

POLICY FOR SAFEGUARDING CHILDREN, YOUNG PERSONS AND VULNERABLE ADULTS

Introduction

This policy has been drawn up with close reference to **The Children Act 1989 (as amended), The Safeguarding Vulnerable Groups Act 2006, Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2019, The Prevent Strategy**, and the requirements of **Local Safeguarding Children and Adults Boards**. The policy and its appendices detail Reflection Training Academy's safeguarding arrangements to ensure the safety and wellbeing of its learners and has been updated and amended to reflect the COVID-19 pandemic.

Jason Timms, Divisional Head of Health & Safety
Reflections Training Academies 29/06/20

The following Directors by signing this document show their commitment to successfully achieve Reflections Training Academy's Safeguarding Goals.

Sarah Burrell
Company Managing Director

Phil Davis
Director of Bristol Training Academy

Lucy Agnew
Divisional Director Birmingham &
Bristol

Kate Sperring
Divisional Director of
Administration/Data

Policy Statement

Reflections Training Academy is fully committed to ensuring children, young persons and vulnerable adults are protected from harm and recognise its responsibilities for protecting the children, young persons and vulnerable adults with care and support needs who attend the Training Academies in line with its core values of:

- Care
- Professionalism
- Image
- Quality
- Passion

The Reflections policy for protecting CYPVA applies to all staff working within the Reflections Training Academies who come into contact with CYPVA. There are seven main elements to the Reflections policy:

- Ensuring we practice safe recruitment in checking the suitability of staff to work with CYPVA.
- Ensuring Staff conduct and training on safeguarding matters.
- Ensure that correct policies and procedures are in place for the placement and monitoring of learners within work placements.
- Establishing a safe environment in which CYPVA can learn and develop meeting the requirements of every child matters and have avenues to disclose any safeguarding concern
- Developing and then implementing procedures for identifying, and reporting suspected cases of abuse, concern or need.
- Delivery information, sources of support for all stakeholders
- A suite of support for CYPVA welfare and wellbeing

Definitions

Child - In England, Northern Ireland and Wales, a child is someone who has not yet reached their 18th birthday. Once they turn 18, they are legally an adult. Child protection guidance highlights that under-18s who are: aged 16 or over; living independently; in further education; a member of the armed forces; in hospital; or in custody in the secure estate are still legally children and should be given the same protections and entitlements as any other child. HM Government (2015)

Adults with care and support needs - The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Within this document we will refer to 'children, young persons and Vulnerable adults' as 'CYPVA'

Responsibilities for Safeguarding

Senior Manager Head of Health & Safety is the **Designated Safeguarding Lead (DSL)** with lead responsibilities for safeguarding arrangements, to keep Academy Safeguarding policies and procedures update and to keep Academy Personal up to date of changes to policies & procedures and safeguarding legislation via inductions, staff briefings and training sessions and within the Birmingham* Academy building with responsibilities for the examining of, and reporting of allegations of abuse to the relevant authority. The DSL will also act as the Birmingham Designated person for looked after children and care leavers.

Safeguarding & Prevent Officer is the **DSL** with responsibilities for safeguarding arrangements, to keep Academy Safeguarding policies and procedures update and to keep Academy Personal up to date of changes to policies & procedures and safeguarding legislation via inductions, staff briefings and training sessions and within the Bristol* Academy building with responsibilities for the examining of, and reporting of allegations of abuse to the relevant authority. The DSL will also act as the Bristol Designated person for looked after children and care leavers.

Tutor/ Assessors are responsible for reporting any disclosures or suspicions of abuse to the Designated Person for Safeguarding in line with academy processes.

All Members of staff are responsible for conducting themselves in a manner to not give rise to an allegation of abuse, this includes but is not limited to socialising with learners, holding personal contact details of learners (e.g. mobile phone numbers) for own personal use, unnecessary physical contact, inappropriate language or conversation in line with staff safeguarding code of conduct.

Directors are responsible for oversight of the DSL's and will review safeguarding performance, processes and systems monthly

*the DSL's will deputise for each other when one not onsite

Safe Recruitment & Selection

Reflections training pays full regard to 'Keeping Children Safe in Education Sept 19 and all recruitment will include reference to Reflections commitment to safeguarding and promoting the wellbeing of learners. All staff employed by Reflections Training Academies who have direct access to CYPVA (hereby known as learners) go through a rigorous recruitment procedure as detailed in The Staff Safe Recruitment Procedure (Appendix 2), which includes a suitable level Disclosure and Barring Service (DBS) check and two references. Evidence of these checks are recorded on our Single Central Record.

Any volunteers/contractors/ agency staff who will have access to learners or learner information will be subject to a risk assessment process to determine the need to provide evidence of, or requirement to carry out DBS check before carrying out any activity/contract with the training academy. Any visiting tutor will be subject to a Visiting tutor / external speaker process and will be required to sign and commit to the visiting tutor / external speaker agreement

Staff Training on Safeguarding Matters

All staff are inducted within their first week of employment to the Reflections Training Academy Safeguarding Policy/Processes by a DSL.

All staff will be made aware of systems within the organisation which support safeguarding and these should be explained to them as part of the staff induction. This will include:

- The Safeguarding Policy;
- The behaviour policy;
- The staff code of conduct;
- Definitions and signs of abuse
- The safeguarding responses required to raise, respond to and report concerns via MyConcern
- The role of the DSL (including the identity of all DSL's and any deputies).
- Copies of policies and a copy of Part one of the KSCIE-19 document will be provided to all staff during induction.

All staff within the induction period will also complete the applicable to job role ETF Safeguarding & Prevent modules and assessments

All staff inclusive of Senior Leaders undergo as a minimum annual refresher training session on safeguarding matters and policy updates in line with Academy CPD and QA processes.

Matters arising, ad hoc policy and process changes are delivered to all through team meetings, training sessions, emails.

Persons with key responsibilities for Safeguarding including the DSL attend courses/workshops on the area of safeguarding relevant to their role and any statutory requirements inclusive of updated DSL training every two years.

All safeguarding training is recorded on the safeguarding training matrix.

Safe Working Environment

Reflections Training Academy ensures the elements of Every Child Matters are met so that all learners can work and learn in a safe and healthy environment. The Academy has a Health and Safety Policy, which all learners and employees receive on induction. Reflections Training Academy has got a Health & Safety Manual, which contains all Academy health and safety policies and procedures, and risk assessments that have been carried out within the Academy buildings this includes assessments for learners, COVID-19, fire precautions, and COSHH, which all learners are made aware of at induction and are displayed throughout the Training Academy buildings. All work placements undergo a health & safety vetting process.

COVID-19

Safeguarding at Work Placements

All employer partners are inducted to Safeguarding of CYPVA during initial and annual H&S checks. Placement employers are inducted to and sign to commit to a safeguarding statement for employer and work placements and are issued a guidance document alongside the 'If in Doubt, Shout' contacts.

Where a learner attends a work experience placement as part of their programme (such as Study Programmes & Traineeships) then the work placement will be subject to an additional Health & Safety vetting visit that includes Safeguarding elements. Safeguarding issues and procedures will be discussed with placement owners/supervisors and information handed out. A contract for training is then discussed and signed by the work placement and a Reflections representative. The contract contains clauses for safeguarding including the procedure for reporting any safeguarding issue that should arise.

All learners undergo a 3 way (assessor, employer and learner) 10-week workplace review process which includes safeguarding / welfare.

Learner Training On Safeguarding Matters

Learners are inducted to Reflections Training Academy "What's Up", "If in Doubt, Shout' and Safeguarding support systems during the first day induction. On the day 3 induction each learner undergoes a 1-2-1 pen portrait with the DSL, where safeguarding is discussed and opportunities to disclose historic or current safeguarding concerns arises and is documented. Alongside the qualification scheme of work is an additional workshop schedule that tutors need to work to including workshops for safeguarding, prevent and learner welfare. Promotions over safeguarding, equality and well bring are carried out with four times a year and embedded within the calendar year planner with different themes and ongoing promotions inclusive of areas such as Forced Marriage, Honour Based violence, FGM, Knife crime and other applicable and local threats. These promotions and training is targeted at raising learner awareness, resilience to being drawn into abusing situations and as a preventative measure. Learner understanding and concerns are monitored via the 10 weekly pre-review process and followed up by the DSL for that relevant academy.

Identifying Concerns and Responding to learners

Where tutors or other staff member sees signs which cause them concern or receives a disclosure they should seek information from the learner with tact and sympathy. If a learner confides or discloses in a member of staff and requests that the information is kept confidential, Learners over 16 have the right under the Mental Capacity Act 2005 to make choices and decisions for themselves however there is still the statutory duty to report safeguarding concerns. It is important that the member of staff tells the learner sensitively that he or she has a responsibility to refer cases of alleged abuse or safeguarding concern to the DSL. Within that context, the learner should, however, be assured that the matter will be disclosed only to people who need to know about it. Staff members should record the suspected case of abuse on via MyConcern in line with the correct reporting process.

It is not, however, the responsibility of the tutor or other staff within Reflections to investigate suspected abuse. They should not take action beyond escalating the suspicion via MyConcern.

All learners undergo a 1-2-1 pen portrait during the induction process where they are questioned over safeguarding and welfare need as an early identification system. A Pyramid of Need tool is used to identify if a safeguarding concern need to be raised at this stage.

If there is a suspicion of abuse the DSL will decide, depending on the evidence whether to refer the suspicion to the appropriate agency.

Supporting Learners

Reflections staff will offer appropriate support to individual learners who are identified as being at risk or a concern has been raised.

A safeguarding action plan will be devised, implemented and reviewed regularly for these young people through MyConcern. This plan will detail areas of support, who will be involved, and the young person's wishes and feelings. Task can be allocated within MyConcern and allocated to relevant personal (usually but not limited to a member of the safeguarding team or their group tutor) This will be detailed with the Chronology of the concern within MyConcern.

External support agencies will be engaged as appropriate (Able Futures, Off The Record etc) and if learner agrees. All Learners have access to Big White Wall (BWW) and are inducted to the resource on joining. All Risk register learners are required to sign up to BWW.

All active safeguarding cases and identified learners on Risk Register will be contacted by the appropriate location DSL according to their allocated risk level. Contact to consist of telephone conversation, face to face contact.

High - to be contacted and monitored by DSL weekly as minimum

Medium - To be contacted fortnightly

Low - Monthly

Reflections will work in partnership with parents / carers and other agencies as appropriate

Whistleblowing

All staff should be aware as well as their duty to raise and report safeguarding concerns, there is also the duty to report where concerns are present about the attitude, conduct or actions of colleagues who abuse their position of trust in line with the Staff Safeguarding Code of Conduct (Appendix 13).

Any such concerns should be raised in the strictest confidence to the Senior Designated Safeguarding Lead in person, by phone 07500668567 or email jason@reflectionstraining.co.uk. Whistleblowing concerns about Safeguarding Leads should be raised the relevant academy director and concerns about Directors should be raised with the DSL who will liaise with the Company Managing Director.

This procedure is designed to encourage openness and aims to allow staff and learners to report any safeguarding wrongdoing or raise issues that concern them that effect the welfare and safety of young people without fear of possible consequences or victimisation. There is a statutory duty of an employee to raise such concerns and no detriment will be suffered provided that the employee is acting in good faith. For circumstances where these normal reporting lines cannot be followed then concerns can be reported to the NSPCC whistleblowing advice line on 0800 028 0285 or help@nspcc.org.uk

Safeguarding Allegations against staff

If a safeguarding allegation is made against a Reflections Training Academy staff member, then that staff member **will be suspended from work immediately** until investigated or in cases of referral the appropriate agency has fully completed its investigation.

When examining an allegation care must be taken to ask only enough questions to get the basic facts and not to form any sort of investigation that may prejudice the investigating authority, taking care to avoid leading questions. If there is the slightest piece of evidence that the allegation could be true, then the above 'Allegations of Abuse' procedure **MUST** be followed

The internal examination may lead to a number of conclusions:

- There are grounds that the allegation may be true. This **must** be reported to the local safeguarding team and/or social services department within one working day.
- A staff member has acted inappropriately but it is not a safeguarding issue. The action was in breach of company rules and disciplinary action and/or training may be needed.
- A staff member has acted inappropriately but it is not a safeguarding issue. The action taken lay within the bounds of company rules and therefore there is a need to review policies and procedures.
- There is no basis to the allegation or suspicion. No further action is to be taken under these procedures. The company may, however feel that the allegation requires internal action under other company procedures.

Safeguarding Concerns /Allegations

All Safeguarding allegations **must** be referred via MyConcern

If the allegation is made against someone from a work placement, then the learner's attendance (and that of any other Reflections learners who may be attending the same workplace) to the placement will be suspended immediately until the appropriate agency has fully completed its investigation.

For other Safeguarding allegations, the DSL will review the seriousness of the allegation before deciding to refer to the relevant authority if the allegation has got any safeguarding relevance then the relevant authority will be notified. If a decision is made NOT to refer to the relevant authority the DSL will record this along with the action (if any) on MyConcern that will be taken instead i.e. matter to be addressed within the normal company complaints procedure, suspension of work placement etc. For openness and removal of doubt guidance will be sought from the applicable local authority LADO

Extremism and Radicalisation

Staff at Reflections Training Academy will be alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where learners may be at direct risk of harm or neglect. For example; this could be due to a learner displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a learner's family that may equally place a young person at risk of harm. (These examples are for illustration and are not definitive or exhaustive).

Therefore, all staff are required to report instances where they believe a young person may be at risk of radicalisation or of harm or neglect due to extremist behaviour via MyConcern

Peer On Peer Abuse

Reflections Training recognise that Learners are capable of abusing their peers. Peer-on-peer abuse includes bullying, cyberbullying, physical abuse, sexual violence, and sexual harassment, sexting, and so-called initiation ceremonies and banter. Academy policies, pastoral support, and the Academy Values complement each other to create an environment that helps to prevent negative behaviour. Reflections Training policies on expected behaviours and anti-bullying make it clear that abuse is abuse which should never be tolerated or passed off as "banter" or "part of growing up". All incidences are to be reported via MyConcern. Any reported incidents will be investigated in line with safeguarding and conduct policies.

SEND

There's a concern sometimes that, for CYPVA with SEN and disabilities, that their SEN or disability needs are seen first, and the potential for abuse second. If a learner is behaving in particular ways or they're looking distressed or their behaviour or demeanour is different from in the past, staff should think about that being a sign of the potential safeguarding concern, and not simply see it as part of their SEN or disability.

Learners with SEND statistically have a higher risk of peer isolation, and they are disproportionately affected by bullying. Staff are encouraged to make sure that learners with SEN and disabilities have got a greater availability of mentoring and support. All SEND learners and all learners with EHCP's are automatically added to the risk register and a concern raised via MyConcern

Online Safety

We use content filtering on all inhouse learner accessible IT systems which are in place for the safety of all of our learners. This monitors, flags, and blocks access to websites that are blacklisted or considered to be dangerous, harmful or contain inappropriate content.

Lanschool monitoring software is in place on learner servers, alerting to keystrokes, keywords and inappropriate access. The monitoring and content filtering systems are monitored by the IT team who alert the safeguarding team to any alerts. These are then dealt with under normal safeguarding processes and logged via MyConcern.

There is a recognition that most learners are using data on their phones, this means that not only must staff think about filtering and monitoring within the Academy IT infrastructure, they also need to be vigilant to Learners accessing the internet whilst they're at Academy locations.

Our Learner Acceptable Use of Technology Policy Agreement states the importance of being safe online, our fulfilment to the Prevent Duty, what our IT equipment is allowed to be used for and what is unacceptable. Any unacceptable use of IT will be handled in line with the conduct and behaviour policies.

The use of technologies impacting safeguarding are monitored and risky or inappropriate behaviours with technology are raised as safeguarding concerns.

For all remote and online delivery all staff & Learners are required to follow the Remote & Online appendix

MULTI-AGENCY WORK

We work in partnership with other agencies to promote the best interests of our young people as a top priority in all decisions and actions that affect them. Reflections will, where necessary, liaise with these agencies and make requests for support from the applicable Local Authority first response teams (listed at the end of this policy). These requests will be made by the DSL. Where the young person already has a safeguarding Social Worker or Family Support Worker, the request for support should go immediately to the team involved, or in their absence to their team manager.

When invited the DSL will participate in any MASH strategy meeting, usually by conference phone, adding any held data and intelligence to the discussion so that the best interests of the young person are met.

We will co-operate with any Child Protection enquiries conducted by local authorities and will ensure representation at appropriate inter-agency meetings such as Our Family Plan, Children In Need, Initial and Review Child Protection Conferences, and Core Group meetings. We will provide reports as required for these meetings.

Where a learner is subject to an inter-agency Child Protection plan or a multi-agency risk assessment conference (MARAC) meeting, Reflections will contribute to the preparation, implementation and review of the plan as appropriate.

Role of Designated Safeguarding Lead

Action to be taken by the DSL on receipt of an raised concern, allegation or suspicion:

- To act swiftly but also avoid hasty and ill judged action
- Clarify the allegation or concern
- Clarify the context within which the alleged incident took place.
- Assess the validity (e.g. was the person in the location at that time) of the allegation or suspicion.
- Refer to the local social services department/police if appropriate.

Monitoring

DSL's monitor all safeguarding concerns via MYConcern on an ongoing basis until closed.

Safeguarding & Prevent concerns statistics for number and RAG rating are recorded and are reviewed by Directors monthly giving strategic overview.

Learner pre reviews are quality assured and any arising concern followed up by the DSL each review cycle.

Safeguarding procedures and the robustness and effectiveness are reviewed annually as part of the annual Self-Assessment process and Quality Improvement Plan.

Review & Update

Last Policy review May -June 2020 in response to COVID-19 pandemic. This policy will be reviewed and update annually and as required due to statutory or legislative requirement.

Next review September 2020 – in line with Keeping Children Safe In Education 2020

Appendix 1

Local Authority Lead Authority Designated Officers (LADO's)

West Midlands

Authority Area	LADO Name	Contact number	Contact email	address
Birmingham	LADO Team	0121 675 1669	Ladoteam@birminghamchildrenstrust.co.uk	PO Box 17340 BIRMINGHAM B2 2DR
Solihull	Simon Stubbs	0121 788 4310	cpru@solihull.gcsx.gov.uk (put 'LADO referral' in subject line)	Child Protection and Review Unit Bluebell Centre Chelmsley Wood B37 5TN
Walsall		0300 555 2866 Evenings, weekends, bank holidays (out of hours) 0300 555 2922	mash@walsall.gcsx.gov.uk	Walsall Safeguarding Children Board The Council House Room 27 Lichfield Street Walsall, WS1 1TW
Worcestershire	Jon Hancock James Borland	01905 843311 01905 846383	socialcare@worcestershire.gov.uk	Social Services, PO Box 585, Worcester WR4 4AD
Sandwell	Lisa Burn	0121 569 4770	lscb_sandwell@sandwell.gov.uk	Metsec Buildings, Ground Floor, Broadwell Road, Oldbury, B69 4HE
Dudley		0300 555 0050 during office hours (9am - 5pm). Out of office hours 0300 555 8574	SPA_Team@Dudley.gcsx.gov.uk	Council House Priory Road Dudley DY1 1HF

Coventry		024 7683 3443	LADO@coventry.gcsx.gov.uk	Broadgate House Broadgate, Coventry CV1 1FS
Herefordshire	Paul Rooney	01432 260680	lado@herefordshire.gcsx.gov.uk	Council Offices, Plough Lane Hereford, HR4 0LE
Shropshire		0345 678 9021. Out of office hours 0345 6789040.	sscb@shropshire.gov.uk	Shropshire Council Room GN94, Ground Floor Shirehall Abbey Foregate Shrewsbury SY2 6ND
Telford & Wrekin	Wendy Chetta	01952 385385 Monday - Friday 9am - 5pm 01952 676500 Monday - Sunday After 5pm		Addenbrooke House, Ironmasters Way, Telford, TF3 4NT
Wolverhampton	Paul Cooper	01902 550661	paul.cooper@wolverhampton.gcsx.gov.uk	Priory Green Building Whitburn Close Pendeford Wolverhampton WV9 5NJ
Staffordshire	First Response Team	Freephone: 0800 1313 126 (Monday to Thursday, 8.30am to 5pm and Friday 8.30am to 4.30pm) In an emergency outside office hours telephone 0845 6042 886	FirstR@staffordshire.gov.uk	Staffordshire Safeguarding Children Board Wedgwood Building Tipping Street Stafford ST16 2DH

South West Area

Authority Area	LADO Name	Contact number	Contact email	address
Bristol	Bristol Safeguarding Board First Response	01179036444 Emergency response team 01454615165	https://bristolsafeguarding.org/children-home/contact/report-a-concern/	BSCB Safeguarding (CH) PO Box 3176 Bristol, BS3 9FS
Bath and North East Somerset	LADO	01225 396312/ 01225 396313		Child Protection Unit Bath & North East Somerset Council, Lewis House, Manvers Street, Bath,BA1 1JG
South Gloucestershire	South Gloucestershire Safeguarding Children/ Adults Board	Children: 01454 866000 Adults: 01454 868007 Emergency: 01454 615165		
North Somerset	North Somerset Single Point Access	01275 888 808 - Monday to Friday, 8am - 6pm 01454 615 165 - Out of hours and at weekends	Email for Independent chair: tony.oliver@n-somerset.gov.uk http://www.northsomersetsafeguarding.co.uk/contact	
Wiltshire:	Wiltshire Multi Agency Safeguarding Hub (Mash)	0300 4560108	mash@wiltshire.gcsx.gov.uk	Multi-agency Safeguarding Hub (MASH) County Hall Bythesea Road Trowbridge Wiltshire BA14 8JN