

Safeguarding and Prevent Duty Policy & Procedure

Contents

1. PURPOSE	2
2. SCOPE	2
3. KEY PRINCIPLES	2
4. RESPONSIBILITIES	2
Directors and Senior Managers	2
Designated Safeguarding/Prevent Officers	3
Safeguarding/Prevent Officers	3
All Staff	3
5. RECRUITMENT	3
6. REGULATED ACTIVITIES	4
7. RISK DEFINITIONS	5
Actions or omissions that constitute abuse	5
Neglect	5
Physical Abuse	5
Domestic Abuse	5
Financial or Material Abuse	5
Emotional or Psychological Abuse	6
Sexual Abuse / Harassment	6
Discriminatory Abuse	6
Institutional Abuse	6
Modern Slavery	6
8. PREVENT DEFINITIONS	7
9. REPORTING PROCEDURES	7
Alleged or suspected abuse, harm or radicalisation of a vulnerable person where the disclosure is not against a member of staff	7
Alleged or suspected abuse, harm or radicalisation of a vulnerable person by a member of staff:	8
10. USE OF MYCONCERN IN RECORDING AND CASE MANAGEMENT	9
User Management	9
Recording Concerns and Updates	9
Triaging Concerns by the Designated Safeguarding Officer(s)	9
Managing the Concerns Dashboard	10
Managing Referrals	10
Information Sharing	10
MyConcern Users - Data Security	10
11. POLICY IMPLEMENTATION	10
Leadership and Values	10
Raising Awareness	11
Teaching and Learning	11
Learner Support	11
Managing Risks and Responding to Events	12
11. ROLE OF SAFEGUARDING BOARDS	12
12. INFORMATION SHARING AND GDPR	13
13. ASSOCIATED COMPANY POLICIES	13
14. APPENDIX 1 INFORMATION SHARING FLOW CHART	14
15. APPENDIX 2 TELEPHONE CONTACTS FOR LOCAL SAFEGUARDING BOARDS	15
16. APPENDIX 3 MANAGING SAFEGUARDING DURING COVID-19	17

Policy Review Date: May 2021

Next Policy Review Date: May 2022

1. Purpose

This policy associated procedures and guidance provides advice on dealing with Safeguarding to meet our legal responsibilities and requirements of the Safeguarding Vulnerable Groups Act 2006, amendments, and associated legislation. This policy also provides guidance on dealing with potential extremism and radicalisation issues in order to meet our legal responsibilities and requirements of the Counterterrorism and Security Act 2015 and Prevent Duty Guidance for England and Wales. The policy encompasses all groups equally, is non-discriminatory and has open and transparent processes.

In all aspects of our work, the needs and interests of vulnerable people will be placed above the needs and interests of all others. Hence, this policy and guidance will have priority over all other policies and procedures. The aim of the policy is to create and maintain a safe, healthy and supportive learning and working environment for our learners, customers, staff and visitors alike.

2. Scope

We recognise our legal responsibilities in safeguarding all our learners, apprentices, employees and other customers, along with the promotion of wellbeing. Our safeguarding practices are an integral and fundamental part of this commitment. This policy applies to all employees (permanent, temporary, fixed term, agency, volunteers and self-employed or contracted arrangements), visitors, customers, apprentices, learners, suppliers and sub-contractors working in partnership with, or for the company. It applies to all our functions, services, and employment practices and activities.

This policy and procedure applies to Itec Training Solutions Holdings Group, including its subsidiaries and associated companies: Centre for Strategy and Communication Limited and Itec Training Solutions Limited and all employees thereof. Throughout this policy, any references to “the Company”, means the Itec Training Solutions Holdings Group and its subsidiaries and associated companies; Centre for Strategy and Communication Limited and Itec Training Solutions Limited.

As a prime contractor, we will encourage and work with sub-contractors in relation to ensuring safe working practices and compliance with relevant safeguarding and prevent legislation.

3. Key Principles

The key principles that underpin this Safeguarding policy and guidance are found in the Human Rights Act 1998, the Children Act 2004, Protection of Freedoms Act 2012, and the Safeguarding Vulnerable Groups Act 2006, Social Services and Well-being (Wales) Act 2014 and Counter-Terrorism and Security Act 2015. They are explained in the documents including Prevent Duty Guidance for England and Wales, Working Together to Safeguarding Children (England), Keeping Children Safe in Education (England), Keeping Learners Safe (Wales), In Safe Hands: implementing Adult Protection Procedures in Wales’ and the ‘UN Convention on the rights of the child’, to which the United Kingdom is a signatory. Definitions of ‘Children’ and ‘Vulnerable’ adults are outlined below.

4. Responsibilities

Directors and Senior Managers

It is the responsibility of Directors and Senior Managers to:

- ensure the company has clear guidelines and policies in relation to safeguarding and prevent legislation in place and acted on where appropriate,
- take appropriate measures to ensure this policy is fully and effectively implemented,
- ensure that all staff are aware of this policy,
- ensure all staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Safeguarding/Prevent Officer,
- ensure that appropriate resource is applied to prevent & safeguarding procedures,
- monitor and evaluate the provision of safeguarding & prevent,
- provide advice and guidance as required.

Designated Safeguarding/Prevent Officers

It is the responsibility of Designated Officers to:

- ensure that safeguarding strategies are implemented across the Company
- contribute to the development of safeguarding policies and procedures,
- keep up to date knowledge on changes and developments in legislation,
- ensure policies and procedures on safeguarding/prevent are reviewed at least annually,
- support training for relevant staff as required, including in this policy / procedure, training new staff on induction, ensuring yearly refresher training takes place and other training as required.
- ensure any concerns are shared with relevant external organisations, in order to minimise the risk of our learners becoming involved with terrorism and/or at risk of harm,
- make decisions on whether to refer to appropriate external organisations / authorities,
- make referrals to social services, police, Channel, DBS and/or EWC using appropriate protocols,
- cooperate with any external investigation resulting from a referral,
- respond to new concerns that have been recorded and for triaging those concerns on the system, updating and maintaining records,
- provide Directors, SMT and Sub-contractors with updates on safeguarding/prevent as required.

Safeguarding/Prevent Officers

It is the responsibility of Safeguarding/Prevent Officers to:

- contribute to the development of safeguarding policies and procedures,
- act as the first point of contact for staff on safeguarding & prevent matters and disclosures,
- collect information regarding referrals, respond to new concerns that have been recorded and for triaging those concerns on the system, updating and maintaining records
- discuss information with the Designated Officer for the appropriate action to be taken,
- take direction and act on instructions given by the Designated Officer and
- promote and comply with all responsibilities as detailed in the all staff section below.

All Staff

It is the responsibility of all our staff to:

- create and support an ethos that upholds the Company's mission, vision and values including British Values, to create an environment of respect, equality and diversity and inclusion,
- support a safe environment, where all learners, apprentices feel supported and are aware of how to report concerns.
- be commitment to the implementation of and adhere to the policy and support the business in effectively implementing its key safeguarding and prevent procedures and strategies,
- undertake safeguarding and prevent training to have the skills to recognise those who may be vulnerable to harm, radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns,
- report any concerns around harm, abuse, extremism or radicalisation via safeguarding reporting channels,
- report and remove any literature displayed around the Company that could cause offense or promote extremist views,
- support the development of learner understanding of the issues around safeguarding, wellbeing, extremism and radicalisation through activities such as training and awareness sessions,
- participate in engagement with local communities, training providers, and external organisations as appropriate.

5. Recruitment

It is the responsibility of the HR Department to operate in line with the company's Safeguarding and DBS Policies and as a minimum:

- Specify in advertisements that offers of employment are subject to reference checks, satisfactory DBS and in Wales EWC registration checks based on job role and
- Based on job requirements, process and complete the EWC registration checks, enhanced DBS disclosures and basic disclosures and obtain references as required.

6. Regulated Activities

A **child** is anyone who has not yet reached their 18th birthday.

For the purpose of the ROA 1974 (Exceptions) Order 1975, the definition of 'working with children' under the Regulated activity relating to Children the definition of regulated activity relating to children comprises of:

- 1) Unsupervised activities: teach, training, instruct, care for or supervise children, or provide advice / guidance on well-being, or drive a vehicle only for children;
- 2) Work for a limited range of establishments ('specified places'), with opportunity for contact; for example, schools, children's homes, childcare premises. Not work by supervised volunteers;

Work under (I) or (ii) is regulated activity only if done regularly.

- 3) Relevant personal care, for example washing or dressing; or health care by or supervised by a professional;
- 4) Registered Child minding; and foster-carers

Regulated activity relating to **adults**

The definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics or circumstances of the adult receiving the activities.

There is no requirement for a person to do the activities a certain number of times before they are engaging in regulated activity. There are six categories of people who will fall within the new definition of regulated activity (and so will anyone who provides day to day management or supervision of those people). A broad outline of these categories is set out below.

- (i) Providing health care by, or under the direction or supervision of, a regulated health care professional
- (ii) Providing personal care made up of:
 - physical assistance with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't carry this out themselves because age, illness or disability
 - prompting and then supervising with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't decide to do this for themselves because of age, illness or disability
 - training, instructing, providing advice or providing guidance on how to physically assist an adult with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't carry this out themselves because age, illness or disability
- (iii) Providing social work by a social care worker to an adult who is a client or potential client
- (iv) Assisting an adult who can't manage themselves because of their age, illness or disability with the day-to-day running of their household relating to: managing the adult's cash; paying the adult's bills; shopping.
- (v) Assistance in the conduct of an adult's own affairs, where
 - a lasting power of attorney is created
 - an enduring power of attorney is registered or applied for
 - Court of Protection has made an order in relation to the making of decisions on the adult's behalf
 - an independent mental health or mental capacity advocate is appointed
 - independent advocacy services are provided
 - a representative is appointed to receive benefits payments on the adult's behalf.
- (vi) Conveying adults to, from or between health care, personal care and/or social work services who can't convey themselves because of their age, illness or disability
- (vii) Day to day management or supervision of anyone carrying out the above activities.

7. Risk Definitions

The risk to a vulnerable person is defined as intentional or non-intentional abuse which results (or could result) in 'significant harm' to the abused person. The term "Harm" is defined as:

- Ill treatment.
- The impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- The impairment of physical intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

"Ill treatment" includes sexual abuse, neglect, emotional abuse and psychological abuse.

Where the question of whether harm suffered by a vulnerable person is significant, the focus is on the vulnerable person's health or development, their health or development shall be compared with that which could reasonably be expected of a similar individual.

Actions or omissions that constitute abuse

Abuse may consist of a single act or repeated acts. It can be physical, verbal, psychological, financial or material. The abuse can be an act of neglect or an omission to act and the abuse may be the unintended consequences of a person's actions. It can and may occur, for example, when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent to. Abuse can occur in any relationship but commonly is an abuse of power.

These are some of the most common types of abuse in relation to vulnerable people.

Neglect

The persistent or severe neglect of a vulnerable person, or the failure to protect them from exposure to any kind of danger, including cold, starvation, neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs, or extreme failure to carry out important aspects of care, resulting in the significant impairment of their health or development, including non-organic failure to thrive.

Physical Abuse

The hitting, slapping, shaking, pushing, kicking, throwing, poisoning, misuse of medication, burning, scalding, drowning, suffocating, undue restraint, inappropriate sanctions or otherwise causing physical harm to a vulnerable person. Physical harm may also be caused when a parent or carer fabricates or induces illness in a vulnerable person who they are looking after.

Domestic Abuse

Domestic violence also known as domestic abuse is defined as: "An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality". Domestic violence can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual and financial. It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage.

Domestic violence affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The violence can begin at any stage of the relationship and may continue after the relationship has ended. Domestic violence is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

Financial or Material Abuse

Includes theft, fraud, identify theft, pressure around wills, property or inheritance, misuse or misappropriation of benefits/allowances, fraudulent seizure of someone's material assets via power of attorney or eviction

Emotional or Psychological Abuse

The persistent emotional ill-treatment of a vulnerable person: such as to cause severe and persistent adverse effects, on the persons emotional, behavioural development or well-being. This includes threats of harm, abandonment and humiliation, verbal abuse, racial abuse, isolation and withdrawal from services or supportive networks. It may include not giving an individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve seeing or hearing the ill-treatment of another and include serious bullying (including cyber-bullying) causing individuals to feel frightened or in danger, or the exploitation or corruption of an individual.

Sexual Abuse / Harassment

Forced or unforced sexual acts with minors or vulnerable adults. Non-consensual sexual activity (physical contact or non-contact activities) with a vulnerable person whether or not the person is aware of what is happening, including

- Physical contact, including penetrative or non-penetrative acts.
- Non-contact activities, such as involving vulnerable people in looking at, or in the production of, pornographic material or watching sexual activities.
- Grooming in preparation for abuse (including via the internet).
- Encouraging vulnerable people to behave in sexually inappropriate ways.
- 'Upskirting' is a form of sexual harassment and since April 2019 has been listed a criminal offence. Definition: upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

Discriminatory Abuse

Discriminatory abuse may manifest itself as any of the other categories of abuse previously stated. What is distinctive, however, is that discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include: disability - physical or learning disability, mental, ill-health or sensory impairment; race; gender; age; religion; cultural background; sexual orientation; political convictions; appearance. Examples of discriminatory abuse may take the form of any of those listed under any of the other categories of abuse. The difference lies in that the abuse is motivated by discriminatory attitudes, feelings or behaviour towards an individual.

Institutional Abuse

Institutional abuse includes the practice of an abusive regime or culture which destroys the dignity and respect to which every person is entitled. It is the mistreatment of people brought about by inadequate care or support, and poor practice that affects the whole setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

Modern Slavery

Encompassing any type of slavery and / or human trafficking, forced labour and/or domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. This can include: bonded labour, child slavery, early and forced marriage, forced labour, descent-based slavery, trafficking. Many forms of slavery involve more than one element, for example, trafficking often involves an advance payment for the trip and organising a promised job abroad which is borrowed from the traffickers. Once at the destination, the debt incurred serves as an element of controlling the victims as they are told they cannot leave the job until the debt is paid off.

8. Prevent Definitions

Prevent is one of 4 strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Work Based Learning Providers, and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health

The following are commonly agreed definitions within the Prevent agenda:

- **An ideology** is a set of beliefs.
- **Radicalisation** is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- **Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological purpose.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.
- **Extremism** is vocal or active opposition to fundamental British Values, including democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.
- **British Values** are detailed within the Prevent Duty and include democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.

9. Reporting Procedures

Alleged or suspected abuse, harm or radicalisation of a vulnerable person where the disclosure is not against a member of staff

Member of staff taking the disclosure should:

- Not promise confidentiality but explain that you are obliged to pass this information on;
- Listen carefully and sympathetically;
- Clarify what has happened but try to ask as few questions as possible
- Inform the Safeguarding/Prevent Officer of the disclosure immediately
- Record the concern on the safeguarding system as soon as practicable.
- There may be the immediate need to contact the Safeguarding/Prevent Officer prior to a record being made on the system
- Complete all actions above within an hour of notification

Safeguarding/Prevent Officer

- Liaise with the informant as appropriate
- Advise the Designated Officer of the concern/disclosure immediately
- Responded to new concerns that have been recorded and for triaging those concerns on the system, updating and maintaining records, including actions taken
- Review the case with the Designated Officer and make recommendations as necessary
- Complete all actions above within 2 hours of notification from the member of staff

Where the Safeguarding/Prevent Officer is unavailable, the duties of that person in relation to Safeguarding will be undertaken by an alternative Safeguarding/Prevent Officer or Designated Lead.

Designated Safeguarding/Prevent Officers

- Following initial contact from the Safeguarding/Prevent Officer decide on any holding action necessary.
- Review the information with the Safeguarding/Prevent Officer
- Make the decision whether a potential safeguarding/prevent issue is present
- Make or instruct relevant Safeguarding/Prevent Officer to make the necessary referral/s to external agencies
- Responded to new concerns that have been recorded and for triaging those concerns on the system, updating and maintaining records, including actions taken
- Ensure that central records are kept of all communication and reporting occurrences on the Safeguarding system

Where the Designated Officer is unavailable, the duties of that person in relation to Safeguarding will be undertaken by another Decision Manager or HR Manager.

Alleged or suspected abuse, harm or radicalisation of a vulnerable person by a member of staff:

Member of staff taking the allegation

- Not promise confidentiality but explain that you are obliged to pass this information on;
- Listen carefully and sympathetically;
- Clarify what has happened but try to ask as few questions as possible
- Inform the Safeguarding/Prevent Officer of the disclosure immediately
- Record the concern on the safeguarding system as soon as practicable.
- There may be the immediate need to contact the Safeguarding/Prevent Officer prior to a record being made on the system
- Complete all actions above within an hour of notification

Note. Where the person taking the allegation is also the accused, they must immediately pass the allegation on to another member of staff or a Safeguarding/Prevent Officer to carry out the actions outlined above and then have no further contact with the person.

Safeguarding/Prevent Officer

- Liaise with the informant as appropriate
- Advise the Designated Officer of the concern/disclosure immediately
- Respond to new concerns that have been recorded and for triaging those concerns on the system, updating and maintaining records, including actions taken
- Review the case with the Designated Officer and make recommendations as necessary
- Complete all actions above within 2 hours of notification from the member of staff

Where the Safeguarding/Prevent Officer is the subject of the allegation or unavailable, the duties of that person in relation to Safeguarding will be undertaken by an alternative Safeguarding/Prevent Officer.

Decision Maker / Designated Officer

- Following initial contact from the Safeguarding/Prevent Officer decide on any holding action, necessary. e.g. temporarily removing a staff member from their job function, temporarily removing the learner from provision pending review
- Review the available information with the Safeguarding/Prevent Officer
- Make the decision whether a potential Safeguarding/Prevent issue is present
- Make the decision whether to suspend the employee on full pay pending investigation
- Instruct the HR Director/ Senior Advisor to conduct an investigation
- Review the findings of the investigation with the HR Director/ Senior Advisor
- Identify whether the criteria for making a referral to the DBS and/or EWC has been met
- HR Director/ Senior Advisor to make the necessary referral/s or reinstate the full employment status
- Ensure that a central record is kept of all communication and reporting occurrences in the Safeguarding file

Where the Designated Safeguarding/Prevent Officer is the subject of the allegation or unavailable, the duties of that person in relation to Safeguarding will be undertaken by an alternative Designated Safeguarding/Prevent Officer, HR Director/ Senior Advisor or Director.

HR Director/ Manager

- Carry out an investigation, together with the person's line manager suspend the member of staff on full pay pending the outcome of the investigation
- Carry out a thorough impartial and objective investigation as timely as possible (even if the employee leaves employment) in order to gather sufficient evidence to decide whether the criteria for making a referral has been met
- Relevant parties will be notified of anticipated timescales for investigation and advised of any reasons for delay and anticipated dates. Processes will be dealt with in accordance with the company's Disciplinary Procedures
- Following investigation, submit a report to the Decision Maker
- If required make the referral to the DBS and/or EWC and liaise with DBS and/or EWC until a decision is made.
- Communicate DBS and/or EWC decisions to relevant parties, including Board of Directors.
- Where a member of staff is barred under the DBS, together with the person's line manager, instigate disciplinary procedures advising that it could result in the termination of employment.
- Ensure that a central record is kept of all communication and reporting occurrences

Where the HR Director/ Manager is the subject of the allegation or unavailable, the duties of that person in relation to the above will be undertaken by a Director

Note. If an employee is employed in a regulated or controlled job role and becomes barred as a result of conduct inside or outside of their employment, this will be deemed as gross misconduct and dealt with in accordance with the company's Disciplinary Procedures

10. Use of MyConcern in Recording and Case Management

The MyConcern safeguarding software is an electronic recording system which enables members of staff in educational establishments and other trusted users to record and update safeguarding concerns. The system allows Designated Safeguarding Officer (DSO) to case manage incidents, produce data reports and access all relevant data for their establishment. Below is advice and guidance on the use of the system in an educational setting and complies with the statutory guidance

User Management

The DSO is responsible for managing access to the system and ensuring that individuals are allocated appropriate user roles within MyConcern. When a member of staff leaves the establishment, it will be the responsibility of the DSO to ensure that the relevant account has been deactivated.

Recording Concerns and Updates

When a staff member identifies a concern, it will be their responsibility to record that concern on the system as soon as practicable. The recording of the concern should not take precedence over any support that needs to be provided to a child, young person or vulnerable adult who may be at risk of harm. There may be an immediate need to contact the DSO prior to a record being made on the system.

The person recording the concern should provide as much relevant information as possible, so that the DSO is in a position to make an informed assessment of the incident. Members of staff recording concerns should ensure that the information they provide is factual, non-judgemental and avoids assumptions.

Any relevant documentation and/or media files (eg: scanned documents, screenshots etc) should be uploaded to the concern at the time of recording. Safeguarding Officers will ensure that concerns are updated as soon as possible if they have further, information relating to that incident.

Triaging Concerns by the Designated Safeguarding Officer(s)

The DSO will be responsible for responding to new concerns that have been recorded and for triaging those concerns on the system. Each concern should be assessed by the DSO and the relevant categories of concerns added to the record. The DSO should also ensure that each concern is associated to the correct learner(s). Any decisions or action taken by the DSO should be recorded as an update, so it appears in the chronology for that concern.

Managing the Concerns Dashboard

The DSO will be responsible for maintaining the 'Concerns Dashboard' and ensuring that those concerns which are no longer active and require no further action are filed.

Managing Referrals

The DSO will ensure that any referrals to other agencies are recorded in the Referrals area under the Dashboards tab in the main navigation bar. This will ensure that the establishment has a full record of all agency referrals in the system. All relevant documentation relating to the referral process should be uploaded onto the system to facilitate secure storage and access to key documents when required.

Information Sharing

The DSO will be responsible for ensuring that information sharing on the system is in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Further guidance can be found in the HM Government Information Sharing Advice for Practitioners

DSOs are able to invite Trusted Users into individual concerns and profiles as a team member when they wish to share relevant information and should ensure that the rationale for doing so is recorded in the system. The DSO is able to invite members of staff from other agencies into concerns and profiles provided they have been created as a Trusted User. It will be the responsibility of the DSO to decide on the necessity for sharing that information in line with data protection principles.

When pupils leave the establishment, it will be the responsibility of the DSO to ensure that their profiles are archived on the system and that any data is retained in line with data retention policies/guidelines.

MyConcern Users - Data Security

All users of MyConcern must ensure the following is adhered to:-

- Users on the system will avoid re-using a password that they currently use or have previously used for other systems.
- Users are responsible at all times for the security of their password and will not disclose it to any other person or allow any other person to use it.
- If a user's password is lost, stolen or otherwise compromised the password will be changed immediately and the HR department notified immediately.
- Use of the system will be in accordance with the GDPR, the Data Protection Act 2018 and the company's policies on information security.
- Any non-user requests for information from the system (whether from a parent, learner or any other person) should be directed to the HR Department.
- Users will ensure that no-one is able to see their log-in details or any of the information recorded on the system whilst in use.
- When using Wi-Fi users will ensure that access to the system is from secure wireless access points
- When users have finished using the system they will make sure they have logged off so no-one else can gain unauthorised access.
- If it is suspected that any person has gained unauthorised access to the system, the HR Department must be notified immediately.

11. Policy Implementation

Leadership and Values

To create and maintain a company ethos that upholds core values of shared responsibility and wellbeing for all learners, staff and visitors whilst promoting respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff and learner understanding of safeguarding/prevent and confidence to deal with them through mandatory staff training, awareness campaigns and local community engagement activities.
- Actively working with the local safeguarding and prevent Groups.
- Review and amend the Safeguarding Policy annually or earlier in response to changes in legislation
- Operate safe recruitment practices.

- Recognising that if we fail to challenge extremist views we are failing to protect our learners from potential harm.
- A commitment to creating and maintaining a safe, healthy and supportive learning and working environment for our learners, staff and visitors alike
- Ensure appropriate ICT filters and monitoring processes in place
- Ensuring Sub-contractors who deliver our provision comply with Safeguarding / Prevent legislation
- Sharing information with third parties so that effective decisions can be made and appropriate preventative action taken
- Ensuring positive action is taken to respond to disclosures or suspicions of any form of abuse

Raising Awareness

This will be achieved through:

- All new members of staff will receive safeguarding and prevent training as part of their induction programme, including training on the Safeguarding policy and procedures.
- All agency staff, volunteers and contractors will be provided with appropriate training / updates regarding changes to safeguarding and prevent agendas.
- We will raise awareness; provide updates and information to staff via appropriate communication channels.
- Providing information advice and guidance to employees and learners where appropriate.
- Providing on-going adequate training to staff in relation to the safeguarding and prevent.
- Ensuring members of staff know the roles and responsibilities of the appointed people within the Safeguarding company structure
- Ensuring staff are aware of the potential signs and indicators, including changes in behaviour, reporting concerns in line with the procedures.
- Ensuring safeguarding procedures are in place and staff know where the procedures are located
- Ensuring staff awareness of the need for maintaining appropriate and professional boundaries in their relationships with vulnerable people, learner, parents, guardians and carers.

Teaching and Learning

To provide a curriculum that promotes and developed understanding and knowledge of wellbeing, safeguarding, prevent and British Values. This will be achieved through:

- Encouraging active citizenship and learner voice.
- Promoting and reinforcing shared values, including British Values; creating space for free and open debate; and to listen and support the learner voice.
- Building the resilience of learners to extreme narratives, undermining extremist ideology and supporting learner voice
- Embedding British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum.
- Promoting wider skills development such as social and emotional aspects of learning.
- Reviewing the curriculum and adapting to recognise local needs.
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values.
- Using external programmes or groups to support learning while ensuring that the input supports Company goals and values.
- Engaging all learners in playing a full and active role in wider engagement in society.

Learner Support

To ensure that staff take preventative and responsive steps working with partner professionals, families and communities. Providing a safe, secure and comfortable environment for learners to study and work

This will be achieved through:

- Strong, effective and responsive learner support services.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Ensuring learner safety and that the Company is free from bullying, harassment and discrimination
- Developing community links and being aware of what is happening in the locality.

- Recognising factors that may increase risk to a learner, i.e. vulnerability, disadvantage or hardship and implementing early risk management strategies.
- Ensuring that learners know how to access support in company and/or via community partners.
- Supporting learners with problem solving and repair of harm.
- Supporting 'at risk' learners through safeguarding and counselling processes.
- Focusing on narrowing the attainment gap between the different groups of learners
- Providing a safe space for learners, for example through counselling provision.
- Providing support for learners who may be at risk of radicalisation or harm, and appropriate sources of advice and guidance.
- Establishing and maintaining an ethos where learners feel secure and are encouraged to talk, and are listened to
- Ensuring learners know that there are staff in the company that they can approach if they are worried or in difficulty

Managing Risks and Responding to Events

The Company will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the Company.
- Identifying, understanding and managing potential risks within the Company from external influences.
- Responding appropriately to events reported via local, national or international news that may impact on learners and communities.
- Ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within the Company.
- Ensuring measures are in place to respond appropriately to a threat or incident within the Company.
- Continuously developing effective ICT security and responsible user controls and policies.

11 Role of Safeguarding Boards

It is the duty of the local authority to make enquiries if it has reason to suspect that a child in its area is suffering, or likely to suffer significant harm, to enable it to decide whether it should take any action to safeguard or promote the child's welfare. This is referred to as the 'local authority's duty to investigate'. Each local authority has a Safeguarding Board covering its area (refer to appendix 1), which brings together representatives of the main agencies and professional responsible for helping to protect children from abuse;

Safeguarding Boards - Children

Safeguarding Children's Boards are required to:

- Protect children from abuse and neglect
- Target policies and practice at those children who are suffering, or at risk of suffering significant harm
- Ensure that effective policies and working practices are in place to protect children and that they are properly co-ordinated
- Promote the welfare of all children

The objective of a Local Safeguarding Children's Board is:

- To co-ordinate what is done by each person or body represented on the Board for the purposes of Safeguarding and promoting the welfare of children in the area of the authority by which it is established
- To ensure the effectiveness of what is done by each such person or body for those purposes. (Section 32(1); Children Act 2004)

Safeguarding Boards - Vulnerable Adults

The local authority also has a duty to develop and lead the implementation of multi-agency policies and procedures to protect vulnerable adults from abuse. They have robust procedures in place for dealing with incidents of abuse and to identify the next step forward in responding to the diversity of circumstances in which harm and exploitation occur to the at-risk group.

12. Information Sharing and GDPR

The General Data Protection Regulations (GDPR) May 2018 does not prevent, or limit, the sharing of information for the purposes of safeguarding or keeping children and young people safe, whether internally or externally. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet.

HM Government, Information Sharing non-statutory guidance (July 2018), states that that neither the GDPR 2018 or the Data Protection Act 2018 prevents or limits the sharing of information to keep children safe. Paragraph 77 sets out the “Special Category Personal Data,” which allows sharing information even without consent, in some circumstances.

Responsibilities

- All staff have a duty to share information if there are concerns about a child’s safety or welfare, information should be shared with the Safeguarding team in line with the procedures outlined above.
- Safeguarding / Designated Persons will make decisions about how much information to share, with whom and when.

Sharing Information with third parties

GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.

We will follow the principles, as outlined in [HM Government Information Sharing non-statutory guidance \(July 2018\)](#) when making decisions in relation to sharing information with whom, how and when

Consent

Wherever possible, consent will be sought and we will be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. Consent from the information subject is not necessarily needed to share their personal information. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person’s safety or well-being at risk.

Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being. Where a decision to share information without consent is made, a record of what has been shared should be kept

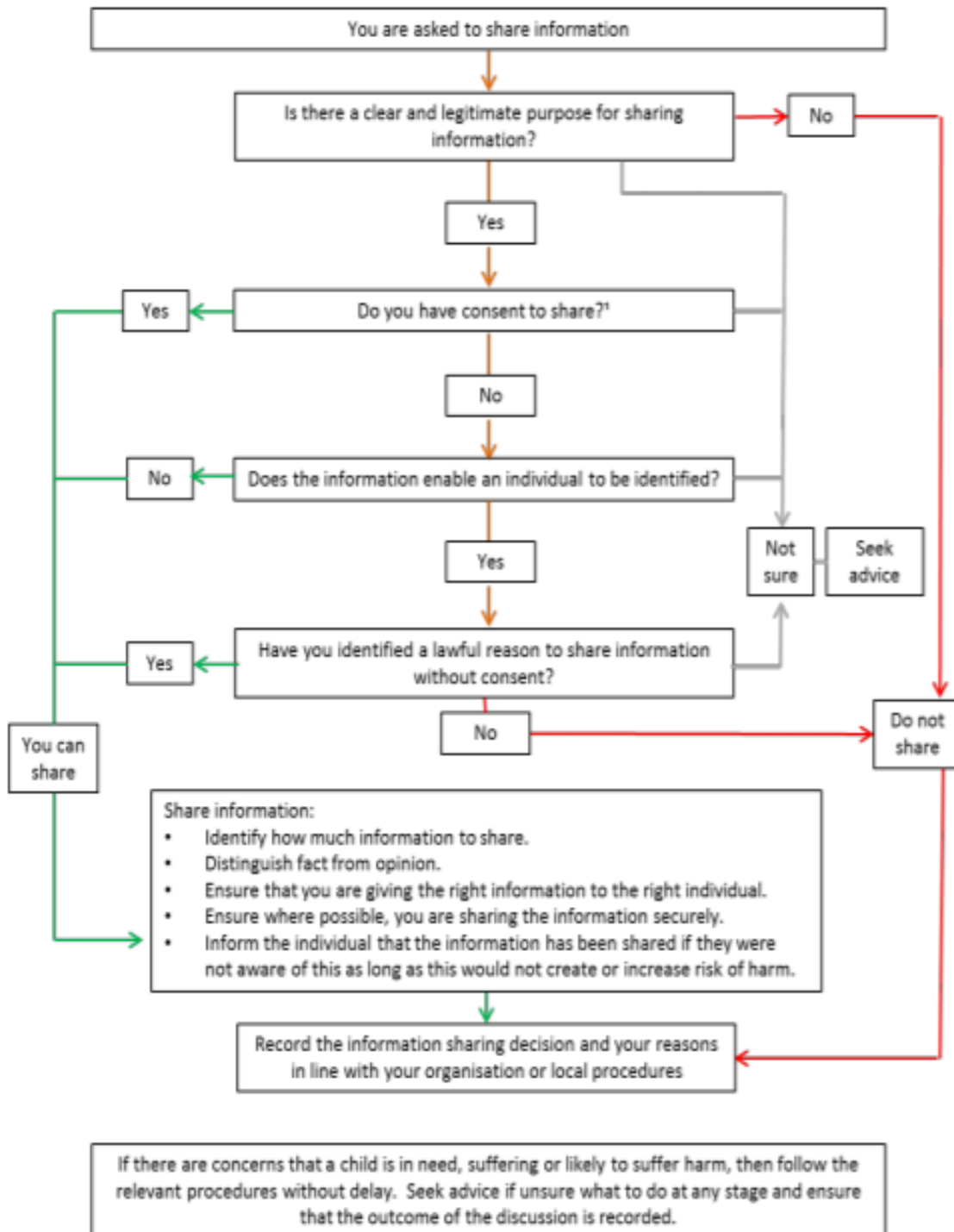
13. Associated Company Policies

This policy should be used in conjunction with the following policies and procedures:

- Equality & Diversity Policy
- Health and Safety Policy;
- Whistleblowing Policy;
- Data Protection Policy;
- Acceptable ICT Use Policies;
- Employee Code of Conduct
- Disciplinary Policy and Procedure
- Bullying, Harassment & Respect at Work Policy
- Grievance Procedure
- Recruitment Policy
- DBS Policy
- Critical Incident procedures

14. Appendix 1 Information Sharing Flow Chart

Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

(Source: HM Government – Information Sharing July 2018)

15. Appendix 2 Telephone contacts for local safeguarding boards

Safeguarding Children and Adult Boards – England

[Links to your Safeguarding Children & Adult Board websites \(Area Child & Adult Protection Committees in Scotland\)](#) (<https://www.safecic.co.uk/your-scb-acpc>)

Safeguarding Boards – Wales

Cardiff and Vale of Glamorgan Safeguarding Board Tel: 02922 330 880 / 02922 330 883 Email: CardiffandValeLSCB@cardiff.gov.uk Website: www.cardiffandvalersb.co.uk		
County	Child referrals	Adult referrals
Cardiff	Children's Access Point Tel 029 2053 6490 Out of Office Hours: Emergency Duty Team: 029 2078 8570	Cardiff Multi-Agency Safeguarding Hub (MASH): 02920 338439 Out of Hours: 02920 788570
Vale of Glamorgan	Intake and Family Support Team Tel 01446 725 202 Out of Office Hours: Emergency Duty Team 029 2078 8570	Vale of Glamorgan Adult Services: 01446 700111 Out of Hours: 02920 788570
South East Wales Safeguarding Boards Children Services: Website: www.sewsc.org.uk Email: sewscb@caerphilly.gov.uk Adult Services: Website: www.gwasb.org.uk Email: sewscbadmin@caerphilly.gov.uk		
County	Child referrals	Adult referrals
Newport	Children and Family Services on 01633 656656 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Newport: Tel: 01633 656656 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Torfaen	Children and Family Service on 01495 762200 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Torfaen: Tel: 01495 762200 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Caerphilly	Children and Family Service on 0808 100 1727 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 0808 100 2500 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Blaenau Gwent	Children and Family Service on 01495 315700 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 01495 315700 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Monmouthshire	Children and Family Service on 01291 635669 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 01291 638928 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
CWM TAF Safeguarding Board Tel: 01443 484 523 Email: cwmtafsafeguarding@rctcbc.gov.uk Website: www.cwmtafsafeguarding.org		
County	Child referrals	Adult referrals
Rhondda Cynon Taff	01443 425 006 Emergency Out of Hours: 01443 743 665	01443 425 003 Emergency Out of Hours: 01443 743 665
Merthyr Tydfil	01685 725 000 Emergency Out of Hours: 01443 743 665	01685 725 000 Emergency Out of Hours: 01443 743 665

Western Bay Safeguarding Board Tel: 01639 763021 Website: www.wbsb.co.uk		
County	Child referrals	Adult referrals
Neath Port Talbot	Tel: 01639 686803 Out of Hours Emergency Duty Team : 01639 895455	Intake Team: 01639 686802
Swansea	01792 635700 Out of Hours Emergency Duty Team: 01792 775501	Intake Team: 01792 636519 Safeguarding Team 01792 636854
Bridgend	01656 642320 Out of Hours Emergency Duty Team: 01443 425012	Social Services: 01656 642279 Safeguarding Team 01656 642477
Mid and West Wales Safeguarding Board cysur@pembrokeshire.gov.uk for the Children Board cwmpas@pembrokeshire.gov.uk for the Adults Board Website: http://cysur.wales/home		
County	Child referrals	Adult referrals
Carmarthenshire	Central Referral Team: 01554 742322 Outside of Office Hours: Careline 01558 824283 & 0300 333 2222	IAA service on 0300 333 2222 Minicom on 01554 756741 SMS on 07892 345678
Ceredigion	Office Hours: Contact Centre Tel: 01545 574000 Outside of Office Hours Emergency Duty Team Tel: 0845 6015392	Office Hours: Contact Centre Tel: 01545 574000 Outside of Office Hours: Emergency Duty Team Tel: 0845 6015392
Pembrokeshire	Office Hours: Assessment Team Tel: 01437 776444 Outside of Office Hours: Emergency Duty Team Tel: 0300 333 2222	Office Hours: Duty Team Tel: 01437 776056 Outside of Office Hours: Emergency Duty Team Tel: 0300 333 2222
Powys	Tel: 01597 827666	Tel: 01597 827666
North Wales Safeguarding Board Regional Administration Officer to the Safeguarding Board Email: regionalsafeguarding@denbighshire.gov.uk Tel: 01824 712903 Website: www.northwalessafeguardingboard.wales		
County	Child referrals	Adult referrals
Anglesey	01248 752 722 01248 353 551 (Out of hours)	01248 752752 Out of Hours: 01286 675502 / 01248 384151
Gwynedd	01758 704 455 01248 353 551 (Out of hours)	Adults Department, Health and Wellbeing 01766 772577 Out of Hours 01248 353551
Conwy	Social Services: 0300 456 1111 Out of Hours: 01492 515777	0300 456 1111 Out of Hours 01492 515777
Denbighshire	01824 712200 Out of Hours: 0345 053 3116	0300 4561000 Out of Hours 0345 053 3116
Flintshire	01352 701 000 Out of Hours 0345 053 3116	01352 803444 Out of Hours 0845 053 3116
Wrexham	01978 292 039 Out of Hours 0345 053 3116	01978 292066 Out of Hours 0345 053 3116

16. Appendix 3 Managing Safeguarding during COVID-19

All company premises have been closed to all staff and learners to help minimise the risk of contracting and spreading Covid-19. All learning has been moved online and sessions will take place utilising digital platforms. We will continue to monitor government advice and guidance and will re-open the building if it is deemed safe and appropriate to do so.

The company has adapted quickly to new arrangements and new ways of working. Consideration has been made in relation to what learning is appropriate to learners, creating and maintaining different ways of support learners and colleagues, prioritising wellbeing as well as continuing with providing distance learning during the COVID-19 pandemic.

Safeguarding during this time, following the normal reporting, all employees are advised that if there are concerns about the welfare of a learner, they are to contact a Designated Safeguarding Officer (see reporting structure) and record the disclosure through the [My Concern system](#).

The company is prioritising support for all learners to ensure their welfare and learning and to enable them to transition effectively back to into work or training in line with government guidance. To achieve this we are collectively making efforts to:

- Ensure learners who are at most risk are being supported
- Support the wellbeing of all our learners, ensuring effective contact and communication
- Incorporating wellbeing within our communications and delivery
- Have an added focus on pastoral care and activities to support the mental wellbeing of learners
- Enable learners to access learning through digital or other accessible methods in a practical and uncomplicated way
- Support parents / carers, where appropriate, in understanding how they can support and how distance learning can provide a breath of learning experiences
- Engage with third parties organisations to safeguarding learners, as appropriate, for example youth offending services, key workers, safeguarding boards
- Continue to work with and support those learner's with social workers to help protect vulnerable children
- Raise awareness with learners in relation to keeping themselves safe on-line
- Provide updates, training and sharing of information to practitioners

Equality Principles

The company is committed to all learners having access to all aspect of learning and experience, taking into account time for maintaining and developing literacy, numeracy and digital skills; building resilience and reflection on wellbeing, offering opportunities to maintain contact with practitioners and peers during this time and in Wales supporting Welsh-medium learners. Refer to the Companies equality and diversity policy for further information. We will seek to ensure as far as possible that no learner is disadvantage because of access to technology, where they live, their age, their special educational needs, the language of their home, or their demographic profile.

Reporting Welfare Concerns

During this time Safeguarding will follow the normal reporting procedures, all employees are advised that if there are concerns about the welfare of a learner, they are to contact a designated safeguarding officer (see reporting structure attached) and record the disclosure through the [My Concern system](#).

If you are worried that a learner, child or young person has been harmed or is at risk of harm you should speak to the Designated Safeguarding Officer and report through the My Concern system as soon as notified of the concern. If there is a requirement to report to the local authority safeguarding board. If you believe that a child or young person is at immediate risk of harm phone the Police on 999.

Safeguarding and Prevent During COVID-19

The risk to a vulnerable person is defined as intentional or non-intentional abuse which results (or could result) in 'significant harm' to the abused person. (See section 8 of the policy for further definitions). The company and all employees have a duty of care to protect against any form of abuse or harm, including

- Sexual abuse
- Bullying and online bullying
- Racist, disability, homophobic or transphobic abuse
- Peer on peer abuse
- Radicalisation and / or extremist behaviour
- Sexual exploitation
- Criminal exploitation and county lines
- Cohesive control and / or teenage relationship abuse
- Risks linked to using technology and social media, including online grooming, radicalisation, and the accessing or creating of inappropriate content, including sexting
- Health and safety concerns / risks
- Issues specific to a local area or population, for example gang activity and youth violence

The company has a zero tolerance approach to bullying, including racially aggravated behaviour that may occur as a result of the pandemic

All employees are to be alert and report any risks of harm and abuse. Specifically during COVID-19 practitioners are to be alert to the potential increased risks in relation to online safety, mental health, domestic abuse, fraud, revenge porn, bereavement, and groups using COVID-19 as an opportunity to spread dis-information and radicalise individuals through various online platforms. The safeguarding team will continue to monitor the impact of COVID-19 in relation to developing risks and will update practitioners as required.

If a learner has been exposed to hurtful or inappropriate content online, they are encouraged to inform their contact at Itec or the safeguarding team and to use the below links to report this material:

- UK Safer Internet Centre - to report and remove harmful online content
- CEOP - for advice on making a report about online
- ACT (Actions Counter Terrorism) - seen or heard something that could potentially be related to terrorism, trust your instincts and report it. Your actions could save lives
- Internet Watch Foundation to report child sexual abuse material online
- Childline - for support and additional guidance

It is important that all staff who interact with children and young people, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should still be made to social services and the police as required.

Distance Learning

The underlying principle during this time is to prioritise wellbeing as well as continuing with providing distance learning. To support this approach consideration needs to be given to what is practically achievable for each individual learner. It is essential to find the right balance between home life and work life to avoid unnecessary pressures.

Online sessions should follow the same principles as set out in the company's Employee Code of Conduct. The company will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Please refer to the Digital Learning Guidance - Practitioners document for further information and what to consider when delivering virtual lessons.

Online Safety

The company will continue to provide a safe environment, including online. This includes the use of an online filtering system. All learners will be accessing their education online via digital platforms. Learners are expected to log into sessions where they will access support from their practitioner. Learners will be submitting their work online which will be assessed by their practitioner in a timely manner.

Learners who do not have access to a computer or laptop have been provided with equipment, which will allow them to log into sessions and continue with their learning. Staff members will maintain communication with learners via their work emails and/or work phones. Staff members are not permitted to communicate with learners via personal emails, personal devices or personal social media.

We will monitor remote sessions and observations of digital delivery will continue in line with observation procedures.

Safer Recruitment and Movement of Staff

It remains essential that people who are unsuitable are not allowed to enter the workforce or gain access to children and vulnerable adults. When recruiting new staff, the company will follow all latest guidance. The Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact. Where new staff are recruited they will continue to be provided with a safeguarding induction

The company will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. The company will continue to consider and make referrals to the Education Workforce Council (in Wales) as required.

Government Guidance

The company is continually monitoring all Government guidance in response to safeguarding during COVID-19. Further information can be found on the links below.

Welsh Government: [Education safeguarding guidance: coronavirus link](#)

England Government: [COVID-19: Safeguarding in schools, colleges and other providers link](#)

Further Support Information and Helplines

Many people will find staying at home difficult, but there are lots of ways to help support learners mental health. Encourage learners to tell you how they are feeling and talk to them about ways to support their mental health.

- Support and helplines are available to learners on the Smart Assessor Wellbeing section of learners portfolio's or available from the Safeguarding team
- Mobile phone apps that can help with wellbeing, [NHS apps library](#).
- CALL helpline provides emotional support 24/7 and can be accessed by phone or text (0800 132 737 or text 81066).
- NHS and GP services are still available for support.
- Samaritans: Confidential support for people experiencing feelings of distress or despair.
- Phone: 116 123 (free 24-hour helpline) Website: www.samaritans.org.uk
- To help [families](#) through lockdown and social distancing, new articles on [Parent Info](#) tackle some of the key issues they are experiencing.

Additional support for young people

- Call, text, or message [MEIC](#), a free service in English and Welsh that is all about listening and helping young people get access to support.
- [Childline](#) is a free service that can give young people information, advice, and support including 1-2-1 counselling from trained professionals, a learner can also [contact them in Welsh](#)