SKILLS & EMPLOYABILITY

SAFEGUARDING POLICY 2018 - 2019
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1. INTRODUCTION

Staffordshire County Council has a statutory duty to ensure that all young people and vulnerable adults are safe and are committed to providing a safe learning environment for all of its learners and those accessing its services. The Skills and Employability Service will promote the safeguarding and welfare of all children and vulnerable adults in accordance with the Children’s Act 1989, the Children’s Act 2004 and section 175 of the Education Act 2002. This policy has been written following guidance “Working Together to Safeguard Children” March 2013, produced by HM Government and Department for Education “Keeping Children Safe in Education” September 2018.

Throughout this policy and associated procedures, reference is made to children. Children include anyone under the age of 18 years. The Skills & Employability Service recognise that some adults are also vulnerable to abuse; accordingly this procedure may also be applied to vulnerable adults. The definition of ‘vulnerable adult’ as defined by No Secrets (Department for Health 2000) which is: “A person aged over 18 years old, who may be in need of community care services by reason of mental health or other learning difficulty and/or disability and who is, or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation”.

This policy statement aims to provide guidance to staff on dealing with potential safeguarding issues and the procedures they must follow.

Safeguarding is broader than ‘child protection’ or ‘adult protection’, as it also includes prevention. Statutory safeguarding guidance defines Safeguarding as protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

The broader perspective of safeguarding covers the following:
- A child who is anyone who has not yet reached their 18th Birthday.
- Learners with a learning difficulty and/or disability who, because of this, may be vulnerable regardless of their age.
- Those whose personal circumstance, family history or socio-economic situation leave them in a more vulnerable position (regardless of their age).

The welfare of children and vulnerable adults is paramount. Everyone has a right to be protected from harm and exploitation and to have their welfare safeguarded. Everyone is unique, all action taken by organisations should be person-centered, taking account of cultural, religious and ethnic backgrounds, their gender, sexual orientation and individual ability and special needs.
2. RECOGNISING THE SIGNS AND SYMPTOMS OF ABUSE

Working Together to Safeguard Children 2015 defines the main categories of abuse, which is also used for the purposes of drawing up protection plans for children and vulnerable adults at risk of harm. The categories are as follows:

Physical Abuse
Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness. Indicators of possible physical abuse:

- Bruise marks consistent with either slaps or straps
- Undue fear of adults – fear of going home to parents or carers
- Aggression towards others
- Unexplained injuries or burns – especially if they are recurrent
- Any injuries not consistent with the explanation for them
- Injuries that occur to the body in places which are not normally exposed to falls
- Bruises, burns, bites, fractures etc which do not have an accidental explanation
- Cuts/scratches/substance abuse
- Fabricated illness
- Hitting, smacking, punching, kicking, slapping, twisting, pulling, biting and burning

Emotional Abuse
Emotional abuse is the persistent emotional maltreatment such as to cause severe and persistent adverse effects on the child or vulnerable adult’s emotional development. It may involve conveying that a child or vulnerable adult is worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not being given opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.

Emotional abuse may feature age or developmentally inappropriate expectations being imposed on children or adults. These may include interactions that are beyond development capability, as well as over protection and limitation of exploration and learning, or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying) causing children or adults to feel frightened or in danger or the exploitation or corruption of children or adults. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Indicators of possible Emotional Abuse:

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also depression/ aggression, extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying
- Humiliating, taunting or threatening a child whether in front of others or alone.
- Persistent lack of attention, warmth or praise.
- Shouting/yelling at a child
- Radicalisation – use of inappropriate language, possession of violent extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others
Sexual Abuse

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Indicators of possible sexual abuse:
- Language and drawing inappropriately for age.
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Regularly engages in age inappropriate sexual play
- Sexual knowledge inappropriate for their age
- Wariness on being approached
- Soreness in the genital area or unexplained rashes or marks in the genital areas
- Pain on urination
- Difficulty in walking or sitting
- Stained or bloody underclothes
- Recurrent tummy pains or headaches
- Bruises on inner thigh or buttock.
- Any allegations made by a child concerning sexual abuse
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders - anorexia, bulimia
- Unaccounted sources of money
- Telling you about being asked to ‘keep a secret’ or dropping hints or clues about abuse.

Neglect

Neglect is 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.
- Exposure to danger/lack of supervision
- Under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc.
- Injuries that have not received medical attention
- Inadequate/inappropriate clothing
- Constant hunger
- Poor standards of hygiene
• Untreated illnesses
• Persistent lack of attention, warmth or praise

Specific Safeguarding Issues:
Expert and professional organisations are best-placed to provide up-to-date guidance and practical support on specific safeguarding issues. You can also access broad government guidance on the issues listed below via the GOV.UK website:

• Child Sexual Exploitation (CSE) – also see below
• Bullying including cyberbullying
• Domestic violence
• Drugs
• Fabricated or induced illness
• Faith abuse
• Female Genital Mutilation (FGM) – also see below
• Forced marriage
• Gangs and youth violence
• Gender-based violence/violence against women and girls (VAWG)
• Mental health
• Private fostering
• Radicalisation
• Sexting
• Teenage relationship abuse
• Trafficking
3. DESIGNATED STAFF WITH RESPONSIBILITY FOR SAFEGUARDING

The Designated Safeguarding Lead responsible for all Safeguarding and Prevent issues for the Skills & Employability Service, is the Community Learning Manager.

The Designated Safeguarding Lead will:

- Develop a culture of safeguarding being everyone’s responsibility
- Ensure that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported when they do
- Act as a source of advice on all safeguarding matters and seek further advice and guidance from local statutory agencies as and when required
- Ensure that a record is kept of any concerns made about a child or vulnerable adult and of any conversation or referrals to statutory agencies
- Complete safeguarding documentation accurately and timely, ensuring that all completed paperwork is referred to Staffordshire Safeguarding Children Board (SSCB)
- Ensure all staff have the appropriate level of training and keep training records
- Liaise with senior managers over matters regarding safeguarding, including; ensuring that policies and procedures are consistent with the SSCB’s procedures
- Ensure that Senior managers considers the policy on Safeguarding and Prevent each year
- Ensure that each year the senior managers are informed of how the Service and its staff have complied with the policy, including, but not limited to, a report on the training that staff have undertaken
- Be responsible for overseeing the liaison between agencies such as the Police and/or Child Services – as defined by SSCB
4. DEALING WITH DISCLOSURES AND PROCEDURE FOR REPORTING CONCERNS

If a child or vulnerable adult has a serious injury, dial 999 and request assistance from the ambulance service and/or police. If you know or suspect the child or vulnerable adult has come to harm through the actions of another, make sure that the professional you hand over to understands this and take their name and record it. It will generally be appropriate to inform parent/carers what has happened once the child/vulnerable adult is safe with an appropriate professional.

If it seems that a child has been abused in any way including sexual abuse (but is not in immediate danger) report this immediately to the service for the area where they live. The numbers are:

Staffordshire’s First Response
0800 1313 126
8.30am – 5.00pm Monday to Thursday
8.30am- 4.30pm Friday
or
email: firstr@staffordshire.gov.uk

EDS (out of hours) Tel No. 0845 6042886
Or email eds.team.manager@staffordshire.gov.uk

Non-emergency - call Staffordshire Police on 101

Stoke-on-Trent Safeguarding Referral Team (SRT)
01782 235100
8.30am – 5.00pm Monday to Thursday
8.30am- 4.30pm Friday
or
Emergency Duty Team (out of hours)
Tel No. 01782 234234

Non-emergency - call Staffordshire Police on 101

If a concern relates to Vulnerable adult, referrals are dealt with through the Contact Centre on 0300 111 8000.

If the concern is long term rather than immediate, you should discuss this with the DSL who will decide whether it meets the threshold for making a referral.

For any concerns raised, consultation must take place with the DSL regarding who will be the most appropriate person to initiate any referral. A written record of concerns will be made using a referral form. This will then be passed to the Local Authority Safeguarding team or to the First Response Team immediately, if appropriate.

If a child or vulnerable adult tells a member of staff about possible abuse, you must:

• Ask open-ended questions to clarify your concern e.g. “What happened to your arm?”
• Listen to the child or adult / your gut feelings
• Take action.
• Listen carefully and stay calm.
• Reassure the child or vulnerable adult that by telling you, they have done the right thing.
• Reassure the child or vulnerable adult that, although information must be shared, it will be on a need to know basis. Inform them that you will need to report the matter.
• Keep the child or vulnerable adult focused on task, encouraging them at all times to ensure they are sharing truthful and accurate information
• Make a detailed note of the date, time, place, exact words that the child or vulnerable adult said without paraphrasing, your questions and all the relevant information. Please sign and print your name at the bottom of the record.

**DO NOT**
• Carry out your own investigation
• Put words in any child or vulnerable adult’s mouth by asking direct questions such as “Did your Dad do it?”
• Feel that you must inform parents/carers if you think it may put the child or vulnerable adult at risk of further harm or cause them to be silenced.
• Ignore your worry
• Ask the child or vulnerable adult to sign what you have recorded or to repeat it to another member of staff
• Take photographs of any injury
• Delete information/ photographs from a computer/ memory stick/ mobile phone or any other electronic device
• Make promises to the child or vulnerable adult

If at any point, there is a risk of immediate serious harm to a child or vulnerable adult a referral should be made to Children’s/Adult Social Care immediately. Anyone can make a referral, however we advise that the referrer should liaise with the Designated Safeguarding Lead. Please see Appendix A for relevant referral numbers.

A flowchart for the referral process can be found in Appendix C

**Record keeping**
Well-kept records are essential in situations where it is suspected or believed that a child or vulnerable adult may be at risk from harm.
Records should:
• State who was present, time, date and place
• Use the person’s own words
• State exactly what was said
• Differentiate clearly between fact, opinion, interpretation, observation and/or allegation
• Be signed by the recorder.
• All documentation must be given to the Designated Safeguarding Lead where the records will be retained securely and separately
5. CONFIDENTIALITY

Confidentiality is an issue that needs to be understood by all those working with children and vulnerable adults, particularly in the context of safeguarding. This is a complex area and involves consideration of a number of pieces of legislation.

Staff can never guarantee confidentiality as some kinds of information may need to be shared with others. Professionals can only work together to safeguard if there is an exchange of relevant information between them. This has been recognised by the courts. However, any disclosure of personal information to others, including social care departments, must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998, European Convention on Human Rights, Article 8). Information may also be shared without consent in order to prevent or detect a crime, prevent serious harm to a child or adult, or due to a public interest concern.

The law also requires the disclosure of confidential information necessary to safeguard a child, children and vulnerable adults. Under Section 47 of the Children Act 1989, statutory agencies have a duty to co-operate with the Local Authority if there may be risk of significant harm. Therefore, if the Police or Social Care services are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt through the Designated Safeguarding Lead.

6. CYBER/ E-SAFETY

The growth of different electronic media in everyday life and an ever developing variety of devices including PC’s, tablets, laptops, mobile phones, webcams, gaming consoles etc. place an additional risk.

The Adult and Community learning curriculum and inductions raise awareness of safeguarding issues so that learners on programmes are able to recognise the indicators of, for example, grooming behaviours, sexual exploitation, or being subjected to abuse, are minimised.

Learners are encouraged to discuss their use of technology and anything which makes them feel uncomfortable or unsafe. If this results in a safeguarding concern, you must inform the Designated Safeguarding Lead immediately.

Nobody should give out their personal details, phone numbers, home address, computer passwords etc. The police will be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media. All providers should ensure that learners sign the Acceptable Use statement, and photo consent forms where relevant.

7. PREVENTING VIOLENT EXTREMISM Refer to the Skills & Employability Prevent Duty Policy

As part of safeguarding we encourage learners to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

In February 2008 and latterly in 2018 the Government published guidance on preventing violent extremism. While the guidance was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups.
We must ensure that political views are not promoted in the delivery of any subject and where political issues are brought to the attention of the learners; reasonable steps have been taken to offer a balance of opposing views. The Skills and Employability Service has a duty under the Counter Terrorism Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate, dealt with in line with Disciplinary Polices. We will share information with the Staffordshire Police Prevent team when appropriate. All staff must undertake awareness training in regard to preventing extremism and radicalisation at least every two years.

Channel is a Government programme which focuses on providing support to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:
- Identifying individuals at risk.
- Assessing the nature and extent of that risk
- Developing the most appropriate support plan for the individuals concerned.

Any Prevent concerns must be recorded in writing and reported to the Designated Safeguarding Lead who will liaise with the Staffordshire Police Prevent team.

8. VOLUNTEERS AND EXTERNAL SPEAKERS

Staffordshire County Council encourages visitors and recognises the potential benefits in promoting access to community classes. At the same time, we have a duty to avoid disrupting the educational process and to protect learners, staff and property. Limitations may be placed on visitors in the interests of safety, security and for the safeguarding of learners. This procedure is designed to manage all visitors to ensure their experience is positive and the outcome is safe for all.

This policy applies to all provision sub-contracted and directly delivered by the Staffordshire County Council’s Skills & Employability Service, wherever the delivery takes place.

Visitors might be:
- Volunteers supporting the tutor
- Care/support workers attending in order to work with specific (ALDD) learners
- Supplementary tutor employed to work with the led tutor in sessions, for example to lend expertise in specific skills
- Members of Adult and Community Learning, Staffordshire County Council or Ofsted, visiting for monitoring or inspection purposes
- Associated with other partners of the Provider
- External speakers engaged by the provider to lead part or a whole of a teaching session.
- Anyone else present in the session who is not either:
  - An enrolled learner
  - The appointed tutor(s) and regular Learning Support Assistants
  - Staff and managers of the sub-contracted provider/DDU

Access to community classes
To uphold our duty to safeguard children and vulnerable adults, unauthorised access to classes is not permitted.

Providers must ensure that all visitors comply with the relevant signing in/registration procedure at their venue. Tutors must ensure that all visitors have registered/signed in with the tutor before
entering the class and are escorted at all times by the member of staff they are visiting. Everyone accessing the building should have some form of ID available. All visitors (whether volunteers, support workers etc) should be identified in name and role by the tutor to any visitor during monitoring visits (eg ACL staff or inspectors).

Anyone who may need unsupervised access to learners must have undergone a suitable disclosure check (DBS) and this will need to be approved by the provider in advance of access. Examples include: Volunteers, agency staff, and additional support workers. Regular visitors must have an ID issued by the provider and the ACL ID card visible and available at all times. Regular visitors can be added to the class register if they have DBS checks in place, undertake safeguarding training and can therefore have unrestricted and unaccompanied access.

**External Speakers**
The term external speaker is used to describe any individual or organisation who is not a learner or staff member. All events held during an ACL class involving external speakers, will be subject to this Policy; including events where external speakers are streamed live into an event (sound and/or visual), or a pre-recorded film/sound recording is playing.

The provider is responsible for the activities that take place within their courses and organised events. All speakers must be made aware of their responsibility to abide by the law, the Adult and Community Learning and Provider policies, including that they:

- Must not incite hatred, violence or call for the law to be broken.
- Are not permitted to encourage, glorify or promote any acts of terrorism, including individuals, groups or organisations that support such acts.
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony.
- Must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge.
- Are not permitted to raise or gather funds for any external organisation or cause without express permission of the ACL Senior Manager and Provider Manager.

Adult and Community Learning reserves the right to cancel, prohibit or delay any event with an external speaker which does not meet the criteria in this Policy.

**9. REPORTING AND DEALING WITH ALLEGATIONS AGAINST A MEMBER OF STAFF**

This procedure applies to all staff, whether teaching, administrative, management or support, as well as to volunteers. The generic term ‘staff’ is used for ease of description and refers to all staff groups.

Any situation in which an allegation or concern arises about the conduct of a person who ‘works’ with children and vulnerable adults should be managed using the Staffordshire or Stoke-on-Trent Safeguarding Children Board inter-agency policy and procedures.

Specifically, the question should be asked as to whether the allegation or concern possibly meets any one of the following thresholds:

- Behaved in a way that has harmed or may have harmed a child or vulnerable adult,
- Possibly committed a criminal offence against, or related to a child or vulnerable adult,
- Behaved towards a child or vulnerable adult in a way that indicates they may pose a risk of harm.
If any of these situations apply then it must be reported to the Designated Safeguarding Lead who will then refer to the Local Authority Designated Officer (LADO) within 24 hours of the allegation being made.

10. PROFESSIONAL CONDUCT GUIDELINES

Staffordshire County Council’s Skills & Employability Service expects all its employees to behave in a professional manner at all times. This also incorporates considering your personal actions and giving due consideration for any action that may bring the County Council into disrepute. The following information is provided as guidance for what is deemed as acceptable and reasonable behaviour and aims to help staff safeguard students and reduce the risk of conduct which could be mistakenly interpreted as improper and lead to allegations being made against individuals.

Principles:
- The welfare of young people and vulnerable adults is paramount
- Staff are responsible for their own actions
- Staff should be seen to work in a transparent way
- All staff should report any incident which may give rise to concern to their manager
- All staff and sub-contractors should be aware of and follow Skills & Employability’s safeguarding procedures
- Staff who breach this code of conduct may be subject to disciplinary procedures
- Serious breach of this code may result in a referral being made to an external or statutory agency such as the local authority Social Care Team or the Police.

Working with learners
All staff have a duty of care to keep learners safe and are accountable for the way in which they use their authority and position of trust. This duty can be best exercised through the development of caring but professional relationships. Staff should ensure that their relationships with learners are appropriate to the age and gender of the student, taking care that their conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when dealing with both young and vulnerable learners. Comments by staff to young and vulnerable learners, either individually or collectively, can be misconstrued. As a general principle, staff must not make unnecessary comments to and/or about others, which could be construed to have a sexual connotation. It is also unacceptable for staff to introduce or to encourage debates in a class, training situation or elsewhere, which could be construed as having a sexual connotation that is unnecessary given the context of the session or the circumstances.

Staff should:
- Treat all students with respect and dignity
- Always put the welfare of the student first
- Understand that the systematic use of insensitive, disparaging or sarcastic comments such as those that refer to a person’s body, intelligence, gender, sexual orientation or ethnicity in any way are unacceptable
- Not swear or use offensive or discriminatory language
- Never make sexual remarks or discuss your own personal sexual relationships
- Avoid any communication which could be interpreted as sexually provocative
- End the discussion if it becomes uncomfortable or embarrassing
- Work in an open environment avoiding private or unobserved situations and encourage open communication
- Give enthusiastic and constructive feedback rather than negative criticism
- Always challenge inappropriate language from students or colleagues
- Never allow allegations made by a student to go unrecorded or not acted upon

Confidentiality
Staff should never share information about students in a casual manner or allow student access to information on staff computers. Staff should:
- Never give out their own personal details or a student’s personal details to other students
- Log off or lock their computer whenever leaving it unattended
- Not allow students to use your computer unless you have logged off;
- Staff should only email students from their work email address and not their personal email address

Behaviour
Staff should adopt high standards of personal conduct at all times.
- Staffs’ clothing should reflect a professional appearance and should be suitable for the occupational area in which they are working
- Staff must wear their identity badge when on the premises
- Staff should, where applicable wear relevant protective clothing to set a professional example to students
- Staff should dress in a manner which will avoid inappropriate comments
- Never act in a way that can be perceived as threatening
- Accessing or bringing images of pornography i.e. sexualised images without artistic merit on site is never acceptable, regardless of format
- Storing or disseminating such material is illegal and if proven will lead to the person being barred from working with young people
- When communicating with learners electronically, staff should only use the organisation’s mobiles, email or official internet sites
- Staff should never keep images of learners on personal equipment.

Mobile phones
Staff should only use company devices when contacting students i.e. not their personal mobile phone number.

Social media for study
When setting up a Facebook (or other) page for study purposes staff must declare this to their line manager. Also staff should liaise with their organisations’ IT Manager and External Communications Manager to ensure that the page has the correct security and corporate logos in place.

Sexual contact
It is a criminal offence for a person in a position of trust to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent, even if the basis for their relationship is consensual. There is NO acceptable behaviour
that has either explicit sexual connotations or innuendo. Any such behaviour will always be treated as extremely serious and must be reported immediately.

**Incidents that must be reported**
- If a student is accidentally hurt
- If you are concerned that a relationship is developing that could represent an abuse of trust
- If you are concerned that a student is becoming attracted to you or a colleague
- If you are concerned that a colleague is becoming attracted to someone in his/her care
- If a student misunderstands or misinterprets something you have done
- If you have had to use reasonable physical restraint to prevent a student harming themselves, or another, or from causing significant damage to property
- If a student makes an allegation of abuse
- If you see any suspicious marks on a student
- If you notice sudden changes in behaviour.

**11. WHISTLEBLOWING**

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among members of staff.

Whistleblowing is when a worker reports suspected wrongdoing at work. For example
- A criminal offence; and/or
- A miscarriage of justice; and/or
- Damage to the environment; and/or
- Breach of a legal obligation; and/or
- A danger to health and safety; and/or
- A deliberate concealment of any of the above

A colleague can report things that are not right to their line manager or DSL, that are illegal or if anyone at work is neglecting their duties, including:
- Someone’s health and safety is in danger
- Damage to the environment
- A criminal offence
- The company isn’t obeying the law
- Covering up wrongdoing

The Council will, at its discretion, consider disclosures that are made anonymously, although such disclosures are inevitably much less powerful. The Council will also treat every disclosure in confidence, and only reveal the identity of the person making it if absolutely necessary (e.g. if required in connection with legal action).
12. ROLES AND RESPONSIBILITIES

Skills and Employability Service Roles and Responsibilities:

- Establish a Safeguarding Strategy for the Service in relation to its work with sub-contractors and review on an annual basis.
- Request enhanced Disclosure and Barring Service (DBS) checks against the children’s barred list for ACL staff who work within Family Learning and ALDD provision only, in line with the latest legislation and DBS requirements.
- Identify a member of its management team as the Designated Safeguarding Lead.
- Respond to any safeguarding issues that are reported or identified.
- Work within guidance and procedures established by the Staffordshire and Stoke on Trent Adult Safeguarding Partnership and the Staffordshire Safeguarding Children Board.
- Promote safeguarding throughout its recruitment process and ensure all required checks are completed prior to the appointment of any individual and rigorously check references.
- Instil confidence that the learning environment is safe.
- Ensure the organisation complies with its requirements around safeguarding.
- Ensure safeguarding, including The Prevent Duty is included during the induction of all new staff.
- Ensure safeguarding activities are included in learner inductions and reinforced throughout the programmes.
- Check learners have completed inductions and feel safe during observations and class visits.
- Monitor that tutors have completed safeguarding and Prevent duty training.
- Provide an alternative format of safeguarding information for ALDD learners.
- Check all tutors have received safeguarding updates.
- Provide guidance on the Code of Conduct for staff to support staff in keeping safe.
- Provide information on the Prevent Duty to all staff.
- Provide tutor and learner guidance on the safe use of social media and cyberbullying.
- Establish clear lines of communication and reporting procedures when courses are delivered in centres that have their own designated person for safeguarding e.g. schools, day care centre.
- Ensure that Provider Managers review completed ACL Learner Feedback forms to check learner responses to ‘safer learning’ questions and respond appropriately, where necessary.

Sub-contractor Roles and Responsibilities:

- Have a current Safeguarding Policy for their organisation, which meets the latest government’s legislation and also has a Designated Safeguarding Lead. If providers do not have a specific policy, they must adopt the Skills & Employability Service’s policy.
- Adhere to the requirements for DBS checks and provide ACL with dates of issue.
- Ensure all staff involved with delivery of ACL courses complete safeguarding and Prevent Duty training and provide ACL with the details of training, including copies of certificates. All tutors update their Safeguarding and Prevent Duty training every two years, as a minimum.
- Immediately inform the Skills & Employability Designated Safeguarding Lead of any safeguarding, Prevent bullying incidents and detail the actions taken.
- Promote safeguarding throughout their recruitment process and ensure all required checks are completed including rigorously checking references.
- Ensure safeguarding is included during the induction of all new staff involved with ACL programmes and will include, as a minimum; the provider’s policy and procedures for safeguarding, The Prevent Duty, identification of the Designated Safeguarding Person, how to report disclosures, enquiries or incidents, cyber bullying and safe code of conduct for staff.
APPENDIX A: Relevant contact and referral numbers.

Staffordshire County Council's Skills and Employability
Designated Safeguarding Lead:
Preeya Buckley
Community Learning Manager

Email: preeya.buckley@staffordshire.gov.uk
Tel: 01785 277147 or 07815 633209

Further advice on Safeguarding matters can also be obtained from:

- Staffordshire Safeguarding Children's Board 01782 277151
  www.staffsscb.org.uk
- First Response Team including LADO advice 0800 1313126
- Emergency Duty Team (for out of office hours referrals for children and vulnerable adults) 0845 6042886
APPENDIX B: Further guidance and information

- Child Exploitation & Online Protection Centre [http://www.ceop.police.uk](http://www.ceop.police.uk)
- Child Sexual Exploitation; definition & guide for practitioners: February 2017, Department for Education
- Counter Terrorism and Security Act 2015
- Multi Agency Statutory Guidance on FGM: April 2016, Department for Education
- Keeping Children Safe in Education: 2018, Department for Education
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