



# SAFEGUARDING POLICY



## **SAFEGUARDING POLICY STATEMENT**

C2C Training Limited places the highest importance on safeguarding, and the safety and wellbeing learners is paramount. This policy sets out C2C's commitments and duties to safeguard and promote the wellbeing of children, young people and vulnerable adults.

C2C implement this policy to raise awareness of safeguarding amongst learners, employers and employees, and to ensure policies and procedures are in place to minimise the risks to children, young people and vulnerable adults, including well-trained staff who are supported to respond appropriately and sensitively to safeguarding concerns.

This policy covers children, young people and vulnerable adults defined as:

- **'Child' or 'children'** refers to a person or persons under the age of 18 years (Children's Act 1989)
- **'Vulnerable adult'** refers to a person who is aged 18 or over "Who is or may be in need of community care services by reason of disability, age or illness; and is, or may be unable to take care of, or unable to protect him or herself against significant harm or exploitation"

This Policy should be read in conjunction with other C2C policies and procedures, with key policies including:

- Data Protection and Privacy Policy
- Health, Safety and Welfare policy
- Equality, Diversity and Inclusion Policy
- Prevent Policy
- Compliments and Complaints Procedure

This policy and related procedures are driven by the following legislation and guidance:

- Education Act 2002
- Education Act 2011
- Equality Act 2010
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Safeguarding Children and Safer Recruitment in Education (DfES 2006)
- Counter Terrorism Act 2015

## **AIMS AND OBJECTIVES**

C2C is firmly committed to promoting, maintaining and providing a positive and safe environment for our learners and employees to work and train in.

Through the implementation of this policy we strive to maintain the highest standards to meet our moral and legal responsibilities to protect the welfare of young people and vulnerable adults with whom C2C comes into contact through the delivery of its educational services.

This policy aims to provide information, advice and guidance covering the following essential areas for Safeguarding:

- Key responsibilities
- Types of and possible signs of abuse
- Different categories of abuse
- Prevent within Safeguarding
- E-safety
- Confidentiality
- Reporting incidents or concerns

## **KEY RESPONSIBILITIES**

C2C expects all employees to have an understanding of and ensure that this policy is implemented confidently and competently throughout their work, in particular when working with young people and vulnerable adults.

All staff have a personal responsibility for safeguarding the welfare and wellbeing of all children, young people and vulnerable adults by protecting them from abuse; with key responsibilities as follows:

### DESIGNATED SAFEGUARDING OFFICER

The Director with lead responsibility for Safeguarding is **Ian Shiers**, who is the Designated Safeguarding Officer (DSO) for company.

Specific DSO responsibilities regarding safeguarding:

- Act as a point of contact for those outside the organisation, in such matters.
- Maintaining confidential records of reported cases and any subsequent investigation and action taken.
- Engage with external agencies to establish suitable support for any individuals who suffer abuse
- Providing staff with information, advice and guidance on issues relating to child and adult safeguarding

### DIRECTORS AND MANAGEMENT

The directors and management will ensure that this policy is effectively implemented by committing time to:

- Review and update policies and working practices in line with relevant legislation.
- Ensure this policy is communicated to all staff, including updates, and made available via computer systems.

- Will use the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of trust, in particular those who will carry out activities involving regulated activity.
- Have in place clear codes of conduct for staff regarding behaviour and standards.
- Ensure all staff have access to Safeguarding training (relevant to FE) on a regular basis.
- Ensure specific disciplinary and grievance procedures are in place and communicated to all staff.
- Complete monitoring activities across all learning programmes to assess the effectiveness of teaching, learning and assessment in relation to Safeguarding.
- Complete a Safeguarding risk assessment on an annual basis, to evaluate performance and identify areas of good practice and/or areas for development.
- Complete an action plan to address any areas for development will be completed and shared with all staff and monitored on a regular basis for progress.
- Capture and monitor Safeguarding within learner voice that will subsequently drive reflection and development activities

### TUTORS, ASSESSORS AND INTERNAL QUALITY ASSURANCE STAFF

C2C expects that its tutors, assessors and quality assurance staff have a particular responsibility for safeguarding and must:

- Be aware of and comply with C2C's code of conduct regarding behaviour and standards, including the use of ICT.
- Ensure that initial information, advice and guidance is impartial and unbiased and covers Safeguarding considerations.
- Ensure individual needs of learners are met both in workshops and during one-to-one activity through the adoption of suitable teaching, learning and assessment methods.
- Ensure that Safeguarding is promoted to learners (and employers) via their learning programme and is embedded throughout the learner journey.
- Maintain a good knowledge of Safeguarding in FE, in particular the signs and indicators of potential abuse (Appendix 1).
- Complete regular Safeguarding training as part of their commitment to CPD.
- Ensure ID badges are worn at all times.
- Promote Safeguarding during teaching, learning and assessment activity and learner progress reviews.
- Report any concerns or evidence of abuse immediately to the Designated Safeguarding officer.

### ALL STAFF

C2C expects that the wider staff team also have an understanding of the Safeguarding policy and principles within. As such, they are expected to:

- Be aware of and comply with C2C's code of conduct regarding behaviour and standards, including the use of ICT.
- Ensure ID badges are worn at all times.

- Report any concerns or evidence of abuse immediately to the Designated Safeguarding officer.
- Complete regular Safeguarding training as directed by management.

## **TYPES OF, AND POSSIBLE SIGNS OF ABUSE**

### **PHYSICAL ABUSE**

Physical abuse can be defined as any intentional act that causes injury or trauma to another person. This may involve hitting, shaking, slapping, misuse of medication, throwing, poisoning, burning or scalding or drowning for example.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child/young person.

#### **Possible Signs of Physical Abuse:**

- *Injuries not consistent with the explanation given*
- *Injuries that have not been treated*
- *Cuts, bruises and scratches*
- *Other injuries or health problems such as scarring, vomiting or seizures*

### **NEGLECT**

Neglect is the persistent failure to meet some physical and/or psychological needs, likely to result in the serious impairment of the child/young person or vulnerable adult's health or development.

#### **Possible signs of Neglect Abuse:**

- *Under nourishment*
- *Untreated illnesses or injuries*
- *Re-occurring illnesses or infections*
- *Poor appearance or hygiene*
- *Poor language or communication skills*

### **SEXUAL ABUSE**

There are two different types of sexual abuse; **contact abuse**, and **non-contact abuse**.

**Contact abuse** involves touching activities where an abuser makes physical contact with a child, including penetration. This includes sexual touching of any part of the body whether the child, young person or vulnerable adult is wearing clothes or not.

**Non-contact abuse** involves non-touching activities such as: grooming, exploitation, persuading vulnerable individuals to perform acts over the internet and flashing.

Sexual abuse is not solely perpetrated by adult males; woman can also commit acts of sexual abuse, as can other children/young person and vulnerable adults.

### Possible signs of Sexual Abuse:

- *Any allegation of sexual abuse made by a child/young person or vulnerable adult*
- *Excessive preoccupations with sexual matters*
- *Use of sexual language or information that you wouldn't expect them to know*
- *Sexually provocative or seductive behaviour*

### EMOTIONAL ABUSE

Emotional abuse is the ongoing emotional maltreatment of a child/young person or vulnerable adult, which is sometimes referred to as psychological abuse. It will likely cause severe and persistent effects on an individual's emotional development.

It may involve conveying messages that the individual is worthless, unloved or inadequate. It may also involve seeing or hearing the ill-treatment of another or serious bullying (including Cyber bullying).

Some level of emotional abuse is involved in all types of maltreatment of a vulnerable person or child, though it may occur alone.

### Possible signs of Emotional Abuse:

- *Lacking in confidence or becoming very wary or anxious*
- *Being overly affectionate towards strangers*
- *Depression, aggression, extreme anxiety*
- *Obsessions or phobias*
- *Sudden under-achievement or lack of concentration*
- *Inappropriate relationships with peers or adults*
- *Attention-seeking behaviour*

### OTHER CATEGORIES OF ABUSE

**Financial or material abuse:** this includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possession or benefits.

**Modern slavery:** this encompasses slavery, human trafficking, forced labour and 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.

**Discriminatory abuse:** this includes forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

**Organisational abuse:** this includes neglect and poor care practice within an institution or specific care setting such as a hospital or a care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Neglect and acts of omission:** this includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Self-neglect:** this covers a wide range of behaviour neglecting to care for one's own personal hygiene, health or surroundings and includes behaviour such as hoarding.

There are also wider safeguarding issues that we need to consider and act upon, these include:

- Child sexual exploitation
- Domestic Violence
- Fabricated or Induced Illness
- Gangs and Youth Violence
- Private Fostering
- Mental Health
- Teenage Relationship Abuse
- Female Genital Mutilation
- Bullying, including Cyberbullying
- Drugs
- Faith Abuse
- Forced Marriage
- Gender-based Violence
- Radicalisation
- Sexting
- Trafficking

## PREVENT DUTY WITHIN SAFEGUARDING

When operating this policy C2C Training uses the following accepted Governmental definition of extremism:

*“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; and/or calls for the death of members of our armed forces, whether in this country or overseas”.*

Children and vulnerable adults are particularly at risk of being targeted and radicalised, therefore raising awareness and Safeguarding through education is essential, and part of the Government's agenda.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of people of all ages. We believe that education can equip learners with knowledge, skills and critical thinking to challenge in an informed way.

As a company we are aware that learners can be exposed to extremist influences or prejudiced views. These can emanate from a variety of sources and media, including via the internet, and at times learners may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners, stakeholders or staff will always be challenged and where appropriate dealt with in line with internal disciplinary procedure.

As part of wider safeguarding responsibilities, company staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of the company/learning environment, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Learners accessing extremist material online, including through social networking sites.

- Learners voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious, or based on (but not exclusive to) gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-western or Anti-British views.

Where there are concerns of extremism or radicalisation, learners and staff will be encouraged to make use of our internal systems and raise any issue in confidence.

Initially, staff must follow the procedure set out in this policy and use the report form therein.

Staff at C2C will be alert to the fact that Extremism and Radicalisation is broadly a safeguarding issue, and that the risk of direct harm or neglect may be present. Therefore, instances should be initially based on this framework and that of the Safeguarding Policy, ensuring a swift response is given in such circumstances.

Tutors, Assessors and Internal Quality Assurance staff have a particular responsibility through the delivery of IAG and teaching, learning and assessment activities to ensure that learners (and employers) have a good awareness of radicalisation, extremism and British Values, and that they promote a climate of tolerance and understanding both in their workplace and the wider community.

*See C2C's Prevent policy for specific Prevent Strategy.*

## **E-SAFETY**

C2C recognises the benefits and opportunities which modern technologies offer to teaching and learning.

C2C encourage the use of technology in order to enhance skills and promote achievement across all qualifications and aspects of delivery.

However, the accessible and global nature of the internet and variety of technologies available mean that the company are also aware of potential risks and challenges associated with such use. The approach is to implement safeguards within the company and to support staff and learners to identify and manage risks independently.

C2C believe this can be achieved through a combination of security measures, training and guidance and implementation of associated policies.

All C2C staff are expected to comply with the company Code of Conduct and ICT user policy which is introduced during staff inductions.

- Free expert advice for safe ICT usage, including safeguarding children:

<https://www.getsafeonline.org/>



- CEOP – Child Exploitation and Online Protection is a national Crime Agency Command that can support with concerns or reports of online concerns:

<https://ceop.police.uk/safety-centre/>

## PREVIOUS CONVICTIONS (LEARNERS)

Upon induction or enrolment, it is recognised that some learners may have previous convictions or criminal declarations that are disclosed to the company as a part of this process. In addition, learners may disclose such matters at any stage of their learning.

In each case, the DSO should be informed of these disclosures at the earliest opportunity, and each case will be assessed on an individual basis. It is envisaged that if in employment, the employer will already be aware of such previous convictions, and their own risk assessments will have taken place.

Any decisions, if any, regarding these disclosures will be progressed by the DSO in conjunction with the employer, should it be necessary. Staff members will not make judgements based on the nature of the declaration or the offence.

## CONFIDENTIALITY

Information sharing is vital to safeguarding and promoting the welfare of all learners.

It is the duty of all C2C staff to report any instances of, or concerns relating to abuse, whether they are related to regulated activity or not. It is also the duty of all C2C staff to protect and support learners when they wish to make a report.

Although any reported incident will be kept confidential in line with policy and data protection, **staff cannot, and must not, promise confidentiality when harm is reported.** C2C's Designated Safeguarding Officer has a duty to pass on the names and details of any child or adult who has been harmed to the relevant authorities.

The General Data Protection Regulations do not set out specific minimum or maximum periods for retaining reports or personal data, however it states that, *"Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes"*.

## PRINCIPLES OF INFORMATION SHARING

C2C adopts the 'seven golden rules of sharing information' as below:

**Necessary and proportionate** – when taking decisions about what information to share, you should consider how much information you need to release. The Data Protection Act requires you to consider the impact of disclosing information on the information subject and any third parties. Any information must be proportionate to the need of level and risk. The General Data Protection Regulations 2018 requires that information sharing meet one or more of the lawful bases. In the case of protecting learner interests this would fall under legitimate interest. If sharing information is done so in the interest of protecting an individual's safety (or risk to life) then this also falls under vital interests.

**Relevant** – only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.

**Adequate** – information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

**Accurate** – information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

**Timely** – information should be shared in a timely fashion to reduce the risk of harm. Timeliness is a key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore harm any other person.

**Secure** – wherever possible, information should be shared in an appropriate, secure way.

**Record** – information sharing decisions should be recorded whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester of the information.

## REPORTING SAFEGUARDING INCIDENTS OR CONCERNS

For any concerns regarding Safeguarding, please raise these immediately with the Designated Safeguarding Officer within 24 hours of first noting the concern or immediately after receiving a disclosure of abuse.

The Report/Incident form (*Appendix 1*) should be sent to the Designated Safeguarding Officer: **Ian Shiers – Director**, C2C Training Ltd, Derwent Business Centre, Clarke Street, Derby, DE1 2BU, 01332 987090, [ishiers@c2ctrainingltd.com](mailto:ishiers@c2ctrainingltd.com).

## PROCEDURES FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST A STAFF MEMBER

In rare instances, staff engaged in the education of others have been found responsible for abuse. Due to frequent contact, staff may have allegations of abuse made against them. C2C recognise that any allegations made against staff may be made for a variety of reasons and that the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The welfare of the individual is the prime concern, and it is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, C2C will deal with such circumstances with the required sensitivity and will act in a careful, measured way.

All allegations of abuse against staff will be dealt with directly through the DSO, who will conduct all investigations and maintain secure records of the alleged incident and subsequent reports.

## PROCEDURES FOR DEALING WITH A DISCLOSURE, INCIDENT OR CONCERN

Any allegation, disclosure or suspicion of abuse needs to be taken seriously and handled in a sensitive manner. Individual members of staff should never deal with disclosures in isolation, and should **always refer to the Designated Safeguarding Officer**, who will progress the matter.

Information should be strictly limited to those that need to know.

If someone confides in you:

- Stay calm and try not show surprise or shock.
- Try and listen carefully without interrupting.

- Avoid leading questions and making comments or judgements.
- Reassure them they've done the right thing in telling you.
- Let them know that you'll do everything you can to help them and that you are taking the information seriously.
- Ensure that you explain that you may not be able to offer confidentiality as you may need to report this to C2C's Safeguarding Officer, who in turn may need to contact relevant agencies.
- Let them know what action you will take and that you will keep them updated.

Ensure that you record the following information:

- Make a note of what the person said, taking care to use his or her own words and phrases.
- Include the date and time of the disclosure.
- Describe how the disclosure came about, and who was present.
- Make sure the information you record is factual.
- Record any other useful information such as any obvious physical marks etc.
- Preferred course of action.

DO NOT

- Press the person for more details than they are willing to give.
- Promise to keep the information confidential.
- Interrupt or stop someone who is trying to make a disclosure to you, they may never find the courage to tell you again.

Always follow this policy and report any concerns or disclosures to C2C's Designated Safeguarding Officer, Ian Shiers.



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## APPENDIX 1

### SAFEGUARDING CONCERN/INCIDENT REPORT FORM

This form is to be used to report any safeguarding concerns or disclosures of abuse relating to a child, young person or adult.

Once completed please submit it to the Designated Safeguarding Officer, Ian Shiers, immediately (within 24 hours of noting the concern or the disclosure).

<b>Your name</b>	
<b>Your position with C2C</b>	
<b>Contact details</b>	<i>Landline no.</i>
	<i>Mobile no.</i>
	<i>Email</i>

#### Details of the child, young person or adult:

<b>Full Name</b>	
<b>D.O.B</b>	
<b>Address</b>	
<b>Contact details</b>	<i>Landline no.</i>
	<i>Mobile no.</i>
	<i>Email</i>

#### Parent(s)/Carer(s) details

<b>Name</b>	<b>Relationship</b>	<b>Contact details</b>
		<i>Landline no.</i>
		<i>Mobile no.</i>
		<i>Email</i>

**Safeguarding Incident/Concern Report**

Please detail all the information, including: date, time, place of disclosure, the capacity with which you know the person, and the precise details of the concern.

Also describe/list any evidence that you have witnessed or seen.

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<b>Signature</b>		<b>Date</b>	
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