarding and Prevent lead.

CTS also asks its delivery partners to:

- Review their own processes and procedures against best practice guides and assess risk to ensure their own process works effectively and responds efficiently in recording incidents
- Complete risk assessments for Prevent requirements on all centres and on employers premises
- Follow the guidelines set out by agencies such as SFA and Ofsted
- Undertake annual training on safeguarding and Prevent in order to raise awareness and keep informed of up to date legislation and issues
- Maintains a Single Central Register (SCR) of all staff qualifications, safeguarding training and Disclosure and Barring Service (DBS) checks
- Ensure all staff have completed Prevent awareness sessions and Channel programme module as a minimum

5 Disclosure and Barring Service Checks

CTS has a responsibility to ensure all staff and delivery partners are delivering in and offering safe recruitment and delivery practice. Therefore all staff that frequently work with learners and/or vulnerable adults in training, advice or transport have been checked through the Disclosure and Barring Service.

Ongoing monitoring of DBS checks will take place throughout the year to ensure delivery staff details are kept up to date. It is a contractual requirement to respond to these requests for information.

6 Review

CTS's Safeguarding Policy and procedures are reviewed. Prevent is checked to ensure processes and procedures are up to date in line with changes to requirements. CTS also reviews delivery partner policies and procedures relating to safeguarding.

CTS also monitors delivery partner progress made against minimum requirements standard for Safeguarding and Prevent at quarterly monitoring meetings. If CTS considers insufficient progress has been made there will be an intervention including the requirement for an improvement plan and possibly restriction of further recruitment of learners.

CTS reports all Safeguarding/Prevent activities and issues directly to the Board of Directors. The CTS Board has a lead representative for both Prevent and safeguarding and this colleague will work closely with CTS in monitoring and addressing issues.

A safeguarding group, made up of the delivery partners safeguarding officers, meets six monthly to review activities, referrals and support arrangements.

7 Safeguarding Procedure

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse, neglect, and the risk of radicalisation and/or extremism.

Safeguarding and promoting the welfare of children can be defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

(Working together to safeguard children A guide to inter-agency working to safeguard and promote the welfare of children, 2015)

Safeguarding adults at risk of harm/abuse can be defined as:

- Adults who need care and support (whether or not the authority is meeting any of those needs)
- Adults who are experiencing, or is at risk of, abuse or neglect, and
- Adults who are unable to protect himself or herself against the abuse or neglect or the risk of it.

<http://www.skillsforcare.org.uk/document-library/standards/care-act/learning-and-development/care-act-implications-for-safeguarding-adults-briefing.pdf>

What is abuse?

Young people and adults can experience abuse in a variety of settings including: at College, within the family home, within a personal relationship, in the community as well as whilst using online computer networks and phones.

The following categories of abuse are used in the *Keeping Children Safe in Education Guidance 2015* and the *Safeguarding Adults Bradford Multi-Agency Policy and Procedures December 2015*:

Abuse: a form of maltreatment of a child or adult. Somebody may abuse or neglect a child or adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or a child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

In addition for adults, it may include unlawful or inappropriate use of restraint or physical interventions and/or unlawful deprivation of liberty is physical abuse.

Emotional abuse includes the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental 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 (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

In addition for adults this may include threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal from services or supportive networks.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child 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 in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child 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.

In addition for adults this may include rape and sexual assault or sexual acts to which the adult is at risk has not consented, or could not consent or was pressured into consenting. Sexual acts would include being made to watch sexual activity.

Neglect the persistent failure to meet a child’s 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 abuse. Once 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 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 basic emotional needs.

In addition for adults this includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Modern slavery includes human trafficking, forced labour, and domestic servitude. Traffickers and slave masters use the means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhuman treatment.

Discriminatory abuse includes abuse based on a person’s race, gender, identity, age, disability, sexual orientation or religion; or other forms of harassment, slurs or similar treatment or hate crime/hate incident. Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. It can result from situations that exploit a person’s vulnerability by treating the person in a way that excludes them from opportunities they should have as equal citizens, for example, education, health, justice and access to services and protection.

Financial or Material abuse is a crime. It is the use of a person’s property, assets, income, funds or any resources without their informed consent or authorisation. It includes: theft, fraud, internet scamming, coercion in relation to an adults financial affairs or arrangements, such as wills, property, inheritance or financial transactions, exploitation or the misuse of an enduring power of attorney or a lasting power of attorney, or appointee-ship.

Domestic abuse includes psychological, physical, sexual, financial, emotional abuse; as well as so called ‘honour’ based violence, forced marriage and female genital mutilation. Many people think that domestic abuse is about intimate partners, or abuse of women by men, but it may also be caused by wider family members, and committed by women towards men and in same sex relationships, as made clear in the Home Office definition: *“An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse....by someone who is or has been an intimate partner or family member regardless of gender of sexuality”*.

Support for learners and staff where there are additional concerning factors

Support for learners is essential whilst investigations are being undertaken or services being set up. Counselling, Learning Support, Advice and Guidance and Financial Support can be helpful to some learners. CTS can refer learners to organisations externally who provide a range of specialist support, guidance and advice. There are confidential helplines such as ChildLine, Forced Marriage Unit and Domestic Violence Helpline for learners who do not want to talk to staff.

Support for staff is also important given often the sensitive nature of Safeguarding. Support is available from the DSO. Staff may also wish to seek counselling for themselves through the College Counselling Service. <http://www.brad.ac.uk/counselling/>

Learners who may present at risk to other learners, including sex offenders and violent offenders

If a CTS staff member becomes aware or is concerned that learner is about to, or is currently on a programme of learning may have been involved in sexual or violent offences this information needs passing immediately to the Lead DSO. The Lead DSO will have the responsibility to contact the outside agencies to request further information on a 'need to know' basis and liaise with the appropriate personnel about the action to be taken. CTS have a role in rehabilitation of offenders but will assess the risks to other learners before making any decisions.

Allegations of a learner abusing another learner

If a learner has reported being abused by another learner, a DSO should be contacted immediately. The learner reporting the abuse will be advised to report the matter to the Police. In some circumstances the DSO will contact the Police, especially if the learner reporting the abuse is vulnerable. If the learner is under 18 years their parents may be contacted (the learner's wishes will be taken into account when deciding this). If the Police or Children's Social Care or the Adult Protection Unit are undertaking an investigation it is likely CTS will need to wait for the outcome of this before undertaking an internal investigation (in some cases this takes several months). Support should be offered to both the learner reporting the abuse and the learner who is the subject of the allegation in such situations and judgements should not be formed until the outcome of the investigation.

Forced Marriage

Forced marriage is different from and should not be confused with, arranged marriage. A learner who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse such as physical, psychological, financial, sexual and emotional pressure. The Government has produced guidelines for schools, colleges and universities in how to respond to this situation.

If there are concerns that a learner may be in this situation, they can be offered support and advice locally as well as details of the Forced Marriage Unit who can offer specialist advice. Confidentiality is extremely important in these circumstances. Whilst establishing the learner's situation, staff should try to ascertain the immediate risk the learner is in. In all cases, staff must consult with a DSO, either to take action or to provide information and advice, given the learner's age and understanding. If the learner is going overseas imminently it is important to contact the DSO immediately and to gather as much information as possible from the learner. **The learner's family should not under any circumstances be contacted without consultation with the Lead DSO and learner. Confidentiality within CTS is also essential.**

Learners Going Missing

CTS staff, in conjunction with College colleagues, should report learners that go missing from education, particularly on repeat occasions, to the Safeguarding Team to prevent the risk of them going missing in future.

It is essential that CTS staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential Safeguarding concerns such as travelling to conflict zones, female genital mutilation (FGM) and forced marriage and child sexual exploitation (CSE).

Once the Safeguarding team is aware of the concerns for a missing learner; this information will be shared with the relevant external authority.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

If staff become aware of any concerns, this needs to be reported to a DSO to refer the concerns to the relevant agency.

It is the purpose of this procedure to ensure that all learners under the age of 18 and/or vulnerable adults are safeguarded, showing CTS's commitment to provide protection for all learners on programme.

Responsibilities:

It is the responsibility of CTS staff and the delivery partners to:

- Appoint a Designated Safeguarding Officer
- Appoint a Prevent lead
- Ensure that all employed and voluntary staff and associates have a recent DBS check
- Ensure that all staff have received training, information and support on all aspects of safeguarding including, but not limited to, safer recruitment practices, internal and social media safety, bullying, grooming, abuse, Prevent, exploitation and extremism
- Ensure that staff support is carried out in a confidential manner
- Ensure Prevent awareness for all staff takes place and fundamental British Values are adhered to for staff and learners
- Ensure referral agencies and support posters/guides are in prominent places for staff and learners to see and provide support for employers in ensuring their learners are protected and safe from abuse or extremism (and all the features these include)
- Ensure the safeguarding process is adhered to and correct documentation, evidence and support has been provided
- Carry out internal investigations should it be appropriate
- Monitor the progress of cases on a daily basis as required

It is the responsibility of CTS and delivery partner staff to:

- Seek urgent medical or Police assistance if needed
- Show concern and refer any learner who needs support
- Not offer or promise confidentiality but to record the facts without 'leading'
- Offer support and security and not react emotionally
- Make a record of their concerns and refer to the DSO/Named Person (s)
- Not discuss concerns or disclosures with anyone including parents
- Tell the learner that a record will be made and the DSO/Named Person (s) informed
- Understand that protocols may require that they have no further involvement, but will be given feedback
- Get personal support if required
- Understand the risks of bullying, grooming, abuse, exploitation, extremism and online safety and how to support learners in keeping themselves safe
- Identify and signpost to organisations for support where characteristics of exploitation, extremism, bullying, abuse or grooming has been recognised

It is the responsibility of the DSO/Named Person (s) to:

- Investigate, improve, monitor and review company policies and procedures
- Take action on referrals from both internal and external sources
- Make decisions about referrals to Local Child Safeguarding Board (LSCB)
- Keep up to date with all Child/Vulnerable Adult Protection legislation
- Chair case discussions if appropriate
- Collect all necessary data and ensure it is kept strictly confidential and protected by password access, stored under lock and key
- Determine if an internal investigation is required and liaise with LSCB, Police and other relevant bodies to avoid compromising any official investigation
- Liaise with the relevant persons at delivery providers to ensure all necessary support and guidance is available as appropriate
- Ensure HR and recruitment practices are fit for purpose and in line with safer recruitment practices

See also:

Safeguarding Reporting Procedure

BC Prevent Strategy