



QTS-Global Ltd

Safeguarding Policy

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Amendments:

No:	Amendment	Date	Name & Signature
1	Inclusion of allegations of abuse against staff (Page 7-9)	16 Feb 16	K. Pound
2	Numbering of document and ESFA terminology update	29 Jun 18	K. Pound

Review Record:

Planned Review Date	Review By	Date Reviewed	Next Review Date
May 16	K. Pound	01 Feb 2016	Feb 2017
Feb 2017	K. Pound	17 Feb 2017	Feb 2018
Feb 2018	K. Pound	29 June 2018	June 2019
June 2019			

1. Safeguarding Policy for Young People and for Vulnerable Adults

POLICY STATEMENT

QTS-Global Ltd is committed to practices that protect Young People and Vulnerable Adults from abuse, exploitation, bullying neglect and self-harm in relation to training provision funded by the Skills Funding Agency. QTS-Global Ltd ensures the board of directors, senior managers and staff recognise and accept their responsibility to develop the awareness of the risks and issues involved in safeguarding and are clear on how to identify and report any incidents.

QTS-Global Ltd is committed to working with local safeguarding organisations, such as the local authorities, Education Skills Funding Agency (ESFA) and others to ensure the safeguarding of all learners on its programmes. The policy seeks to promote effective multi-agency working in light of the Children Act 2004 and Working Together to Safeguard Children 2006 (Dfe 2013) as well as the recent 'Prevent' duty covering Extremism and British Values.

Additional guidance has also been taken from the following sources:

Safeguarding Vulnerable Groups Act 2006
Protection of Freedoms Act 2012
Equality Act 2010
Counter Terrorist & Security Act 2015

2. ACCOUNTABILITY & RESPONSIBILITY

QTS-Global Ltd ensures delivery staff who deliver the services to learners have been trained in safeguarding issues and the Prevent Duty Agenda which is led by one of our directors; Sean Rafferty. QTS-Global Ltd has also set out a minimum requirements standard for delivery staff in order to ensure they are at or above the required threshold in relation to meeting the needs of Safeguarding. The nominated safeguarding champion works with the delivery staff and managers to ensure the monitoring and management of incidents or concerns are completed in the correct manor and are communicated to the appropriate safeguarding agencies.

3. TRAINING

QTS-Global Ltd ensures delivery staff have adequate safeguarding training and awareness; inclusive of the prevent agenda topics of extremism and British values, managers are qualified to the required level. QTS-Global Ltd also asks its delivery staff to:

- review their own processes and procedures against best practice guides and assess risk to ensure their process works effectively and responds efficiently in recording incidents.
- Follow the guidelines set out by the agencies such as ESFA and Ofsted.
- Undertake regular training on safeguarding in order to raise awareness and keep informed of up to date legislation and issues.
- Maintain a record of their qualifications, safeguarding training and Disclosure and Barring Service (DBS) checks.

The training and support of staff is crucial in providing them with the correct tools to be able to identify and act on any concerns about an individual or group of individuals and be confident they can follow the correct guidelines using the 5 R's and understand when it is appropriate to refer concerns about students, learners or colleagues to the Prevent officer, usually via the nominated safeguarding officer.

4. DISCLOSURE AND BARRING SERVICE CHECKS

QTS-Global Ltd has a responsibility to ensure its delivery staff are delivering in and offering a safe recruitment and delivery practice. Therefore all staff that frequently works with Young People and or Vulnerable Adults in training, advice or transport will be checked through the Disclosure and Barring Service.

QTS-Global Ltd requires confirmation through the regular checks via Contract & performance reviews that delivery staff have been DBS checked and using these details ensure that checks are within a three year period.

5. REVIEW

Safeguarding policy and procedures are reviewed annually through the self - assessment and quality improvement cycle.

QTS-Global Ltd also monitors delivery staff progress made against the minimum requirements standard for Safeguarding at monitoring meetings. If the company considers insufficient progress has been made there will be an intervention including the requirement for an improvement plan and the possibly restriction on further teaching of learners.

6. SAFEGUARDING PROCEDURE

6.1. Purpose

It is the purpose of this procedure to ensure that all Young People under the age of 18 and or Vulnerable Adults are safeguarded, showing QTS-Global Ltd.'s commitment to provide protection for all learners on programme.

6.2. Responsibilities

It is the overall responsibility of QTS-Global Ltd to ensure that;

- 6.2.1. DBS processes are undertaken for delivery staff as required.
- 6.2.2. Ensure that all employed, voluntary staff and associates have a recent DBS check.
- 6.2.3. Ensure all staff have received training, information and support on all aspects of safeguarding including but not limited to safer recruitment practices, internet & social media safety, bullying, grooming & abuse, exploitation, extremism and the prevent agenda.
- 6.2.4. Ensure that all staff support available is carried out in a confidential manner.
- 6.2.5. Carry out internal investigation should it be appropriate.
- 6.2.6. Monitor the progress of cases daily as required.

It is the responsibility of the Board of Directors to:

- 6.2.7. Instigate, improve, monitor and review company policies and procedures.
- 6.2.8. Act on referrals from both internal and external sources.
- 6.2.9. Make decisions about referrals to Social Services Child Protection Team and/or the Channel Co-Ordinator.
- 6.2.10. Endeavour to keep up to date with all Child/Vulnerable Adult Protection legislation.
- 6.2.11. Chair case discussions if appropriate.
- 6.2.12. Collect all necessary data and ensure it is kept strictly confidential and protected by password access, stored under lock and key.
- 6.2.13. Determine if an internal investigation is required and liaise with Social Services and the Police to avoid compromising any official investigation.
- 6.2.14. Liaise with the Chief Executive and or senior manager of the delivery partner to ensure all necessary support and guidance is available as appropriate.
- 6.2.15. Ensure HR & recruitment practices are fit for purpose and in line with safer recruitment practices.

It is the responsibility of all delivery staff to:

- 6.2.16. Seek urgent medical or Police assistance if needed.

- 6.2.17. Show concern and refer on any learner who needs support.
- 6.2.18. Not offer or promise confidentiality, but to record the facts without 'leading'. Offer support and security and not to react emotionally.
- 6.2.19. Make a record of their concerns and refer into the Safeguarding Champion.
- 6.2.20. Not discuss concerns or disclosures with anyone including parents.
- 6.2.21. Tell the learner that the record will be made, and the Safeguarding Champion informed.
- 6.2.22. Understand that protocols may require that they have no further involvement but will be given feedback.
- 6.2.23. Get personal confidential support if required.
- 6.2.24. Understand the risks of bullying, grooming, abuse, exploitation, extremism and online safety and how to support learners in keeping themselves safe.
- 6.2.25. Identify & signpost to organisations for support where characteristics of exploitation, extremism, bullying, abuse or grooming has been recognised.
- 6.2.26. Understand the Prevent Duty.
- 6.2.27. Be familiar with and be able to follow the 5 R's where necessary

7. Allegations Against a Member of Staff:

Allegations about a member of staff should be recorded in full, as soon as possible and should include the nature of the allegation and any other relevant information.

The allegation must be reported to one of the Designated Persons as soon as possible and within 2 hours.

The Designated Person, in conjunction with the HR Director and the Operations Director, will assess the allegation and identify next steps, including, where appropriate a referral to an external agency. Consideration will be given on whether the member of staff should be suspended on full pay pending the investigation. The Designated Person in conjunction with the Operations Director and HR Director will be responsible for any decisions on suspension. Any suspension will as necessary be as short as possible while ensuring the safety of the young person.

N.B. Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently.

8. Allegations Against an Employer of an Apprentice/Workplace

Allegations about an Employer should be recorded in full, as soon as possible and should include the nature of the allegation and any other relevant information.

The allegation must be reported to one of the Designated Persons as soon as possible and within 2 hours.

Ensure the safety of the young person in question and any others who may be at risk. If necessary visit the workplace and take the young person out of the workplace.

The Designated Person, in conjunction with the HR Director and the Operations Director, will assess the allegation and identify next steps, including, where appropriate a referral to an external agency. The Designated Person in conjunction with the Operations Director and the HR Director will be responsible for any decisions on whether the young person is removed from the employer and whether QTS-Global Ltd will continue to work with the company.

As per the Employer Agreement the Employer is to be aware that QTS-Global take cases of bullying, verbal and physical abuse very seriously and will inform the police and any other relevant authorities in any cases of abuse.

9. Responding to an Allegation

Any suspicion, allegation or incident of abuse must be reported to the Designated Person as soon as possible and in any event within 2 hours. If after careful assessment the Designated Person considers that there is reasonable cause to suspect abuse they must, as a matter of urgency, refer out of the organisation to an appropriate local outside agency. An appropriate outside agency may include the Police, local Social Services, the NSPCC or the Local Safeguarding Board.

Where in exceptional circumstances a member of staff deems there to be an immediate risk to a young person and it is not possible to contact the Designated Person within the same day, she/he shall report the matter normally by telephone directly to the local Social Services Department, Duty Social Worker or Police Service Child Protection Unit. The staff member shall notify the Designated Person as soon as possible and normally within one working day of the action taken and submit a written report of that action and the circumstances leading to it.

10. Written Records

The relevant Designated Person shall retain a copy of the report; any notes, memoranda or correspondence dealing with the matter; and any other relevant material. Copies of reports, notes etc should be kept secure at all times.

The member of staff who has cause for concern shall make a full record as soon as possible. The record should include the nature of the allegation and any other relevant information including:

- 10.1. Date, time and place where the alleged abuse occurred;
- 10.2. Names of others present;
- 10.3. Name of the complainant and, where different, the name of the young person who has allegedly been abused; nature of the alleged abuse;
- 10.4. Description of any injuries/incidents observed; and the account which has been given of the allegation
- 10.5. A copy of all documentation is to be held centrally by the Designated Person

11. Confidentiality

Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy.

12. SAFEGUARDING & PREVENT AGENDA GUIDANCE and DEFINITIONS

Disclosure of abuse by an individual: The 5 R's

12.1. RECEIVE

Listen without signs of shock, disgust or disbelief and accept what is said. To communicate "I believe you" is vital (It may be that this is not true but that is not for us to decide).

Give plenty of time and allow for plenty of silence.

12.2. REASSURE

It is helpful to the individual if the staff member is able to communicate something of the following:

"You're not to blame, it's not your fault"

"You're very brave to have told someone"

But do not make promises that you are unable to keep:

"I'll stay with you"; everything will be ok now"

"I won't let him/her hurt you again"; I won't tell anyone"

12.3. REACT

Ask open-ended questions: "Is there anything else you'd like to tell me?"

Do not ask leading questions (e.g. "Did he/she also touch you anywhere he/she shouldn't have done?") as this may invalidate any future legal proceedings.

Do not ask 'accusing questions: "Why didn't you tell someone earlier?"

"Why didn't you tell your parents?"

Do not criticise the perpetrator: If it is a family member emotions are going to be horribly mixed but the family staying together may well be the preferred solution.

Do not ask the individual to repeat it all for any other member of staff.

12.4. RECORD

Make notes as soon as possible afterwards. Do not record your assumptions and interpretations, just what you heard and saw. Do not destroy original notes even if you later write things up more neatly and fully.

Record the date, place, time and any non-verbal behavior and words used including 'pet' sexual words (if any used).

Draw a diagram if bruising is apparent to give exact location.

12.5. REFER

Confidentiality is an important principle but in cases of abuse no member of staff can maintain absolute confidentiality. Confidentiality cannot be promised to an individual who is disclosing. Refer all cases to the nominated individual who will liaise with other agencies as required.

Other members of staff will only be notified by the nominated individual on a need to know basis.

13. DEFINITIONS:

13.1. Definition of Child

Children and young people up to the age of 18 years, including unborn babies, the terms "children" or "child" refer to all children and young people up to the age of 18 years. The fact that a child has become sixteen years of age, is living independently or is in further education, is in the armed forces, in hospital, or in prison or a young offender's institution, does not change their status or their entitlement to services or their protection under the Children Act.

13.2. Definition of Vulnerable Adult

When a young person reaches the age of 18 the responsibility for their well-being may transfer to adult service providers. Although they cease to be subject of the Safeguarding Children Procedures, some adults may continue to be vulnerable.

A "vulnerable adult" is defined as any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

13.3. DEFINITIONS OF ABUSE

13.3.1. Abuse

Abuse is form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be

abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

13.3.2. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after.

13.3.3. Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental 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 (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

13.3.4. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

13.4. Neglect

Neglect is the persistent failure to meet a child's 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 abuse. Once a child is born, neglect may involve a parent or carer failing to:

- 13.4.1. provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- 13.4.2. protect a child from physical and emotional harm or danger;
- 13.4.3. ensure adequate supervision (including the use of inadequate care-givers); or
- 13.4.4. ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

14. PREVENT AGENDA RESPONSIBILITIES and DEFINITIONS:

All staff have a legal responsibility under the Prevent Duty to make sure that:

- They have undertaken training in the Prevent Duty as identified by the company.
- They are aware of when it is appropriate to refer concerns about individuals or colleagues to the Prevent officer, via the nominated individual or bard member.
- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice.

What is Extremism?

The government has defined extremism in the Prevent strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs." This also includes calls for the death of members of the British armed forces

What are British Values?

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the [Equality Act 2010](#).