Safeguarding Policy

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6/3/2020	Change of DSO names	Alison Hughes		6/3/2020
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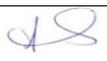
Contents

1. Policy Statement

Purpose and scope

All providers of adult, community and work-based learning in England are required by the Safeguarding Vulnerable Groups Act 2006 to secure the safety of children, young people and vulnerable adults who they come into contact with for the purposes of adult learning or apprenticeship delivery. As a provider of further education, System Group is committed to ensure all learners are kept safe so that they can learn and thrive. The drive for 'Inclusive Learning' has succeeded in bringing into the system learners with a wide range of needs, including many who can now be deemed 'vulnerable'.

The term vulnerable is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness: and who is or may be unable to care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health 2000)

The term vulnerable may also apply to people at increased risk of abuse or mistreatment due to some of the following factors:

- They may be unaware of their rights
- They may be socially isolated
- They may not know how to complain or who to complain to
- They may have communication difficulties in making decisions
- They may have low self esteem
- They may be discriminated due to age or disability
- They may not have access to healthcare
- They may be dependent on others for their basic health care needs
- They may be subject to Child On Child Abuse

At System Group, this may apply to a colleague or a learner you work with.

A child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people'. The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection under the Children's Act 1989.

Essential Appendix documentation for safeguarding policy:
- Appendix A Safeguarding Children/Vulnerable Adult Incident Record
- Appendix B Safeguarding Children & Vulnerable Adults Flowchart
- Appendix C Designated Safeguarding Persons Contact Details
- Appendix D Covid 19 Addendum

The essential appendix documentation is relevant to this safeguarding policy covering children, young people and vulnerable adults and should be used in conjunction with this policy.

Safeguarding and promoting the welfare of children, apprentices and adult learners is defined for the purposes of this policy as:

- protecting people from maltreatment
- preventing impairment of learner's mental and physical health or development.
- ensuring that learners and vulnerable adults grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all to have the best outcomes.

2. What is Safeguarding?

The term 'Safeguarding' describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children and young people from any potential harm or damage.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices and procedures around the learner for them to succeed. For example, System Group have a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated. It should never be passed off as "banter".

Safeguarding must be the informed responsibility of all staff, senior management, volunteers and board members to ensure the learning environment is safe and secure for all. In order to do so they will need to consider and act on the 5 R's:

The 5 R's
1. Recognition – All Staff
The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on System Group premises, in the home or in any other setting in which the learner may find themselves, all those playing a role in meeting learners' needs should be aware and informed so that possible abuse can be recognised, investigated and acted upon effectively. Signs and symptoms of abuse of young people and/or vulnerable adults may include direct disclosure. All staff will be trained on a regular basis to understand signs of possible abuse and know how, where and to whom to report concerns following the safeguarding policy. Staff will be able to recognise signs of abuse, will know how to respond to Learners, how to use appropriate questioning and how to record information accurately. They will be aware of the Designated Person Flowchart and how to follow this procedure.

2. Response – All Staff

Appropriate response by our staff is vital. No report of or concern about possible abuse should ever be ignored. Staff are trained how to determine the most appropriate response and to clarify precise details. They are aware of the correct protocol, i.e.:

- ☐ Do not lead or probe with questions
- ☐ Remain calm and demonstrate interest and concern while investigating.
- ☐ Do not agree confidentiality, this may restrict you from taking any action later
- ☐ Reassure that they have done the correct thing in reporting their concerns and that everything possible will be done to help
- ☐ Record any disclosures on the form provided in appendix A
- ☐ Keep copies of any notes taken and please sign and date them accordingly

3. Reporting – All Staff

The following individuals are trained as Designated Safeguarding Officers:

Designated Safeguarding Lead – Karen Barham, QA
Designated Safeguarding Deputy Lead – Stephen King, DOQ
Designated Safeguarding Officer – Richard Robinson, AEB Coach
Designated Safeguarding Officer – Fran Crook, Learner Engagement Officer
Designated Safeguarding Officer – Michael Farrar, Learner Engagement Officer
Designated Safeguarding Officer – Earl Hibbert, Head of People Development

Training and support has been provided to ensure these roles are carried out effectively. The Safeguarding Leads are qualified up to Level 4. During both staff and learner inductions the Designated Safeguarding Lead will be identified. System Group's safeguarding policy is embedded in all our courses and is displayed in the Learner Handbook and onour LMS system.

Report your concerns to the Designated Safeguarding Lead in the first instance at safeguarding@system-group.com, this generates an alarm for an auditable response. Should this be inappropriate for whatever reason, you should not hold back from reporting, but do so to an alternative Designated Officer or to any member of the Exec team. Once you have reported concerns about the abuse to the Designated Officer it is their responsibility to take further action.

4. Recording – Designated Safeguarding Officer

Designated staff should record precisely what has been alleged, using the words of the complainant. Records should include accurate quotation. It should also, if felt appropriate, include factual observations about the observable physical and emotional state of the individual sharing their concerns with you.

5. Referral – Designated Safeguarding Officer

Only the Designated Officer should mount an investigation into complaints, allegations or suspicions of abuse. An investigation may include questioning staff or learners. Actions of these sorts carried out by someone other than the Designated Officer could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

3. Safeguarding Strategy

The safeguarding strategy sets out the strategic approach to strengthening our arrangements for safeguarding across the company.

System Group is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult (hereinafter referred to as learners).

The emphasis of our safeguarding strategy and action plan is to focus on all who use our services. This will be a further demonstration of our organisational vision and value base. In order to meet the company vision and values to treat people well and keep people safe we need to demonstrate our effectiveness in safeguarding adults and children from abuse or the potential of abuse of any kind to enable people and children to feel safe.

The Aims of the Safeguarding Strategy

Our aims are:

- ☐ To ensure that all staff understand safeguarding is everyone's business
- ☐ To keep children, young people and vulnerable adults safe
- ☐ To raise and maintain awareness regarding Safeguarding, Prevent, Health & Safety, and Equality and Diversity across the company, our subcontractors and our partners
- ☐ To ensure that we work in partnership and contribute to the safeguarding work with the relevant Stakeholders and Boards.
- ☐ To learn the lessons and good practice from serious case reviews, local and national enquires.

We shall achieve our objectives by carrying out the following strategic activities:

Strategic Planning
- ☐ By ensuring that safeguarding is embedded within our strategic and operational planning processes
- ☐ By reviewing annually this policy and associated policies

Leadership and Management
- By implementing an annual Safeguarding and Prevent Action Plan to address our areas for improvement and build on our strengths so that our safeguarding arrangements continue to improve.
- By ensuring all personal data will be processed in accordance with the requirements of the GDPR (General Data Protection Regulation) 2018.
- By highlighting in job descriptions, staffs' responsibilities in relation to safeguarding.
- By giving staff opportunities to propose ideas and to share best practice through regular staff meetings, training and awareness sessions and through staff surveys.
- By continuing to work with employers to benchmark their current safeguarding practice and work collaboratively to support improvement.
- By monitoring the development of all learning materials and establishing standardised best practice.
- Ensuring that all use of technology is closely monitored and reviewed
- All learners access online safety training including raising awareness of radicalisation, cyber bullying and exploitation
- Ensuring the wellbeing of team members is supported and any safeguarding concerns referred to the DSL

Safer Recruitment
- System Group has a rigorous staff recruitment and selection process to ensure their suitability to work with learners.
- All applicants have a robust telephone interview to check suitability for the role, along with a face to face interview with 2 managers. Role play activities and presentations also form part of the selection process, depending on the role.
- All recruiting managers are required to complete Safer Recruitment e-learning as part of their recruitment training.
- Clear enhanced DBS and two satisfactory references are required for anyone to start working unsupervised with our learners

Induction
- By providing a thorough induction to both staff and learners to raise awareness and understanding of System Group safeguarding arrangements, the standards expected and their responsibilities in relation to these.
- System Group's shared drive System displays our Safeguarding policy

Continuous Professional Development (CPD)
- All staff will complete online learning in Safeguarding and Prevent on an annual basis
- Delivery staff will attend a Safeguarding and Prevent workshop quarterly
- Governors and exec members will also complete annual safeguarding training and this will be monitored

Adult Learner and Apprentice Protection

- ☐ By undertaking thorough risk assessments to ensure that all relevant staff and service providers are subjected to the relevant DBS check.
- ☐ By educating and empowering learners to take responsibility for their own safety and wellbeing and that of others.
- ☐ By using the System Group Information Hub to access prevent, safeguarding and wellbeing training and support
- ☐ By training learners in the use of online learning and technology
- ☐ By ensuring learners know exactly where to report any safeguarding concerns
- ☐ Learners under 18 will receive intensive support, contact at least once a fortnight from the learner experience team members who are also safeguarding officers

4. Radicalisation and Extremism

Since 2015 there has been a specific statutory duty (The Prevent Duty) on FE Skills funded providers & a range of public sector bodies to ensure that they protect people, in this case our learners & staff, from being drawn into supporting terrorism or extremism. There have been several occasions in which extreme groups have attempted to radicalise vulnerable young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Protecting people from radicalisation at System-Group is treated as any other safeguarding concern. Staff and learners should share concerns in line with the processes underlined for all safeguarding concerns in this policy.

When any member of staff has concerns that an apprentice or adult learner may be at risk of radicalisation or involvement with terrorism, they should speak with one of the company's designated safeguarding officers. Most young people do not become involved in extremism. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example, they may address mental health, relationship or drug/alcohol issues.

As part of the wider safeguarding responsibilities, staff at System Group will be alerted to use of extremist or 'hate' terms to exclude others or incite violence or hatred.

Communication and Promotion of the Safeguarding Policy and Agenda

There are a wide range of meetings which address the implementation of this Safeguarding Strategy including, senior management team meetings, quality team meetings, and operational team meetings. Staff development sessions also enhance communication of the safeguarding agenda and focus on improving practice.

5. Reporting Procedure

Report your concern or allegation to the Designated Safeguarding Officers or member of staff with specific designated responsibility for dealing with issues relating to safeguarding your centre. The Designated Safeguarding Officer will take responsibility from this point forward.

No one other than the Designated Safeguarding Officer should mount an investigation into complaints, allegations or suspicions of abuse. If actions are carried out by someone other than the designated person or deputy it could be seen as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

All allegations against people who work with children and that meet the specific criteria below should be reported by the employer within one working day to Local Authority Designated Officer (LADO).

- Staff who have behaved in a way that has harmed a child or may have harmed a child
- Staff who have possibly committed a criminal offence related to a child
- Staff who have behaved towards a child or children in a way that indicates that he/she is unsuitable to work with children.
- Low level concerns or suspicions must also be reported to the DSL

How to contact the LADO

If you need to contact your Local Authority Designated Officer (LADO), please consult your Local Safeguarding Children Board (LSBC) or Local Authority.

System Group have a dedicated email address for safeguarding issues which is as follows: safeguarding@system-group.com

The current named Designated Safeguarding Officers and how to contact them can be found on posters around the System Group offices. The Safeguarding policy is available to view on SharePoint and at www.system-group.com

Please follow the Safeguarding Children & Vulnerable Adults Flowchart in Appendix B.

Recording

Staff are trained to ensure allegations are recorded accurately on the Safeguarding Children/Vulnerable Adult Incident Report form which can be found in Appendix A of this policy. Please use the words of the complainant and include accurate quotation. This can include observations about the physical and emotional state of the individual sharing their concerns. Information is recorded and stored securely, confidentially and only accessible to those who need to access it as part of the action taken to resolve the complaint or allegation.

Referral

The decision to refer a complaint or allegation lies with the Designated Safeguarding Officers, having gathered and examined all relevant information. No one else will investigate such a situation. Investigation will involve questioning colleagues, learners, carers, parents, learners, assessors and the complainant. Designated Safeguarding Officers will have access to organisations and websites in order to seek guidance and help for learners.

6. Key guidance and legislation

The key guidance and legislation for the safeguarding of children responsibilities for System Group are contained within:

- ☐ Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (2017)
- ☐ Disqualification under the Childcare Act 2006 (2018)
- ☐ Information sharing: advice for practitioners providing Safeguarding services (2018)
- ☐ General Data Protection Act (2018)
- ☐ Sexual violence and sexual harassment between children in schools and colleges (2018)
- ☐ Working Together to Safeguard Children (2018)
- ☐ Keeping Children Safe in Education (KCSIE) 2022
- ☐ The Children Act (2016)
- ☐ Counter Terrorism and Security Act 2015 & FE Prevent Duty Statutory Guidance
- ☐ Coronavirus (COVID-19) -Safeguarding in schools, colleges and other providers (2020)

7. Responsibilities and Training

Learners

All learners will be introduced to their rights and responsibilities with regards to Safeguarding through their induction and initial assessment. Learners will go through a thorough sign up procedure with a member of staff, where any special needs will be determined, logged and appropriately dealt with. All Learners in work-based learning will have their place of work vetted by a trained assessor for Health and Safety purposes. Learners who work in places deemed medium or high risk will be revisited at regular intervals. Learners under 18 will have contact from the Learner Experience officer every two weeks. Reviews with learners include specific safeguarding questions, covering areas including Health & Safety and Equality and Diversity; these reviews are carried out 12 weekly as a minimum. Learners have direct access to their Skills Coach/Tutor at all times and use this person as their first point of contact if they have any concerns.

Training

All new employees will be introduced to their rights and responsibilities with regards to Safeguarding at their initial induction. The relevant policies are available to all employees via SharePoint and IRIS.

All staff in contact with learners who are under 18 or vulnerable adults will receive appropriate safeguarding training and regular safeguarding updates. Effective training is the key to carrying out our responsibilities of promoting and safeguarding children and young people. Staff will need to be trained on how to identify a learner in need, and what subsequent action to take. Training will take place on a variety of levels and will depend upon the needs of the staff concerned. All staff will have a basic induction which will include how to report safeguarding concerns and how to manage online delivery. The Designated Safeguarding Officers will undertake regular inter-agency training and refresher training every 3 years.

IT usage

System Group Team members should apply the same rules and standards of best practice when communicating with learners via digital media as in face-to-face communication. Extra diligence must be taken to ensure messages cannot be misinterpreted. Colleagues must not accept a friend request on social media from a learner. If colleagues receive verbally abusive or threatening messages, or if they worry about the safety of the sender orsomeone else, they must contact their line manager and the Designated Safeguarding Lead (DSL).

System Group will not tolerate any abuse of IT systems. Whether offline or online, communications by staff and learners must be courteous and respectful at all times. Any reported incident of bullying or harassment or other unacceptable conduct will be treatedseriously and in line with the relevant System Group policies and procedures, such as the Anti Bullying and Harassment Policy and Procedure. These are available on SharePoint.

Where conduct is found to be unacceptable, System Group will deal with the matter internally. Where conduct is considered illegal, System Group will report the matter to the police.

Cyber bullying is the act of communicating harmful, violent and/or malicious words andor pictures through the means of technology. Cyber bullying is the term used to refer to bullying and harassment by use of electronic devices though means of e-mail, instant messaging, text messages, blogs, mobile phones,pagers and websites.

Our laptops restrict access to illegal, harmful, or inappropriate images or content. We educate learners in online safety practice, e.g., not sharing personal information or inappropriate communication with strangers. We ensure that learners know how and to whom online safety incidents should be reported. Our team undertake only professional related communication directly with learners. Always report situations which are or could be interpreted as Safeguarding incidents to the Designated Safeguarding Officers.

Monitoring usage

- We loan laptops (specifically Chromebooks) to learners if they have no other means of accessing their course material
- The learners are allocated their own unique user ID, and other learners/staff cannot see their files or data held on the learner's laptop
- The laptops are configured with the latest version of operating system, to ensure their security. They are configured to automatically update as needed
- The laptops are configured to use "Safe Search", which restricts access to adult material through web searches
- The laptop is returned at the end of the learner's programme, and all content is wiped, following review of usage (the device is cleaned and re-installed)

8. Types and Signs of Abuse

Physical Abuse - may involve hitting, shaking, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or career feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as factitious illness by proxy or Munchausen's by proxy.

Emotional Abuse – is the persistent emotional ill treatment of a child that causes severe and persistent side effects on the child's emotional development. It may involve conveying to the children that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all types of ill treatment of a child, though it can still occur alone.

Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape or buggery) or nonpenetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging children to act in sexually inappropriate ways.

Sexual Harassment - Sexual harassment is unwelcome sexual behaviour that is likely to violate a learner's dignity, intimidate, degrade, or humiliate them, and/or create a hostile, offensive, or sexualised environment. It can happen both online and offline. Sexual remarks, such as telling sexual stories; lewd remarks; sexual remarks about clothes and appearance; calling someone sexualised names; sexual "jokes" or taunting; deliberately brushing against someone; interfering with someone's clothes; or displaying pictures, photos, or drawings of a sexual nature are all examples. Sexual harassment on the internet can occur on its own or as part of a larger pattern of sexual harassment and/or sexual assault. Non-consensual sexual image and video sharing sexualised online bullying, unwelcome sexual comments, and messages (including on social media), sexual exploitation, coercion, and threats, and up-skirting are all examples. If staff have a concern about a learner or a learner makes a report to them which relates to child on child sexual violence and/or sexual harassment, they must report their concerns to the safeguarding team immediately.

Neglect - is the persistent failure to meet a child's or vulnerable adults basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect the child or vulnerable adult from physical harm or danger, or failure to ensure access to medical care or treatment. It may also be neglect of or unresponsiveness to the child's emotional needs.

Radicalisation – the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. There is no single way of identifying whether a person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family & friends may contribute to their vulnerability. Similarly, radicalisation can occur through many different methods & settings, such as the internet, social media & face to face.

Child on child abuse – Child on child abuse is abuse that happens between children of a similar age or stage of development. It can happen between any number of children, and can affect any age group (Department for Education (DfE), 2021a). This can affect vulnerable adults, and at System Group we make learners aware of how they can report any concerns they have in this regard. Child on child abuse is behaviour that intentionally hurts another individual or group either physically or emotionally. It is more likely that females will be victims and males' perpetrators, but all child on child abuse is unacceptable and will be taken seriously at System Group. Child on child abuse can take many forms including serious bullying (including cyberbullying), up-skirting, relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person's race, religion, gender, sexual orientation, special educational needs or disabilities; or where a young/ vulnerable person is adopted or in care, has caring responsibilities, is suffering from a health problem, is frequently on the move (e.g. those from military families or the travelling community), is experiencing a personal or family crisis.

9. Recording, Sharing of Information and Consent Issues:

In the climate of 'working together' with other agencies, young people and families, information will have to be shared, so it is important that our records are kept up to date at all times.

It is important that records are updated as and when information is received, and with any action taken in following these procedures. As with other records, we need to bear in mind that an individual can request their records, so until official 'consent' has been sought we need to be sensitive as to what we record.

It is also necessary to keep written records for yourself, you may need to refer to these at a later stage or keep them as evidence. These should be locked away in a secure designated location.

The Designated Safeguarding Lead should keep a 'confidential' file containing all Safeguarding matters for the company which can be secured for safety and confidentiality.

Sharing Information
Important statutory duties in relation to vulnerable adults and children in need cannot be met without effective and appropriate sharing of information. For agencies to work together to the benefit of children, they must be able to share relevant information. This includes a referral to Children's Social Care, but could simply be sharing information between supporting agencies regarding a young person, for example, before a referral is made. However, sharing of information should take place according to the principles of good practice and on a need to know basis. When a request for information is made we need to be clear about why the information is needed and the way it is going to be used. Prior to information being shared with other agencies, or a referral being made, consent should normally be sought from the young person and/or from one parent/carer with agreed parental responsibility.

However, there are certain important circumstances where consent should not be sought.

These are:

- If this would put the child or young person at greater risk of significant harm.
- Interfere with criminal enquiries.
- Raise concerns about the safety of staff

10. Safeguarding Guidance

Good practice ideas:
- Always work in an open environment avoiding private or unobserved situations and encouraging open communication
- Treating all learners equally with respect and dignity always putting the welfare of each child first
- Maintaining a safe and appropriate distance with learners
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of learners
- Be aware of the effect that your words and actions may have
- Assessments should be scheduled to be within the normal working day of System Group
- Ensure training and work experience providers are fully briefed on Safeguarding issues and that they agree to a Safeguarding policy or appropriate control measures.
- Ensure LGBTQ+ learners are given a safe space to speak out or share their concerns

Practices to be avoided:
- Spending excessive amounts of time alone with learners away from others.
- Straying from the task in the specification or assignment.
- Being unnecessarily inquisitive – only ask for what is necessary to fulfil the requirements of the assessment or matter in hand.
- Saying anything that might make the learner feel uncomfortable or debased.
- Saying anything that could be interpreted as aggressive, hostile or impatient.
- Being drawn into personal conversations or introducing personal subjects.
- Sitting or standing too close to the learner.
- Standing over the learner or otherwise making the learner feel pressured.
- Meeting other than at the pre-arranged venue.
- Team members should not connect to or accept requests to connect to learners on social media other than platforms and forums specifically approved by System Group for training and support purposes
- Exchanging personal contact details.

Practices never to be sanctioned
You should never:
- Allow or engage in any form of inappropriate touching
- Allow children or vulnerable adults to use inappropriate language unchallenged
- Make sexually suggestive comments to a child or vulnerable adult, even in fun
- Reduce a child or vulnerable adult to tears as a form of control
- Allow allegations made by a child or vulnerable adult to go unchallenged, unrecorded or not acted upon
- Promise a child or vulnerable adult that their confidences will be kept secret.

11. Staff Recruitment

System Group's recruitment policy acknowledges our responsibility for protecting young people through safe recruitment practices. When recruiting we will consider whether a role is regulated or controlled and whether any safeguarding measures are needed Regulated activities - are activities that involve contact with children or vulnerable adults frequently, intensively and/or overnight. Regulated activity is frequent (once a month or more) or intensive (takes place on three or more days in a 30-day period). Controlled activities - frequent or intensive support work in further education. A controlled activity is when this type of activity is frequent (once a month or more) or intensive (takes place on three or more days in a 30-day period).

Disclosure and Barring Service (DBS)
All staff that have regular unsupervised contact with learners are subject to an DBS check. The period condition for 'regular unsupervised contact' is to teach, train or instruct learners as per a period condition as stipulated below:

- Once a week or more
- 4 or more days in a 30-day period
- Overnight between 2am-6am and the opportunity for face-to-face contact.

When an individual is offered a position with System Group, their offer is subject to receiving a clear enhanced DBS certificate. System Group will arrange for a DBS check to take place using a third-party organization. Any positive disclosures are reviewed and a risk assessment is put in place agreed by the DSL and hiring manager. Any risk assessments are kept with HR and reviewed by the DSL. See System Group Recruitment policy.

The following roles are regulated:

- Teaching or training anyone who is under 18 years old or a vulnerable adult.
- Care of anyone who is under 18 years old or a vulnerable adult.
- Supervision of anyone who is under 18 years old or a vulnerable adult.
- Advice to anyone who is under 18 years old or a vulnerable adult.
- Transport of anyone who is under 18 years old or a vulnerable adult.

The following roles are controlled:

- Anyone with access to children's or vulnerable adult's details.

However, this list of controlled and restricted roles is not exhaustive. Please refer to our HR department for further information on safeguarding actions in the recruitment process.

Allegations Against Staff

Allegations of abuse, or concerns raised against members of staff, will always be treated seriously. The allegation must always be referred to the DSL who will follow the Safeguarding procedure in the same way as an escalated Safeguarding concern. The DSL will take the appropriate steps to ensure the safety of the learner, and any others who may be at risk. The DSL will escalate to the Director of Quality and Curriculum in order that System Group procedures may be followed and an appropriate investigation is carried out. Where there is a complaint against a member of staff, there may also be criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. Actions should be taken both to protect the learner and the accused member of staff. These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place.

Low Level Concerns
The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a learner does not meet the threshold set out in section 3.11 (Allegations Against Staff).

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of System Group may have acted in a way that:
• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
• does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to safeguarding

Examples of such behaviour could include:

• being over friendly with learners
• having favourites
• taking photographs of learners on their mobile phone
• engaging with a learner on a one-to-one basis in a secluded area or behind a closed door; or,
• using inappropriate sexualised, intimidating, or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
Should an employee be identified as having behaved in an inappropriate manner that does not cause risk to a learner, a Low-Level Concern Form should be completed to alert the DSL of the concern.
If the DSL is unavailable, the Director of Quality should be contacted in their place.

12. Other Relevant Policies
Please refer to the following policies for further guidance:

- Equality and Diversity
- Health and Safety
- Whistleblowing Policy
- Learner code of conduct
- Prevent Policy
- External Speaker Policy
- Online Safety Policy
- Recruitment Policy
- Digital Safeguarding Action Plan

13. Monitoring

Our procedures for safeguarding learners will be in line with Government legislation and the ESFA guidelines. When this is changed our policy will be amended to reflect the changes. A review of the policy and implementation will be monitored by the Exec Team annually and by our Quality Board quarterly.

Appendix A - Safeguarding Children/Vulnerable Adult Incident Report

Safeguarding Adults Referral Form

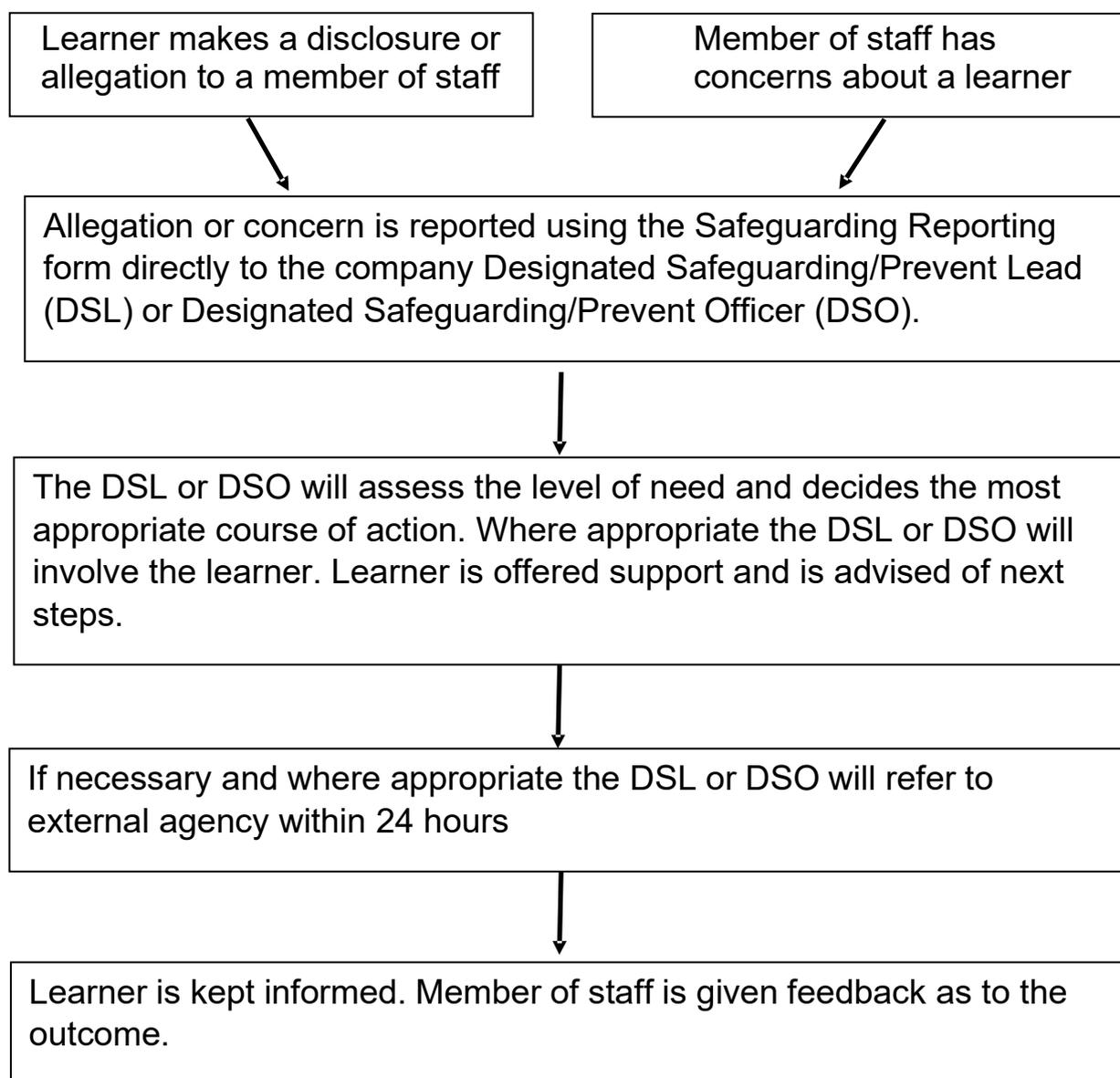|						
Date of referral:						
Date of Incident: *If there is over 24 hours between the incident and the referral what is the reason for the delay?*						
Details of adult at risk:	**Name**					
	System Group employee	**Yes**		**No**		
	Employer					
	Telephone Number					
	Date of Birth					
	Gender					
	Ethnicity					
	Address					
	Postcode					
	Email					
Course Title (N/A for System Group Staff)		**LEVEL**	**APPS**	**AEB**	**BOOTCAMP**	
Your details (referrer): *Please provide an email address so that feedback can be given regarding the outcome of the referral.*	**Name**					
	Role					
	Tel No					
	Email Address					

Is the learner at immediate risk?	Yes ◯ No ◯ If yes, call DSL immediately
Is the adult at risk aware of this referral?	Yes ◯ No ◯ *If no, what is the reason that they are unaware? E.g. person is unwell, lacks capacity, it is not safe to contact them.*
Have they given consent for this referral? *Please note that consent is desirable but not essential in order to share information.*	Yes ◯ No ◯ *If No, what is their reason for not consenting?*
Please provide a summary **Of the concern** *Please explain what your concerns are.*	
Time Reported	
Type of alleged abuse or risk: *Please put an x against all that apply*	**Physical abuse** ☐ **Discriminatory abuse** ☐ **Sexual abuse** ☐ **Organisational abuse** ☐ **Psychological abuse** ☐ **Neglect and acts of omission** ☐ **Financial or material abuse** ☐ **Self-neglect** ☐ **Modern Slavery** ☐ **Domestic abuse / violence** ☐ **Mental Health Issues** ☐ **Housing** ☐ **Wellbeing (Covid 19)** ☐ **Gambling** ☐ **Mental Health** ☐
Location / setting of alleged abuse or risk (where did it take place): If applicable *Were there witnesses?* *If so, who?*	
Has the adult at risk experienced harm? *If so, please give details.*	Yes ◯ No ◯
Is the adult at risk unable to protect him or herself from abuse or neglect because of their care / support needs?	Yes ◯ No ◯ *If Yes, please provide rationale*

To be completed by safeguarding officer	
Safeguarding Officer Name	
Date	
What actions have already been taken or may be required to make the situation safer? *Please explain what you have done, referred to another service.*	
Please return the completed form to the Safeguarding Team by secure email: to safeguarding@system-group.com	

Please complete a Safeguarding Children/Vulnerable adult incident record form and send a copy marked private and confidential to the Designated Safeguarding Lead, Karen Barham using the following email address:
safeguarding@system-group.com

Appendix B - Safeguarding Children & Vulnerable Adults Flowchart

Learner makes a disclosure or allegation to a member of staff	Member of staff has concerns about a learner

Allegation or concern is reported using the Safeguarding Reporting form directly to the company Designated Safeguarding/Prevent Lead (DSL) or Designated Safeguarding/Prevent Officer (DSO).

The DSL or DSO will assess the level of need and decides the most appropriate course of action. Where appropriate the DSL or DSO will involve the learner. Learner is offered support and is advised of next steps.

If necessary and where appropriate the DSL or DSO will refer to external agency within 24 hours

Learner is kept informed. Member of staff is given feedback as to the outcome.

If a learner makes a disclosure or staff member has concerns

You should
Listen, do not ask questions
Take the matter seriously.
Act without delay – if you are unsure whether the matter needs reporting consult the DSP.
Note down the details and pass all records to the DSP.

You should not
Promise confidentiality – say 'you can keep it a secret' as you may have to pass the information on.
Make promises you cannot keep.

Appendix C Designated Safeguarding Persons Contact Details

Role	Who	Contact Number	Email
Designated Safeguarding Lead	Karen Barham, IQA	07880 030306	safeguarding@system-group.com
Deputy Designated Safeguarding Lead	Stephen King, Director of Quality	0783155515	safeguarding@system-group.com
Designated Safeguarding Officer	Richard Robinson AEB Coach	07761762832	safeguarding@system-group.com
Designated Safeguarding Officer	Earl Hibbert Head of Talent and People Development	07542 861517	safeguarding@system-group.com
Designated Safeguarding Officer	Michael Farrar Learner Experience Officer	07880 030306	safeguarding@system-group.com
Designated Safeguarding Officer	Fran Crooke Learner Experience Officer	07880 030306	safeguarding@system-group.com

Appendix D - Addendum Covid-19 – Safeguarding and Prevent

This is an addendum to the Safeguarding and Prevent Policy which is relevant for the duration of the pandemic and any future lockdowns.

Safeguarding contact details as per Appendix C

Learners:
Email safeguarding@system-group.com

Employees:
Email safeguarding@system-group.com
Complete the Safeguarding Referral form found in Appendix 1

Context
Coronavirus has presented itself in extraordinary circumstances and we continue to deliver but have moved from face to face delivery to online delivery for our programmes. We understand we are working in a difficult period and we need to be on the alert for the wellbeing and safety of our learners.

This addendum does not replace the Safeguarding and Prevent Policy and counts as an addition to the existing policy.

- Employees complete AEB delivery sessions and internal meetings remotely
- Delivery team members complete most 1-2-1 sessions remotely with some limited face to face within Covid guidelines
- Safeguarding materials and policies are available to all learners on Canvas
- Apprentices and learners continue to work with the skills coaches and tutors and wellbeing and safeguarding reporting remains the same
- Apprentices and adult learners are contacted regularly to check on their wellbeing
- Employees have been given additional information on suggested topics to discuss with their learners
- Learners have access to mental health awareness support material on a regular basis throughout the pandemic and on our Information Hub
- Internal Prevent updates and training have been delivered remotely via Teams and email communications