

Safeguarding Policy

1. Introduction:

1.1 COMMUN-IT fully recognises the contribution it can make to protect children and vulnerable adults within COMMUN-IT. The aim of the policy is to safeguard and promote our learners' welfare, safety and health by fostering an honest, open, caring and supportive climate. The learners' welfare is of paramount importance and all concerns about abuse are taken seriously. COMMUN-IT is committed to its duty in safeguarding and promoting the welfare of children and vulnerable adults.

1.2 This policy is consistent with:

- the legal duty to safeguard and promote the welfare of children, as described in section 175 of the Education Act 2002 [or section 157 of the Education Act 2002 for independent schools and academies], the working together to safeguard children 2015 and the Statutory guidance *"Keeping children safe in education – Statutory guidance for schools and colleges"* September 2018)
- local Safeguarding Children Board (LSCB) Procedures, which contain procedures and guidance for safeguarding children

1.3 There are four main elements to our Safeguarding Policy:

- Prevention (e.g. positive environment, teaching and pastoral support to learners, safer recruitment procedures)
- Protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns)
- Support (to learners and staff and to learners who may have been abused)
- Working with parents and other agencies (to ensure appropriate communications and actions are undertaken)

1.4 This policy applies to all staff and visitors to COMMUN-IT. We recognise that child protection is the responsibility of all staff. We will ensure that all parents and other working partners are aware of our safeguarding policy by mentioning it in our prospectus, on our website, displaying appropriate information in our reception and by raising awareness at meetings with parents and others.

1.5 Sub- contracting and partners

Where COMMUN-IT provides services or activities directly under the supervision or management of COMMUN-IT staff, COMMUN-IT's arrangements for child protection will apply. Where services or activities are provided separately by another body, COMMUN-IT will seek assurance that the body concerned has appropriate policies and procedures in place to safeguard and protect learners and there are arrangements to liaise with COMMUN-IT on these matters where appropriate.

2. Safeguarding commitment

2.1 COMMUN-IT adopts an open and accepting attitude towards learners as part of its responsibility for pastoral care. Staff encourage learners and parents to feel free to talk about

any concerns and to see COMMUN-IT as a safe place when there are difficulties. Learner's worries and fears will be taken seriously and they are encouraged to seek help from members of staff.

2.2 COMMUN-IT will therefore:

- establish and maintain an ethos where learners feel secure and are encouraged to talk, and are listened to
- ensure that learners know that there are staff in COMMUN-IT whom they can approach if they are worried or are in difficulty
- include in the curriculum activities and opportunities for wider education which equip learners with the skills they need to stay safe from abuse (including online), and to know to whom they can turn for help
- ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies
- operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children and vulnerable adults including references, Criminal Record and prohibition from teaching checks
- COMMUN-IT is also committed, as good practice to applying these principles in respect of those over 18 years of age felt to be 'vulnerable'
- COMMUN-IT reserves the right to refuse admission to any person who may pose a threat to children and vulnerable adults or exclude any person who becomes a risk during their time at COMMUN-IT
- COMMUN-IT will take appropriate action against any member of staff in COMMUN-IT breaching safeguarding rules and the staff code of conduct. This may include formal discipline or even dismissal

Safeguarding in the curriculum: The following areas are among those addressed in the wider curriculum:

Bullying/Cyber bullying

Drugs, alcohol and substance abuse

E Safety / Internet safety

Domestic violence / Relationships

Diversity issues e.g. forced marriage, Female Genital Mutilation (FGM), Honour Based

Violence (HBV)

Sexual exploitation of children (CSE)

Extremism

3. Roles and Responsibilities

3.1 General

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with safeguarding responsibilities within COMMUN-IT.

The names of the Designated Safeguarding Leads for the current year are listed at the end of this document.

3.2 Governing Board

In accordance with the Statutory Guidance "Keeping children safe in education" April 2018, the Governing Board will ensure that:

- COMMUN-IT has a child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly
- COMMUN-IT operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers
- there are procedures for dealing with allegations of abuse against members of staff
- there is a senior member of COMMUN-IT's Senior Management Team who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and that there is always cover for this role
- the Designated Safeguarding Lead undertakes Local Authority training (in addition to basic child protection training) and this is refreshed every two years
- the Designated Safeguarding Lead, and all other staff and volunteers who work with children, undertake appropriate training which is regularly updated (at least every three years in compliance with the LSCB protocol); and that new staff and volunteers who work with children are made aware of the COMMUN-IT's arrangements for child protection and their responsibilities. The Local Authority leaflets, "Safer working in Education Settings" and "Education Child Protection" will be used as part of this induction
- any deficiencies or weaknesses brought to the attention of the Governing Body will be rectified without delay
- chair of the governing board of COMMUN-IT (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against any Senior Manager, in liaison with the Head of Apprenticeships
- effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff

COMMUN-IT contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2015 (updated February 2017) including providing a co-ordinated offer of early help for children who require this. Safeguarding arrangements take into account the procedures and practice of the local authority and the Local Safeguarding Children Board (LSCB).

3.3 Head of Apprenticeships (or designated lead)

The Head of Apprenticeships of COMMUN-IT will ensure that:

the policies and procedures adopted by COMMUN-IT are effectively implemented, and followed by all staff

sufficient resources and time are allocated to enable the Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children

allegations of abuse or concerns that a member of staff or adult working at COMMUN-IT may pose a risk of harm to a child or young person are notified to the Local Authority Allegations Manager

all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner

all staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care Services or the Police

3.4 Designated Safeguarding Lead

The responsibilities of the Designated Safeguarding Lead are found in Annex B of "Keeping children safe in education" and include:

- provision of information to the LSCB/Local Authority on safeguarding and child protection
- liaison with the Board and the Local Authority on any deficiencies brought to attention of the Board and how these should be rectified without delay
- referral of cases of suspected abuse to Specialist Services First Response Children's Duty (and/or Police where a crime may have been committed)
- act as a source of support, advice and expertise within COMMUN-IT
- ensure each member of staff has access to and understands COMMUN-IT's safeguarding policy especially new or part-time staff who may have worked with different educational establishments
- ensure all staff have induction training covering child protection and are able to recognise and report any concerns immediately they arise and to give the Commu-IT – Child Protection – Code of Conduct to all staff
- keep detailed, accurate and secure written records of concerns and referrals
- obtain access to resources and training for all staff and attend refresher training courses every two years
- where children leave COMMUN-IT, ensure their safeguarding file is handed to the Designated Safeguarding Lead and signed for in the new employer as soon as possible
- maintain and monitor child protection records, including monitoring and acting upon individual concerns, patterns of concerns or complaints, in accordance with section on "Records and Monitoring" below
- work with a team of other staff including the nominated deputy who are available on a rota to deal with concerns

4. Records, Monitoring and Transfer

4.1 Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within COMMUN-IT. The Operational Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

4.2 Records relating to actual or alleged abuse or neglect are stored apart from normal learner or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

4.3 Safeguarding records are stored securely, with access confined to specific staff, e.g. the Operational Safeguarding Lead.

4.4 Safeguarding records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.

4.5 When learners transfer institutions their safeguarding records are also transferred, where the destination is known. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to the Designated Safeguarding Lead in the receiving organisation, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead and a photocopy kept. Files requested by other agencies e.g. Police should be copied.

5. Support to learners and COMMUN-IT staff

5.1 Support to learners

Commun-IT recognises that children and young people who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children Commun-IT may be one of the few stable, secure and predictable components of their lives. Other children and young people may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

5.2 Commun-IT recognises that children and young people sometimes display abusive behaviour and that such incidents must be referred on for appropriate support and intervention.

5.3 Complaints or concerns raised by learners will be taken seriously and followed up in accordance with the Commun-IT's complaints process.

5.4 Support for Staff

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child/young person as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a safeguarding concern, he/she should in the first instance speak to the Operational Safeguarding Lead about the support he/she requires. The Operational Safeguarding Lead should seek to arrange the necessary support.

6. Working with parents/carers

Commun-IT will:

- ensure that parents/carers have an understanding of the responsibility placed on Commun-IT and staff for child protection by setting out its obligations in the Commun-IT apprenticeship prospectus
- undertake appropriate discussion with parents/carers prior to involvement of CYPS Specialist Services (Children's Social Care) or another agency, unless to do so would place the child at risk of harm or compromise an investigation

7. Other Relevant Policies

7.1 Commun-IT's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies and processes, for instance:

- Learner Harassment and Bullying (including Cyber bullying)
- Work experience and extended work placements
- Health and Safety
- Site Security
- Equal Opportunities
- e-safety
- Trips and visits

The above list is not exhaustive but when undertaking development or planning of any kind Commun-IT needs to consider the implications for safeguarding and promoting the welfare of children and young people.

8. Recruitment and Selection of Staff

8.1 Commun-IT's recruitment processes consider the Statutory Guidance: Keeping children safe in education July 2015. Commun-IT will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection / inappropriate conduct.

Cases in which an allegation has been proven to be unsubstantiated, false or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

8.2 Commun-IT has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction and are briefed on the code of conduct for adults working with children.

8.3 On every interview panel for COMMUN-IT staff at least one member will have undertaken safer recruitment training either online on the Government website or by attending the local authority one day training course.

APPENDIX 1

PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

- General Contents:
- A. Individual Staff/Volunteers/Other
 - B. Adults - main procedural steps
 - C. Designated/Operational Safeguarding Lead
 - main procedural steps

A. General

- 1) The Local Safeguarding Children Board Procedures contain the inter-agency processes, protocols and expectations for safeguarding children. (Available on LSCB website www.lrlscb.org) The Operational Safeguarding Lead is expected to be familiar with these, particularly referral processes.
- 2) It is important that all parties act swiftly and avoid delays.
- 3) Any person may seek advice and guidance from the First Response Children's Duty Team Managers, particularly if there is doubt about how to proceed (see contacts at the end of this policy document). Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
- 4) Written records, dated and signed, must be made to what has been alleged, noticed and reported, and kept securely and confidentially.
- 5) In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral that might put the child at risk and in individual cases advice from Children's Social Care will need to be taken.

B. Individual Staff/Other Adults – main procedural steps

- 1) When a learner who is under 18 or is classed as a vulnerable adult makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine the learner, or promise confidentiality. Those making disclosures should be reassured that their concerns are to be taken seriously and if possible at this stage should be informed what action will be taken next.
- 2) As soon as possible write a dated, timed and signed note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead in Commun-IT.
- 3) If the concern involves the conduct of a member of staff, a visitor, a director, a trainee or another young person or child, the Head of Apprenticeships must be informed.

4) If the allegation is about the Head of Apprenticeships, the information should normally be passed to the Chair of the Board of Directors or the Local Authority Allegations Manager (LADO).

5) If this has not already been done, inform the learner (or other party who has raised the concern) what action you have taken.

C. Designated/Operational Safeguarding Lead – main procedural steps

1) Begin a case file which will hold a record of communications and actions to be stored securely (see Section on Records and Monitoring).

2) Where initial enquiries do not justify a referral to the investigating agencies inform the initiating adult and monitor the situation. If in doubt, seek advice from First Response professional's advice line.

3) Share information confidentially with those who need to know.

4) Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care (Priority 1), the First Response Children's Duty should be contacted by phone. Written confirmation should be made within 24 hours on the LSCB Agency Referral Form to Children's Social Care). All other referrals should be made using the online form. The First Response Children's Duty Managers are available for advice on the advice line number given in the contact details at the end of this document.

5) If the concern is about children using sexually abusive behaviour, refer to the separate guidance.

6) If it appears that urgent medical attention is required arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.

7) Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving Commun-IT, take advice from First Response Children's Duty managers (for instance about difficulties if the work day has ended, or on whether to contact the police). Remain with the learner until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the learner, the member of staff has no right to withhold the learner, unless there are current legal restrictions in force (e.g. a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated and the Police should be contacted immediately.

APPENDIX 2

PROCESS FOR DEALING WITH ALLEGATIONS AGAINST STAFF (INCLUDING THE HEAD OF APPRENTICESHIPS) (n.b. References to staff in this process include all staff).

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

Relevant documents:

- “Keeping children safe in education: Statutory guidance for schools and colleges”
July 2015 (part 4)

1) Individual Staff/Other Adults who receive the allegation:

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report immediately to the Head of Apprenticeships.
- Pass on the written record.
- If the allegation concerns the conduct of the Head of Apprenticeships, report immediately to the Chair of the Board of Directors. Pass on the written record. (If there is difficulty reporting to the Chair of the Board of Directors, contact the Allegations Manager, Safeguarding and Improvement Unit as soon as possible.)

2) Head of Apprenticeships

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Before taking further action notify and seek advice from the Allegations Manager, Safeguarding and Improvement Unit on the same day.
- You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Report to First Response Children’s Duty if the Allegations Manager, so advises or if circumstances require a referral.
- Ongoing involvement in cases:
 - liaison with the Allegations Manager
 - co-operation with the investigating agency’s enquiries as appropriate
 - consideration of employment issues and possible disciplinary action where the investigating agencies take no further action

3) Chair of Board of Directors (only relevant in the case of an allegation against the Head of Apprenticeships)

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Notify the Allegations Manager, Safeguarding and Improvement Unit on the same day.
- You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Report to First Response Children’s Duty if the Allegations Manager so advises or if circumstances require a referral
 - liaison with the Allegations Manager
 - co-operation with the investigating agency’s enquiries as appropriate
 - consideration of employment issues and possible disciplinary action where the investigating agencies take no further action

APPENDIX 3

Named staff and contacts:

Designated Safeguarding Lead: Kerry Prigg

Safeguarding Lead : Kerry Prigg

Safeguarding and Improvement unit contacts for local County Council:

Safeguarding and Improvement Unit Service:

<https://www.hillingdon.gov.uk/reportabuse>

If immediate action is needed dial 999.

First Response Children's Duty (Priority 1 referrals)

Reviewed by: Kerry Prigg

Review Date: 1st March 2022

Next Review: March 2023

