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Safeguarding Policy

Table of Contents

Section	Title	Page No.
1	Introduction	Pg. 1-2
2	Policy Statement	Pg. 2
3	Definitions	Pg. 3-5
4	Responsibilities	Pg. 6-7
5	Reporting	Pg. 7-9
6	Safer Recruitment of Staff	Pg. 10
7	Staff Development & Training	Pg. 10
8	Working with other Agencies	Pg. 11
9	Allegations of Abuse against members of staff	Pg. 11
10	Reporting the cases to the DBS service (DBS)	Pg. 11
11	Resignations	Pg. 11
12	Whistleblowing	Pg. 12
13	Support for Staff	Pg. 12
14	Radicalisation & Extremism	Pg. 12-13
15	Online Safety	Pg. 13
16	References & Resources	Pg. 13
Addendum	Online Teaching Through Zoom	Pg. 13-14

Safeguarding Policy

1: Introduction

This policy has been developed to ensure that all staff at WELL Associates are working together to safeguard and promote the welfare of children, young people and vulnerable adults.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our candidates and staff.

It identifies actions that should be taken to redress any concerns about child safety and welfare including protecting candidates and staff from extremist views, vocal or active, which are opposed to fundamental British values.

All opinions or behaviours which are contrary to these fundamental values and the ethos of the organisation will be vigorously challenged.

The Department for Education (DfE) is responsible for child protection in England. It sets out policy, legislation and statutory guidance on how the child protection system should work.

From 29 June 2018, local safeguarding children's boards (LSCBs) have been replaced by safeguarding partners, who are responsible for child protection policy, procedure and guidance at a local level.

The local safeguarding arrangements are led by three statutory safeguarding partners:

- The Local Authority
- The Clinical Commissioning Group
- The Police

Working together with other relevant agencies, they must co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children, including making arrangements to identify and support children at risk of harm.

The government has given local authorities until 29 September 2019 to transition to the new partnership arrangements for safeguarding.

Principles upon which the Safeguarding Children's Policy is based:

This policy and procedures are based on the following principles:

- Children and young people should never experience abuse of any kind
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them

We recognise that:

- The welfare of the individual is paramount
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse

Safeguarding Policy

- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- It is everyone's responsibility to report any concerns about abuse to the Designated Safeguarding Officer (Jackie Wyke) and the responsibility of the Social Services Department and the Police to conduct a joint investigation where appropriate.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately
- All personal data will be processed in accordance with the requirements of General Data Protection Regulations

Those people in positions of responsibility within the organisation will work in accordance with the interests of Vulnerable Adults and young people and follow the policy outlined in this document.

2: Policy Statement

The purpose of this policy statement is

- To protect children and young people who receive WELL Associates services. This includes the children of adults who use our services
- To provide parents, staff and employers with the overarching principles that guide our approach to safeguarding.

This policy statement applies to anyone working on behalf of WELL Associates Ltd including Directors, Managers, paid staff, volunteers, sessional workers, agency staff and students.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England

The Chief Executive and Safeguarding Leads or in their absence, the authorised members of senior staff, have the ultimate responsibility for safeguarding and promoting the welfare of children and young people.

Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures.

It is an integral part of all activities, functions, culture and ethos at WELL Associates.

In accordance with guidance set out in 'Working together to Safeguard Children – March 2015', 'Keeping Children Safe in Education – September 2016', 'Working together to Safeguard Children' -July 2018 and 'The Prevent Duty', WELL Associates will work in partnership with other organisations where appropriate to identify any concerns about child welfare and take action to address them.

Safeguarding Policy

3: Definitions

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

Child or Children: The Children Act 2004 defines a child as a person under eighteen for most purposes.

Vulnerable Adult or Adults: The Office of the Public Guardian (OPG 2013) 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.

Types of abuse and neglect:

Abuse:

A form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

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
- Not giving the child or vulnerable adult opportunities to express their views
- Deliberately silencing them or 'making fun' of what they say or how they communicate
- Interactions that are beyond a child or vulnerable adults' developmental capability as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction
- Seeing or hearing the ill-treatment of another

Safeguarding Policy

- Serious bullying (including cyberbullying), causing children or vulnerable adults to feel frightened or in danger
- 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, not necessarily involving a high level of violence, whether or not they are aware of what is happening.

These activities may involve physical contact, including assault by penetration (for example rape or oral sex) and non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

This may also include non-contact activities, such as involving children or vulnerable adults in looking at, or being involved 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.

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. 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 from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child or vulnerable adults emotional needs.

There are also specific issues which we expect our staff to be aware of, these include:

- Child sexual exploitation
- Forced marriage
- Domestic violence
- Female genital mutilation
- Radicalisation
- Self-harm
- Bullying/cyberbullying
- Drugs
- Faith abuse

Safeguarding Policy

- Gangs and youth violence
- Exploitation as part of County Lines
- Violence against women and girls
- Sexting
- Honour Based Violence
- Trafficking
- Modern Day Slavery

Safeguarding is a term used to denote the duties and responsibilities that those providing a health, social or education service have to carry out / perform to protect individuals from harm.

Best practice is that safeguarding duties extend to whole organisation policies, values and ethos, and include all staff. It is better to be broad in scope as a provider in order to ensure a safer environment.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play.

In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Definitions:

Children in Need:

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm:

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

Safeguarding Policy

4: Responsibilities

All members of WELL Associates community, including staff, employers, learners, any associates 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 has a duty to safeguard and promote the welfare of children and vulnerable adults. Staff will be trained to understand their responsibilities and be aware of the signs of abuse and neglect and extremism and radicalisation so that they are able to identify cases of children/vulnerable adults who may be in need of help or protection.

Staff working at WELL Associates are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or vulnerable adult, staff members should always act in the interest of the child or vulnerable adult. 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 the Safeguarding policy and associated procedures safeguard and promote the welfare of children and vulnerable adults
- alert the Designated Safeguarding Officers if they have concerns about a child or vulnerable adult

Designated Safeguarding Officers:

The Designated Safeguarding Lead for the organisation have specific responsibility for championing the importance of safeguarding and promoting the welfare of children and young people registered in the organisation.

The Designated Person will:

- Act as the first point of contact with regards to all safeguarding matters.
- ◀ • Attend up-dated training every two years.
- Provide support and training for staff and volunteers
- Ensure that the organisations actions are in line with the Wolverhampton Safeguarding Inter-Agency Procedures.
- Support staff to make effective referrals to the Children and Families Services and any other agencies where there are concerns about the welfare of a child.
- Keep copies of all referrals to Children and Families Services and any other agencies related to safeguarding children.

Safeguarding Policy

- Ensure that Safeguarding is a key part of all staff inductions, both in relation to policy but also procedures.
- Ensure that any staff with specific responsibility for safeguarding children receive the appropriate training to undertake this role.
- Manage and keep secure the organisations safeguarding records.
- Ensure that all staff and volunteers understand and are aware of the organisations reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Liaise with the Chief Executive about any safeguarding issues.
- Ensure that the Safeguarding Policy is regularly reviewed and updated.
- Keep up to date with changes in local policy and procedures and be aware of any guidance issued by the DfE concerning Safeguarding.

5: Reporting

All staff working in direct contact with learners in WELL Associates environment must be alert to the signs of abuse.

Anyone who suspects that abuse is taking place inside or outside WELL Associates, or to whom a learner discloses issues relating to safeguarding, should report their concerns to a Designated Safeguarding Lead who will follow the referral processes outlined by Wolverhampton Safeguarding (1)

Staff who are not Designated Safeguarding Officers, but who are approached with concerns about a child or vulnerable adult, must bring the concerns raised to the attention of the Designated Safeguarding Officers immediately.

All staff to whom a learner discloses issues that may be related to safeguarding must keep written records of concerns.

Such records must be kept securely, separate from the main learner files and in locked locations. The Multi Agency Form will be completed and submitted following local guidelines (2) and records will be retained in your personnel file.

The Lead Designated Safeguarding Officer has developed effective links with relevant agencies and co-operates as required with any enquires regarding child or vulnerable adult protection matters, including attendance at case conferences.

In the absence of the Designated Safeguarding Lead being at WELL Associates when you need to make a referral, advise your immediate line manager, and they will make the referral on your behalf, ensuring the DSO is informed on their return.

¹ [Contact Us - Wolverhampton Safeguarding Together](#)

² <https://marf.wolverhampton.gov.uk/>

Safeguarding Policy

Reporting Process – Wolverhampton:

If you are concerned about a child or young person (including yourself)....

If a child is in immediate danger of serious harm or has been left alone **dial 999** and let the operator know that it is a possible child protection issue.

If the child is not in immediate danger of serious harm but you know or suspect they are being abused or neglected call us:

- Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm on **01902 555392**
- Outside of the above hours for emergencies on **01902 552999**
- If the child or young person is at immediate risk of serious harm dial **999**

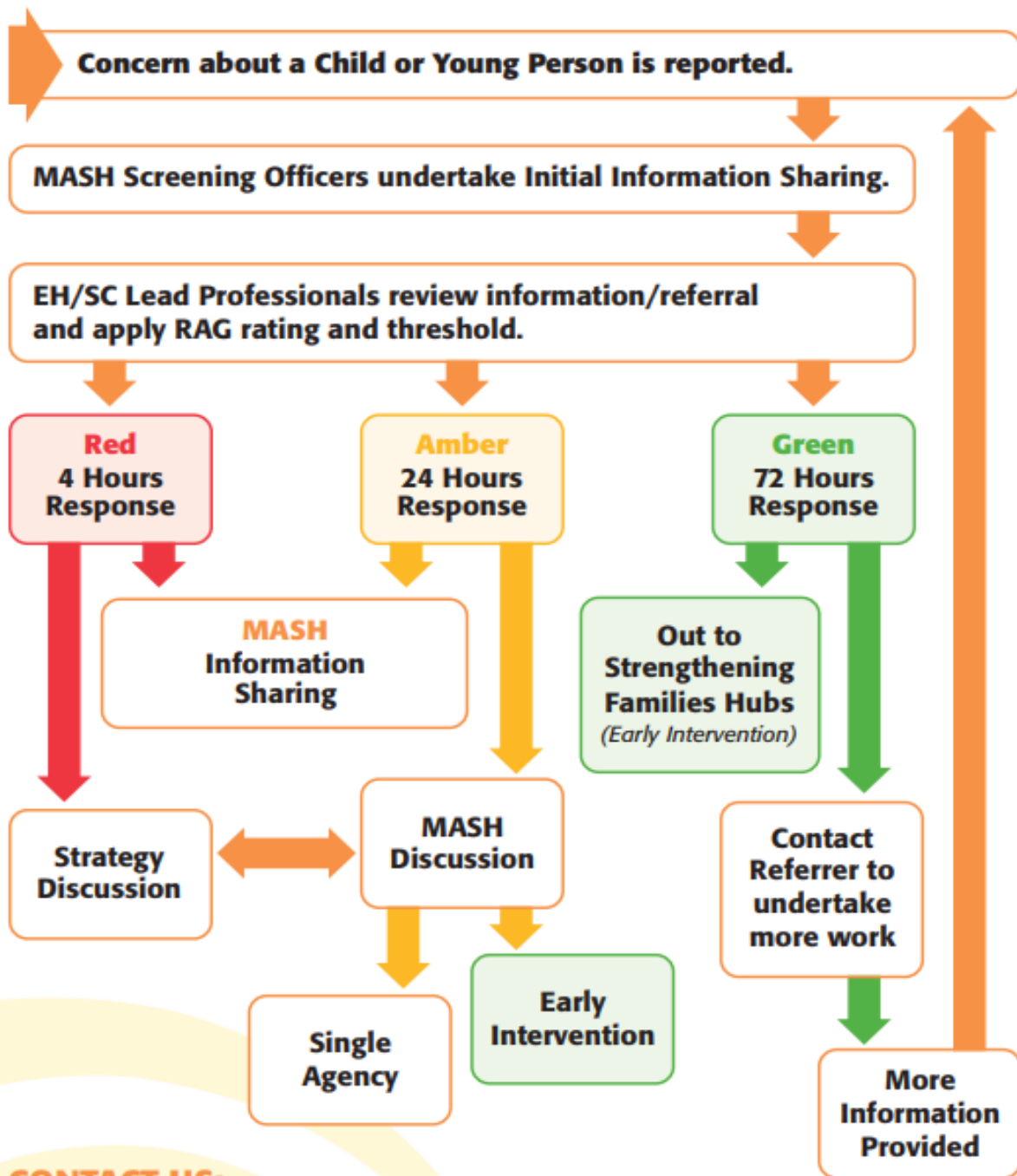
If you suspect or believe a child is suffering or is likely to suffer Significant Harm, including any form of mistreatment or abuse, you should report your concerns.

Members of the public can report their concerns by phone (see above).

Organisations should report their concerns by phone or by completing the [Wolverhampton Safeguarding Children Board online Multi-Agency Referral Form \(MARF\)](#). If you work for an organisation, and initially report a concern by phone, you must always complete the online MARF within 1 hour of any phone call preferably after having spoken with your organisation's Named Safeguarding Children Lead.

Safeguarding Policy

The MASH process is as follows:



CONTACT US:

If you would like to find out more visit the website at www.wolverhampton.gov.uk/MASH

If you are concerned about a child's welfare, please contact the MASH using the phone number below.

Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri)

01902 555392

Safeguarding Policy

6: Safer Recruitment of Staff

WELL Associates undertakes appropriate screening to ensure that their staff are fit to work in a training provider setting with young people and vulnerable adults. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

WELL Associates 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 prior to appointment:

- a minimum of two references, satisfactory to WELL Associates one of which should be from a previous employer
- documentary evidence checks of identify, nationality, residency and "right to work" status
- enhanced DBS (Disclosure & Barring Service) check with barred list information*
- documentary evidence of qualifications
- satisfactory completion of the probationary period
- safer recruitment training is undertaken by all staff involved in the recruitment process at all levels

In accordance with the Regulations, records of all checks carried out are kept in a single, central record.

*If a DBS check is delayed for any reason the staff member will not be subject to lone working with learners aged under 18. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check.

7: Staff Development and Training

WELL Associates' Safeguarding policy, procedure and accompanying guidance will be issued to all new staff as part of their comprehensive induction.

All staff will be supported to recognise warning signs and symptoms in relation to specific safeguarding issues and will receive training or briefings on for example: County Lines, Guns and Gangs, Forced Marriage, Female Genital Mutilation, Domestic Abuse, Child Sexual Exploitation, Trafficking and Preventing Violent Extremism through mandatory Safeguarding Level 1 training and update briefings with a refresher every 3 years.

As part of WELL Continuous Professional Development programme staff will also have annual training inputs from professionals from West Midlands Police and the local Safeguarding teams around key updates.

Safeguarding Policy

8: Working with Other Agencies

WELL Associates has developed effective links with other relevant agencies, for example, the Local Authority, Children's Social Care, Channel, West Midlands Police, and the MASH and co-operates as required with any enquiries regarding child protection issues.

<https://marf.wolverhampton.gov.uk/>

9: Allegations of Abuse Against Members of Staff

Allegations of abuse, or concerns raised against members of staff, will always be treated seriously. The allegations need to be applied with common sense and judgement. All cases must be referred to the Designated Safeguarding Officer who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations.

The Designated Safeguarding Officer 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 Officer will also inform the CEO and Directors in order that training provider procedures may be followed, and an investigation be carried out. If the allegation or concern is against the Designated Safeguarding Officer, it should be reported to the CEO. Where there is a complaint against a member of staff, the CEO will be informed and involved.

This may result in possible criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services.

10: Reporting cases to the DBS Service (DBS)

WELL Associates has a statutory duty to make reports and provide relevant information to the DBS 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 DBS lies with the Designated Safeguarding Officer.

11: Resignations

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, WELL Associates 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.

Safeguarding Policy

12: Whistleblowing

WELL Associates has an established Whistleblowing procedure for enabling staff to share, in confidence with a Designated Lead, concerns they may have about instances of suspected malpractice in WELL Associates.

Malpractice can include fraud and financial irregularities, criminal offences being committed, that have been committed or that are likely to be committed, endangering the health or safety of individuals, and can also include concerns around the protection of children or vulnerable adults.

The procedure is intended to provide safeguards to enable members of WELL Associates staff to raise concerns without fear of repercussions.

WELL Associates recognises that it may be difficult to express concerns about colleagues and is fully supportive of Whistleblowing for the sake of a child or vulnerable adult and will provide support and protect those who "blow the whistle". This procedure is, accordingly, intended to provide safeguards to enable members of staff to raise concerns about malpractice in connection with WELL Associates.

13: Support for Staff

WELL Associates recognises 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 one of the Designated Safeguarding Officers or with a trained counsellor.

Staff wishing to be referred for counselling should discuss this with their line manager.

14: Radicalisation and Extremism

WELL Associates values the fundamental British Values, rights of freedom of speech, expression of beliefs and ideology and tolerance of others which are the core values of our democratic society.

However, all rights come with responsibilities and free speech or beliefs designed to manipulate the vulnerable or which advocate harm or hatred towards others will not be tolerated.

WELL Associates is clear that exploitation and radicalisation will be viewed as a safeguarding concern and will be referred to the appropriate safeguarding agencies.

Training:

Our Designated Safeguarding Officers will take a lead role in upskilling them self and other staff members in this important area. We are continually updating our networks in West Midlands and organises regular inputs to staff on Prevent as part of our Prevent policy.

Our staff are trained to ensure the employers and partners we work with are not linked to any extremist activity or organisations by completing an initial online monitoring activity (recommended by Prevent), visiting the premises and also in discussions with various employees. If

Safeguarding Policy

they suspect any activity of which they are not happy, they will report this immediately to our Designated Safeguarding Officers and Prevent Leads.

15: Online Safety

WELL Associates has an Online Safety Policy which recognises that Online Safety is a safeguarding issue.

The internet is an essential element in 21st century life for education, business and social interaction and WELL Associates has a duty to provide children and young people with quality access as part of their learning experience.

It is the duty of the organisation to ensure that every young person in its care is safe and this applies equally to the 'virtual' or digital world. It enables learners the tools and resources to understand and identify the importance of online safety.

WELL Associates will ensure that appropriate filtering methods are in place to ensure that learners are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material. This will be in line with the 'Prevent Duty'.

16: References and Resources

This policy is based on guidance available from the NSPCC
<https://learning.nspcc.org.uk/media/1601/safeguarding-policy-statement-example.pdf>

Keeping Children Safe in Education
[Statutory guidance overview: Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/446442/Keeping-children-safe-in-education-2019.pdf)

Wolverhampton Safeguarding MASH referral:
<https://marf.wolverhampton.gov.uk/>

Wolverhampton Safeguarding update:
<http://www.wolverhamptonsafeguarding.org.uk/images/safeguarding-children/D-Mooney--LSCB-24-11-16.pdf>

MASH Guide for Professionals:
<http://www.wolverhamptonsafeguarding.org.uk/images/safeguarding-children/WhatisMASH-A5booklet.pdf>

Addendum – Online Teaching through Zoom and Ms Teams

To ensure a continuation of provision during the period of Covid 19, WELL Associates have moved all face to face teaching sessions online. To ensure that all learners and trainers remain safe, this addendum to the Safeguarding Policy will be followed, and will continue to apply to all online teaching forthwith.

Safeguarding Policy

- The online classroom should be viewed as an extension of the physical classroom and as such, all safeguarding measures set out in this policy including for reporting should continue to be followed. In addition, professional attire, language and communication should be maintained.
- Trainers should ensure that they are teaching in a room where they cannot be overheard. However, if this is not possible, the camera should be angled to show a plain backdrop and headphones should be worn.
- When setting up a Zoom and Teams meeting for online teaching, all meetings must have a password. These details must be sent to delegates via email only in advance of the meeting. All meetings must also have the waiting room function enabled to ensure no learners can enter the online classroom before the trainer.
- WELL staff have received training on Zoom and MS Teams can operate the functions including safeguarding measures.
- Before admitting any learner into the online classroom, they must be marked on the register and their screen name must match up with a name on the register. If not, this must be changed before they can be admitted.
- All learners must be joining the meeting with a camera-enabled device and this camera should be switched on throughout the session
- Following the agreed start time, the trainer must ensure that the classroom is locked within 5 minutes.
- All online learning will be recorded for safeguarding reasons and stored in a secure cloud for 28 days in accordance with GDPR regulations. If these recordings need to be used as evidence for safeguarding reasons, the learners will be asked for their consent unless, through asking, it is deemed to pose a risk to a child or vulnerable adult.