




Norfolk Training Services

Safeguarding Children and Vulnerable Adults Policy

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This policy contains 26 pages

Policy Document

What is a policy?

Policies provide a guiding framework for an organisation to conduct its business. These principles help to create behaviours, consistency and manage risks for our employees and the products and services we provide for learners, employers and partners.

The policy explains each principle, why it is needed, the activity required to support and uphold each principle, owners within NTS and the potential consequences if not followed;

Policies:

- Outline rules
- Provide principles that guide actions
- Set roles and responsibilities
- Reflect values and beliefs
- State an intention to do something

NTS policies are reviewed to ensure they are continually developed to take account of:

- Amendments to statutory requirements
- User and customer feedback
- New risks or conditions arising from new ventures or markets we operate in
- Audit results and recommendations
- External regulator/partner feedback and recommendations



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Rationale

Purpose

The purpose of this policy is to demonstrate that Norfolk Training Services (NTS) meets its legal and moral duties to safeguard and promote the welfare of children and vulnerable adults.

This policy covers children and young people who are below or who have attained the age of 18, and vulnerable adults.

A vulnerable adult is defined as;

'a person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect him or herself against significant harm or exploitation' ... 'No Secrets (2000)'

Safeguarding is defined as;

'Protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and; taking action to enable all to have the best outcomes' ... 'Working together to safeguard children (2013)'



Rationale

At NTS we meet out legal obligations by ensuring that:

1. all staff understand their '**duty of care**' and take reasonable steps to ensure the safety of a young person/vulnerable adult involved in any activity, or interaction for which they are responsible.
2. all staff working with or on behalf of young people and vulnerable adults are **competent, confident and safe to do so.**
3. all staff are familiar with local safeguarding procedures and understand **their duty to report any child/adult protection or welfare concerns to the Designated Safeguarding Lead (DSL)** who will make referrals to the appropriate local authority safeguarding team.

This policy should be viewed together with our 'Equality & Diversity' policy, 'Preventing Extremism' policy, our 'Health and Safety' policy, and our 'Whistle-blowing' policy

NTS does not tolerate discrimination, harassment and victimisation by anyone associated with delivering services for or on behalf of Norfolk Training Services.

Any member of staff who breaches this policy may be subject to disciplinary action.



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Legal and other external drivers

NTS pays due regard to its duties to safeguard and promote the welfare of children and vulnerable adults, in accordance with a range of legislation, including (but not limited to):

- The Children Act (1989)
- Section 115(4) of the Police Act (1997)
- Public Interest Disclosure Act 1998
- Protection of Children Act 1999
- No Secrets (2000)
- The Education Act - Section 175 (2002)
- Every Child Matters (2003)
- Sexual Offences Act (2003)
- The Children Act (2004)
- Safeguarding Vulnerable Groups Act (2006)
- Guidance for Safer Working Practice for Adults working with Children and Young People in Education settings (2009)
- Protection of Freedoms Act 2012
- The Care Act (2014)
- Working Together to Safeguarding Children (2015)



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Framework and Principles

As a training and service provider, NTS will:

- maintain a visible and open safeguarding procedure in order that learners and staff can report concerns about unacceptable and/or abusive behaviour.
- have a named Designated Safeguarding Lead and one or more deputies (making up the Safeguarding Team) who have clearly defined roles and responsibilities in relation to child protection, appropriate to the level at which s/he operates.
- maintain a reporting system with clear step-by-step guidance on what learners/staff should do in different circumstances, and communicate this to all learners from induction onwards.
- maintain a confidential and secure recording system for recording incidents, concerns and referrals.
- have a strategy in place for tackling cyber-bullying and promoting e-safety.



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Framework and Principles

As an employer, NTS will:

- maintain safe recruitment, selection and vetting procedures to ensure the eligibility and suitability of all staff who have direct or indirect contact with children, young people or vulnerable adults
- ensure that staff working with young people and vulnerable adults are monitored and adequately supervised to minimise risks to learners and themselves
- ensure that staff understand their personal responsibilities in relation to safeguarding children, young people and vulnerable adults, (including maintaining confidentiality and information sharing when protection of the child/vulnerable adult is the most important consideration)
- provide staff with regular training and up-to-date guidance from induction onwards to ensure that they know how to recognise, respond to, and report safeguarding concerns in accordance with their roles and responsibilities
- take disciplinary action against any member of staff who breaches this policy or abuses a child, young person or vulnerable adult



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Responsibilities - Safeguarding Team

NTS has a suitably qualified **Designated Safeguarding Lead (DSL)** or deputy available at all times at all sites. Together they form the **Safeguarding Team**. The Safeguarding Team members receive accredited training annually.

The Safeguarding Team are collectively responsible for:

- acting upon all reported disclosures and other safeguarding matters
- making referrals, as necessary, to external agencies and acting as the single point of contact for NTS
- keeping all involved parties informed of actions taken with regards disclosures
- recording incidents in the Safeguarding Log and Individual Learner Personal File (ILPF) and ensuring these are kept up to date
- reporting incidents involving staff to the Directors

A member of the Safeguarding Team will be available at NTS. Staff can contact an available member of the Safeguarding Team in person or via safe@Norfolktrainingservices.co.uk or 07827275373.



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Responsibilities – Designated Safeguarding Lead

In addition to the responsibilities of the Safeguarding Team, the **Designated Safeguarding Lead** is responsible for:

- supporting and advising members of the Safeguarding Team to act on disclosures / incidents and make external referrals as necessary.
- maintaining the Safeguarding log, ensuring that all incidents are 'closed' when dealt with
- chairing a monthly safeguarding meeting to review all 'open' safeguarding incidents with the Safeguarding Team and invited managers
- disseminating appropriate information on safeguarding matters to NTS staff
- providing a monthly report to the Directors on safeguarding matters
- ensuring that all staff receive appropriate annual safeguarding training and that all new starters receive an appropriate induction into safeguarding policy and procedures.
- ensuring that this policy is reviewed annually and kept up to date according to changes in legislation
- ensuring that all **reasonably substantiated allegations** involving staff are reported to the appropriate authorities
- liaising with other agencies as appropriate (for example Norfolk Safeguarding Children's Board) in order to ensure NTS meets its legal and moral duties to safeguard children, young people and vulnerable adults.



Responsibilities - Directors

Directors are responsible for ensuring that:

- they have an overview of safeguarding matters at NTS (including the volume of disclosures and incidents reported); to inform strategic decision-making with regards the learning environment
- all safeguarding work is appropriately prioritised and resourced to ensure it remains the highest priority
- all staff receive appropriate annual accredited safeguarding training
- appropriate levels of staffing are maintained in learning situations to ensure risk of potential abuse is minimised while learners are engaging with NTS
- all areas accessible to learners are adequately risk-assessed
- all staff have been suitably vetted including Disclosure Barring Service (DBS) checks at the 'Enhanced with List Checks' level before they work unsupervised with learners



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Responsibilities - Employees

All staff must:

- ensure that they are familiar with this policy and their personal responsibility to report all disclosures and incidents to the Safeguarding Team
- notify a member of the Safeguarding Team immediately if they identify or suspect harm or abuse of a learner (including threats of harm)
- ensure the immediate safety of any learner believed to be at risk by ensuring that all concerns about learner safety are acted upon by the Safeguarding Team
- co-operate fully in any investigation into a safeguarding matter, including providing information or support requested by the DSL or an external agency
- attend annual training sessions delivered by, or on behalf of, NTS
- read any briefings issued by the Safeguarding Team
- inform their Line Manager immediately if they are cautioned, charged, summonsed or convicted of a criminal offence. ***Failure to disclose such information may lead to disciplinary action being taken against the individual.***



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Responsibilities - Learners

All learners have a responsibility for their own safety and that of others.

If a learner has any concern about abuse or harm they must report it immediately to:

- **NTS's Safeguarding Team**
- or
- **ANY** NTS employee, that they feel comfortable talking to,

Learners can also report concerns by email to safe@norfolktrainingservices.co.uk or by telephone to **Mobile: 07827275373**

Details of the Safeguarding Team are provided:

- on posters throughout NTS buildings
- in the NTS Learner Handbooks
- in this policy



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Responsibilities - Visitors

Where visitors are expected, staff issuing invitations should give advance notice to reception staff.

- All visitors should present themselves at reception to sign in and receive a visitor's badge before entering the site. This should be **displayed at all times**
- All visitors will be appropriately briefed on **safety** and **safeguarding** procedures at sign in by reception staff
- All visitors must adhere to NTS policies and procedures at all times. Failure to do so will result in their removal from site
- Visitors should be appropriately supervised by a member of staff at all times.

Regular visitors (including but not limited to: tradespeople, maintenance workers, temporary teaching staff, visiting speakers, and other volunteers) may be asked to submit to a DBS check if they are likely to be working unsupervised in areas where learners are present.

All visitors to the NTS site should direct **any and all** concerns that they may have about the safety and wellbeing of young people or vulnerable adults to the Designated Safeguarding Lead or another member of the Safeguarding Team.



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Risk Management

This policy and procedure will be audited on an annual basis (or more frequently if there are changes to the relevant legislation).

Abidance by this policy will be monitored and measured through:

- 1) Monthly Safeguarding Team meeting chaired by the DSL and attended by all deputies and invited Managers. The standing agenda for the meeting will include:
 - Review of ongoing safeguarding issues (including learner case files)
 - Any issues arising from the handling of disclosures and incidents.
 - The timeliness and robustness with which disclosures and incidents are handled.
- 2) Monthly safeguarding monitoring report submitted to the Directors.
- 3) Annual audit of all processes and procedures relating to the safeguarding of learners and employees.

Callington College failed to stop homophobia and racism

20 May 2015 | Cornwall



A Cornwall secondary school has been put in special measures following an inspection that highlighted homophobic and racist attitudes among pupils.

Callington Community College was first criticised in January and inspectors who returned in March said it was still failing to safeguard students.

The college has been rated inadequate after being rated outstanding at its last inspection in 2012.

The college said it was "working extremely hard" to improve.

Ofsted will now be monitoring its improvement in a plan being developed by staff and governors.



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Safeguarding Procedure

This procedure defines the actions to be followed by staff in the event of a Safeguarding issue relating to a learner or a member of staff at NTS including:

- how to raise a safeguarding concern
- confidentiality in reporting a safeguarding issue
- allegations against employees
- support for those who report abuse
- what actions will be taken following a safeguarding concern being raised



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Safeguarding Procedure

How to raise a safeguarding concern

If a disclosure of harm or abuse (including the threat of harm) is made to you, or you have a **suspicion** of harm or abuse of a learner, you **MUST**:

- call the Police (if there is any immediate danger)
- ensure that the alleged victim is currently safe and will remain so
- listen closely to what is being said and tell the learner you are making a referral to the Safeguarding Team safe@norfolktrainingservices.co.uk or 07827275373
- record as soon as possible, what you have been told using the words of the person speaking to you and not your own thoughts and feelings using a **Record of Involvement (ROI)** attached to this policy

You **MUST NOT**

- ask for additional information or proof.
- **promise confidentiality** – if you are concerned for someone's safety you will need to share this information with the Safeguarding Team, who in turn may share this with others

As soon as possible, notify a member of the Safeguarding Team. This can be done in person, by telephone, or by email safe@norfolktrainingservices.co.uk or 07827275373 . If you have not already done so they will help you to complete an ROI which will be kept confidentially on the Individual Learner Personal File (ILPF).



Safeguarding Procedure

You may report the following types of abuse (whether disclosed or suspected). This is not an exhaustive list – you may report **any** concern of harm to the Safeguarding Team

Abuse and neglect of children and young people (under 18) is defined as:	
Physical abuse	including hitting, pushing, kicking, misuse of restraint or inappropriate sanctions. Self-harm could also be a form of physical abuse.
Sexual abuse	including sexual assault or sexual acts to which the victim did not, or could not, consent
Emotional or psychological abuse	including emotional abuse, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse, isolation or withdrawal from services
Neglect or acts of omission	including ignoring medical or physical care needs, withholding of medication or adequate nutrition and failure to provide access to appropriate health, social care or educational services. Not having enough to eat may be a form of neglect.
Cyber abuse	including use of social media, mobile phone, email or internet to threaten, intimidate, groom or harass
Vulnerable adults may be subject to the above types of abuse, but may also experience:	
Financial or material abuse	including exploitation and pressure in connection to property, inheritance or financial transactions
Discriminatory abuse	including racist, sexist and other forms of harassment



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Safeguarding Procedure

You may also use the Safeguarding procedure to report concerns regarding learners or staff who you believe may be at risk of radicalisation or violent and non violent extremism.

Extremism is defined in the Government's **Prevent** Strategy as

'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.' It includes 'calls for the death of members of our armed forces, whether in this country or overseas.'

'Non-violent extremism' is defined as extremism (in those same terms) 'which is not accompanied by violence.'

Radicalisation is defined within this context as *"the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups."*

NTS is legally required to refer anyone displaying any indication of extremist behaviour to the local authority safeguarding team, using the Channel process.

For further information and guidance about this please see the 'Preventing Extremism' policy.



Safeguarding Procedure

Confidentiality

All disclosures raised with the Safeguarding Team will be treated with sensitivity. A record is always kept. Disclosures may need to be shared with the Multi-Agency Safeguarding Hub (MASH), a joint Police and Social Services team. The Safeguarding Team are responsible for decisions to share information and will liaise with the MASH.

If a learner leaves NTS, the DSL will make a decision as to whether to share information about any safeguarding concerns or any investigations with other external parties, (such as other training providers or employers)

Information sharing within Safeguarding:

Confidential information is:	sensitive, not already in public domain, shared in confidence
Information can be shared if:	authorised by the person who provided it or to whom it relates
Information can be shared without prior authorisation if justified in the public interest:	where evidence exists that a child or adult is suffering or at risk of suffering significant harm reasonable cause exists to believe a child may be suffering or at risk of suffering significant harm where it is necessary in order to prevent significant harm to children or serious harm to adults



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Safeguarding Procedure

Allegations against members of staff

NTS recognises that a disclosure of abuse may be made against a member of staff. It is imperative that those dealing with an allegation maintain an open mind and ensure that external investigations are not subject to delay. The welfare of children, young people and vulnerable adults is the paramount concern.

All allegations made against staff must be reported to a member of the Safeguarding Team without delay. This information needs to be passed to the DSL who will then notify the Directors. Where allegations against staff are made and the member of staff is working with under 18s or vulnerable adults the DSL will report to:

- The Local Area Designated Officer (**LADO**). - Norfolk County Council Children's Services LADO team can be contacted on **01603 223473**.
- The Ofsted Compliance Investigation & Enforcement Team – who can be contacted on **0300 123 4666**.



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Safeguarding Procedure

Allegations against staff (continued)

Internal investigations with regards a member of staff's continued employment will be carried out in accordance with the NTS 'Discipline Policy' and will pay due regard to the findings of any external investigation.

Dependent on the circumstances, members of staff may be suspended while investigations are carried out.

Reasonably substantiated allegations will result in the member of staff being dismissed.

Where a member of staff leaves employment with NTS during an internal/external investigation into allegations **OR** where a member of staff is dismissed due to misconduct relating to a safeguarding matter, a referral will be made to the **Disclosure and Barring Service** for their consideration.

Additionally:

If, following a member of staff's appointment, they are subsequently cautioned, charged, summonsed or convicted of a criminal offence, they **MUST** inform their Line Manager immediately. **Failure to disclose such information may lead to disciplinary action being taken against the individual.**



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Safeguarding Procedure

Support for those who report abuse

Staff have a duty to act in response to anyone making a disclosure of abuse or expressing concern, whether they be learners, parents/carers, other staff or members of the general public.

NTS gives assurance that:

- all reports will be taken seriously
- all reports will be treated sensitively, although information may be shared with relevant local authorities where individuals are deemed to be at risk of harm
- if a learner makes a report, the learner will be protected from the risk of reprisals or intimidation while at NTS
- if a report is made against a member of staff, they will be offered support while investigations are carried out

Staff or learners who have reported a safeguarding disclosure will be kept informed about all investigations and their outcomes by a member of the Safeguarding Team and offered appropriate ongoing support.

Further information relating to the support available is detailed in the NTS Staff Handbook and the NTS Learner Handbook.



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Safeguarding Procedure

What happens after a disclosure is reported?

All information received by the Safeguarding Team will be recorded confidentially on the **Individual Learner's Personal File**.

The DSL will act as the single point of contact for NTS liaising with other agencies and will keep all records updated.

Involved members of staff may be asked to participate in internal or external investigations or provide additional support or information to the learner, the DSL or an external agency as required.

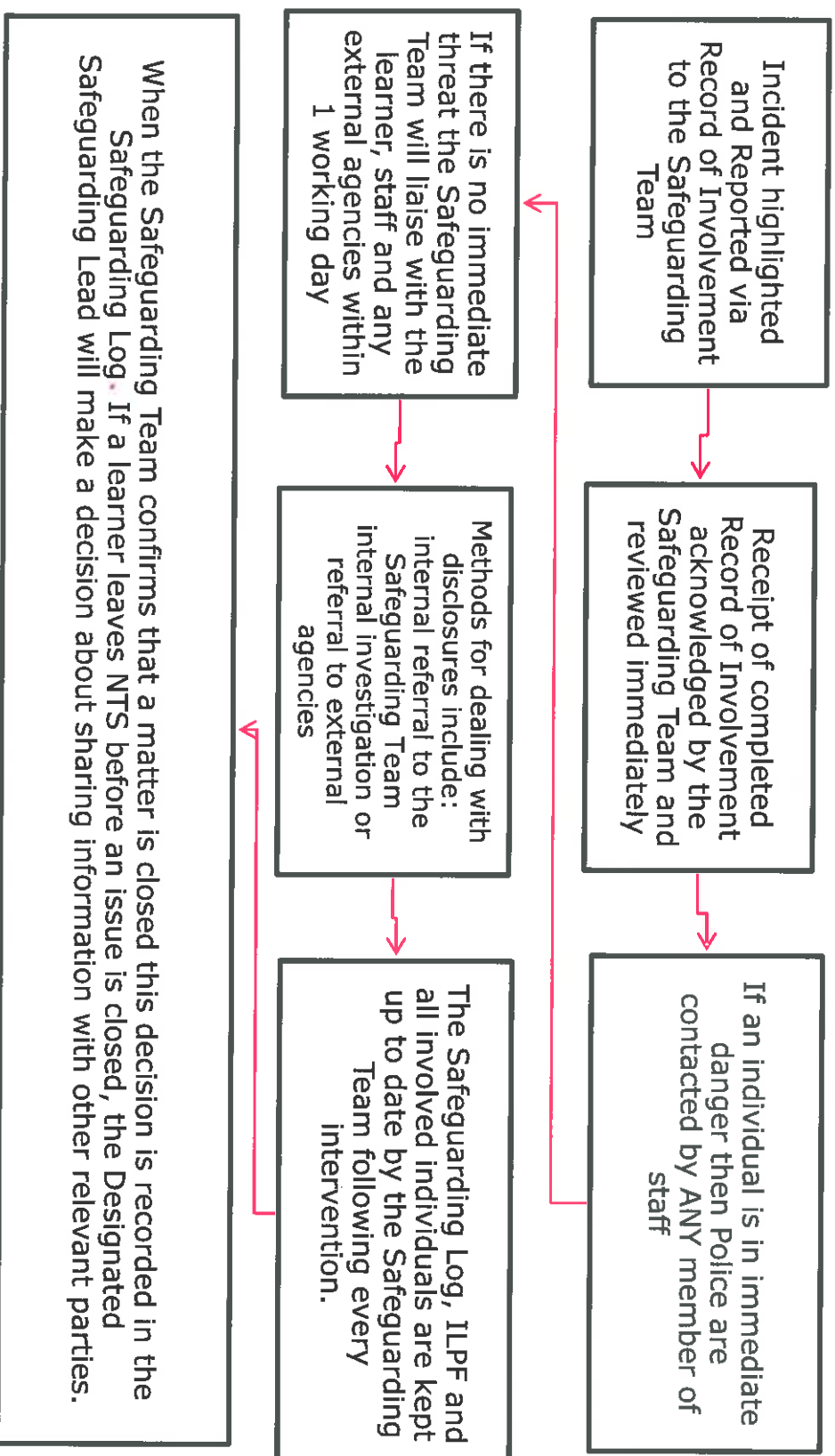
The DSL will record that a safeguarding matter is 'Closed' on the Individual Learner Personal File **ONLY** when the situation is fully resolved or where the risk to the learner becomes significantly low and no further action is required.

A separate Safeguarding Log will also be maintained by the DSL. 'Open' and 'Closed' matters are recorded by the DSL in the Safeguarding Log together with the date of the decision to close the issue.



Safeguarding Procedure

The following actions will be taken following a safeguarding concern being raised.





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Further Information

For general enquiries about Norfolk Training Services' "Safeguarding Children and Vulnerable Adults" policy and procedure please contact:

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