



SENDTAC LTD
SEND Training and Consultancy

Title	Date of Issue	Date to be reviewed	Written by (name/role)
Safeguarding Policy 2020	Sept 2020	Sept 2021	Sharon Davies and Kate Gillespie

Aim

The policy aims to ensure that:

1. SENDTAC LTD provides a safe environment in which all users, with particular reference to school children, young people and vulnerable adults, can learn and in which service users can operate, flourish and progress; this includes students who study and work on courses away from Company premises.
2. In identifying all service users, with particular reference to children, young people and vulnerable adults, who are suffering or likely to suffer harm, the Company takes appropriate action to ensure they stay safe in the company, at home and in a work based setting and ensure that they have the best outcomes.
3. Everyone who comes into regular contact with children and young people through the organisation receive checks and training appropriate to their level of role and responsibility.
4. Safeguarding is everyone's responsibility: all staff, volunteers, students, employers, and all other stakeholders should play their full part in keeping children, young people and vulnerable adults safe.
5. All those listed above should feel confident that they can report all matters of a safeguarding nature to the Safeguarding Team, to be dealt with swiftly and securely, and with the safety and wellbeing of the students in mind at all times. Sendtac Ltd strives to embed a culture whereby all staff have a clear understanding of safeguarding and child protection regarding abuse and neglect in all forms; including how to identify, respond and report. This also includes knowledge of the process for allegations against professionals.

Scope

This policy and associated operating procedures apply to Sendtac Ltd. This policy and its associated procedures apply to all staff, students and other service users; including volunteers, external contractors, remote students, apprentices and employers where students have work placements. Throughout the policy, reference is made to service users. This term is used to refer to all students but with particular reference to safeguarding duties in respect of young people under the age of 18 years, and vulnerable adults.

Policy Statements

Sendtac Ltd has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all service users, with particular reference to young people and vulnerable adults, receiving education and training via Sendtac Ltd. This document represents Sendtac Ltd's commitment to

Child Protection responsibilities, which is underpinned by the Department for Education statutory guidance 'Keeping Children Safe in Education' (September 2018). The framework for working with agencies to promote the safety and wellbeing of young people within College is also reflective of the legislative framework 'Working Together to Safeguard Children' (2018). This policy also demonstrates the company's commitment to online safety, which forms an intrinsic part of modern day living but can present risks if people are not supported to recognise and develop 'keep safe strategies' This also includes recognition of the legal implications of sexting and youth produced sexual imagery. The company provides a safe, non-threatening, inclusive environment in which all College users can operate and learn, where they are treated with respect and dignity, feel safe, are listened to, and where account is taken of their wishes and feelings and positive wellbeing is promoted. This will produce students and staff who are confident, healthy, safe, emotionally resilient and personally fulfilled. The focus is on minimising the risk of harm to young people and vulnerable adults; which includes recognising peer on peer abuse and responding to this with the same commitment as with any other form of abuse. Staff will always act in the best interest of the students when responding to welfare concerns, and will maintain an attitude of "it could happen here" where safeguarding is concerned. The company is aware of and takes seriously its role in overseeing the company's arrangements for safeguarding. We aim to promote Fundamental British Values and prepare students for life in modern Britain, giving our students the opportunity to mix and learn with, from, and about those from different backgrounds.

Abuse of Trust

All staff need to know that inappropriate behaviour with or towards children, young people or vulnerable adults is unacceptable. In particular, under the Sexual Offences Act 2003 it is an offence for a person of any age who is in a position of trust (e.g. teacher, youth worker) to have a sexual relationship with a child or young person (under the age of 18) or with a vulnerable adult, even if the relationship is consensual. This applies where the child, young person or vulnerable adult is in fulltime education and the person works in the same establishment as the child, young person or vulnerable adult, even if he/she does not teach them.

Children and Young People

Sendtac Ltd recognises the following summary statements as definitions of abuse in terms of Child Protection (from 'Keeping Children Safe in Education' 2018):

Abuse:

a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse:

a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be

caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse:

the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse:

involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect:

the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific Safeguarding Issues

There are further specific safeguarding issues that have become critical in safeguarding in relation to children and young people, and staff should be aware that behaviours linked to drug taking, alcohol abuse, truancy and sexting put young people in danger. Issues can also manifest themselves via peer on peer abuse which may include bullying, cyberbullying, gender based violence/sexual assaults, and youth produced imagery.

Listed below are some of the issues that staff should be aware of in terms of recognising and reporting:

- Children involved in court proceedings
- Children missing education/missing from home or care
- Children with family members in prison
- Child Sexual Exploitation (CSE)
- Child criminal exploitation: county lines
- Domestic abuse • Homelessness
- So called 'honour based' violence (HBV)
- Female Genital Mutilation (FGM)
- Forced Marriage
- Being involved in gangs
- Sexual violence and sexual harassment between children in schools and colleges
- Hate crime
- Mental ill-health
- Private Fostering *
- Preventing Radicalisation
- Relationship abuse
- Sexting; including youth produced sexual imagery **
- Trafficking * A 'Privately Fostered' child is a child under the age of 16 (18 if disabled) who is cared for and accommodated by someone other than a parent or close relative (i.e., step parents, grandparents, brothers/sisters or aunts/uncles) for more than 28 days.

** 'Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18'. (Sexting in Schools and Colleges: Responding to incidents and safeguarding young people).

Report ALL instances of youth produced imagery immediately as a safeguarding concern – DO NOT CONSCIOUSLY VIEW, COPY, SHARE OR PRINT THE IMAGERY. If a device is confiscated (with consent of the individual concerned) it should be turned off and locked away by the Designated Safeguarding Lead until further action is determined. Seizing and confiscating without consent should be carried out only by authorised persons, i.e. the Security Team or the Police.

Adults

Physical abuse:

this includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions.

Sexual abuse:

this includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same sex and it can also occur within a marriage or any long-term relationship. A relationship of trust must exist between a member of staff or a volunteer and the person for whom they are caring, it would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person they are caring for.

Psychological abuse:

this includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial or Material abuse:

this includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

Neglect and Acts of Omission:

this includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

Discriminatory abuse:

this includes racist, sexist, or other forms of abuse that are based on a person's disability, and other forms of harassment or similar treatment.

Self-Neglect:

this is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management, and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

The College recognises that the types of abuse and neglect and the specific safeguarding issues detailed in this section do not provide an exhaustive list, and is committed to responding to all concerns around students in relation to any form of abuse or welfare concerns. This includes any form of peer on peer abuse, harassment or bullying, including cyberbullying.

Designated Safeguarding Lead

DSL: 07957219493. Responsibility for development and implementation of organisational safeguarding arrangements. Deputy DSL: 07957219488. Responsibility for first response to operational safeguarding concerns. The Designated Safeguarding Lead and Deputies are responsible for the following in relation to any service users:

- Overseeing the referral of cases of suspected abuse or other allegations to relevant agencies;
- Providing advice and support to other staff on issues relating to child protection and safeguarding;
- Maintaining a formal record of any child protection referral, allegation, disclosure or concern (even where that concern does not lead to an external referral), including a chronology of actions and interventions;
- Ensuring that relevant and up to date safeguarding information is available for all students, parents, employers, and other stakeholders via the company website;
- Liaising with the relevant Local Authority, Police and Prevent teams along with other appropriate agencies and professionals;
- Ongoing development and delivery of mandatory safeguarding training to include child protection, risks associated with Radicalisation and Extremism, along with other specific safeguarding issues.

Implementation

The company will ensure that:

1. All new employees of Sendtac Ltd, including Apprentices, appointed to work within the organisation, will be subject to an Enhanced Disclosure via the Disclosure and Barring Service (DBS). The Disclosure Code of Practice detailed within the Recruitment and Selection Policy and Procedures (PHR13) will be followed at all times by the Human Resources department in terms of Safer Recruitment practices;
2. All new staff complete mandatory safeguarding and Prevent training through the formal induction process, in order to establish their own roles and responsibilities and to become aware of the policies and procedures as set out in this and related documents. Staff are made aware of extremism and processes of radicalisation, including how to recognise concerning behaviours and ideologies considered to be extreme, and the responses required in terms of the usual safeguarding reporting procedures;
3. Management and departmental team meetings are held in which safeguarding is a regular agenda item, to enable an ongoing dialogue around safeguarding and related procedures, policies, and practices;
4. All staff working with or on behalf of the company; including volunteers and external contractors who have regular contact with students; have access to information and training appropriate to their role in order to familiarise them with safeguarding issues, outline their responsibilities, and equip them with the understanding of how to report concerns in line with the company

Safeguarding Policy. All staff undertake full refresher training every 3 years, with annual safeguarding updates as appropriate for front line staff, which is recorded and monitored through relevant company systems;

5. There are procedures in place to identify and support all College users, particularly vulnerable groups of young people e.g. looked-after children, young people who are themselves carers, young people on the Child Protection Register, and students with special educational needs (SEN) and disabilities;

6. All staff are responsible for recognising and reporting safeguarding concerns within their day to day practice. In addition, an 'open classroom' concept where learning walks are commonplace enables effective support and monitoring of safeguarding arrangements;

7. Information technologies are used to guarantee that policies and procedures are accessible to all service users;

8. Acceptable Use Policies are in place across the organisation in relation to access to ICT, whereby internet usage will be proactively monitored in order to detect any material promoting terrorism, posing a risk of radicalisation, or posing other safeguarding risk. Risk categories are flagged in a timely manner to the Safeguarding Team via an automatically generated report, with appropriate action taken in line with the Safeguarding Procedures and where appropriate the Tackling Extremism and Radicalisation Policy and Procedures (GOV06);

9. All students who self-declare a criminal conviction, or have a positive disclosure on a DBS check made in preparation for work placement, will receive a support interview to discuss the implications on their future learning. If deemed necessary, in relation to this type of disclosure or any other type of risk posed by a student, a risk assessment panel is convened to make recommendations regarding their admission to learning (class based or work based) or suitability for work placement;

10. All staff, including students and visitors, should display their official photo ID badge. All staff have a duty to challenge non-compliance in order that unauthorised people on site can be identified and dealt with accordingly;

11. The Designated Safeguarding Lead and deputies are appropriately trained to respond to reported safeguarding and Child Protection concerns, and have a working knowledge of appropriate referral pathways, for example Local Authority Social Care Teams, Multi-Agency Teams, Prevent Teams, and the Channel Panel;

Communication Flow

1. The policy and procedures are approved by SENDTAC LTD .

2. The policy and procedures are communicated to all staff through staff induction, staff intranet, annual briefings, meetings, and a variety of training resources.

3. The company has a nominated senior member of staff with strategic lead responsibility for safeguarding, a Designated Safeguarding Lead (DSL) who is in charge of policy, training and operational management of safeguarding arrangements, and Deputy DSL's who deal with day to day reporting and direct safeguarding intervention as required.

4. Staff and students' views are regularly sought regarding their safety whilst studying/in the workplace through discussions.
5. Identification cards with lanyards and including safeguarding information are made available to staff and students, with clear guidance around the mandatory wearing of lanyards embedded within staff and student codes of conduct.
6. Safeguarding information, literature and awareness raising resources are shared with staff, students and other stakeholders as appropriate through a variety of means across the organisation.
7. All students are actively encouraged to report any safeguarding, health and welfare issues through a planned and promoted self-referral process.

Associated Information and Guidance

This policy is underpinned by associated legislation and guidance as listed below:

- Protection of Freedoms Act 2012 <http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>
- Safeguarding Vulnerable Groups Act 2006
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
- Disclosure and Barring Service <https://www.gov.uk/government/organisations/disclosure-and-barring-service>
- Working Together to Safeguard Children (HM Government 2018)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Keeping Children Safe in Education: Statutory Guidance 2018 (and all associated guidance contained therein including Children Missing Education guidance and Sexual Violence and Sexual Harassment between Children in Schools and Colleges)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>
- Data Protection Act 2018/General Data Protection Regulation (GDPR) 2018
<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- Guidance for Safer Working Practice for those working with Children and Young People in Education Settings 2015 <https://www.saferrecruitmentconsortium.org/GSWP%20Oct%202015.pdf>
- What to do if you're worried a child is being abused (March 2015)
http://www.safeguardingschools.co.uk/wp-content/uploads/2015/03/What-to-do-if-you_re-worried-a-child-is-being-abused.pdf
- Information Sharing: Advice for practitioners (March 2015)
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- Prevent Duty Guidance England and Wales

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf

- The Prevent Duty Departmental advice for schools and childcare providers (June 2015)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

- Sexting in schools and colleges: Responding to incidents and safeguarding young people (UK Council for Child Internet Safety)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

- Care and Support Statutory Guidance issued under the Care Act 2014 Department of Health (Chapter 14 Safeguarding) <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>