



Safeguarding Children & Vulnerable Adults Policy (including Prevent)

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Relevant to: Tutors Staff Contractors Directors	
Signed	<i>M C Emmett</i>

Amended	
12.12.18	Arrangements for Prevent strategy added
12.12.19	Updated safeguarding
1.5.20	Updating policy amended
8.08.20	At risk register added and storage information added
10.09.20	New categories 'at risk' added
29.10.20	Added the details of the safeguarding lead and deputy
29.1.21	Freedom of speech and external speaker added



Introduction

As part of our commitment to assuring quality standards and protecting learners EM Skills ensures that any regulatory requirements are met and provides guidance and support to employees, centres, consultants, trainers and learners to achieve their learning and development goals. These processes are reviewed as appropriate to ensure that they remain fit for purpose.

This policy concerns safeguarding children and vulnerable adults with whom EM Skills employees, or those acting on our behalf, come into contact. The policy reflects the latest guidance **Keeping Children Safe in Education (Sept 2020)**

Under the Counter-Terrorism and Security Act 2015 EM Skills is required to take such steps as are reasonably practicable to ensure due regard to the need to prevent people from being drawn into terrorism. EM Skills adherence to the government's **Prevent strategy** is reflected in this policy.

Scope

This policy relates to all situations in which EM Skills staff (paid and unpaid), contractors and suppliers and others instructed by and acting on behalf of the company, who come into contact with children and vulnerable adults.

Definition. The term 'staff' for this policy includes any of the following: paid staff and volunteers, contractors and suppliers and others instructed by, and acting on behalf of, the company.

Safeguarding lead and deputy

- **The safeguarding lead for EM Skills is: Maureen Emmett. 07848991234**
- **The safeguarding deputy for EM Skills is: Paul Emmett 07446063845**

Both are based in at the head office: Suite 6, Parkside Business Centre, Hoddesdon, Herts. EN11 0ES

Policy statement

Safeguarding and promoting the welfare of children, young adults and vulnerable adults. In some of our activities, EM Skills staff, may come into contact with those who are vulnerable, perhaps because of their age, physical or mental ability or ill health. EM Skills has a responsibility to ensure that children and other vulnerable adults are not harmed in any way, subject to harm through contact with the company or its agents. We have a legal duty to act on concerns regarding the student's welfare and wellbeing and should report concerns as they arise.

Implementation of this policy

EM Skills Ltd will appoint staff and contractors who are deemed suitable to work with children and vulnerable adults by implementing their Safe Recruitment Policy.

Staff found in breach of the Safeguarding and Prevent policy will be subject to disciplinary action. Suppliers may be subject to legal action.

EM Skills Ltd will comply fully with all relevant legislation in responding to a breach of this policy. Breaches will be reported to the appropriate authorities. A full record of any reported incidents or suspicions, including the procedures followed, the feedback received and to whom the case was referred.

Safeguarding Procedures

1. Introduction

EM Skills makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.

EM Skills comes into contact with children and / or vulnerable adults through the following activities:

- Delivery of training
- Tutoring of students
- Assessing of students
- General contact through our normal activities

This policy seeks to ensure that EM Skills undertakes its responsibilities with regard to protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation's expectations. The policy recognises that there can be student on student abuse, particularly through cyber bullying and that abuse can happen outside of the classroom/training environment.

For the purposes of this policy the need to safeguard children and adults includes the need to protect them from being radicalised.

2. Legislation

The principal legislation governing this policy are:

- Keeping Children Safe in Education 2019
- Working Together to Safeguard Children 2010
- Counter Terrorism and Security Act 2015
- The Children Act 1989
- The Adoption and Children Act 2002:
- The Children act 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Standards Act 2000
- Public Interest Disclosure Act 1998
- The Police Act – CRB 1997
- Mental Health Act 1983
- NHS and Community Care Act 1990
- Rehabilitation of Offenders Act 1974

3. Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority or influence. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying
- Neglect
- Financial (or material) abuse
- Modern slavery
- FMG
- Indoctrination or radicalisation

Safeguarding also extends to:

- Honour-based abuse
- County lines
- Homelessness
- Child sexual exploitation
- Children missing from education
- Children with family members in prison
- Child criminal exploitation
- Forced marriage

The **Prevent strategy** is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism and requires sectors and institutions to respond to the ideological challenge of terrorism and the threat faced from those who promote it and prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support

Definition of a child

A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

Definition of vulnerable adults

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This **may** include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

4. Responsibilities

All staff and contractors have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.

We expect all staff and contractors to promote good practice by being an excellent role model, contribute to discussions about safeguarding and Prevent and to positively involve people in developing safe practices.

The safeguarding lead must ensure that the safeguarding and Prevent policies are:

- in place and appropriate
- accessible
- implemented
- monitored and reviewed

and that all staff and contractors are aware of the policies and able to implement the policies.

Safeguarding concerns are reported to the safeguarding lead, or deputy (if appropriate).

All staff and contractors must undertake safeguarding training which is renewed every two years.

All relevant staff and contractors will have an enhanced DBS check before they start work.

All staff will be aware of systems within their centre. This should include the:

- child protection policy
- behaviour policy
- staff behaviour policy (sometimes called a code of conduct)
- safeguarding response to children who go missing from education
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

Tutors will receive updated versions of Part one of the annual updated 'Keeping children safe in Education'

5. Implementation

EM Skills leadership will ensure that:

- Sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented.
- They promote the welfare of children and vulnerable adults.
- Evidence of radicalisation is dealt with according to the correct procedure.
- Staff and contractors have access to appropriate training/information, as part of their induction and annually.
- Staff concerns about safeguarding and radicalization are investigated and will respond to all of them seriously, swiftly and appropriately.
- They keep up -to-date with local arrangements for safeguarding.
- They develop and maintain effective links with relevant agencies.
- Student induction and on-going tutorial sessions will reinforce safeguarding issues and where support can be accessed.
- Tutors are required to register for the DBS updating service and their records will be checked annually.
- Establish or use existing mechanisms for understanding the risk of radicalisation
- Tutors understand the risk and build the capabilities to deal with radicalism
- Tutors know they have a duty to report concerns where they suspect female genital mutilation appears to have been, or is about to be carried out, on a girl of under 18.
- Understand and implement the Prevent strategy, published by the Government in 2011, is part of our overall counter-terrorism strategy, CONTEST.
- Concerns of potential terrorist activity will be reported using Channel guidelines.

- Incidents of sexual violence and sexual harassment are reported and actioned
- Suspected child criminal exploitation is reported and actioned. This includes: homelessness, domestic abuse, children who are absent from education
- **Safeguarding and prevention is included in student induction and are a recurrent theme in tutorials. Safeguarding is included in schemes of work and lesson plans.**

6. Associated policies

The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation.

These include:

- Whistleblowing – ability to inform on other staff/ practices within the organisation
- Grievance and disciplinary procedures – to address breaches of procedures/ policies
- Health and Safety policy, including lone working procedures, mitigating risk to staff and clients
- Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory
- Data protection (how records are stored and access to those records)
- Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose
- Safer recruitment
- E-safety policy

7. Service delivery contracting and sub-contracting:

Contracts and memorandums of agreement/understanding for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures.

8. Safer recruitment

EM Skills ensures safe recruitment through the following processes:

- Job or role descriptions for all roles involving contact with children and/or vulnerable adults will contain reference to safeguarding responsibilities.
- There are person specifications for roles which contain a statement on core competency with regard to child/vulnerable adult protection/ safeguarding
- Shortlisting is based on formal application processes/forms and not on provision of CVs
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults.

9. Support for tutors

EM Skills commits resources for induction, training of staff and contractors, effective communications and support mechanisms in relation to safeguarding

Induction will include:

- Discussion of the Safeguarding Policy (and confirmation of understanding)
- Discussion of the Prevent Strategy
- Discussion of other relevant policies/strategies
- Familiarity with reporting processes

- Initial training on safeguarding including: safe working practices, safe recruitment, understanding child protection and the guide for adult safeguarding
- A clear process for how to report concerns

All tutors working with school age children will be enrolled onto the C&G L2 Award in Introduction to safeguarding Young People for Harm, Abuse and Exploitation. This qualification lasts for two years.

Tutors working with vulnerable adults will undertake suitable training for their role.

Safeguarding training will be refreshed every two years unless there is a significant change in legislation or guidance.

All tutors who, through their role, are in contact with children and /or vulnerable adults will be required to undertake Prevent training, equal opportunities and health and safety training, at an appropriate level.

Those undertaking 1-2-1 sessions will be required to undertake lone worker training.

Tutors, contractors and staff will be required to attend update training for Prevent and safeguarding every two years, as a minimum.

The safeguarding lead and deputy will be required to attend lead update training for Prevent and safeguarding training every year.

The following communication methods will ensure effective communication of safeguarding issues and practice:

- team meetings
- management meetings
- one to one meetings (formal or informal)
- participation in multi-agency safeguarding procedures and meetings in order to be involved in child/ adult protection procedures
- provision of a clear and effective reporting procedure which encourages reporting of concerns.
- encouraging open discussion to identify and barriers to reporting so that they can be addressed.
- inclusion of safeguarding as a discussion prompt during supervision meetings/ appraisals to encourage reflection
- weekly newsletter

We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:

- Debriefing support for staff and contractors so that they can reflect on the issues they have dealt with.
- Seeking further support as appropriate e.g. access to counselling.
- Staff who have initiated protection concerns will be contacted by line manager within one week.

10. Professional boundaries

Professional boundaries define the limits of a relationship between a support worker and a client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.

EM Skills expects staff and contractors to protect the professional integrity of themselves and the organisation. We do not accept our staff and contractors to:

Saved in students and tutors

- Use abusive language
- Use punishment or chastisement
- Pass on personal contact details
- Sell to or buy items from a service user
- Accept responsibility for a student
- Accept money as a gift/
- Borrow money from, or lending money to, service users

Professional boundaries:

- EM Skills does not encourage staff and contractors to give gifts to or receive gifts from students.
- Personal relationships between a member of staff and a student under 18 or vulnerable adult are not encouraged and could lead to dismissal if EM Skills directors felt the relationship could harm the student.

11. At risk register

An 'at risk' assessment of students will be undertaken at sign up. EM Skills will hold an 'at risk' register. Students will be added to the register when necessary. This will be monitored.

12. Reporting safeguarding concerns

The process outlined below details the stages involved in raising and reporting any concerns that may harm a child of an adult:

Communicate your concerns with your immediate manager or safeguarding lead



Seek medical attention for the vulnerable person (if needed)



Discuss with parents of child or with vulnerable person

Obtain permission to make referral if safe and appropriate



If the immediate manager is implicated, then refer to their line manager or peer.

13. Allegations Management

EM Skills recognises its duty to report concerns or allegations against its staff within the organisation or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

First step: Any member of staff from EM Skills is required to report any concerns in the first instance to their line manager or safeguarding manager. A written record of the concern will be completed by the safeguarding manager.

Saved in students and tutors

Second step- Contact one/all of the safeguarding partners

- The local authority
- Clinical commissioning group
- Chief officer or police

Third step – Follow the advice provided

EM Skills recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the DBS.

14. Managing information

Information will be gathered, recorded and stored in accordance with the following policies:

- Data Protection Policy
- Confidentiality Policy

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the designated senior manager.

All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

The at risk register and all safeguarding related documentation will be kept in a secure location with safeguarding lead and deputy access only.

15. Freedom of speech

EM Skills is a community of tutors, students and staff from multi-ethnic backgrounds with different beliefs, cultures and religions. Central to EM skills values is to freely challenge prevailing orthodoxies and query the positions and views of others, whilst adhering to its duty to prevent unlawful discrimination and promote equality of opportunity. This policy applies to our engagement with **visiting speakers**, who are required to complete a risk assessment before engaging with our students.

16. Conflict resolution and complaints

EM Skills adheres to the Hertfordshire Safeguarding Children Board on resolution of professional disagreements in work relating to the safety of children / Escalation Policy and if necessary this will be taken forward by the Designated Safeguarding lead.

Conflicts in respect of safety of vulnerable adults will be taken forward by the safeguarding lead via the local authority and Adult Care Directorate.

17. Communicating and reviewing the policy

EM Skills will make students aware of the Safeguarding Policy through:

- a statement about safeguarding arrangements being displayed on our website
- student handbook

The Complaints Policy which outlines how clients can make complaint about the service.

Saved in students and tutors

This policy will be reviewed by EM Skills Directorate annually and when there are changes in legislation.