

SAFEGUARDING POLICY

POLICY STATEMENT

Rebus Training are committed to promoting the welfare of children and vulnerable adults who have contact with our organisation, as defined in the Children's Act 1989, The Protection of Vulnerable Adults Scheme 2004 and other guidance including:

- Keeping children safe in education' September 2020
- 'Working together to safeguard children' July 2018
- "Prevent Duty Guidance: for further education institutions in England and Wales" (July 2015)

We believe that it is the duty of all staff members to play an active role in ensuring this.

We will ensure that this commitment to safeguarding applies to all areas of our operation, including our role as an employer, a deliverer of work-based learning (including sub-contracted provision) and an influencer of our employer base and collaborative partnerships.

All staff members are expected to be aware of their duty to report concerns, the guidance for identifying child abuse, what to do if a child makes an allegation of child abuse and issues about confidentiality.

Rebus Training are committed to the government national framework for change outlined in Every Child Matters: Change for Children.

Staff are required to read and to be familiar with this policy and with "Keeping Children Safe in Education" Part 1 *updated September 2020*.

This policy is supported by:

- Equality & Diversity Policy
- Prevent Duty Policy
- Whistleblowing policy

Principles

The Management Team – will have overall responsibility for ensuring the organisation meets its obligations within this area. They will be responsible for the approval of the safeguarding policy.

Rebus Training believe that children and vulnerable adults given the right support, training and encouragement can realise their true potential and make a valuable contribution to their local community. All children / vulnerable adults, regardless of age, disability, gender, race, religious belief and sexual orientation or identity have the right to protection from all types of harm and abuse.

Rebus Training's Safeguarding policy and procedure is based on the following principles:

- An ethos that promotes a positive, supportive and secure environment where learners feel valued and equipping learners with the skills needed to keep them safe;
- Liaison with other agencies that support learners, such as social/children's services;
- All allegations and suspicions of abuse are taken seriously and responded to swiftly and appropriately.

There are five main elements to the policy:

- Ensuring that Rebus Training practices safe recruitment in checking the suitability of staff and volunteers to work with young people; and checking their continued suitability through routine monitoring.
- Raising awareness of safeguarding and child protection issues amongst staff;
- Implementing procedures for identifying and reporting cases or suspected cases, of child abuse;
- Supporting the young person/vulnerable adult who has been abused;
- Establishing a safe environment in which young people can learn and develop, where they are able to talk and be listened to.

Definitions

The following definitions apply throughout the Safeguarding policy and associated procedures:

Child or Children

The Children Act 1989/2004 defines a child as a person under eighteen for most purposes.

Vulnerable Adult or Adults

The Protection of Vulnerable Adults Scheme (PoVA 2004) defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- A substantial learning or physical disability;
- A physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs;
- A significant reduction in physical or mental capacity.

Safeguarding

The action that is taken to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is defined for the purpose of the Children Acts 1989 and 2004 respectively 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.
- Enabling children to have optimum life chances.
- Enabling children to enter adulthood successfully

Forms of Abuse

The Children Act 1989/2004 defines four types of abuse: physical, emotional, and sexual and neglect, however for completeness we have included bullying.

Physical Abuse:

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

Emotional Abuse:

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- Conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person;
- Imposing developmentally inappropriate expectations;
- Causing the child or vulnerable adult to feel frightened or in danger – e.g. witnessing domestic violence;
- Exploitation or corruption of children or vulnerable adults.

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

Sexual Abuse:

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative and non-penetrative acts.

It may also include non-contact activities, such as looking at, or being involved in the production of pornographic materials, watching sexual activities or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

Neglect:

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

Bullying:

Bullying involves deliberate hostility and aggression towards a person, physical pushing, kicking, hitting pinching, verbal name calling sarcasm, spreading rumours, teasing, ridicule, humiliation and ignoring individuals, racial taunts, graffiti and gestures, sexual and abusive comments and unwanted physical contact. Rebus Training should identify and deter any form of bullying behaviour. Bullying can escalate rapidly and can damage children or vulnerable adults significantly.

Child Sexual Exploitation

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them. This can involve a broad range of exploitive activity, from seemingly “consensual” relationships and informal exchanges of sex for attention, accommodation, gifts or cigarettes, through to very serious organised crime. Children and young people at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse.

Risk to self and /or others

This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and or stress.

Financial or Material Abuse

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse of misappropriation of property, possessions or benefits.

Discriminatory Abuse

Is an action that denies social participation or human rights to categories of people based on prejudice. Rebus Training Ltd does not tolerate discrimination on any grounds.

Forced Marriages

These are marriage relationships conducted without the valid consent of both parties, where duress is a factor. If there are concerns that a student is in danger of a forced marriage the Designated Safeguarding Lead or Nominate will follow government guidelines and contact will be made with the “Forced Marriage Unit”. Arranged marriage is an entirely separate issue and must not be confused with forced marriage.

Female Genital Mutilation (FGM)

FGM is a form of abuse which has devastating physical and psychological consequences for girls and women. Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM or herself. The FGM Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

Cyberbullying

Cyberbullying is the use of communication technology to torment, threaten, harass, humiliate, embarrass or otherwise harm an individual by sending or posting text messages or pictures intending to do so.

Duty to Report

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.'

Mental Health 'All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

All members of the staff at Rebus Training, including full time, part-time, self-employed, voluntary staff and sub-contractors and associate staff are responsible for safeguarding and promoting the welfare of children and vulnerable adults.

All Staff:

All staff that come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults. Staff will be trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.

Staff are expected to:

- Attend safeguarding training as required;
- Familiarise themselves with, and adhere to, the Safeguarding Policy and associated procedures;
- Safeguard and promote the welfare of children and vulnerable adults;
- Alert the Designated Safeguarding Lead if they have concerns about a child or vulnerable adult.

Designated Safeguarding Lead:

Designated Safeguarding Lead - Caroline Astbury

Deputy - Jonathon Grocock

Deputy - Rob Glover

Designated Safeguarding Lead and their deputies are responsible for providing support, advice and guidance on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend training as appropriate, liaise with the Managing Directors where necessary, and make referrals to external agencies. Other aspects of their role include:

- Obtaining information from staff, volunteers, children, parents or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information;
- Assessing information quickly and carefully and asking for further information where appropriate;
- Consulting with a statutory child protection agency e.g. the local social services department, to clarify doubts or worries;
- Making referrals to statutory child protection agencies or the police without delay;
- Record any raised concerns on the Safeguarding Log.

Designated Safeguarding Lead/s have contact telephone numbers for the local Area Safeguarding Children's Board and other statutory agencies.

The Managing directors:

The Managing Directors are responsible for ensuring that:

- Rebus Training's Safeguarding policy and procedures are fully implemented and followed by staff;
- Safeguarding Lead/s have sufficient time and resources to carry out their roles;
- All staff feel able to raise concerns about the safety of children and vulnerable adults;
- Concerns are dealt with sensitively, effectively and in a timely manner.

Information Sharing & Confidentiality

Rebus Training staff should never give absolute guarantees of confidentiality to children and vulnerable adults wishing to tell them about something serious. They should however guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to protect the child/vulnerable adult.

Record Keeping

Any member of staff receiving a disclosure of abuse from a child/vulnerable adult, or noticing signs or symptoms of possible abuse, should make notes as soon as possible, writing down exactly what was said, using the child/vulnerable adults' own words. All notes should be timed, dated and signed on the Learner Concern Record (SG2 002) which should be passed to the Designated Safeguarding Lead, or their deputy. All concerns will be recorded on the Safeguarding Log (SG3 001). All records will be securely stored.

Managing a Disclosure

All staff working in direct contact with learners must be alert to the signs of abuse. Anyone who suspects that abuse is taking place inside or outside of the setting, or to whom a learner discloses issues relating to safeguarding, should contact the Designated Safeguarding Lead immediately.

Staff who are approached with concerns about a child or vulnerable adult, must bring the concerns raised to the attention of the Designated Safeguarding Lead immediately.

The Designated Safeguarding Lead will develop effective links with relevant agencies and co-operate as required with any enquiries regarding child or vulnerable adult protection matters, including attendance at case conferences.

Allegations against staff

Allegations of abuse, or concerns raised against members of Rebus Training staff, will always be treated seriously. The allegation must always be referred to the Designated Safeguarding Lead who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations.

The Designated Safeguarding Lead will take the appropriate steps to ensure the safety of the child or vulnerable adult, and any others who may be at risk. The Designated Safeguarding Lead will also inform the managing Director in order that Rebus Training procedures may be followed, and a Disciplinary Investigation is carried out.

If the allegation or concern is against the Designated Safeguarding Lead, it should be reported to the managing director.

Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adults protection investigation, carried out by Social Services.

Whistleblowing

Rebus Training recognise that children and vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

If a member of staff believes that a Safeguarding concern has not been actioned appropriately, they are expected to report it themselves to an external agency such as the Local Authority or police.

Reporting

Rebus Training has a statutory duty to make reports and provide relevant information to the Independent Safeguarding Authority (ISA) where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the ISA lies with the Managing Director

The Independent Safeguarding Authority make barring decisions for Section 142 of the Education Act (formally known as List 99), The Protection of Children Act List (PoCA) and the Protection of Vulnerable Adults List (PoVA).

Prevention

Rebus Training recognise that as a provider of learning we play a significant part in the prevention of harm to our learners by providing them with good lines of communication with trusted adults and an ethos of protection, both in learning and at work.

Rebus Training will:

- Establish and maintain an environment where children/vulnerable adults feel secure, are encouraged to talk and are always listened to;
- Ensure learners know who to speak to in learning and at work if they are worried or experiencing difficulties;
- Include in the learning programme development opportunities that equip children/vulnerable adults with the skills they need to recognise and stay safe from abuse;
- Clearly communicate this policy and associated procedures to learners and employers at induction and throughout the learning programme.

Safer Recruitment and Selection of Staff

Rebus Training undertake to ensure that staff are fit to work in our learning environments with children and vulnerable adults. We also reserve the right to refuse to employ staff who we believe may pose a risk to our learners.

Rebus Training has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made on appointment in line with the organisations Safer Recruitment Policy SRP 001:

- Documentary evidence checks to confirm nationality, residency and "right to work" status;
- References requested from current and previous employer
- CV showing full history since leaving school (any gaps in employment need to be justified to the satisfaction of the appropriate manager)
- Enhanced DBS Disclosure;*
- Documentary evidence of qualifications;
- Satisfactory completion of the probationary period as defined in their letter of appointment.

*The Further Education (Providers of Education) England Regulations 2006 place a duty on colleges and work based learning providers to undertake an Enhanced Disclosure and Barring Service Disclosure for all new staff providing education, training or care to children, young people or vulnerable adults. An Enhanced Disclosure is carried out for staff who regularly care for, supervise, train or are in sole charge of children or vulnerable adults (Regulated activity).

Staff Training & Development

All staff must undertake training on the subject of safeguarding and Rebus Training's procedures. This Safeguarding Policy, procedure and accompanying guidance will be issued to all new staff as part of their induction and supported by training and assessment to ensure the appropriate skills and knowledge have been achieved.

Supporting Staff

Rebus Training are aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with our Designated Safeguarding Lead. Those staff requiring additional support have access to a free, confidential counselling service.

Resignations

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, Rebus Training is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

E-safety

Rebus Training's IT policy recognises that internet safety is the whole organisation's responsibility (staff, learners, employers).

Children and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some children and vulnerable adults may find themselves in activities which are inappropriate or possibly illegal.

We therefore recognise our responsibility to educate our learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

Apprentices are actively encouraged to use Rebus laptops for research and assignment work. All session activity is monitored by Tutors that are vigilant to the online risks. Laptops are assigned to learners to facilitate this monitoring process.

Equality and Diversity

All children and vulnerable adults have the right to be safeguarded from harm and exploitation whatever their race, religion, gender, sexuality, age, or disability. This policy relates to Rebus Training's legal obligation to protect children who are suffering forms of abuse as defined in the Children Act 1989/2004 and is therefore in line with the organisation's equality and diversity policy.

Relevant Policies

Rebus Training acknowledge that their legal responsibility for safeguarding the welfare of children and vulnerable adults goes beyond basic child protection procedures. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies and documents, for instance:

- Recruitment and Selection
- Health & Safety
- Equality and Diversity
- IT Policy
- Lone Worker Policy
- Staff Handbook

Monitoring and Review

Rebus Training will undertake an annual review of the Safeguarding policy and procedures to reflect new legislation and amendments to current legislation.