



## SAFEGUARDING POLICY

### Purpose of this Policy

The purpose of this policy is to demonstrate our commitment in protecting children, young people and vulnerable adults from the risk of harm at all times, and to fulfil our legal obligations as a training organisation to record and respond to disclosures in a timely manner. This may involve the use of referral agencies.

### This policy should be read in conjunction with:

- Keeping Children Safe in Education - September 2024  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education>
- Working together to Safeguard children – 2018 (last updated December 2020)
- Education Act 2002 (section 175)

### Scope of this Policy

This policy applies to all staff, associates, employers, and learners involved in a training programme with Skills for Security.

### Other Related Documents and Procedures

- Safeguarding Procedures
- Prevent Policy
- Whistleblowing Policy and Procedures
- Caseload reviews
- Staff Induction
- Employee Handbook
- Learner Induction
- Learner Handbook
- Ofsted Education Inspection Framework (EIF) and Handbook
- Attendance and Absence Policy
- arrangeMy Travel Request End User Guide

### Aim of this Policy

The overall aim of this policy is to have a set of procedures which staff, associates and learners can easily understand and follow in the event of a disclosure being made, alongside having the confidence in Skills for Security to respond to concerns professionally and in a timely manner.

### To achieve this, Skills for Security will:

- Effectively promote this policy and gain commitment through operational activities, including but not limited to, staff and learner inductions, team meetings, caseload reviews, email briefings and updates, training and standardisation events and course material
- Arrange to take all reasonable measures to ensure the risks of harm to our learners are minimised
- Arrange to take all appropriate actions to address concerns about the welfare of the child, young person, or vulnerable adult, working in full partnership with other local services if necessary. This will include mechanisms to effectively record concerns and their outcomes
- Ensure safe recruitment and employment practices are in place.
- All staff read and acknowledge reading the annual Keeping Children Safe in Education Part 1 (KCSIE) with the full document being available for all staff. Staff are then required to complete the KCSIE knowledge check via Safeguarding Network portal.



- As part of the mandatory training requirement, ensure that all staff complete the L2 safeguarding qualification with a caveat that all delivery staff to complete the L3 safeguarding qualification before they start face-to-face delivery.
- Ensure there are appropriately appointed and trained personnel to act as Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL) and Designated Safeguarding Officer (DSO), who are able to provide the appropriate level of advice and support on Safeguarding matters at operational and board level
- Endeavour to create an open and accountable environment, permitting individuals to voice their concerns about inappropriate behaviour and misconduct, whilst providing strong sanctions to deter abuse, harassment and victimisation, and cover up of malpractice
- Provide the appropriate level of training to all staff and associates through the use of e-learning modules and completion of accredited training courses
- Ensure all our policies and procedures apply to all staff, associates, learners, directors, governors and other stakeholders who have an involvement in Skills for Security
- Raise concerns about the standard of service received from referral agencies by accessing their complaint procedures and escalating where necessary to monitoring organisations, such as, Care Quality Commission and Ofsted
- DBS checks for all Skills for Security staff (or those representing Skills for Security) in contact with learners under 18 years. This is retained and updated on a single central register (identified in the Safeguarding procedure).
- Have robust procedures as to how we manage learners' absence from training or work for those under 18 years
- Ensure effective communication with parents/guardians/ carers for those under 18 years - to update on progress or concerns
- Specific promotion of safeguarding issues relevant to young people e.g. Prevent, online safety, online sexual abuse, knife crime, county lines, sexual harassment & violence, and issues relevant to British Values
- Focus on personal safety for those under 18 years i.e. travel to work, lone working, bullying

## Access to this Policy

Staff and associates can access this policy remotely through the shared drive. In addition to this, learners will also be able to review this document within their portfolio.

## Responsibilities

Skills for Security have an organisational approach to Safeguarding, with all staff, associates and learners being responsible for reporting concerns. However, the Board of Directors for Skills for Security will have the overall responsibility for this policy and evaluating the overall effectiveness of the procedures with the support from:

- The Designated Safeguarding Lead (DSL) has the overall responsibility for providing a strategic overview of safeguarding arrangements within the organisation to ensure we are meeting regulatory requirements, whilst providing operational support to the Deputy Designated Safeguarding Lead (DDSL) and Designated Safeguarding Officer (DSO) in responding to and acting on disclosures or concerns made in relation to Safeguarding
- There is a designated safeguarding committee that meet on a monthly basis to discuss all aspects of safeguarding including, but not limited to, new disclosures, central record, learners on a BIL and new training opportunities. The committee will be made up of key stakeholders within the business who will have influence on promoting the importance of safeguarding.
- The DSL, DDSL and DSO have the responsibility to respond to disclosures by undertaking the appropriate investigations, maintaining records and escalating where necessary to the



appropriate referral agencies. This may include more than one agency depending on the nature of the concern.

- Staff and associates have the responsibility to report any concerns relating to Safeguarding directly to the DDSL or DSO, to ensure there is a safe environment to learn. As the majority of our learners are in permanent employment, they may wish to speak directly with their course tutor or line manager. In these situations, the member of staff will escalate to member of the Safeguarding Committee, who will then liaise directly with employers to ensure individuals receive the support they need.

## Designated Safeguarding Team:

Designated Safeguarding Lead (DSL): Jon Ansty 07442095446

Designated Safeguarding Officer (DSO): Sarah Noakes

Designated Safeguarding Officer (DSO): Ian Stringer

Designated Safeguarding Officer (DSO): Laura Jones

Designated Safeguarding Officer (DSO): Chelsey Norton-Stainfield

Designated Safeguarding Officer (DSO): Dave Dooay

Designated Safeguarding Officer (DSO): Shaun McCutcheon-Kay

Safeguarding email address: [safeguarding@skillsforsecurity.org.uk](mailto:safeguarding@skillsforsecurity.org.uk)

Safeguarding telephone number: 01565745036

## Implementation of this Policy

Skills for Security have a strong ethos that Safeguarding is embedded throughout the organisation, and a culture that it is everyone's responsibility to protect individuals from harm.

The table below illustrates key areas where we are able to effectively support the implementation of this policy within operational activities, to enable us to raise the awareness of the importance of safeguarding within our organisation and the wider community, such as County Lines.

Theme	Statement	Evidence
Accountability, Roles and Responsibility	<p>There are clear lines of accountability within the Senior Management of the organisation that show where responsibility lies.</p> <p>There is a clear indication of who has the responsibility and at what level for various aspects of Safeguarding vulnerable adults and children.</p>	<p>The Board has strategic responsibility for Safeguarding which is reviewed as a set agenda item at Board meetings.</p> <p>DSL, DDSL and DSO roles are effectively in place to support governance and operational activities.</p> <p>Safeguarding committee monthly meetings.</p>
Rights and Values	<p>There is a clear statement that shows the organisation's values and beliefs in relation to individual rights to freedom from abuse.</p> <p>It states the expectation for the whole organisation to demonstrate these values through corporate and individual behaviour.</p>	<p>Safeguarding Policy and Procedures</p> <p>Equality and Diversity Policy</p> <p>Complaints Policy and Procedures</p>



Theme	Statement	Evidence
Tolerance Levels	<p>There is a clear statement for all staff, associates and learners which indicates that there is zero tolerance of abuse and other harmful behaviours.</p> <p>Policies and Procedures direct both staff, associates and learners towards taking appropriate actions when abuse and harmful behaviours occur.</p>	<p>Safeguarding Policy and Procedures</p> <p>Equality and Diversity Policy</p> <p>Complaints Policy and Procedures</p>
Risk Assessment	<p>The risk management system works in relation to Safeguarding vulnerable groups and protect them from risk of radicalisation.</p>	<p>Prevent Risk Assessment</p>
Policy	<p>There is a Safeguarding Policy and Procedures for Safeguarding vulnerable adults and children which can be accessed electronically by staff, associates and learners</p>	<p>Policy and Procedures are shared on company drive and are included within our staff and learner inductions. A copy is also in the Learner Handbook.</p>
Staff Recruitment	<p>The organisation demonstrates commitment to excellent quality processes in the recruitment and vetting of new staff and the monitoring of existing personnel.</p>	<p>Safe Staff Recruitment and Selection Policy</p> <p>Quality Assurance Policy and Framework</p>
Capacity and Capability	<p>There is a strong commitment to training all staff at all levels on the issue of Safeguarding young person and vulnerable adults through the completion of staff induction, standardisation events, online training modules and accredited qualifications.</p>	<p>CPD records</p> <p>Minutes of meetings</p> <p>Certificates</p>
Information and Communication	<p>Information for learners and staff is available and accessible through electronic learning platform or shared drive.</p> <p>There is clear communication for issues of safeguarding, including reporting of allegations or concerns, which is covered at the induction stage.</p> <p>Information on Safeguarding features in all communication processes including formal meetings and training events</p> <p>Contact numbers for referral agencies have been listed as part of the Safeguarding Procedures</p>	<p>Version controlled documents.</p> <p>Staff and learner Induction material</p> <p>Disclosure reports and logs (accessible for authorised personnel only)</p> <p>Minutes from the monthly safeguarding committee meetings</p> <p>Standardisation and training events</p>
Curriculum	<p>Personal safety rights and responsibilities are embedded into the curriculum for all learners.</p>	<p>Learner induction and course modules (GDPR, Mental Health, Online Safety and Cyber Security)</p>

## Safeguarding of Learners Under 18

Skills for Security is committed to providing a safe and secure environment for all learners, staff and associates. This is the responsibility of all staff at all times.



We acknowledge, in particular our responsibility to safeguard the wellbeing of learners aged under 18 years and vulnerable adults. We approach this responsibility proactively, with on-going awareness raising and training. This policy is intended to provide supplementary information for awareness & understanding, action and response should an issue of safeguarding concern arise.

### **Definition**

In child protection guidance 'child' is a person not yet 18 years of age, i.e. who has not yet reached his/her 18 birthday.

Vulnerable adults, or adults at risk, are defined as an adult (18+ years) who needs special or additional care because of mental or other disability, illness, infirmity or age.

### **Scope & principles**

We have a responsibility to safeguard and promote the wellbeing of all persons who come into contact with us and, in particular, of under 18's and vulnerable adults.

All Skills for Security employees are in a position of trust, especially those who teach, guide, support or in any way interact directly with learners. We must be mindful of this responsibility and position of trust at all times and in any direct or indirect contact which we have with learners.

The Designated Safeguarding Lead is the person of focus and contact for all safeguarding related matters. Staff should note that their responsibility is not to resolve any safeguarding issue which may come to their attention, but rather to report the details to the DSL/DDSL/DSO, who will take appropriate action. Any matter of concern must be reported, so that the DSL/DDSL/DSO can decide on the appropriate course of action. This may include involving local social services and/ or informing the local LADO (Local Authority Designated Officer). Safeguarding matters relating to under 18's or vulnerable adults should be considered the highest priority and take precedence over other matters.

### **Code of behaviour and good practice**

All staff at Skills for Security must demonstrate exemplary behaviour at all times when coming into contact with under 18's and/or vulnerable adults in order to protect those in their charge from risk and also to protect themselves from false allegations. The following is a list of useful examples to create a positive climate and culture, with regard to appropriate professional behaviour.

- Always put the welfare of under 18's & vulnerable adults, first. All learners must be treated with respect and dignity and be provided with the same equality of opportunity.
- Maintain an accurate register of under 18's/vulnerable adults at all times
- Ensure consent has been obtained to allow under 18's or vulnerable adults to take part in trips or extra-curricular activities and that adequate supervision and vigilance is in place
- Always work in an open environment, avoiding any unobserved or private meeting/situation and encourage open communication. Skills for Security has a zero tolerance for inappropriate relations (e.g. sexual or pre-sexual) between staff and learners. All staff are in a position of absolute trust, which must never be abused in any way.
- Never spend time alone with either under 18's or vulnerable adults, away from other people. Always conduct tutorials or other meetings in centre and ensure that you are never alone with children or vulnerable adults.
- Maintain a professional relationship with all learners, including under 18's and adults at risk. Sexual or emotional relationships are inappropriate with all learners, particularly under 18's or vulnerable adults.
- Staff must ensure that any form of physical touching/ manual touching within the context of a lesson is only ever and always with the student's explicit consent
- Staff are not allowed to **buy or sell goods** on their own behalf, on company/satellite premises or during working hours (this includes any agreed rest breaks).



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- Staff are not allowed to **receive or provide gifts** on their own behalf, on company/satellite premises or during working hours (this includes any agreed rest breaks).
- Be an excellent role model in all aspects
- Always give constructive feedback, not negative criticism
- Keep a detailed record of any injury / incident, together with treatment / resolution
- Attend relevant training courses. All staff will receive Safeguarding initial and updated training

## Concerns about a member of staff

All members of staff are mutually responsible for the safeguarding of children and vulnerable adults. Any concern about a member of staff e.g. inappropriate behaviour or language in the presence of children or vulnerable adults, is important. Any such concern must be brought to one or more of the following:

- Designated Safeguarding Officer
- LADO Local Authority Designated Officer

## Low Level Concern

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that a member of staff have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to the organisations policies
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating pupils

## Procedure for responding to allegations against staff

Any member of staff who is the subject of an allegation within the remit of the Skills for Security Safeguarding Policy will normally be suspended from duties while an enquiry is undertaken. The staff member will be informed of each stage of the proceedings and the police will be informed at the outset if breach of the law is suspected.

Staff who are found to be falsely accused will be exonerated and restored to their post. Staff who are found to have breached the Skills for Security code of conduct or to have contravened the Safeguarding Policy will be dismissed and reported to the appropriate authorities, including the DBS and local authority Social services.

## Policy regarding the use of and access to images

No images must be taken or distributed without specific permission of the subject. This includes children and adults. Photographs must never be taken unless the subject has agreed. In the case of children under 18 agreement of parents must be sought.

## Policy regarding children under 18's who go missing



Registers record personal mobile numbers and the contact number for their next of kin. These records are checked regularly to ensure they remain up to date.

Delivery staff gather attendance figures every day, within 15 minutes of the start of the session and report to the office. We contact the learner and employer. If the learner is not found, then we will contact the learner's next of kin and DSL/DDSL/DSO. The DSL/DDSL/DSO will decide whether to inform the police and/or the LADO depending on the age and personal circumstances of the child/children.

### **Staff recruitment**

All staff that have direct contact with children must have DBS checks in place when they take up the post to which they have been appointed. Advertising and job descriptions clearly state that DBS checking and self-declaration as to suitability to work with under 18's and vulnerable adults is required from all employees. All staff share responsibility to act in appropriate ways with learners at all times and to provide excellent role models of safe, considerate and appropriate behaviour. It is particularly important that posts of responsibility are staffed by persons committed to the safeguarding of all learners, particularly under 18's and vulnerable adults. The Designated Safeguarding Lead will take every measure to ensure that this is the case.

### **Definition of forms of child abuse**

There are 4 categories which are:

- Physical abuse - Any inappropriate contact which injures or risks injury to a child
- Emotional abuse - Maltreatment causing under 18's to lose confidence or self-esteem.
- Sexual abuse - Any inappropriate contact involving or attempting to involve under 18's in sexual activity. Inappropriate use of images is included in this category.
- Neglect - Failure to provide a child's physical & psychological needs

### **Reporting concerns about suspected abuse**

Any suspicion that a child may have been abused by a staff member, other student or anyone else or may be in danger of being abused must be reported to the Safeguarding Officer. Staff may also refer to the DfE Guidance documents on reporting suspected child abuse.

### **Admission policy for under 18's**

Parents/legal guardians of under 18's must complete the application forms in full; these include details of any allergies or pre-existing medical conditions and emergency contact details for parents/guardians. The application also requires parents to sign their agreement that we may act 'in loco parentis' in the case of an emergency.

### **arrangeMy Accommodation for under 18's and adult learners**

Skills for Security have partnered with Apprentice accommodation and travel specialists arrangeMY to provide our employers with safeguarded accommodation options to support apprentices who are required to stay overnight as part of their training. The service will allow employers to request hotel bookings on behalf of their learners in reputable hotels nearby to each college location ensuring they are in safe hands when staying away from home as part of their learning timetables. Every hotel on the Skills for Security program is fully safeguarded and undertaken extensive checks to ensure apprentices are kept safe during travel. Hotels are briefed on the escalation process in an emergency situation, however if you need any further emergency assistance, arrangeMY offer a 24-hour service by calling 01905 610016 to support apprentices during all times.



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**Last Review Date: April 2024**

**Next Review Date: May 2025**

**Position in Organisation: Head of Quality/DSL**

**Signed:**