

2021

Safeguarding Policy



Webs Training Limited
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Safeguarding Policy

Date: 01 December 2021

Purpose of Policy: Sets out the arrangements of WEBS safeguarding arrangements

Approved by: Nick Crowther (Chair of Board of Directors)

Responsibility for Updates: Lorraine Jameson (Head of Business & Quality Assurance)

Policy applies to: All Webs employees, Learners, Employers, Contractors and visitors

Proposed Date of Review: December 2022

Links and Dependencies

This policy is part of a suite of support policies defining the learner journey support arrangements and should be read in conjunction with the following policies and procedures

- | | |
|--|--|
| <ul style="list-style-type: none">Anti-Bullying PolicyBehaviour PolicyStaff Code of ConductDBS PolicyDisciplinary PolicyEquality & Diversity Policy | <ul style="list-style-type: none">E Safety PolicyHealth & Safety PolicyPreventing Radicalisation PolicySafer Recruitment PolicyWhistleblowing Policy |
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Version History			
Version	Date	Detail	Author
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Signed



Dated 01.12.21

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Policy Statement

The legislation relevant to safeguarding and promoting the welfare of children is set out in the ‘Children Act 1989 (updated 2004)’ and the statutory guidance, ‘Working Together to Safeguard Children 2018’.

WEBS Training Ltd has a statutory duty and a moral duty to ensure that they function with a view to safeguard and promote the welfare of young people and vulnerable adults receiving training. In addition, Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on providers to have “due regard to the need to prevent people from being drawn into terrorism¹”.

We are committed to ensuring that children and vulnerable adults are safe and protected from all forms of abuse and neglect including radicalisation.

This policy applies to all persons employed within our organisation. We recognise our responsibility to respond appropriately and, with respect to children, young people and vulnerable adults, to work with other agencies to ensure the safety and wellbeing of those groups with whom we have contact and to have clear guidelines for our procedures.

1. We believe children and vulnerable adults should be valued, safe and happy. We want to make sure that these people we have contact with know this and are empowered to tell us if they are suffering harm.
2. We want children, young people and vulnerable adults who use or have contact with this organisation to enjoy what we have to offer in safety.
3. We want employers and outside agencies to support young people and vulnerable adults in a way that promotes their health and wellbeing and keeps them safe.
4. We want organisations that work with or commission work from us, or who provide funding to us, to have confidence and recognise that we are a safe organisation.
5. We will achieve this by having an effective safeguarding children and young people and vulnerable adults procedure and following the national guidance in ‘What To Do If You’re Worried A Child Is Being Abused’, or the ‘Protection of Vulnerable Adults’ Act.
6. If we discover or suspect a child, young people and vulnerable adult is suffering harm we will, for children notify the appropriate authorities.
7. This Safeguarding Children, Young People and Vulnerable Adults Policy Statement and our Safeguarding Children, Young People and Vulnerable Adults Procedure applies to all staff, volunteers and users of Webs Training Limited and anyone carrying out any work for us or using our premises.

We recognise and adhere to further statutory requirements within the following important and relevant pieces of safeguarding legislation;

- Keeping Children Safe in Education (2021)
- Safeguarding Children and Safer Recruitment in Education (2011)
- Protection of Freedoms Act (2012)
- Disclosure and Barring Service Code of Practice (2012, 2015)

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- Sexual Offences Act (2003)
- Every Child Matters (2004)
- Equality Act (2010)
- updated Prevent Duty Guidance April 2021

Covid 19

WEBS Training are conscious of the significant impact that the COVID-19 pandemic and how it continues to have on our key stakeholders, in particular our learners and employers. This document reflects any change to policy or procedure in relation to the safeguarding & welfare of our staff, learners, and visitors.

Purpose

The purpose of this policy and the associated procedures is to protect and promote the welfare of the children, young people and vulnerable adults we work with and support WEBS employees, Directors, Board members and the employers we work with in fulfilling their statutory responsibilities.

It is not the role of any employee to investigate allegations of abuse. However, all employees have a clear responsibility to take action following organisational procedures when they suspect or recognise that a young person or adult is at risk and may be a victim of significant harm or abuse, including the threat of radicalisation.

Policy Promotion

We will promote this policy by embedding it into WEBS processes and procedures including staff and learner inductions, staff team meetings and learner and employer tripartite reviews.

We will continue to actively promote Fundamental British Values, Prevent and Safeguarding covered in our learner induction and reviews and staff CPD.

We will ensure that all our representatives, employers, staff members and learners are aware, and kept up to date of WEBS policies and procedures – with copies made available via the website, intranet, student share drive and hard copies upon request.

Hard copies will also be made available at reception.

Definitions

In accordance with the Children Act 1989 and 2004, a child is any person who has not yet reached their 18th birthday. For the purpose of this policy the reference to children therefore means 'children and young people' throughout.

Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or 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.

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Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child². Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk³. For the purpose of this definition, we also include the risk of radicalisation.

Scope

All staff have a responsibility to provide a safe environment in which children and young people can learn.

All staff have a responsibility to identify children and young people who may need extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

Policy Implementation:

Commitment from all sides of the organisation is vital for employee and learner involvement to be effective and successful in implementing this policy. We will do this through: -

- policy consultation and approval, ensuring that the Board and WEBS employees understand their legal and moral duties in relation to this policy and that views and feedback are considered.
- operating safer recruitment practices in accordance with the legislative document 'Safeguarding Children and Safer Recruitment in Education (2011)'.
- ensuring that all employees receive appropriate, relevant and update training and development are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe including the need to recognize and respond to the signs of neglect, abuse and/or radicalisation amongst our learners.
- raising awareness of safeguarding to all of our learners ensuring that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe.
- developing and implementing procedures for identifying, reporting and monitoring cases or suspected cases of abuse and other safeguarding issues.
- establishing a safe environment in which learners can learn and develop including staying protected on-line.

We recognise that because of the day-to-day contact with learners, our staff are well placed to observe the outward signs of abuse including potential radicalisation. WEBS Training Ltd will therefore: -

- ✓ Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to.
- ✓ Ensure learners know who the designated staff are whom they can approach if they are concerned or worried.
- ✓ Include opportunities within our ongoing assessment process and classroom delivery for learners to develop the skills they need to recognise and stay safe from abuse including radicalisation.
- ✓ Ensure that effective safeguarding procedures are developed, implemented, and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of Recognition, Response, Record, Report, Refer.
- ✓ Ensure that we develop effective links with relevant external agencies, local safeguarding and Prevent coordinators and co-operate with any requirements with any safeguarding referral matters.

² Such action might be taken under section 47 and section 44 of the Children Act 1989

³ Such action might be taken under section 17 of the Children Act 1989.

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- ✓ Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- ✓ Ensure all records are stored securely and in accordance with the Data Protection Act.

All Board, staff members, learners and other users will be made aware of systems within WEBS which support safeguarding including radicalisation and these will be explained to them as part of staff /learner induction.

Staff Responsibilities in relation to Safeguarding

WEBS Board

It is the role of the board to ensure that WEBS meets its statutory duties with regard to safeguarding including preventing radicalisation and monitor the implementation of this policy.

The board has a nominated person who will liaise with the Senior Management Team and other staff about issues to do with safeguarding including Prevent. **The nominated person is Nick Crowther.**

WEBS Board Safeguarding and Prevent Lead

Duties include:

- Overseeing safeguarding and prevent policies and procedures and their implementation.
- Ensuring safeguarding/prevent is included as item for update/discussion on board agendas.
- Work with Lead DSO to ensure policies are implemented

Designated Safeguarding Officers (DSO's)

WEBS have appointed four DSO's who will be responsible for:-

WEBS Designated Safeguarding Officers are:

James Woolley

Sharon Hearst

- Acting as the first point of contact for staff and employers, supporting and advising them on issues related to safeguarding/prevent concerns.
- Be available for learners wanting to raise concerns directly.
- Ensure records are accurately recorded and stored in line with statutory guidance
- Undertake mandatory Safeguarding/Prevent training.
- Attend multi agency meetings, contributing to plans as required.
- Ensure effective signposting of services and referrals by developing good working relationships with other key stakeholders including professionals from external specialist support agencies, local authorities, and Police.
- Produce risk assessments and support plans to safeguard learners including those at risk of radicalisation.

WEBS Designated Safeguarding Lead

Lorraine Jameson

Additional duties include: -

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- Receive concerns from staff.
- Monitor and manage safeguarding cases and referrals ensuring interventions are timely and responsive in line with child protection legislation and statutory guidance (Lead DSO).
- Maintain a record of any reported incidents (Lead DSO).
- Ensure all staff aware of and abide by all policies and procedures in relation to safeguarding and prevent.
- Ensure all staff undertake annual online Safeguarding and Prevent refresher training (Lead DSO) in addition, those involved in recruitment of new staff undertake annual refresher training in Safeguarding and Safer Recruitment in FE.
- Ensure appropriate referrals to Channel are made where there is a radicalisation concern (Lead DSO).
- Creation and implementation of Safeguarding/prevent policies (Lead DSO).

WEBS PREVENT Lead is:

Sharon Hearst

Additional duties include: -

- ensure that staff understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns.
- receive safeguarding concerns about learners and young people who may be vulnerable to the risk of radicalisation or are showing signs of radicalisation.
- working with the lead DSO make referrals to appropriate agencies with regard to concerns about radicalization.
- liaise with partners, including the local authority and the police.
- provide reports to the board of Directors on these matters.
- Deliver learner inductions/sessions to raise awareness of Prevent and Safeguarding.
- Work with other staff to producing employer/apprentice materials in relation to safeguarding and prevent.
- Contribute to safeguarding and radicalisation policies.
- Work with Lead DSP in relation to referrals to Channel.

All other Employees

must:-

- follow the safeguarding/prevent reporting procedures.
- participate in mandatory CPD on safeguarding and related topics at regular intervals.
- maintain an attitude that “it could happen here” and always act in the best interests of the learners with regard to safeguarding and welfare.
- ensure that the employers they engage with are sufficiently well informed to understand their vital role when agreeing to take learners on training programmes, are aware of WEBS policies and ensure that safeguarding (and prevent) are discussed at tri-partite review meetings.
- record any concerns, discussions and decisions made in relation to safeguarding issues in writing (record of concern) and notify DSO.
- follow the staff code of conduct outlined in the Staff Handbook.
- Adhere to guidance set out in ‘best working practice’.

Staff Training

All staff and board members will receive induction training, which will give an overview of the organisation and ensure they know its purpose, values, services, and structure. Relevant

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training and support will be provided on an ongoing basis, and will cover information about their role, and opportunities for practising skills needed for the work.

Training on specific areas such as safeguarding children, identifying and reporting abuse, preventing radicalisation and confidentiality of personal information will be given as a priority to new staff and board members and will be regularly reviewed.

Definition and types of Abuse or Neglect

'Child abuse and neglect' is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the persons health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm. Young or vulnerable learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them. In England there are four categories of abuse in general use:

Physical injury: this may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child including fabricating the symptoms of, or deliberately causing ill health.

Indicators of Physical abuse: Bruises to the eyes, mouth ears, fingertip bruising (grasp mark), bruises of different ages in the same place, outline bruises (prints of hands, belts, shoes), bruises without obvious and verifiable explanations, clear impressions of teeth, burns or scalds with clear outlines, small round burns which may be from cigarettes, large number different aged scars, unusual shaped scars, scars that indicate the young person did not receive medical treatment. Other injuries could include poisoning, injections, ingestion or other damaging substances including drugs and alcohol, female genital mutilation and signs of shaking.

Neglect: is the persistent failure to meet a child's basic physical and/or psychological needs, which, is likely to result in the serious impairment of the Childs 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 and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a persons basic emotional needs.

Emotional abuse: is persistent or emotional ill treatment of a child that adversely affects their development. May involve conveying to a child that they are worthless, unloved and inadequate, or where inappropriate expectations are imposed upon them. This also includes Children and young people who are regularly frightened, exploited or corrupted.

Indicators of emotional abuse: abnormally passive, lethargic or attention seeking behaviour, specific habit disorders e.g. excessive drinking, eating unusual substances and self harm, severely delayed social development, poor language and speech development not otherwise explained, excessively nervous behaviour such as rocking or twisting of the hair and low self esteem.

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Sexual abuse: this involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. These activities may involve physical contact, including penetrative or non-penetrative acts. This may also include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.

Indicators of sexual abuse: sexual transmitted diseases, recurrent urinary infections, genital and rectal itching and soreness, unexplained bleeding ad discharges, bruising in the genital region, sexually explicit behaviour, inappropriate level of sexual knowledge and unexplained pregnancy.

Additional types of abuse and unsafe activities which we recognise and which have become more prevalent in recent times are:

- Bullying and Harassment including Cyber Bullying
- Discriminatory Abuse
- Financial Abuse
- Domestic Violence
- Alcohol and Drugs

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Protecting learners from the risk of radicalisation is seen as part of the WEBS wider safeguarding duties and is similar in nature to protecting children from other harms. As a provider of training, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our learners.

Preventative Action Measures

WEBS Training will maintain policies and procedures geared towards abuse prevention that include, but are not limited to the following topics:

- employee and volunteer disciplinary procedure
- staff and volunteer induction and training
- staff member code of conduct
- whistleblowing policy
- data protection and confidentiality

In addition, WEBS Training Limited will:

1. Arrange to take all reasonable measures to ensure the risks of harm to children, young people and vulnerable adults are minimised including challenging all forms of bullying and harassment.
2. Take their Duty of Care seriously and put the interests and safety of children, young people and vulnerable adults first.
3. Arrange to take all appropriate actions to address concerns about the welfare of the child, or children, young people and vulnerable adults, working to agreed local policies and procedures in full partnership with other local services.
4. take all possible steps to prevent unsuitable persons working with young people and/or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2011)

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and the Safer Practice, Safer Learning document produced by NIACE. Refer to Webs Safer Recruitment Policy.

5. Ensure Employment practices are observed as we recognise this is an important part in safeguarding children, young people, and vulnerable adults.
6. Listen to children, young people, and vulnerable adults, encourage them to respect and care for others and take action to stop any inappropriate verbal or physical abuse taking place.
7. Endeavour to create an open and accountable environment, permitting staff, young people and vulnerable adults to voice their concerns about inappropriate behaviour and misconduct while providing strong sanctions to deter abuse, victimisation and cover up of serious malpractice.
8. Ensure our policies and procedures apply to all staff (paid or unpaid), children, young people and vulnerable adults, parents, carers, and employers regardless of gender, ethnicity, disability, sexuality or religion.

ONLINE SAFETY

Online Safety covers text, phone, social media, websites, chat and forums and any other means of digital communication.

The four areas of risk include:

- Exposure to illegal, inappropriate, or harmful **content**
- Harmful **contact** and online interaction with other users
- Personal online **conduct** or behaviour that increases the likelihood, or causes, harm
- Risks to **commerce** or financial wellbeing from online gambling, phishing, and scams

WEBS approach to these four areas is to:

- **Shield and Secure** to limit access to risk via our systems
- **Educate and Inform** to raise awareness of risks and how to avoid them
- **Monitor and Assess** to ensure that online safety measures are effective.

Shield and Secure

To shield and secure from exposure to the 4Cs WEBS maintains secure systems by:

- Ensuring all laptops, PCs, Tablets, Servers and Mobile technologies good quality anti-virus software and firewalls e-mail filtering that are kept up to date.
- Maintaining a web filtering solution at the network level that can provide keyword, category and website blocking with facilities to customise so that legitimate content can still be accessed and not impede teaching and training. This is centrally controlled and capable of reporting so that attempts to access harmful content, contact, conduct and commerce can be identified.
- Ensuring devices and software are compliant with Cyber Security Essentials and maintaining certification in this.

With respect to personal devices, WEBS recognises that we have little or no direct control over these devices, especially if internet access is facilitated to them by 4G/5G. To ban them from

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use on premises is impractical, does little to promote their responsible use in the first place and nothing to prevent their use elsewhere.

The key strategy therefore, is to educate and inform learners so that they know what constitutes good conduct and behaviours around mobile technologies and what to do if they have issues with the behaviours of others online, including fellow learners.

The use of such devices in lessons is governed by the learner code of conduct and modified by any ground rules imposed by the tutor.

Educate and Inform

Teaching staff must therefore be prepared to be innovative in their approach to online safety. Learning resources and or discussion must be recent, preferably fresh and draw upon up to date examples.

Resources for Online Safety must achieve one or more of the following aims:

- Help learners recognise harmful content, contact, conduct and commerce
- Help learners recognise the risks of such
- Help learners know what course of action to take if exposed such
- Help learners understand the risks posed by sharing information
- Give guidance on support available within WEBS if they become a victim as a result of the 4Cs

WEBS senior leaders also recognise the importance of ensuring that staff are also educated and kept current with online safety. To achieve this online safety training is part of annual mandatory CPD.

The Staff Handbook contains a code of conduct for all employees that includes acceptable use and behaviour on online platforms.

The Learner Handbook outlines a core code of conduct which includes acceptable use and behaviour on online platforms.

Monitor and Assess

Data from web filters, virus scans and other software will be analysed at regular intervals to identify any issues and trends.

Where filtering is limiting access to legitimate resources, staff can request for such websites to be added to a safe list.

Regular reports and an annual security assessment of online safety will be conducted and discussed in the team/board meetings. Actions arising from this will be added to the QIP.

The Process following a Disclosure

Recognition

This procedure must be followed whenever an **allegation** is made that a child or vulnerable adult has been abused or when there is a **suspicion** that a child or vulnerable adult has been abused or such information has been disclosed including suspected radicalisation.

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Respond

Do not make promises regarding confidentiality. Explain to the person **at the outset** that you will need to report the disclosure and share the information with the respective designated Safeguarding Officer. The Safeguarding Officer will, where possible, respect the wishes of the individual; however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

Report

A Designated Officer should be advised of any matter that could be regarded as a Safeguarding issue. A Designated Officer should be advised either in person or by phone as soon as possible, e-mails to communicate such information should be avoided.

Record

A record of the incident or concern should be made in writing. If the complainant is the child or vulnerable adult him/herself, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. (The use of leading questions can cause problems for the subsequent investigation and court proceedings). The record should focus on the facts. Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events. Use the learners own words where possible. Make an accurate record of the information given taking care to record the timing, setting and people present, the person's presentation as well as what was said. Do not discard this as it may be later needed as evidence. Remember to sign and date your record.

Staff should reassure the person:

- ✓ That you are glad that they have told them
- ✓ That he / she has not done anything wrong
- ✓ What you are going to do next
- ✓ That help will need to be sought to keep them safe

Refer

The Designated Person for Safeguarding/PREVENT must be informed immediately, The Designated Safeguarding Officer will decide if the matter needs to be reported to an external agency (Adult or Children Safeguarding Boards or the Local Authority). In circumstances where no designated safeguarding officer is available, and it is judged that an external referral is required the Board Lead should be advised of this and they should make the decision if a referral is required. The Designated safeguarding officers can also seek advice from external agencies in terms of whether a referral should be made.

External referrals will be undertaken over the telephone to the duty social worker (or such other person as required by the local Area Child Protection Committee (ACPC) procedures or the Adult equivalent). In the unlikely event that social services cannot be reached the designated person can contact the relevant police child protection team for the area.

A written record of the report will be retained by the Designated Safeguarding officer. The written record will note the date and time of the report and must include the name and position of the person to whom the matter is reported. The DSO should discuss with the appropriate services what action will be taken to inform the parents/guardian of the child or vulnerable adult and a note of that conversation should be made.

In any inter-agency meeting, the designated person will also retain a record of the meetings and any agreed actions and all correspondence will be securely maintained.

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Procedure for dealing with allegations against staff

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:-

- Behaved inappropriately in a way that has harmed or may have harmed a learner
- Possibly committed a criminal offence against or related to learner
- Behaved towards a learner in a way that indicates he/she is unsuitable to work with them

The Designated Safeguarding Officer should be informed of the matter immediately. (Where a Designated Officer is involved in the allegation, the most senior member of staff should be informed).

An investigation will take place which:

- Will determine if the police need to be involved immediately to protect the person further
- Will record all details received and secure them safely
- Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation
- Will determine whether suspension is appropriate whilst undertaking the investigation

All allegations will be acted upon, however due to the variance in the risk levels, all allegations will be treated individually and the appropriate actions assigned on a case by case basis.

Anonymous Allegations

Concerns raised anonymously tend to be far less effective, and depending on the level of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

- The seriousness of the matter
- Whether the concern is believable
- Whether an investigation can be carried out on the information provided

Staff Code of Conduct in relation to safeguarding

The code of conduct should guide all actions taken by staff and anyone else working on behalf of WEBS Training Ltd. If it is necessary to act contrary to it (for example visiting a learner in a home) you should only do so after discussion and approval with your line manager.

- Place the safety and well-being of learners first – before any organisational or personal goals and before any loyalty to colleagues and friends
- Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been, inappropriate
- Be committed to actively preventing the exploitation and abuse of young or vulnerable learners
- Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual learner with respect and dignity. Respect each learners boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem

The focus of your relationship with a learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Facebook or Twitter.

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Do not take illegal drugs whilst at work, do not drink alcohol prior to or during contact with learners and do not smoke with or in front of vulnerable learners.

Do not give learners alcohol, tobacco products or any form of drug or medication. You should not assist learners in anyway, in obtaining these items.

- Do not engage in or tolerate the bullying or harassment of any person
- Never engage in or tolerate inappropriate physical activity such as 'horse play'
- Ensure all lone working with young or vulnerable learners is undertaken with caution and awareness in mind

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

- ✓ Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners

Do not:

- make sexual or discriminatory comments of any kind
- engage in rough or sexually provocative games
- make sexual comments / innuendos
- lend or borrow money or property
- develop exclusive or secretive relationships
- Invit young or vulnerable learners into your home
- Provide inappropriate reading materials / internet use
- Use unacceptable forms of restraint

All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or vulnerable learners. If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or vulnerable learner who is upset and administering first-aid are examples of necessary and acceptable behaviour.

Employees should, however, endeavour to minimise any possible misunderstanding of their actions.

Useful Links

The links below provide the framework for the organisations responsibilities as part of a co-ordinated shared response to the health and wellbeing of children, young people or vulnerable adults. All staff will be made aware of these links via the policy.

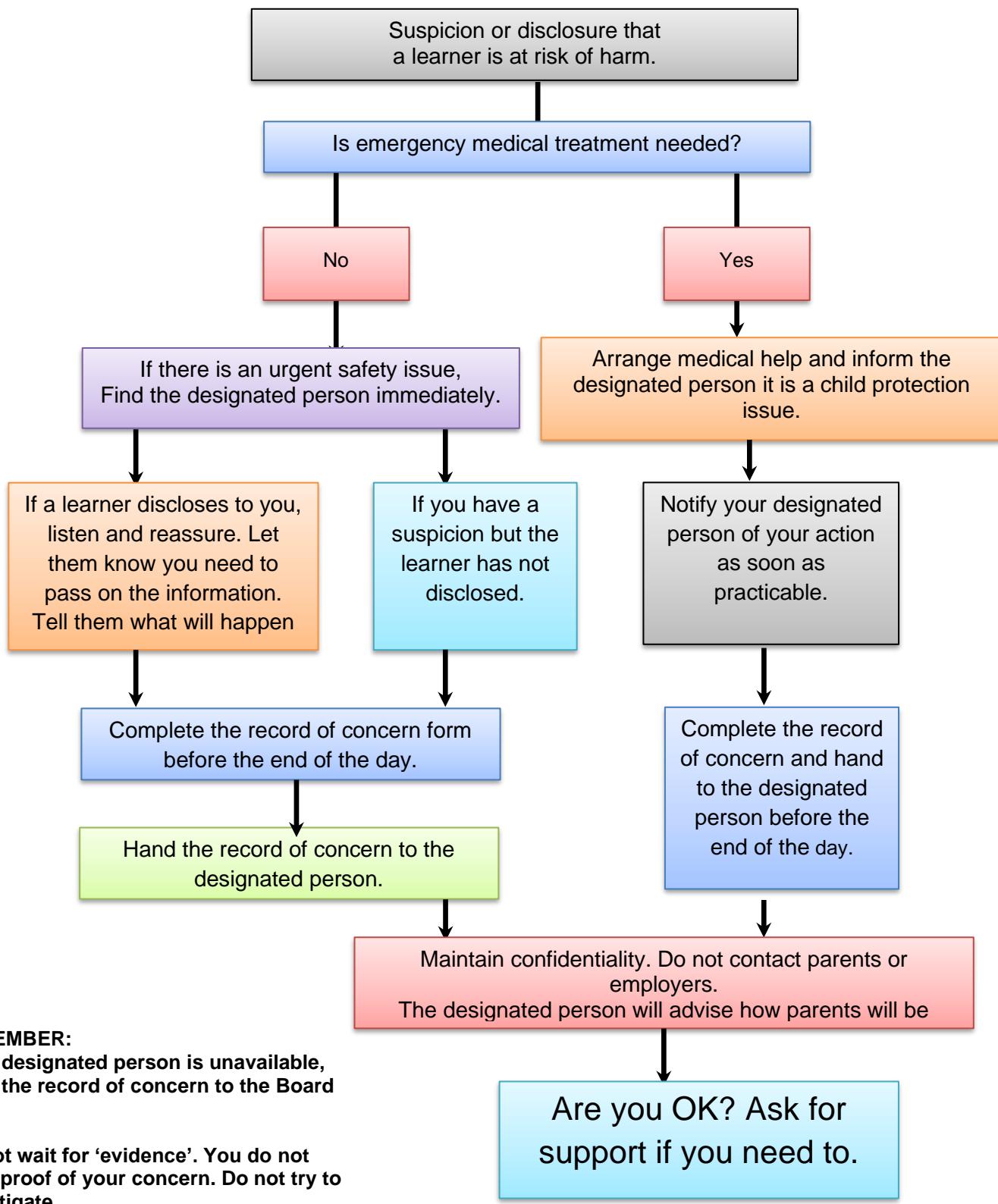
- [Keeping Children Safe in Education](#)
- [www.nspcc.org.uk](#);
- [child sexual exploitation \(CSE\)](#)
- [bullying including cyberbullying](#)
- [domestic-violence-and-abuse](#)
- [drugs](#)

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- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation](#)
- [Forced Marriage](#)
- [Gangs and Youth Violence](#)
- [Gender based violence](#)
- [mental health](#)
- [private fostering](#)
- [radicalisation](#)
- [Sexting](#)
- [Teenage Relationship Abuse](#)
- [Trafficking](#)
- [prevent-duty-guidance](#)

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Appendix 1 - Safeguarding 'Quick View' Procedure for Staff



REMEMBER:
If the designated person is unavailable, hand the record of concern to the Board Lead

Do not wait for 'evidence'. You do not need proof of your concern. Do not try to investigate.

Only record what has been said to you in the words of the learner

Appendix 2 - Best working practice for staff

- ✓ Be friendly, courteous and kind- a good role model
- ✓ treat all with dignity and respect regardless of age, sex, ethnicity, disability or sexuality
- ✓ Be available to listen and ready to refer to someone more experienced- in this case the safeguarding officer or the deputy designated personnel
- ✓ Respect personal privacy but recognise the difference between privacy and offering confidentiality
- ✓ Be sensitive to the needs and preferences of others
- ✓ Never make belittling or discouraging remarks
- ✓ Do not use inappropriate language and subject matter. Be careful not to do or say anything that could be misunderstood or be interpreted as innuendo
- ✓ Avoid any questionable behaviour /communication in face to face: telephone: email and social media activities
- ✓ Challenge unacceptable behaviour and report any allegations or suspicions of abuse
- ✓ Be firm and fair with children- avoid favouritism and singling out those who cause trouble
- ✓ Remember it is the bad behaviour that is blameworthy not the individual
- ✓ Never ignore or trivialise bullying. Refer to the safeguarding and anti-bullying policies and if further guidance is required contact the Designated Safeguarding Officer or speak with your line manager.
- ✓ Take every reasonable precaution to minimise risk while providing demanding, challenging and enjoyable activities
- ✓ Ensure that all, and especially those who are vulnerable are kept safe from harm whilst they are involved in and with the organisation
- ✓ Follow this policy and contact the Safeguarding officer or designated personnel if you are not sure about what to do

Safeguarding Policy

Appendix 3 – Record of Concern

For use by all staff:-

Learner's Name:	Date of Birth:
Date and Time of Incident:	Date and Time (of writing):
<p>Name of person reporting incident:</p> <p>Signature</p>	
<p>Job Title:</p> <p>Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?</p>	
<p>What is the learner's account/perspective?</p>	
<p>Professional opinion where relevant.</p>	
<p>Any other relevant information (distinguish between fact and opinion). Previous concerns etc.</p>	
<p>What needs to happen? Note actions, including names of anyone to whom your information was passed and when.</p>	

Please pass this form to your Designated Safeguarding Lead.