

Safeguarding Policy (A07)



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Introduction

This policy is to inform everyone connected with Inclusive Training Solutions LTD and with whom it subcontracts or comes into connection, of our position concerning the safeguarding of learners.

Policy Statement

Inclusive Training Solutions LTD recognises its responsibility to safeguard the welfare of all learners, by the commitment to practice that protects them and looks to minimise potential harm.

Inclusive Training Solutions LTD is committed to ensuring that its apprenticeship programmes offer a safe and friendly environment, where people feel comfortable and valued.

Inclusive Training Solutions LTD believes that:

- All learners have the right to learn in a safe and caring environment and their welfare is paramount
- All learners have the right to expect an individual in a position of responsibility to listen to them when they need to express themselves
- All learners 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 and should be valued and respected as individuals
- Bullying in any form is strictly unacceptable
- Racist, homophobic and sexist language or behaviour is strictly unacceptable
- Any form of discrimination is strictly unacceptable
- Working in partnership with learners and with other agencies is essential in promoting a safe learning environment
- Adopting robust safeguarding guidelines through procedures and a code of conduct for learners, staff and volunteers
- Sharing information about concerns with agencies that need it, and involving learners, and their parents/carers appropriately
- Safer recruitment practices
- Offering support services, referrals
- Ensuring all learners have a ready point of contact, referral or support, such as the designated lead and their main tutor

The purpose of this policy and its supporting documents will be to:

- Protect the learners on Inclusive Training Solutions LTD apprenticeship programmes
- Provide staff and volunteers with guidance on procedures they should adopt if they suspect a learner may be experiencing, or be at risk of harm or abuse
- Provide staff with training, guidelines and a code of conduct

The policy applies to all staff, including senior managers and the Board, paid staff, part-time workers, agency staff, learners or anyone working on behalf of Inclusive Training Solutions LTD. We are committed to reviewing our policy and practice annually through the Senior Management Group and consultation with learners.

Background Context

Inclusive Training Solutions LTD is committed to safeguarding and promoting the welfare of learners and expects all learners and staff to share this commitment. The following outlines how Inclusive Training Solutions LTD will meet this commitment.

This document reflects the following key pieces of legislation:

- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2023)
- Education Act (2002)
- Children Act (1989)
- Children Act (2004)
- Safeguarding Children (2006)
- Information Sharing (2018)
- Education & Training (Welfare of Children) Act 2021

Safeguarding is intended to keep children safe from a range of potential harm and looks at preventative action, not just reaction. It is protecting children from maltreatment; preventing impairment of children's 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 children to have the best outcomes. (Keeping Children Safe in Education 2023).

Inclusive Training Solutions LTD extends its statutory responsibilities to vulnerable adults, and is committed to displaying, promoting and delivering the safeguarding message across its whole provision, with its learners and with all employers and partners.

It means promoting the welfare of children and vulnerable adults and having policies and procedures in place which define how we will seek to protect our learners.

Safeguarding defines how we will respond to:

Child and Vulnerable Adult Protection:

- Protection from maltreatment (abuse, harassment, exploitation or victimisation) or risk of harm where the perpetrator is a member of the learner's family, the wider community, another learner or a member of staff.

Welfare support needs:

- Responding to a learner (of any age) via either direct intervention, advice and guidance or sign posting where an issue exists within their day to day lives (including the workplace) that could impact on their ability to achieve. For learners under 18 this includes providing early help.

Recruitment:

- Recruiting staff that are committed to offering learners a safe, happy and healthy environment and who share in the belief that the welfare of the learner is paramount.

Who we safeguard:

The term 'child' means anyone who has not yet attained the age of 18 and the term 'vulnerable adult' means a person, aged 18 or over, who is or may need community care services because of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation.

Inclusive Training Solutions LTD is mindful that several other situations may render a person 'vulnerable' such as – victims of domestic violence, migrants, living in a drug-misusing family, living in areas of high crime, and being likely to face racism or having caring responsibilities.

What are we safeguarding from?

In line with working together to safeguard children 2023 safeguarding is defined as.

- Protecting children from maltreatment.
- Preventing impairment of a child's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

The following should therefore be considered when working with learners.

- Sexual abuse or inappropriate relationships
- Physical and emotional abuse or neglect
- Exploitation e.g. financial, sexual, forced marriage
- Neglect
- Grooming behaviour
- Domestic violence
- Bullying including cyber bullying, bullying in the workplace
- Victimisation (race, sexuality, gender, disability etc.)
- Accidents (road, home, in the workplace)
- Self-harm
- Unsafe activities and environment
- Crime
- Unsuitable housing/homelessness
- Extremism
- County Lines
- So called 'honour' based abuse, including (FGM & forced marriage)

Levels of responsibility

Working Together to Safeguard Children states that 'all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced'.

Inclusive Training Solutions LTD is committed to supporting all staff to understand the requirements placed upon them and the various pieces of safeguarding legislation. This is done through a variety of ways including information, advice and guidance and training.

The Board accepts overall responsibility for Safeguarding and as a result is committed to reviewing Inclusive Training Solutions LTD policy and practice annually. The Board receives a

regular report of safeguarding matters which highlights any risks posed to the business and patterns of safeguarding support to learners.

Day to day responsibility for all safeguarding matters sits with the Head of Training who is the company's 'Designated Safeguarding Lead' (DSL). The Designated Safeguarding Lead fulfils all the responsibilities as listed within Part 1 (point 55) of Keeping Children Safe in Education 2023Worki.

Inclusive Training Solutions LTD operates a culture of vigilance and expects its staff to play their part in this. Staff are expected to highlight any poor practice or behaviour which could put a learner at risk whether this is that of a colleague, a learner, a member of the public or an employer to the DSL.

All staff have a duty to act to ensure that the welfare of the learner is paramount. Any allegations against or concerns about poor practice or abuse by the Designated Safeguarding Lead should be referred to the Board. Concerns related to the practices of staff are investigated by the Board with support from the Local Authority's Designated Safeguarding Officer. This is in line with legislative requirements

Child and Vulnerable Adult Protection

Safeguarding contact: Managing Director – Liam Fassam is the Designated Safeguarding Lead; they can be contacted on:

Tel: 01604 422264. Email: safeguarding@itseducation.org.uk

The Designated Safeguarding Lead is supported by Deputy Designated Safeguarding Leads, who champion good practice on the ground and provide absence cover if the DSL is not available.

Where it is suspected that a learner (child or vulnerable adult) is experiencing abuse this should be immediately reported to a Designated Safeguarding Lead.

Our deputy Safeguarding leads are Amisha Naik and Beth Tomlin.

Telephone:01604 422464 Email: safeguarding@itseducation.org.uk

Training for Staff

In line with Keeping Children Safe in Education 2023 Inclusive Training Solutions LTD is committed to preparing its staff to act following its Safeguarding policy and procedures.

All staff are required to undertake mandatory awareness-raising training. It is expected that staff will undertake refresher training every year. This is in addition to annual CPD activity. All face to face and in-house training will ensure that all staff have a shared understanding of how to report a disclosure or suspicion of abuse or risk of harm.

All training and participation in CPD activities are recorded on the central training record. In year updates to policies/procedures will be communicated to relevant staff via email, updates or through team meetings. Further to mandatory safeguarding training the Designated Safeguarding Lead and the Deputy Designated Safeguarding, leads are available to offer generic

and specific information, advice and guidance to staff around day-to-day safeguarding matters either by phone or by email.

Safer staff recruitment and ongoing staff management

Inclusive Training Solutions LTD is committed to safer recruitment for all positions across the business and practises safer recruitment activities throughout the recruitment processes; this includes undertaking DBS checks, risk assessment activity as well as active promotion of the safeguarding message.

Inclusive Training Solutions LTD welcomes applications from individuals from all backgrounds and where appropriate risk assessments are undertaken in line with the 1974 Rehabilitation of Offenders Act.

DBS checks will be undertaken following the Recruitment policy and the requirement to undergo such a check will be highlighted to applicants at an early stage. It is a criminal offence for barred individuals or those associated with barred individuals to work with children or vulnerable adults in regulated activity.

Inclusive Training Solutions LTD operates a safer recruitment approach for staff outside of the scope of regulated activity and seeks information from individuals regarding unspent convictions through the completion of a Rehabilitation of Offenders form. Further to this Inclusive Training Solutions LTD requires all staff to make immediate disclosures related to cautions, convictions or reprimands. Inclusive Training Solutions LTD ensures that it operates panel interviews for all learner facing roles.

Where a staff member is dismissed or leaves pending an investigation for a safeguarding related matter Inclusive Training Solutions LTD will make the required referral to the Disclosure and Barring Service in line with legislation. This is without exception. Any breaches of this policy or any safeguarding work instruction may result in appropriate disciplinary action being taken.

Staff support

It is recognised that to enable staff to meet their safeguarding responsibilities they may, at times, require additional support. Inclusive Training Solutions LTD operates an open-door policy and whilst the first port of call is always the line manager, we recognise that staff may wish to seek additional personal support from either senior managers or HR.

Specific advice on safeguarding can be sought from the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. Where allegations of abuse are aimed at an Inclusive Training Solutions LTD staff member an independent Senior Manager will act as a welfare officer to the individual.

Information and Support for learners

All learners will receive Safeguarding information during their induction. This is delivered by their assessor/tutor. Safeguarding will also be addressed directly with Learners via the review process.

The assessor/tutor has the day-to-day responsibility to ensure that the learner understands how safeguarding, and confidentiality operate within Inclusive Training Solutions LTD as a part of the induction process.

Where directly requesting welfare support or early help Learners can expect a confidential service (within the bounds of Child Protection) when making direct contact with their assessor/tutor and/or the Head of Training.

Learners can expect that they will be treated sensitively and with dignity should a safeguarding incidence/concern occur, or an allegation of abuse be made. Inclusive Training Solutions LTD requires staff to treat such matters confidentially, notifying colleagues only on a 'need to know' basis under the direct guidance of the Designated Safeguarding Lead.

Confidentiality

Inclusive Training Solutions LTD works to the following Confidentiality Statement with its learners:

“Whilst respecting privacy and GDPR, Inclusive Training Solutions LTD cannot guarantee confidentiality in all circumstances. If we discover anything that we believe parents/carers, social services or the police should be informed of, we will do so believing it is in the best interests of the individual involved.”

This is introduced to learners at induction and referred to throughout the learning process.

Inclusive Training Solutions LTD takes its responsibility to report serious crimes earnestly and as a result, will not afford confidentiality in the following situations:

- Where it is identified that a child or vulnerable adult is at risk of harm
- Where we are told that a serious crime has been committed or is about to be committed
- Where information regarding terrorism or drug trafficking is disclosed
- Where we are instructed to disclose something by a court

Reacting to Child Protection disclosures, incidents or concerns

Inclusive Training Solutions LTD requires its staff to operate in line with the following process. Training will highlight the barriers and blocks that may exist to prevent disclosure.

Recognition

- Recognition covers both disclosures of abuse and your concerns
- Disclosure of abuse is likely to be direct
- A concern that you have may arise from either a conversation or a change in a learner's behaviour

Response

- Do not interview – just listen and clarify if necessary
- Remain un-biased, calm and listen non-judgementally
- Inform the person that the concerns must be recorded and passed on so that the issue can be dealt with
- Reassure the person that they have done the right thing in reporting their concerns and that you will do everything you possibly can to help
- Do not make unrealistic promises about confidentiality

Reporting

- All disclosures of abuse must be urgently reported to a Designated Safeguarding Lead
- DO NOT DISCUSS THE DISCLOSURE WITH ANYONE ELSE
- Report any welfare concerns verbally to the Head of Training as soon as practicably possible, but before the end of the working day

Recording

- Record precisely what has been alleged/happened – use the words of the learner
- This should be scanned and emailed to the Designated Safeguarding Lead.
- Your record should use accurate quotation

If appropriate, include factual observations

- Once you have reported concerns using this process it is the DSL's responsibility to take any further decisions as to the actions which would follow. This may or may not directly involve you

Referral

- Only a Designated Safeguarding Lead can decide to refer a complaint or allegation having gathered and examined all relevant information
- Only a Designated Safeguarding Lead should look into a complaint, allegation or suspicion of abuse. Actions carried out by others could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case
- No member of Inclusive Training Solutions LTD staff is in a position to decide whether abuse has taken place

All general concerns for a learner's welfare should be logged with the Designated Safeguarding Lead to monitor across the Company, what are the commonalities and whether further training is needed.

All allegations of abuse or misuse of power/trust regarding an Inclusive Training Solutions LTD staff member should be immediately advised to the Board by the receiving member of staff. The Board and the Designated Safeguarding Lead will then decide whether the individual will be suspended pending further enquiry.

Where there is a significant and immediate risk of harm posed to a learner, or where staff are concerned that a concern that they have raised has not been dealt with appropriately, staff are encouraged to escalate this to the relevant external agency directly.

Overcoming barriers to disclosure of abuse:

Learners may not disclose to anyone what is happening for several reasons – threats, fear of punishment, guilt/shame, and thinking that they will not be listened to or believed and an inability to communicate. The behaviour and attitude of Inclusive Training Solutions LTD staff should be one of vigilance, openness and confidentiality to create a culture consistent with safeguarding practices.

Young people may allege that abuse or harm has occurred at home or in other situations outside of the company's remit. It is important that these allegations are treated seriously, and the organisation will work in partnership with local safeguarding partnerships or committees in dealing with these situations. As well as neglect, physical, emotional and sexual abuse, children, young people and adults may need to be protected from:

- bullying, including online bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- radicalisation and/or extremist behaviour
- child exploitation and trafficking
- the impact of new technologies on sexual behaviour, for example, sexting
- substance misuse
- issues that may be specific to a local area or population, for example, gang activity and youth violence
- domestic violence
- female genital mutilation
- forced marriage

Inclusive Training Solutions LTD expects staff to be mindful of the support available to learners and seeks to encourage learners to access this at appropriate times throughout the learning process/programme.

The DSL and senior team will seek to identify the most appropriate ways to get the message of Safeguarding across to learners but as a minimum Inclusive Training Solutions LTD will display confidential contact details, confidentiality statements, safe learner posters and the safeguarding positioning statement in all Centres and within the learner handbook.

Inclusive Training Solutions LTD operates a whistleblowing policy. It recognises that it is necessary to undertake safeguarding risk assessments and that safeguarding should be considered alongside other standard assessments of risk processes.

At times it will be appropriate to risk assess individual or specific groups of learners. Such circumstances should be advised to the Board in advance of the learner/s commencing, for a risk assessment to be undertaken, mitigations to be agreed and, where necessary, actioned.

E-safety

Inclusive Training Solutions LTD recognises that there are notable benefits to using social media as communication and promotional tools as well as potential negative effects in terms of reputation and safeguarding.

To use Social Media such as Social Networking Sites and blogs safely and professionally, acceptable use of IT guidance is provided to staff and learners. This guides how Inclusive Training Solutions LTD expects staff to operate when using social media such as Facebook or Twitter.

Owing to the Safeguarding implications surrounding the misuse of social media formats any activities undertaken outside the boundaries of the guidance will be dealt with as a disciplinary matter. Inclusive Training Solutions LTD recognises that there is a possibility that staff, learners or visitors may come into contact with violent or aggressive behaviour and that this contact may lead to personal harm. In such an instance, it is the policy of Inclusive Training Solutions LTD to support victims and deal with these situations and any consequences with sensitivity and compassion. Occurrences of violent or aggressive behaviour must be reported immediately to the most senior person on-site so that the appropriate immediate action can be taken.

All incidents will be investigated and treated with the utmost seriousness and may lead to disciplinary action and/or the involvement of the police. Learners and staff can expect to be able to learn and work in a safe environment and therefore all weapons and/or objects that are carried to be used as a weapon are banned from our centres.

Any learner, staff member or visitor found to have a weapon will be asked to leave the centre and the relevant disciplinary action will be taken. Owing to the level of risk posed by the presence of a weapon on site such an instance will likely result in permanent dismissal from the programme and company premises. Where relevant the Police will be contacted to enable weapons to be confiscated and the relevant actions to be taken.

Learners and staff can expect to be able to learn and work in a safe environment and therefore violence, threats of violence, sexual harassment and abuse will not be tolerated. Any such instances will be treated seriously and in line with the disciplinary procedure. Inclusive Training Solutions LTD will carefully consider the involvement of the police or the undertaking of legal proceedings in response to such instances.

Extremism

The national Prevent strategy recognises that Young People and adults pose a risk and as a result, Inclusive Training Solutions LTD supports the need to recognise that its learners may be at risk of radicalisation.

Inclusive Training Solutions LTD staff have a responsibility to recognise this potential risk and to identify learners that may be at risk of harm with this. Learner facing staff will be provided with basic information on the aims of the Prevent strategy and existing child protection referral mechanisms will be utilised to respond to any concerns or risks of harm posed by extremism.

Inclusive Training Solutions LTD operates a Prevent Strategy and Risk Register in line with the requirements placed upon us under the Counterterrorism and Security Act 2023. Inclusive Training Solutions LTD designated Prevent Officer is the Deputy Safeguarding Lead.

Record keeping and data protection

All records regarding a learner's welfare will be clear, use straightforward language, be concise, accurate in fact and stored confidentially and securely in line with the Data Protection Act. Any judgements, interventions or decisions made will be carefully recorded to facilitate further professional judgements to be made should this be necessary.

The Data Protection Act is not a barrier to sharing information to safeguard the individual. Any

information shared will be shared in line with the Information Sharing: Practitioners' guide (HM Government, May 2018) document.

Records of safeguarding issues will be kept centrally by the Designated Safeguarding Lead. These will be chronological, factual and kept following data protection regulations. Where relevant a reference to the record will be logged on (but not stored on) the learners' file. Records will be destroyed after 3 years.

In line with statutory guidance, the Designated Safeguarding Lead will pass on child protection records to educational establishments to which a learner progresses.

Guidelines for implementing Safeguarding

To support the safeguarding concept, the following Safeguarding Code of Conduct should be followed:

- Staff should always be aware of the needs of learners and be vigilant for any possible signs of abuse or concerns about their general well-being
- Ignoring abuse is not an option and will not be tolerated.
- All staff must report any concerns for the well-being of learners following this policy
- Raise awareness of safeguarding issues and actively equip our learners with the skills needed to keep them safe
- Follow the procedure set out for safer recruitment
- Ensure all individuals supporting Inclusive Training Solutions LTD apprenticeship programmes understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the Designated Safeguarding Lead (DSL)
- Following procedures for identifying, reporting and dealing with suspected cases of abuse or allegations of abuse
- The DSL will develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters
- The DSL will share information internally and externally about vulnerable individuals whilst maintaining appropriate confidentiality
- The DSL will ensure any ICT equipment used by learners on-premises has the appropriate filtering to prevent learners from accessing harmful material and being drawn into terrorism
- All staff will follow the 'Acceptable use of ICT' policy

Staff should never:

- Allow learners to use inappropriate language without challenging them (i.e. Racist, sexist or homophobic comments) Make suggestive comments in front of, about, or to another learner – even in fun
- Let allegations made by a young person go, without being addressed and recorded
- Deter young people from making allegations through fear of not being believed
- Jump to conclusions without checking facts
- Rely on their name and reputation to protect them (i.e. everyone, regardless of position, should adhere to these guidelines)
- Discriminate favourably or unfavourably towards any learner
- Accept or give gifts (other than tokens)
- Develop a personal or sexual relationship with a learner

To ensure that these guidelines are upheld, Inclusive Training Solutions LTD will:

- Ensure that staff are trained in Safeguarding and have passed checks through the Disclosure and Barring Service (DBS)
- Ensure that all staff are aware of their responsibilities regarding the safeguarding of Learners
- Ensure that all relevant staff agree to the guidelines of this policy when around Learners
- Inform management if illegal substances are discovered (i.e. drugs, weapons etc.)

Whilst respecting privacy and data protection, Inclusive Training Solutions LTD cannot guarantee confidentiality in all circumstances.

If we discover anything that we believe parents/carers, social services or the police should be informed of; we will do so, believing it to be in the best interests of the young person Inclusive Training Solutions LTD has a 'zero-tolerance approach to all forms of abuse, intimidation, bullying (physical or emotional), racist and sexist behaviour.

As part of the Pre-Placement, Vetting procedure risk assessments will be carried out on Employers for apprentices placed with them. Employers will have a contractual requirement to have a Safeguarding Policy, carry out staff training and report any incidents or concerns regarding Inclusive Training Solutions LTD Apprenticeship learners through the Channel and inform ATT LTD of such instances on all occasions. Any concerns regarding individual apprentices will be communicated to the employer and monitored.

Responsibility for implementation of the policy

The Head of Training is responsible for implementing and monitoring the Safeguarding Policy. In the event of allegations against this person, staff should consult the Board of All Trades Training Monitoring and Quality Assurance

This policy will be reviewed by the Designated Safeguarding Lead to assess its implementation and effectiveness. This is in line with statutory requirements.

Reporting safeguarding concerns

At Inclusive Training Solutions LTD, we use MyConcern as the companies electronic safeguarding system. It must be used to report safeguarding concerns, e-mail preferences must be turned on so that notifications, tasks, and messages can be received. Any tasks set must be completed timely, failure to do so may result in disciplinary action being taken.

Data protection law does not stop you from sharing data for safeguarding purposes, just make sure that you protect information you share by using authorised systems or encrypted emails.

Any safeguarding concerns must be reported on MyConcern, so the information is stored safely and securely. It is a data breach to lose data, so be mindful to ensure you always report a concern following Inclusive Training Solutions LTD policy and procedure.

Please review Information sharing advice for safeguarding practitioners guidance where you have any reservations in sharing information.

Once Inclusive Training Solutions LTD has received a concern, it will be updated with feedback and filed when appropriate.

Flowchart of Procedures for Responding to Safeguarding Concerns

