

Safeguarding of children, young people and adults at risk Policy & Procedure

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| 1.0 | 05/08/2023 | S Gilmore | New draft; approved by Governors 14th | | | |
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| 1.1 | 22/08/2024 | P Crocker | Reviewed for completeness; DSL name change | | | |
| 1.2 | 10/07/2025 | P Crocker | Reference to most up to date documents Adults at risk – replacing reference to adults at risk Added a procedure with dealing with managing and responding to allegations against staff | | | |
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Updates may take place due to internal or external influences or changes deemed necessary.

^{*}This Policy must be reviewed at least annually.

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The purpose of the Safeguarding Policy and Procedures is to ensure all staff and stakeholders understand their responsibilities and contribution to protecting learners and understanding what to do where there are concerns that a learner is at risk of or is experiencing harm or abuse. Safeguarding and promoting the welfare of all our learners is everyone's' responsibility. Everyone who comes into contact with the young people and adults at risk has a role to play in safeguarding.

'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.' (Keeping Children Safe in Education – Sept 2024)

This policy is in line the requirements of the following key documents:

- ➤ Keeping Children Safe in Education (2024).
- > Prevent Duty Guidance (Dec 2024)
- ➤ Working Together to Safeguard Children (2024).

This legislation provides definitions of children, young people, and adults at risk, and sets out the legislative framework of measures to protect them from harm.

The term 'safeguarding' embraces both child and adults at risk protection and preventative approaches to keep our learners, staff, and employers safe. Safeguarding encompasses learners' health, safety, welfare, and well-being.

1.0 Aim of this policy

- 1.1 To set out Hybrid Training Centre's commitment to keeping children, young people, and adults at risk safe from harm and how, Hybrid Training Centre will meet this commitment.
- 1.2 To give clear direction to staff, employers, visitors, contractors, adult learners, apprentices and parents/guardians about expectations and our legal responsibility to safeguard and promote the welfare.
- 1.3 To clarify the procedures for reporting suspected wrongdoing or bad practice in respect of the protection of children, young people, and adults at risk at Hybrid Training Centre.
- 1.4 To support the development of safe environments for children, young people, and adults at risk to learn, develop and thrive in their environment.
- 1.5 To safeguard children, young people and adults at risk from extremism and radicalisation and to support the Government's Prevent Strategy.

2.0 Commitment of Hybrid Training Centre

- 2.1 Hybrid Training Centre is committed to safeguarding and promoting the welfare of children, young people and adults at risk and expects all staff and employers to share this commitment.
- 2.2 Hybrid Training Centre strives towards providing a preventative curriculum and ethos which ensures children, young people and adults at risk develop a healthy awareness about keeping themselves safe. This includes online safety also.
- 2.3 To provide a safe environment for young people and adults at risk to learn.
- 2.4 To identify young people and adults at risk who may benefit from early help and ensure the appropriate staff and/or external agencies are involved in an early help assessment.
- 2.5 To take appropriate action to see that young people and adults at risk are kept safe both at home, in their workplace and in the community.
- 2.6 To provide all staff and volunteers, employers, and governors with up to date and regular training and are familiar with safeguarding policy and procedures.
- 2.7 To establish clear procedures for reporting and dealing with allegations of abuse, harassment, or harm.
- 2.8 To provide appropriate support to young people and adults at risk who have been abused offering them services of a counsellor/mentor and referring to appropriate agencies.
- 2.9 To ensure the safer recruitment of staff in compliance with the disclosure and barring service (DBS) regulations including DBS enhanced checks and additional list 99 checks to ensure all staff are not prohibited from teaching as well as obtaining and checking of references and identity.

3.0 Definition and Scope

Young Person

This Policy recognises and builds on the legal and statutory definitions of a young person, the distinction between ages of consent, civil and criminal liability are recognised but in the pursuit of good practice for Hybrid Training Centre (HTC), a young person is recognised as being under the age of 18 years. (Children's Act 2004).

Adult at Risk

This refers to all those adults (aged over 18) who have care and support needs, are experiencing or are at risk of abuse or neglect and as a result of those care and support needs are unable or less able to protect themselves from experiencing abuse or neglect or the risk of it (Care Act 2014).

Adults at risk may include people with learning disabilities, mental health problems, older people, and disabled people particularly when their situation is complicated by additional factors such as physical frailty, chronic illness, sensory impairment, challenging behaviour, lack of mental capacity, social and emotional problems, poverty, homelessness, or substance misuse.

"A person who is 18 years of age or over, and who may be in need of adult social care and/or community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or serious exploitation."

- 3.1 This policy applies to all staff, whether teaching, administrative, management, volunteers or employers engaged with Hybrid Training Centre.
- 3.2 Risk Is the future possibility that someone may be harmed due to a range of unwanted or neglectful behaviours.
- 3.3 Harm Emotional, physical, and sexual abuse and neglect describe categories of harm. See Working Together to safeguard children (2018) and Keeping Children Safe in Education (2024) Harm is described as the ill treatment or the impairment of health or development. Harm also includes impairment suffered by hearing or seeing the ill-treatment of another.
- 3.4 Abuse A form of maltreatment. Failure to prevent harm. Abuse can take place wholly online or technology may be used to facilitate offline abuse. There are several forms of abuse, emotional, physical, and sexual.
- 3.5 Neglect Persistent failure to meet basic physical and /or psychological needs likely to result in the serious impairment of health or development. Unresponsive to basic emotional needs.
- 3.6 Mental Health & Well- being -Mental health problems can in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect, or exploitation.
- 3.7 Sexual harassment this includes sexual comments or jokes, displaying sexually graphic pictures or photographs, suggestive looks, staring or leering and propositions and sexual advances and promises in return for sexual favours.
- 3.8 Sexual violence and sexual harassment Child on child abuse Reference Keeping Children Safe in Education) where sexual harassment becomes an act of violence against another.
- 3.9 Female genital mutilation (FGM) this is illegal in England and Wales under the FGM Act 2003. This is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.
- 3.10 IT and Internet Safety All access to internet is filtered and monitored safely with Hybrid Training Centre making effective use of training and appropriate software such as Firewalls to protect against sensitive and critical data and preventing cyber security incident though use of antivirus programmes.
- 3.11 Cyber bullying the use of electronic devises and software used to communicate bullying.

4.0 Roles and Responsibilities

4.1 Designated Safeguarding Lead (DSL) and deputy in the event of the absence of the DSL

- 4.1.1 The role of the DSL is key in ensuring that operational safeguarding in the service-specific contexts is effective. The DSL will also ensure that local delivery staff develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the young people and adults at risk that Hybrid Training Centre staff works with.
- 4.1.2 The DSL ensures that safeguarding matters are central to the strategic management of Hybrid Training Centre and is an experienced and qualified practitioner. DSL is up to date with changes in legislation and LADO (Local Authority Designated Officer) processes and completes inter-agency training and any update training on a regular basis.
- 4.1.3 DSL has responsibility for the safeguarding phone and safeguarding email address to receive information from young people, adults at risk, employers, and staff when requiring assistance.
- 4.1.4 The DSL and deputy must complete level 3 safeguarding, alongside regular updates from the Local Safeguarding Children Boards (LSCBs) as an absolute minimum.
- 4.1.5 The DSL has responsibility for the oversight and management of this policy alongside reviewing and monitoring safeguarding procedures.
- 4.1.6 DSL to provide all staff with a thorough induction and provide them with the following policies and procedures:
 - > The safeguarding and child protection policy.
 - > Staff handbook, including disciplinary procedures and staff code of conduct.
 - Keeping children safe in education (2024) Part One.
 - > Safeguarding response to children who go missing from education (2016).
 - ➤ The role of the designated safeguarding lead (including the identity of the designated safeguarding lead and deputies and early help team)
- 4.1.7 To provide staff with updates throughout the year on any local issues arising e.g., County lines, knife crime, gang culture etc.
- 4.1.8 The DSL is responsible for the production of a report on safeguarding issues and duties discharged, for SMT monthly and a summary report for Board of Directors bi-annually.
- 4.1.9 The DSL together with Senior Management Team will review the Safeguarding policy and procedures annually.

4.2 Board of Governors

- 4.2.1 The Board of Governors and DSL hold ultimate responsibility for ensuring the safeguarding arrangements for learners, apprentices, staff, and associates.
- 4.2.2 Participate in annual training on Safeguarding and prevent.
- 4.2.3 Review and sign off on the Safeguarding Policy and Procedures annually.

4.3 Senior Management Team

- 4.3.1 The SMT are responsible for the culture and promotion of a safe and inclusive environment and the timely monitoring of any concerns raised ensuring that appropriate actions have been implemented to minimise risks.
- 4.3.2 SMT are responsible for the safe recruitment of staff and employees, ensuring all managers involved in recruitment have been trained in Safer Recruitment.
- 4.3.3 SMT are responsible for monitoring of any safeguarding concerns reported to them by the DSL monthly.

4.4 All Staff

- 4.4.1 All staff, regardless of role, have a responsibility in identifying concerns, sharing information, and taking prompt action.
- 4.4.2 Hybrid Training Centre staff must complete bi-annual appropriate safeguarding, online safety, and Prevent/ACT training courses at foundation level one to ensure they are equipped with the skills and knowledge to safeguard effectively.

4.5 **Employers**

- 4.5.1 Employers of apprentices are informed of Hybrid Training Centre safeguarding policy and procedures during sign up process.
- 4.5.2 Employers are made aware of Hybrid Training Centre policy and procedure and any update through website, regular updates via email and newsletters and commentary on apprenticeship progress reviews.

5.0 Safer Recruitment

5.1 SMT have a Safer Recruitment policy which is in line with the Keeping Children Safe in Education (2024). (*Please refer to separate policy – Recruitment and Selection*)

Key requirements

- Hybrid Training Centre informs applicants of their safeguarding policy and procedures.
- Hybrid Training Centre carries out due diligence on perspective employees prior to an offer of employment
- Hybrid Training Centre may carry out online searches as part of the pre-recruitment checks.
- Hybrid Training Centre implement a Single Central Record for recruited staff to evidence all risk assessment and checks have been completed.

- All potential staff have enhanced DBS checks, barred list checks, further checks for those
 who have lived or worked outside the UK and relevant references covering previous
 employment (last two employers as relevant), and investigation into any gaps in
 employment or disciplinaries in previous employment.
- 5.2 All senior managers and directors' complete safer recruitment training and update every 3 years. (Section 128 Safer Recruitment document).
- 5.3 All staff and volunteers should feel able to raise concerns about poor or unsafe practices and potential failures in Hybrid Training Centre's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

6.0 Reporting and response procedures

- 6.1 Information on reporting and response procedures is made clear during induction to all staff and young people and adults at risk.
- 6.2 Information is made clear around the Hybrid Training Centre premises on who to contact if a concern is raised.
- 6.3 Documentation on procedures and reporting a concern is made available to all staff both online and paper based for ease of convenience.
- 6.4 Young people and adults at risk, together with staff and employers are updated on changes to any procedures or reporting documents and their locations.
- 6.5. All staff should feel able to raise concerns about poor or unsafe practice and potential failures in Hybrid Training Centre's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. (See Whistleblowing Policy)

7.0 Training

- 7.1 All staff receive training on Safeguarding and Keeping Children Safe in Education during induction.
- 7.2 All staff must participate in update training at least annually, regarding Safeguarding, Keeping Children Safe and procedures to record any concerns.
- 7.3 It is the responsibility of the individual staff to complete the annual update training and the DSL to support and provide access to update materials.

Related policies and Procedures

There are other specific HTS policies that have our approach to safeguarding embedded within them, these include:

- Prevent Policy and Procedures.
- Whistle Blowing Policy and Procedures.
- Complaints Policy.
- Disciplinary and Code of Conduct.
- > Safer Recruitment Policy and Procedures.
- > Absence and lateness procedures.
- Staff Handbook.

- Employer Handbook.
- > Learner Handbook

Key National guidance and legislation

Legislation and a range of statutory guidelines relating to the safeguarding of children and adults at risk are in place and applicable to Hybrid Training Centre. They include the following: -

- Children Act 1989;
- Children Act 2004:
- Children Act 2014;
- The Protection of Children Act 1999;
- Education Act (2002);
- Education Act 2011;
- Keeping Children Safe in Education (2023);
- No Secrets (2015);
- What to do if You are Worried a Child is being Abused (March 2015);
- Working Together to Safeguard Children (2020);
- Sexual Violence and Sexual Harassment (2021);
- Education and Training (Welfare of Children) Act 2021;
- Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013;
- Safeguarding Vulnerable Groups Act 2006 (Controlled Activity and Prescribed Criteria)
 Regulations and Amendments 2012;
- Care Act 2014;
- The Sexual Offences Act 2003;
- Children and Social Work Act 2017;
- GDPR 2018 and the Data Protection Act 2018:
- Modern Slavery Act 2015;
- Safeguarding Children and Young People from Knife Crime 2019;
- UK Council for Internet Safety (UKCIS) 2020;

- The Counter Terrorism and Security Act 2015;
- The Protection of Freedoms Act 2012;
- The Human Rights Act 1998;
- The Equality Act 2010;
- Safeguarding Children and Safer Recruitment in Education (2007);
- Keeping Children Safe in Education (September 2024)

PROCEDURE

What to do in the event of a disclosure or cause for concern.

Responsibility to report concerns

It is the responsibility of staff / employers to act if there is cause for concern in order that the appropriate action can be taken to protect the person at risk. If it is a serious or significant cause for concern, then you will need to contact the local authorities.

Responding to concerns

Telling somebody about abuse can be frightening and difficult for anyone. In doing so the person disclosing has put Hybrid Training Centre staff in a position of trust, however, they must not keep this disclosure confidential. Staff need to be clear to the learner that they cannot keep a secret that they will write down what they say and that they have done the right thing in telling them.

Staff must inform the learner that they will need to record it. Hybrid Training Centre staff must not ask any questions that may be regarded as leading or closed.

Any person making a disclosure must trust Hybrid Training Centre staff to help them. Staff should:

- > Speak to the learner in a safe and secure place to inform them of the concerns. (Remember to consider your own safety)
- ➤ Obtain the apprentice and parents views, if necessary, on what has happened and what they want to be done about it.
- > Provide information about the safeguarding process and how it could help to make them safer.
- Ensure that they understand the parameters of confidentiality.
- > Explain how they will be kept informed, particularly if they have communication needs.
- ➤ Consider how the abusive experience might impact on the ongoing delivery of services, particularly personal care arrangements and access arrangements.
- > Assess their immediate protection needs.
- > React calmly and in an encouraging manner.
- Advise them that they are right to tell.

- > Emphasise that they are not to blame.
- > Take what is being said seriously and communicate this to them.
- > Keep questions to the minimum necessary for ensuring a clear and accurate picture of what is being said to you. Remember you are not to investigate.
- ➤ Be clear that there are certain people that you will have to tell to make sure that necessary action is taken. Stress it is part of your job to keep children, young people, and adults safe.
- Make a full record of what is communicated as soon as possible using our internal paperwork. This should include exact words used, body charts of injury, behaviour, and other forms of communication.
- > Do not delay in passing the information on to the DSL.

Recording of concerns

Employees working closely with children, young people or adults at risk should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice.

If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact the DSL and director.

Any concern must be documented and emailed securely to the DSL at safeguarding@hybridtec.co.uk. This could be dealt with through an initial 'level of needs exercise' to identify the cause of action, unless in immediate harm, where the relevant authorities will be contacted after the completion of a level of needs exercise. In this situation ensure that the learner is accompanied and kept safe until the relevant authorities arrive.

If staff have any concerns about a learner, then they are encouraged to contact the DSL for advice, even if they are not sure. If in doubt, check.

It is crucial that all concerns are properly recorded. The following information should be recorded on a 'Cause for Concern, Safeguarding form' form available in the safeguarding folder on SharePoint.

- Name of learner.
- > Age and date of birth.
- > Ethnic origin.
- Religion, if any.
- Disability, if any.
- > Name of staff documenting concern.
- Date and time of the alleged incident.
- Location of alleged incident.
- ➤ Nature of concern; please provide full details, i.e. When the behaviour or injury was first noticed, how the incident occurred etc., The explanation in his/her own words as verbatim as possible. Any questions that were asked.
- Date and time of the recording.
- Signature of the person recording the concern.

> Any actions taken.

Some of this information may not be available to staff. It is important that the person/s who discloses, does this freely and volunteers whatever information they have.

When recording, staff must separate fact from opinion by setting out the facts first

Having an opinion is entirely valid and may be crucial but it must not be confused with information.

All written records must be retained securely and confidentially and marked as sensitive and confidential.

Escalating concerns

The DSL and director, in consultation with the staff member, will decide as to whether a referral is necessary and needs to be escalated based on the local authority level of needs.

All reported disclosures regardless of outcome must be reported internally through the completion of the 'Cause for Concern Safeguarding Form', in conjunction with the written referral to the appropriate local authority safeguarding team.

Failure to comply with this procedure will result in disciplinary action and possible dismissal under gross misconduct.

Allegations of Abuse Against Hybrid Training Centre of Staff

Allegations of abuse, or concerns raised against HTC's members of 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 adult at risk and any others who may be at risk.

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, the Sefton Borough Council or Liverpool Local Authority Designated Officer (LADO) will be informed and involved. This may result in possibly criminal (police) investigations and/or a young person or adult at risk protection investigation, carried out by Social Services. In this instance, the Local Safeguarding Children Board, LADO Procedure should be followed. All steps of this procedure will be advised and supported by the LADO, working in partnership with HTC.

The LADO will advise on how to proceed and whether the matter can be dealt with within HTC's own disciplinary arrangements or whether a multi-agency strategy meeting is required. Any external investigation must not be compromised by HTC's internal disciplinary procedure.

Where the LADO decides that the issue can be dealt with internally, the reasoning and advice will be recorded and sent to the Designated Safeguarding Lead, the Safeguarding Children Board or the Safeguarding Adults Board and the Police Child Protection Unit. In this instance it will be necessary to inform the LADO of the outcome of the internal HTC investigation.

Where the LADO decides the case needs to proceed to an 'Incident Evaluation Meeting' (IEM) she/he will make a referral to the Children's Services Referral and Assessment Team and convene the meeting/s in accordance with their guidance.

Complaints made directly to the police will be reported to the LADO as soon as possible and again she/he will decide whether to hold a strategy meeting. The police may interview the complainant if they feel this is appropriate.

<u>It is a requirement of contract to report all safeguarding concerns- please always ensure contract compliance</u>

| Name and contact details of Designated Safeguarding and Prevent Lead | Patsy Crocker: Landline: 0151-524 2951 Mobile: 07887 492832 Safeguarding@hybridtec.co.uk |
|--|---|
| Name and contact details of Deputy Designated Safeguarding and Prevent Lead | James McCawley Landline: 0151 -524 2951 |
| Local and Regional Authority contact information: | Help in a crisis - Liverpool City Council |
| For under 18 s (and those up to the age of 24 with an EHCP- education and health care plan) | Telephone number: Care-line Children's Services– 0151-233-3700 (Available 24/7) |
| For over 18 s without an EHCP (Education and Health Care Plan), identified as vulnerable – Social Care | Telephone number: Care-line Adult Service Services-0151-233-3800 (Available 24/7) Telephone number: Out of hours emergencies: 0151-934-3555 |
| Local Authority Designated officer-LADO In emergencies | Prevent-Channel Referral 0151 777 4878 |
| Merseyside Police Prevent Team Regional Prevent Coordinator | Claire Little claire.little@education.gov.uk /07385114867 |

| Science | 10 th July 2025 | |
|-------------------|----------------------------|--|
| | | |
| Sophie Gilmore | Date | |
| Managing Director | | |