

## Safeguarding Policy for Young People and Vulnerable Adults

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

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

### 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.

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

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