

Safeguarding Policy

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Policy statement

This policy covers all The Square Metre Ltds on and offsite training provisions including external training partnerships

The company recognises its legal duties and responsibilities to safeguard and promote the welfare of children, young people and vulnerable adults, and works within the procedures and guidelines established by the Safeguarding Boards for Children and Vulnerable Adults.

It is the policy of the Company to work with the local Safeguarding Children and Vulnerable Adults Boards, the Police, NHS, PCT's and Social Care Services while always placing the safety and welfare of the child, young person or vulnerable adult at the centre of any actions or interventions that may need to be taken to ensure their protection and safety.

Responsibility and implementation and exemption

Responsibility for implementing this policy sits with all The Square Metre Ltd staff. This policy relates to all staff, students (regardless of age) and anyone who might enter any of the Company's sites, either as a member of the public or in the course of their work, and covers all aspects of Company's activity including off- site activity.

Day to day advice and guidance to staff will be provided by the Group's Designated Safeguarding Officers. Strategic responsibility sits with Head of Compliance and the Managing Director.

Exemption

For classroom based learning due to eligibility all learners are required to be 19 years on the 31st August of the year of training and therefore this policy excludes 14-16 years olds from this policy.

Key Contacts

Designated Safeguarding Officer – Andy Hollinson 07584 352297

Designated Safeguarding Officer – Debbie Barber 07860 777196

Policy Details

The Square Metre Ltd Company recognises that members of staff and students have an important role to play in safeguarding and promoting the welfare of children, young people and vulnerable adults and preventing abuse and exploitation. This procedural document is designed to provide a basic procedure that should be followed in all cases by all company staff.

The police and social care services have the primary responsibility in the areas of safeguarding children, young people and vulnerable adults, including their protection from harm and exploitation. The Children Act 2004 places a duty on local authorities to take steps to protect children in appropriate circumstances and gives certain powers to the police so that they can take action to protect children, young people and vulnerable adults.

The Safeguarding Vulnerable Groups Act 2006 provides the legal framework for safeguarding vulnerable adults, including the Disclosure and Barring Service.

The Children Act of 1989 defines a child or young person as a person under the age of 18. In the publication "Working Together Under the Children Act 1989" (HMSO 1991) para 4.39 p22 states "Schools and Further Education"

The Company has a role in preventing abuse not only by adopting sound policies and procedures on the management of situations where there is suspected abuse, but also through the curriculum". Further, there is a requirement that staff should be aware of the need to alert social care, the NSPCC or the Police when they believe a child has suffered significant harm or is at risk of significant harm. At all times it is the welfare of the child that is paramount.

Under Section 175 of the Education Act 2002, FE companies are under a statutory duty to have in place arrangements for carrying out their functions with a view to safeguarding and promoting the welfare of children and young people. This policy forms part of those arrangements.

Roles and Responsibilities

The Square Metre Ltd will ensure that:

The Company has a safeguarding policy and procedures in place that reflect local safeguarding board standards and recommendations, and locally agreed inter-agency procedures, and that the policy is made available to parents/carers on request

The Company operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff, governors and volunteers who work with children, young people or vulnerable adults

The Company has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance and recommendations from the local Safeguarding Board, Local Authority (LA) and locally agreed inter-agency procedures

A member of the Company's Strategic Leadership Team is designated to take lead responsibility for safeguarding

Staff undertake appropriate safeguarding training and development that is updated after three years or after significant legislative changes or changes in good practice and guidance protocols

They remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements

A Governor is nominated to be responsible for liaising with the LA and/or partner agencies in the event of allegations of abuse being made against the Chief Executive and Principal

A Governor(s) is nominated as safeguarding lead for the Group and all safeguarding governance arrangements

Where services or activities are provided on the Group premises by another body, the body concerned have appropriate policies and procedures in place with regards to safeguarding and liaises with the Group on these matters where appropriate

They review their policies and procedures annually

The Designated Safeguarding Officer(s):

It will be the responsibility of the Designated Officer(s) to lead the review and monitoring of the procedures and to seek the advice of the local Safeguarding Children Board and local Safeguarding Vulnerable Adults Board, and to bring about a change in policy and procedures as required. This will happen at least annually. The Designated Officer(s) will also, with the support of Staff Development, develop, review and implement the Company's Safeguarding training plan.

The Designated Officer(s) are responsible for ensuring all records associated with safeguarding concerns are securely and appropriately stored. Information will be strictly limited to those on a 'need to know' basis internally and externally, for example statutory agencies where there is a duty to share certain information in matters relating to safeguarding children or vulnerable adults

The Group counselling service works to the British Association of Counselling and Psychotherapy Ethical Framework for Good Practice. This means in practice that counsellors can offer confidentiality to clients with certain exceptions. The counsellors may breach confidentiality in exceptional circumstances where, in their professional judgement, there is the risk of another person being harmed. This may be with or without the client's consent depending on the seriousness and urgency of the concerns, in order to protect the client or others. This may also mean that clients may talk about the experience of abuse without disclosures being necessary.

Recruitment and Selection

Safer Recruitment and Selection

The Company pays full regard to DCSF guidance 'Safeguarding Children and Safer Recruitment in Education', January 2007. The Company will ensure that all appropriate measures are applied in relation to everyone who works in the Group, including paid staff, volunteers, staff employed by contractors, students and visitors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and, where appropriate, undertaking Criminal Records Bureau (CRB) checks and registration with the Independent Safeguarding Authority (ISA).

Statutory changes, underpinned by regulations, are that:

An Enhanced DBS Disclosure is obtained for new appointments to the Company's workforce from September 2010

The Company will keep a single central record detailing a range of checks carried out on its staff, including DBS checks

All DBS forms relating to staff and students will be kept for 6 months and then destroyed. The Company will keep an up-to-date electronic database of all staff and student DBS checks

When staff or students leave the Company they will be removed from the ISA's database as an employee or student of the Company

All new appointments to the Company workforce who have lived outside the UK are subject to additional checks as appropriate and required by the UK Border Agency

The Company will satisfy itself that supply and agency staff undergo the necessary safeguarding and other pre-employment checks

Identity checks will be carried out on all appointments to the Company workforce before a formal offer of appointment is made

Vetting and Barring

The Recruitment of Ex Offenders

The Square Metre Ltd will treat all applications for positions from those who have a criminal record fairly and will not discriminate unfairly against the subject of a DBS Disclosure or on the basis of conviction or other information revealed.

The Company will comply with the statutory requirements of the ISA's Vetting and Barring Scheme and will not offer a position to any individual who is barred from working with children and/or vulnerable adults, or to an individual who has been reported to the DBS and is subject to an on- going investigation by an DBS caseworker.

Many of the roles the company will recruit for however are regulated by the Security Industry Authority (SIA) and may require a valid SIA licence to practice.

The Management of Students with Criminal Convictions

The Company shares information and works closely with social care services, safeguarding boards, police, probation and youth offending teams to ensure that students with criminal convictions are appropriately assessed and vetted prior to enrolment, and, where necessary, supported in the Company to minimise risks to other students, staff and the community.

All students are required to disclose criminal convictions on their application form, Learning Agreement or via their probation or youth offending team caseworker. This information is then used by senior staff to form a risk assessment to determine their suitability or otherwise to attend the Company.

Records of all information relating to student criminal convictions, risk assessments and decision making are kept confidentially by the relevant Designated Safeguarding Officer.

Safeguarding Information

Safeguarding Information for Students

The company is committed to ensuring that students are made aware of any behaviour towards them that is not acceptable or appropriate and how to keep themselves safe. All students are aware that we have a senior member of Company staff with the responsibility for safeguarding and know who this member of staff is. The Company will inform students of whom they might talk to, both in and out of Company, their right to be listened to and heard and what steps can be taken to keep them safe and protect them from harm. Materials we use to help students regarding keeping safe are located on Moodle and are referred to in student handbooks.

Written Records

The Designated Safeguarding Officer(s) will retain a copy of the report, any notes, memoranda or other correspondence dealing with the matter and any other relevant materials.

Copies of reports, notes etc will be kept securely locked at all times and for a minimum period of seven years.

The accountable person will keep copies of reports regarding allegations made against staff securely until at least the 25th birthday of any child, or seven years in any other case.

Partnership with Parents/Carers

The Group shares a common purpose with parents/carers to keep children, young people and vulnerable adults safe from harm and to promote their welfare. The Group makes a clear statement in its parents/carers leaflet that is available and sent to all parents/carers annually

The Group is committed to working with parents/carers positively, openly and honestly. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect a parent or carer's right to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to ensure the safety and protection of a child, young person or vulnerable adult.

The Group will share with parents/carers any concerns we may have about their child unless to do so may place a child at risk of harm. Vulnerable adults will always be treated as adults.

The Group encourages parents/carers to discuss any concerns they may have with the personal tutor, learning mentor or safeguarding officer. We make parents/carers aware of our policy through our website, parents/carers leaflet and other publications.

Allegations and Investigations

Responding to an Allegation(s)

It is understood that all staff of the Company may come into contact with students who are at risk of, or have experienced, exploitation, abuse or harm. No member of staff should take any independent action themselves but should observe the protocols set out in this section the policy, unless the individual is in crisis, in which case urgent action should be taken to stabilise the situation in consultation with relevant managers to ensure the child or vulnerable adult is safe.

All complaints, allegations or suspicions must be taken seriously and handled sensitively. The safety and welfare of the child, young person or vulnerable adult is paramount at all times.

Absolute promises of confidentiality should not be given under any circumstances as the matter may develop in such a way that such promises cannot be guaranteed, and our duty of care is to report or refer to the relevant external agencies for appropriate safeguarding interventions.

If the complaint comes directly from the child or vulnerable adult, questions should be kept to the necessary minimum to understand what is being alleged and the context of the situation. Leading questions must always be avoided. Instances such as this should always be referred to the Designated Safeguarding Officer(s).

A full record of any conversations must be made as soon as is reasonably practicable following any conversations with the child or vulnerable adult who has indicated concerns, or concerns have been raised about their safety or welfare. This record must include:

- Date
- Time
- Place where the alleged abuse or harm occurred
- Your name and the name(s) of any other person present
- Name of the complainant
- The nature of alleged abuse or harm
- Description of any injuries observed
- Account which has been given of the allegation
- Child/vulnerable adult's name and course details
- Child/vulnerable adult's address
- Child/vulnerable adult's age
- Date and time of the observation or disclosure
- An objective and factual record of the observation or disclosure The exact words spoken by the child/vulnerable adult (as near as possible)

Any such notes should be, as far as possible, verbatim rather than summarised and should be factual in terms of what the child/vulnerable adult or complainant has reported, and should not be based on opinion, assumptions or hearsay.

Some children or adults with learning difficulties and/or disabilities may need additional support. This may take the form of the child/vulnerable adult's nominated carer, advocate or personal tutor being present at any interview to act as facilitator or in an advocacy role. It should never be assumed that a child/vulnerable adult with learning difficulties and/or disabilities is not capable of providing credible evidence. The Hull Company Group will always respond in a positive manner to any legitimate requests for support from the appropriate agencies.

Any suspicion, allegation or incident of abuse or harm must be reported to the Designated Safeguarding Officer(s) (or in their absence, the Duty Manager) as soon as possible and in any event within two hours.

The Designated Safeguarding Officer(s) will refer the matter to the local social care department for children or vulnerable adults where information is available to indicate that a child or vulnerable adult may be at risk of, or is suffering, significant harm or abuse. A written record of the date and time of the report shall be made using the relevant children or vulnerable adult referral form. The report will include the name and position of the person to whom the report was made. Any telephone report must be confirmed in writing within 24 hours using the relevant referral form. The confirmation may be hand written, posted or faxed, but a copy must be kept on file.

Only the Company's Designated Safeguarding Officer(s) will complete the relevant safeguarding children and vulnerable adult referral forms to statutory agencies.

The advice received from social care services regarding what action, if any, should be taken and a note kept of that conversation.

Allegations Made Against a Member of Staff

This section refers to employed staff, freelance and contracted staff including Volunteers where applicable.

Any suspicion, allegation or actual abuse or harm of a child or vulnerable adult by a member of Company staff must be reported to the Head of Compliance/ CEO as soon as possible, and in any case within 2 hours of the initial concern arising.

On being notified of any such matter, the Head of Compliance/ CEO will:

Take such steps, as s/he considers necessary to ensure the safety of the child or vulnerable adult in question, and any other person who is considered at risk

Following the Company procedures, consider whether suspension of the member of staff is appropriate. This will be considered in line with The Square Metre Ltd Disciplinary Procedure for staff.

N.B Suspension will not necessarily be an automatic response to an allegation and all allegations will be dealt with quickly, fairly and consistently. The decision to suspend can only be made by a member of the Strategic Leadership Team.

Consult the Local Authority Designated Officer (LADO) within one working day

Ensure that the person who reported the original concern completes a report of the matter as set out above

Any investigation relating to a member of staff will follow the Group's procedure for investigations, after agreement with the local social care department responsible for children and vulnerable adults.

If the Head of Compliance is the subject of an allegation or complaint, the matter must be reported directly to the Operations Director / Managing Director or CEO.

If the Managing Director / Operations Director / Commercial Director is subject to any such allegation or complaint, the matter will be referred to the Chair of the Governing Body.

Student Work Placements

Employers and Work Placements

Employers and training organisations will be asked to cooperate with the Company in putting in place and subscribing to appropriate safeguarding and checks.

Where a placement is long term or meets the criteria laid out in 'Safeguarding Children and Safer Recruitment in Education 2007, DCSF', the Group will ensure that additional safeguards are in place. These may include:

Staff arranging placements will have undertaken safeguarding training and development

Employers will be provided with safeguarding training and development

Training organisations will be asked to make a commitment to safeguarding students' welfare by endorsing the Group's safeguarding policy and procedures, including the Group reporting procedures for safeguarding and promoting the welfare of children and vulnerable adults

DBS checking any person whose normal duties will include regular caring for, training, looking after or supervising a child or vulnerable adult in the workplace where that person has been specifically designated to have responsibility for such activities

Students on Work Placements

Students who need to complete a work placement or volunteer work with children or vulnerable adults as part of their programme of study will be required to complete an Enhanced DBS check before being permitted to attend work placements or undertake volunteer work

Child Employment and Entertainment

Compulsory school age children (until the last Friday in June in the academic year they turn 16) cannot work when they want. There is strict legislation in place regarding the work they can do and the hours they can work. Work is classed as any employment paid or none paid that result in profit.

Each child who wishes to work has to have an employment license and the local authority issue these, educational establishments have a duty, if they know a pupil is working to

ensure (with the local authority) the pupil has a license to work and that their education does not suffer due to their employment.

Visitors to Company Sites

All visitors to company sites must report to the site reception and sign in. Visitors must not directly attend appointments in any building without first signing in, collecting and wearing a visitor's identification pass. This applies to all contractors. Members of the public wishing to access the Company's public facilities should do so via the designated entrances and sign in at the relevant service reception area.

All staff must wear their Company identification passes at all times whilst on any of the Company's sites.

Related Procedures, Codes of Practice, Guidance Documents

- Safeguarding Children and Vulnerable Adults procedures and guidance
- Disciplinary Policy (staff)
- Data Protection Policy
- Code of Practice for DBS Disclosure Information (students)
- Recruitment of Ex Offenders Guidance
- Whistle-Blowing Policy
- Praise and Complaints Policy
- Student Charter
- Student Behaviour and Disciplinary Policy
- Attendance Procedures
- Staff Handbook
- Student Bullying and Harassment Policy
- Sex & Relationships Policy

