

Safeguarding Policy

Policy Title	Safeguarding Policy v6
Name of SLT lead	Terri McGregor – Project Manager
Policy approved by	Senior Leadership Team
Date of approval	February 2023
Dates of previous reviews	Feb 22
Date of next formal review	February 2024
Method of communicating policy:	Learner – induction Staff - induction

Statement of Intent

Total Training provision (TTP) believe that it is unacceptable for a child, young person, or vulnerable adult to experience abuse of any kind. TTP recognises its responsibility to safeguard the welfare of a child, young person, or vulnerable adult within our training environments and those who come into contact with our organisation. TTP recognises that:

The policy aims to:

- Promote and prioritise safety and wellbeing of our learners
- Provide assurance that TTP takes reasonable steps to manage risks
- Ensure that everyone understands their roles and responsibilities in respect of Safeguarding and Prevent and is provided with the necessary information, training and support on Safeguarding and Prevent matters
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm from contact with anyone employed by TTP and its associates/contractors in relevant positions, regardless of where the harm has taken place
- Adopt a culture of respect, free from bullying or harassment
- Protect learners from radicalisation and extremism
- Ensure that the appropriate DBS or basic disclosure checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children and/or vulnerable adults

TTP recognise that:

- The welfare of the person is paramount
- All people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity have the right to equal protection from all types of harm or abuse
- Working in partnership with young people, vulnerable adults, their parents, carers, and other agencies is essential in promoting their welfare
- This policy will be reviewed annually, as a minimum, to ensure it remains current and valid

Safeguarding is everyone's responsibility. This policy applies to all staff and self-employed partners conducting onsite and offsite activities with learners, regardless of position, role, and responsibilities.

Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children, young people and vulnerable adults:

- Keeping Children Safe in Education 2021
- Sexual Harassment between children in schools and colleges 2021
- Children Act 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Counter Terrorism and Security Act 2015
- Equality Act 2010

Introduction

Safeguarding is an all-encompassing term used to describe many aspects of keeping people safe, which includes (but is not limited to):

- Health, safety, and wellbeing, including learner's mental health
- Bullying, harassment and discrimination including racial abuse and sexual abuse/harassment whether that be face-to-face or online
- Self-harm
- Domestic violence
- Safety from sexual exploitation, female genital mutilation and forced marriage
- Alcohol, drug, and substance misuse
- Financial exploitation
- E Safety, including all forms of electronic communication including online environments
- Child protection
- Protection of adults at risk
- Protecting learners from radicalisation and extremism

It is the responsibility of all staff to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document:

- Health & Safety
- Data Protection
- IT Policy
- Safer Recruitment
- Safeguarding Handbook

Safeguarding and Welfare Responsibilities

Directors

Directors fulfil statutory responsibilities and will ensure that arrangements are in place to create and maintain a safe learning environment and ensure that policies, procedures, and practices comply with the law.

The Designated Safeguarding Officer (DSO)

The DSO will take lead responsibility for safeguarding and child protection, be aware of and follow new local arrangements and, be prepared to supply information as requested by safeguarding partners. The activities of the designated safeguarding lead may be delegated to the appropriately trained deputy lead however, the ultimate lead responsibility for safeguarding and child protection, remains with the designated safeguarding lead. The designated safeguarding lead will, as required:

- Undertake learner and staff risk assessments where issues/concerns have been identified
- Undertake relevant investigations in accordance with partner guidance

- Maintenance of issues/concerns log
- Ensure staffs knowledge and understanding of safeguarding is current through regular training and development
- Appropriately report where a crime may have been committed to the relevant authorities and partners where required
- Act as a source of support, advice, and expertise for all staff
- Report to the Board of Directors

Staff

All staff (paid or unpaid) must maintain a proper focus on safeguarding learners, and this must be reflected both in sound individual practice and in internal policies and guidance. All permanent and contracted staff working with learners must:

- Give highest priority to their safety and welfare
- Behave appropriately at all times
- Provide a safe environment for learners to learn
- Identify learners who may be in need of extra help
- Act immediately if abuse is alleged or suspected
- Have sufficient training to be able to recognise vulnerability and be aware of what action to take
- Understand the safeguarding procedures & the role of the DSO
- Follow the framework for the Prevent Duty to minimise risk and protect learners
- Contribute, as necessary, to all stages of safeguarding and protection processes
- Under any circumstances staff must not investigate any safeguarding issues and should always report to the DSO.

Prevent

The government Counterterrorism and Security Act 2015, places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism.

The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism.

This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy:

- **Prevent terrorism** – stop people becoming terrorists
- **Pursue terrorism** – disrupt and stop terror attacks
- **Prepare to deal with terrorism** – mitigate impact of attacks that can’t be stopped.

Prevent is an important element within our safeguarding policy and processes. Prevent is focused on safeguarding adults and encourages a learning environment where issues can be raised and discussed safely, whilst ensuring that apprentices and employees are resilient to extreme narratives.

The Prevent strategy is driven by:

- Ensuring all staff, including Governors, Directors and Senior Managers receive awareness training on Prevent
- Wider staff awareness training for all staff
- Providing training to ensure staff understand their safeguarding responsibilities and processes and policy to outline how to make a referral
- Providing staff training and guidance on how to recognise potential signs that a colleague or learner may be becoming involved with extremist organisations
- Creating a single point of contact for Prevent and Safeguarding related issues
- Ensuring British Values are promoted and are embedded within our apprenticeship and skills programmes
- Maintaining IT policies that are robust and can deal effectively with potential online risks from extremist organisations, through appropriate use of firewalls and monitoring usage

British Values

TTP actively promotes the fundamental British values of:

- **Democracy** - an understanding of how citizens can influence decision- making through the democratic process
- **The rule of law** - an appreciation that living under the rule of law protects individual citizens and is essential for wellbeing and safety
- **Individual liberty** - an understanding that the freedom to choose and hold other faiths and beliefs is protected in law
- **Mutual respect and tolerance** - an acceptance that other people having different faiths or beliefs (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour

Actively promoting these values means challenging opinions or behaviours that are contrary to fundamental British values. Staff and associates should not promote or tolerate views or theories as fact which are contrary to established scientific or historical evidence and explanation. The aim is to improve safeguarding and standards of spiritual, moral, social, and cultural development, and to strengthen barriers to extremism.

The British Values and Prevent duty relate to the Equality Act 2010 as we seek to:

- Eliminate unlawful discrimination, harassment, or victimisation
- Advance equality of opportunity between people who share a protected characteristic, and those who do not
- Foster good relations between people who share a protected characteristic, and those who do not

Links with external agencies

We will work with appropriate external agencies to address safeguarding and Prevent concerns. These can include Local Safeguarding Children Boards, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub, Regional Prevent Coordinators, and other professions to ensure a comprehensive safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate.

We will work proactively with the regional Prevent coordinator and where appropriate, the local steering group and Channel panel.

Safer Recruitment

TTP is a responsible employer and ensures that it engages staff in a way that is compliant with the relevant legislation, and that which exempts people with specific convictions from applying for or holding a particular job role where there is an acknowledged risk associated with access to young people or vulnerable adults. As a direct consequence, all vacant positions within the company are routinely reviewed and a consideration of the risks undertaken.

Offers of employment to all posts are subject to an enhanced DBS check and are conditional with the individual meeting the required standard. Failure to do so would result in an immediate withdrawal of the offer of employment. Failure to disclose or the provision of a false statement of disclosure by a potential employee or an employee in post may result in disciplinary action, and possible dismissal of the employee. All DBS disclosures are risk assessed against the job role on an individual basis. All information regarding DBS checks will be kept confidential in line with the Data Protection Act. All staff employed by TTP are subject to routine enhanced DBS checks every three years.

NB. Please refer to the Safer Recruitment Policy for further information.

Staff Employment

In the event of a TTP employee having suspicions regarding the contact of another employee, or an individual engaged on business for TTP, with a young person or vulnerable adult, they should report this in the first instance to the Designated Safeguarding Officer. This is to minimise any potential risk with immediate effect and allow an investigation into the allegations to take place.

All staff working at TTP have undergone basic safeguarding training and will be available for a learner to discuss issues relating to safeguarding. For more serious issues the nominated DSO will take the lead.

In addition, we will:

- Provide safeguarding (including Prevent) training to all staff and volunteers with mandatory annual training
- Ensure all members of staff understand the factors that make people vulnerable to being drawn into terrorism and are confident to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity
- Follow the written Safer Recruitment Policy when appointing staff and have at least one person on the appointment panel who has undertaken safer recruitment training
- Where a DBS check is delayed all other checks will be completed and a risk assessment and appropriate supervision will be put in place

All staff will be required to sign to say they have read and understood the policy.

Keeping Records

TTP acknowledges recording safeguarding concerns is vital to effective safeguarding. All records will:

- Be factual, evidenced, concise, complete, accurate and objective
- Include full names, dates, role/relationship to student
- Be securely stored (physically or electronically)

The Safeguarding Issues and Concerns Log will hold:

- Record of all discussions and meetings
- Copy of any other documents
- Date and time of when the incident(s) occurred
- Details of our concerns, what gave rise to the concern, and any subsequent discussions
- All actions taken to date
- The extent and nature of any involvement by other professionals, and their full details

Access to safeguarding issues and concerns logs and investigation documentation and records is only accessible by the Managing Director, Director of Skills and Designated Safeguarding Officer.

Information Sharing

TTP is committed to sharing information for the purposes of safeguarding and promoting the welfare of young people and vulnerable adults in line with the Working Together (2013) and with respect for the Data Protection Act (2018). Any decision to break confidentiality should always be preceded by informing the learner of what is about to happen and the reason for the decision.

There will be no breach of confidence if the person to whom a duty of confidence is owed consents to the disclosure. The DSO will seek consent from the staff member or learner if considering sharing information with other agencies. It is therefore essential that members of staff understand what is meant by the above and for that reason do not promise absolute confidentiality to the learner.

If the report completed is in a relation to a Prevent concern, the DSO would contact the relevant local FE/HE Prevent Coordinator for the geographical location of the learner:

Role/Region	Contact name
Head of the FE and HE regional delivery networks (Prevent and Counter-Extremism)	Chris Rowell
Regional Prevent Coordinator – Northeast and Yorkshire	Chris Sybenga
Regional Prevent Coordinator – Northwest	Nigel Lund
Regional Prevent Coordinator – West Midlands	Hifsa Haroon Iqbal
Regional Prevent Coordinator – East Midlands	Sam Slack
Regional Prevent Coordinator – Eastern England	Dave Layton-Scott
Regional Prevent Coordinator – Southwest	Vacancy
Regional Prevent Coordinator – Southeast	Alamgir Sheriyar
Regional Prevent Coordinator – London	Jennie Fisher

Where we are unsure of the severity of the Prevent case, we would seek advice from our own Prevent Coordinator, Chris Sybenga - chris.sybenga@education.gov.uk.

Visiting Professionals

Any visitor who has contact with the learners must be appropriately risk assessed in agreement with the Director of Skills or Designated Safeguarding Officer. The visitor should report to reception on arrival and departure and sign in and out and identify themselves with photographic ID. Staff should ensure the visitor is not left alone with the learners unless appropriate, if someone is not identifiable, staff should respectfully ask them for identification and for the purpose of their visit, and if the response is unsatisfactory, they should report immediately to a manager. The visitor should be informed of procedures in the event of a fire, and other relevant health and safety information.

Staying Safe Online

TTP are aware how working online could present opportunity for learners to be exploited sexually and/or suffer harassment. Ongoing training (to support that already undertaken as part of staff/ learner induction) will ensure we continue to raise knowledge and understanding about staying safe online.

- TTP are committed to online safety and work to ensure all stakeholders are kept safe online
- IT systems are monitored closely to ensure anything deemed malicious is interjected quickly
- Only approved platforms are used (Microsoft is TTP's preferred platform). Meetings will be conducted via Teams, for example.
- TTP has an online protocol for users to ensure all are kept safe and expectations are managed. This will be discussed with learners at each session.
- TTP have a learner protocol safety – this includes information around information sharing (inc. personal information), bullying, password protection, content shared, time management, information location (inc. referencing and plagiarism and best practice in locating reliable information) and not meeting people from the internet in real life.
- TTP encourages the use of video within meetings as this provides the opportunity to check the learners' wellbeing and ensure there are no safeguarding concerns
- TTP will follow the advice of the Health and Safety Executive (HSE) by ensuring guidelines are followed and implement timely breaks within session

Reporting Procedure

All learners and staff are advised of the following contact details to report a Safeguarding or Prevent concern.

Designated Safeguarding Officer

Terri McGregor – Project Manager

Tel: 07711491759

Email: safeguarding@total-tp.com

Last Review Date: February 2023

Next Review Date: February 2024

Terri McGregor
Project Manager

Signed:

