

# Safeguarding Policy

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## 1. Who is this policy for?

All Pendersons Limited staff, associates, third-party providers, employers and volunteers have a duty of care to safeguard and promote the welfare of learners, both those that are employed (apprentices) and those who are non-employed. This includes employers safeguarding apprentices within their place of work.

Everyone working with apprentices & learners, vulnerable adults and their families should be familiar with this document and with their role in reporting any safeguarding concern to the relevant local authority and also within Pendersons Limited internal recording procedure. This policy is also available to learners and other stakeholders at the initial point of their engagement with Pendersons Limited.

## 2. The Pendersons Limited approach to Safeguarding

Pendersons Limited not only ensures whether arrangements for Safeguarding learners are appropriate and effective (Ofsted EIF Sep 2019) but we have also implemented outstanding measures to ensure that safeguarding policy and procedures are fully embedded into the learning journey whether the learner has employed (apprentices) or non- employed status and we work closely with employers to ensure the most effective systems are in place.

Pendersons Limited ensures reflection on and learning from best practice in safeguarding through the Local Children's Safeguarding Board's performance framework. All Pendersons Limited Safeguarding policies, which is in accordance with LSCB arrangements and procedures, links to other relevant policies within the setting to ensure awareness of specific safeguarding issues and how to respond across the education setting's community: staff, parents and learners. These details are outlined and described in Keeping Children Safe in Education Sep 2019 (KCSiE).

The policy must be read and signed by all staff members and evidence of this kept on staff files and made available to learners/ parents (if appropriate).

In order to support effective practice, the corporate Pendersons Limited safeguarding policy template has been adapted and expanded to meet the requirements of KCSiE, whilst retaining its structure.

The statutory role of Designated Safeguarding Lead (DSL) in education settings is identified and outlined in KCSiE 2019.

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Pendersons Limited approach to safeguarding all of our learners is founded on the nature of our relationships. We prioritise assessing and managing the needs of our services users and have a dynamic approach to the identification, assessment and response to risk. We have a commitment to ensuring that during all staff, apprentice and learner induction, Health and Safety, Safeguarding, Prevent, Whistleblowing and Complaints procedures are fully covered. As well as initial induction we ensure that all staff have annual refresher training on both Safeguarding and Prevent to promote our commitment to keeping learners safe.

Our organisational structure and approach places emphasis on collaborative relationships with our learners and our partners in delivery. This means our response to need and risk is timely and effective. We ensure that we work together to learn the lessons from our practice and use them to inform our safeguarding.

Our staff are informed in terms of the indicators of possible harm and possible vulnerabilities. Staff know what to do when possible abuse or neglect is suspected or disclosed and are skilled in a range of interventions to prevent further or future risk to our learners.

Our goal is to enable the apprentice or learner. This means that we focus on supporting them in finding their own solutions to challenges that pose a risk to their well-being, empowering them to make positive sustainable changes to their lives.

This policy outlines our organisational standards in safeguarding - Pendersons Limited uses these standards to measure our performance and achievements in safeguarding within all of our education provision. We also outline a range of behaviours that we encourage staff to embed in their approach to safeguarding that in turn, we believe, supports effective safeguarding practice and the prevention of harm. This policy references key legislation and statutory guidance and outlines how we approach safeguarding at local delivery level. It addresses the need to safeguard in all of our practice contexts.

### **3. Staff Induction, Training and Development**

The expectations of staff training as outlined in detail throughout Keeping Children Safe in Education have been summarised and shared within the policy and procedures. This will be updated if and when further updates are made. There is a mandatory safeguarding training offer for all staff within Pendersons Limited.

All Pendersons Limited training staff must complete an appropriate safeguarding course at foundation level and DSL must complete the appropriate DSL qualifications and renewal.

Pendersons Limited is committed to training all staff to work within the local safeguarding procedures and operational safeguarding arrangements where possible as set out by Local Safeguarding Children Boards (LSCBs).

There are detailed requirements for safer recruitment outlined in KCSiE. These include specific requirements for education settings include keeping a Single Central Record (single check register) of the staff recruited and the required checks (i.e. DBS) that have been undertaken by the company. Please also refer to our Safer Recruitment Policy.

All training staff have enhanced disclosure as working with under 18's and vulnerable groups form part of our education offer.

For our staff- It is important that you:

- Take up the mandatory training and development opportunities that Pendersons Limited offer you as a volunteer or member of staff in an education setting (including Prevent)
- Familiarise yourself with local opportunities for multi-agency safeguarding training and other opportunities in developing safeguarding practice (mentoring, shadowing)
- Through the supervision and Contribution Review process with your line manager and other opportunities, consider and examine what knowledge and skills and behaviours you need to carry out your role in safeguarding properly in your education setting
- Seek out and reflect upon any feedback from colleagues, peers and learners about what you do in practice
- Identify if there are new and different ways that Pendersons Limited could improve their offer to you in your safeguarding role as DSL

Pendersons Limited have a clear commitment to ensure that the Central Record is up to date in order to evidence the gaps in vetting; references and DBS check with automatic annual renewal on the updating service, ensuring it is clear to all staff that learners are protected from unsupervised contact with who have not be subject to the required checks.

We have developed a '*what to do approach*' for staff across all of Pendersons Limited. The implementation and embedding in practice of the content of this document form part of a learning outcome for our basic mandatory safeguarding training.

The Designated Safeguarding Lead (DSL) in Pendersons Limited, will attend the external Safeguarding training, as well as the Home Office Prevent awareness training.

Pendersons Limited staff are also trained in the internal Pendersons Limited safeguarding reporting procedure and this is implemented both during staff induction and on an annual basis as mandatory.

#### **4. What is Safeguarding?**

Safeguarding regulations have been around for a while, across a wide range of legislation, but were brought together by the Safeguarding Vulnerable Groups Act 2006 and most recently KCSiE 2019.

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

- Promotion of your health and development
- Ensuring your safety and care
- Ensuring you are offered the best life chances
- Protection from abuse and neglect
- Prevention of bullying and harassment

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

Pendersons Limited is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and employers to share this commitment.

We have developed a Safeguarding Policy and Procedure that aims to meet this commitment.

## 5. Definitions

<b>Safeguard</b>	Protect from harm or damage with an appropriate measure
<b>Vulnerable</b>	Exposed to the possibility of being attacked or harmed, either physically or emotionally
<b>A vulnerable adult</b>	Is in need of special care, support, or protection because of age, disability, or risk of abuse or neglect
<b>Safeguarding</b>	Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity
<b>Vulnerability</b>	Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation

## 6. What is 'risk'?

'Risk' is the future possibility that someone may be harmed due to a range of unwanted or neglectful behaviours. We work to reduce the likelihood of harm to our learners and to mitigate the impact of that harm in terms of its severity.

'Harm' is sometimes 'significant' to a child or young person (Children Act 1989). The definitions of emotional, physical and sexual abuse and neglect describe categories of 'harm' and can be found in the document Working Together 2018 and more recently KCSiE 2019. 'Harm' is described as the "ill-treatment or the impairment of health or development".

'Development' means physical, intellectual, emotional, social or behavioural development;

'Health' means physical or mental health;

'Ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical.

As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another". This is useful when considering harm arising from domestic abuse.

The abuse and neglect (i.e. harm) to an adult can take many forms - these are listed below as defined in the Care Act 2014:-

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

## 7. How does Pendersons Limited safeguard our learners and apprentices?

The Pendersons Limited Senior Management team has responsibility for oversight and management of this policy alongside reviewing and monitoring safeguarding incidents through our safeguarding performance framework and organisational lessons learnt, disseminating safeguarding roles and responsibilities to staff as well as setting the strategic direction for safeguarding within its services. This ensures effective communication between the managers and corporate departments and acts as the leadership group on safeguarding issues by:

- providing up to date knowledge on safeguarding matters
- ensuring that staff have access to appropriate safeguarding training
- reviewing how the safeguarding policies are working in practice

### An overview of organisational safeguarding structure

The DSL holds ultimate accountability for ensuring safeguarding arrangements for both learners including apprentices, staff and associates.

The nominated **Designated Safeguarding Lead** ensures that safeguarding matters are central to the strategic management of Pendersons Limited. The **DSL** is an experienced and qualified practitioner.

The role of the DSL is key in ensuring that operational safeguarding in the service-specific contexts is effective. The DSL will also ensure that local delivery staff develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the apprentices and learners that Pendersons Limited works with.

Every member of staff has a responsibility for ensuring that learners are safeguarded while they are using Pendersons Limited services.

Pendersons Limited organisational safeguarding standards recognise that we safeguard in a wide range of contexts with a diverse group of learners. Therefore, managing the risk to learners in these contexts can require different sets of knowledge and skills, and different responses, some of which are driven by statute and legislation.

Our safeguarding standards and behaviours seek to underpin safeguarding in all of our practice and are derived from section 11 of the Children Act (2004) and the Care Act (2014) as well as best practice guidance such as "Working Together to Safeguarding Children 2018" and of course most recently KCSiE (2019)

Our approach to safeguarding is measured against our Pendersons Limited organisational standards.

We demonstrate that we meet these standards through the evidence we draw together in our performance framework.

<b>Key Themes</b>	<b>Evidence of standards</b>
<b>1. Good Leadership and Accountability</b>	<ul style="list-style-type: none"> <li>• A clear commitment to the safeguarding of all apprentices &amp; learners</li> <li>• A clear line of accountability within the organisation for safeguarding and promoting welfare</li> <li>• Leadership which ensures a dynamic and responsive approach to need and risk in safeguarding, so that we achieve positive outcomes for our apprentices &amp; learners</li> <li>• A shared strategic approach to safeguarding with our partners, through engagement in the activity of strategic partnerships</li> </ul>
<b>2. Clear and embedded Policies and Procedures</b>	<ul style="list-style-type: none"> <li>• A clear priority to safeguard all apprentices &amp; learners: we have defined outcomes for them, explicitly stated in contractual and delivery documentation and demonstrated through the impact of local delivery and individual outcomes.</li> <li>• We provide information and training and access to local procedures for safeguarding that staff are clear on their role and responsibilities in reporting abuse and neglect and on their involvement in safeguarding responses which prevent and protect.</li> <li>• We ensure that our policies and procedures are in accordance with national statutory guidance and locally agreed inter-agency procedures (LSCBs).</li> </ul>
<b>3. Best practice in safeguarding children and vulnerable adults 'at risk'</b>	<ul style="list-style-type: none"> <li>• We ensure that our local practice reflects our organisational approach and we monitor how this leads to positive outcomes for service users.</li> <li>• We support our staff in making effective and proportionate responses to specific safeguarding concerns regarding any apprentices or learners at the centre.</li> <li>• We prioritise effective multi-agency work with our partners in delivery to prevent harm and protect apprentices &amp; learners from risk.</li> <li>• We prioritise outcomes for apprentices &amp; learners which evidence the reduction of risk; the minimisation of the impact of harm; their access to criminal, civil or social justice; and successful resolution and recovery.</li> </ul>
<b>4. A commitment to all staff, prior to access with learners having a DBS check and registered on the updating service, including safe recruitment and selection practices</b>	<ul style="list-style-type: none"> <li>• We have a Safer Recruitment policy that take account of the need to safeguard children and young people and adults at risk that include arrangements for appropriate checks as well the participation of staff, apprentices and learners in the recruitment of new staff and volunteers.</li> <li>• We have clear procedures and practice that ensure an effective response to allegations of abuse or neglect against professional Pendersons Limited staff/ associates/volunteers.</li> </ul>
<b>5. A robust learning organisation</b>	<ul style="list-style-type: none"> <li>• Pendersons Limited has a learning culture that acts upon the lessons from reporting, auditing and reviewing and ensures feedback into practice to ensure that improvements are made.</li> <li>• Our performance management framework ensures that the organisational centre understands safeguarding risks and the response at local delivery level to these risks.</li> </ul>

<b>6. Staff Induction, Training and Development</b>	<ul style="list-style-type: none"> <li>• All staff, including associates, temporary staff and volunteers who work with Pendersons Limited apprentices or learners, are made aware of the organisational approach to safeguarding from induction onwards.</li> <li>• A robust initial induction for each staff member ensures that all Pendersons Limited staff undertake appropriate training to equip them to carry out their safeguarding responsibilities effectively, and keep this up-to-date with annual CPD for all staff i.e. by refresher training at regular intervals</li> <li>• That staff supervision and development addresses the workforce’s role in safeguarding and reviews workforce performance. This ensures reflecting upon practice to ensure that the safeguarding behaviours are evident.</li> </ul>
<b>7. Listening to Learners</b>	<ul style="list-style-type: none"> <li>• A commitment to co-design in safeguarding practice and delivery through a culture of listening to, and engaging in dialogue with learners, seeking learner’s views. We take account of those views in individual decisions to inform the establishment or development of services.</li> </ul>

## Pendersons Limited Safeguarding Behaviours

Pendersons Limited believes that meaningful relationships make a difference in people’s lives. Key aspects of these relationships are trust and empathy but with clear boundaries. Our priority is to be more human – building relationships with apprentices, learners and partners that offer help and the prospect of positive change. This is supported by a commitment to the following Pendersons Limited behaviours in safeguarding practice, which we believe contribute to the prevention of harm

- **Confidence** in practice – knowing when to report and refer, seek consent, ask for assistance and information, being a source of expertise
- **Curiosity** in our relationships with apprentices & learners, whilst being respectful of their rights
- **Committed** to productive partnerships with professionals whilst being able to make professional **challenges** and **escalate** concerns in practice
- Keeping the **apprentice or learner as the focus** of their practice and supporting them through their involvement in safeguarding processes
- Being **aware and informed** of both the harmful and positive aspects of **risk**

### 8. What to do in the event of a disclosure?

#### Responsibility to report concerns

It is not the responsibility of Pendersons Limited to decide whether or not abuse has taken place against an adult.

It is the responsibility of staff at Pendersons Limited to act if there is cause for concern in order that the appropriate local authorities can investigate and take necessary action to protect the adult at risk.

Pendersons Limited staff do not investigate but do make the judgment “if this incident or situation were true, is this cause for concern”.



## Responding to concerns

You may need to make immediate contact with emergency health services, the Police or Local Authority Designated Officer (LADO). Pendersons Limited reporting procedures will subsequently apply to any immediate action taken to safeguard an adult and the incident should be reported through the Pendersons Limited safeguarding procedures as soon as possible after the event.

Telling somebody about abuse can be frightening and difficult for any apprentice or learner. In doing so the person disclosing has put you in a position of trust, however, you must not keep this disclosure confidential. You need to be clear that you can't keep a secret, that you will write down what they say and that they have done the right thing in telling you.

Inform the apprentice or learner that you will need to write it down. Do not ask any questions that may be regarded as leading or closed.

Disclosures of abuse can be frightening. They trust you to help them but you must make it clear that you cannot keep the disclosure 'a secret'. You should:

- Speak to them in a private and safe place to inform them of the concerns
- Obtain their views on what has happened and what they want to be done about it
- Provide information about the safeguarding adult's process and how it could help to make them safer
- Ensure that they understand the parameters of confidentiality
- Explain how they will be kept informed, particularly if they have communication needs
- Consider how the abusive experience might impact on the ongoing delivery of services, particularly personal care arrangements and access arrangements
- Explore their immediate protection needs
- React calmly and in an encouraging manner
- Advise them that they are right to tell
- Emphasise that they are not to blame
- Take what is being said seriously and communicate this to them
- Keep questions to the minimum necessary for ensuring a clear and accurate picture of what is being said to you. Remember you are not to investigate
- Be clear that there are certain people that you will have to tell in order to make sure that necessary action is taken. Stress it is part of your job to keep adults safe
- Make a full record of what is communicated as soon as possible. This should include exact words used, behaviour and other forms of communication
- Do not delay in passing the information on to the DSL

## Recording of concerns

It is crucial that all concerns are properly recorded. The following information, if available, should be recorded:

- Name and address
- Age and date of birth
- Ethnic origin
- Religion, if any
- Disability, if any
- Preferred communication method and language
- Name and address of adults involved in the incident/concern/allegation
- Date and time of the alleged incident
- Nature of injury, behaviour or concern
- When the behaviour or injury was first noticed
- The explanation in his/her own words as verbatim as possible
- Date and time of the recording
- Any questions that were asked
- Signature of the person recording the concern

Some of this information may not be available to you. It is important that the apprentice or learner freely volunteers whatever information they wish you to have.

- When recording, you need to ensure you separate fact from an opinion by setting out the facts first
- Having an opinion is entirely valid and may be crucial but it must not be confused with factual information
- All written records about an adult must be retained securely and confidentially and marked as sensitive within the relevant service recording system

## Reporting concerns

**Line Management:** every staff member must ensure that disclosures are reported to the DSL immediately. In consultation with the staff member, the DSL will decide as to whether a referral is necessary/ will take place.

**All reported disclosures regardless of outcome must also be reported internally within Pendersons Limited through the completion of the 'Safeguarding Incident form'** in conjunction with the written referral to the appropriate local authority safeguarding team.

The form has 3 parts:

- Part 1 outlines the basic details of the referral
- Part 2 the details of the incident being reported.

Both part 1 and 2 must be completed at the same time following the disclosure.

The form must then be anonymised by removing the person's personal details and password protected and sent by email to the DSL

- Part 3 of the form must be completed within 7 days subsequent to the submission of Parts 1 and 2 once the outcome of the referral is known and resubmitted as detailed above.

**It may be a requirement of Contract to report all Safeguarding concerns- please ensure contract compliance at all times**

## **9. Why is safeguarding necessary for employed learners i.e. apprentices?**

Providers of government funded training have a duty to safeguard their apprentices & learners and to take such steps that try to ensure the safety of its apprentices & learners (children under 18 or vulnerable adults) at all times. As part of that duty, we ensure employers and other stakeholders are aware of their commitment in safeguarding their staff and to ensure that learners are not exposed to threats or dangers.

## **10. What are the responsibilities of an Employer?**

- To understand what is meant by safeguarding and promote the welfare of apprentices learners
- Be aware of your statutory duties towards the welfare of children and vulnerable adults
- Be familiar with our guidance, in particular, the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside apprentices & learners are free from convictions and of sound character and judgment and will not pose as any threat or danger to apprentices or learners.

## **11. What do I do if my learner/ apprentice disclose information to me?**

- Re-assure the apprentice or learner that they have done the right thing
- Record what the apprentice or learner said, using their words where possible. Sign and date the record
- Inform our Designated Person or deputy as soon as possible and pass on the written record
- Maintain confidentiality and do not discuss with others
- Listen without making judgments
- Stay calm
- Try not to ask questions, but if you must, make sure they are open-ended questions to clarify understanding and not to probe or investigate
- Don't give an opinion or offer advice
- Don't promise confidentiality - explain you may need to talk to a DSL

Employees working closely with children or vulnerable apprentices or learners should be alert to the possibilities of harm and they should inform only and not investigate or offer advice.

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

Any concern must be documented and emailed to the Designated Safeguarding Lead. Unless in immediate harm, where the relevant authorities will be contacted immediately.

In this situation ensure that the apprentice or learner is accompanied and kept safe until the relevant authorities arrive.

If you have any concerns about an apprentice or learner, then please do not hesitate to contact the Pendersons Limited designated safeguarding deputy in the absence of the Lead.

## 12. Honour-based violence which includes FGM and forced marriage.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl’s age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, best practice is for reports to be made by the close of the next working day, unless any factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information- explain that you are making a report under the FGM mandatory reporting duty:

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation’s designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work
- The girl’s details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation’s designated safeguarding lead is kept updated as appropriate.

In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means.

Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

Forced marriage is an abuse of human rights, a form of violence against women and men, where it affects children, child abuse and where it affects those with disabilities abuse of vulnerable people. A forced marriage is one in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental incapacity, cannot) consent to the marriage and violence, threats, or any other form of coercion is involved. Coercion may include emotional force, physical force or the threat of physical force, and, financial pressure. In an arranged marriage, both parties have consented to the union but can still refuse to marry if they choose to.

FGM and forced marriage is child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.

### **13. Grooming- What does the term grooming mean?**

- Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

### **What is sexual online grooming?**

- Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so
- The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks
- Online groomers will tend to use chatrooms, which are focused on young people. There are countless teen chat rooms on the internet
- Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming
- Grooming online is anonymous and children find it easier to trust an online 'friend' than someone they have met 'face to face'

### **How do you know if a child is being groomed online?**

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

## Grooming – In Person

- Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust
- They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult

### **Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues**

To gain trust, groomers will:

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation
- Take them on trips, outings or holidays

Children or vulnerable adults may not speak out about their situation because they:

- Feel ashamed or guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

## **14. Contextualised Safeguarding**

Keeping children safe in education contains a new term – Contextual Safeguarding. The 2018 update contains information on Contextual Safeguarding in Paragraph 52: all staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Contextual Safeguarding helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

"Contextual Safeguarding, therefore, expands the objectives of child protection systems, beyond focusing on families in recognition that young people are vulnerable to abuse in a range of social contexts." (KCSiE extract)

## **15. Keeping Yourself Safe**

To maintain yours and the apprentice or learner's safety, the following are strictly prohibited:

- Befriending apprentices & learners on personal social media sites
- Distributing personal telephone numbers
- Visit apprentices & learners at home
- Do not use sarcasm, insults or belittling comments towards apprentices & learners
- Personal relationships with apprentices & learners

You will naturally build a rapport with learners & apprentices and they may see you as a confident and support, but be sure to maintain professional boundaries whenever carrying out work on Pendersons Limited behalf. Be respectful and appreciate you are in a position of trust.

- Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so
- Avoid spending time alone with apprentices & learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination ensure a member of the site staff is aware where you are and monitor this
- Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting)
- If at any point, you feel unsafe in an apprentice or learners company inform the site manager, your line manager, the DSL and leave the premises

## **16. Safer Recruitment**

Pendersons Limited carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements. See Safer Recruitment policy for further detail on recruitment procedures.

## **17. Disclosure and Barring Service Checks**

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions. Please see Safer Recruitment Policy for additional information. Staff will only be offered a start date when an enhanced DBS check has been completed with no disclosures.

## **18. I.T. and Internet Safety**

The internet is used in Pendersons Limited to raise educational standards, to promote apprentice & learner achievement, to support the professional work of staff and to enhance the companies management functions. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our apprentices & learners with all the necessary I.T skills that they will need in order to enable them to progress confidently in their educational careers and onward towards their working environments when they leave education.

There's now a link to new DfE the guidance on [teaching online safety in schools](#) in the new updated KCSiE 2019.

Some of the benefits of using I.T and the internet in education are:

For learners:

- unlimited access to worldwide educational resources and institutions such as art galleries, museums and libraries
- contact with education in other countries resulting in cultural exchanges between apprentices & learners all over the world
- access to subject experts, role models, inspirational people and organisations. The internet can provide a great opportunity for apprentices & learners to interact with people that they otherwise would never be able to meet
- an enhanced curriculum; interactive learning tools; collaboration, locally, nationally, and globally
- self-evaluation; feedback and assessment; updates on current affairs as they happen
- access to learning whenever and wherever convenient
- freedom to be creative
- freedom to explore the world and its cultures from within a classroom
- social inclusion, in class and online
- access to case studies, videos and interactive media to enhance understanding
- individualised access to learning

For staff:

- professional development through access to national developments, educational materials and examples of effective curriculum practice and classroom strategies
- immediate professional and personal support through networks and associations
- improved access to technical support
- ability to provide immediate feedback to apprentices, learners and parents
- class management, attendance records, assessment and assignment tracking

For parents (learners under 18 and those identified as vulnerable):

Communication between Pendersons Limited and parents or carers may be through e-mail and telephone messages. This form of contact can often be considered to be more effective, reliable and economic. Text messages and letters will also inform parent or carers of details relating to attendance, behaviour and other appropriate matters.

## **Roles and Responsibilities**

The Safeguarding Lead:

- has day-to-day responsibility for E-Safety issues and has a leading role in establishing and reviewing Pendersons Limited E-Safety policies and documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an E-Safety incident taking place
- provides advice for staff, as required and advises apprentices & learners on E-safety and how to stay safe
- liaises with the Local Authority through the LADO for incidents that are defined as Safeguarding concerns and appropriate referrals made
- receives reports of E-Safety incidents and creates a log of incidents to inform future developments (following Pendersons Limited Safeguarding reporting procedures)



## The Role of Parents or Carers (for under 18's or those defined as vulnerable or 'at risk')

Parents & carers play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. Pendersons Limited will take every opportunity to help parents & carers understand these issues through home/education liaison. Parents and carers will be encouraged to support in promoting good E-Safety practice and to follow guidelines.

### 19. Multi-agency working

Changes to this section in the KCSiE update 2019 are to clarify the expectations for all agencies, including schools, in the context of the phasing out of local safeguarding children boards (LSCBs)- specifically to be aware of and follow these new local arrangements, this includes our senior leadership team and DSL.

As a reminder, our 3 safeguarding partners are:

- Local authority (LA)
- Clinical commissioning group within the LA
- Police within the LA

### 20. Cyber Bullying?

Cyber bullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs.

Social media platforms such as Facebook, Instagram, Snapchat, Twitter and WhatsApp are used by cyber bullies to put out their communications

#### Who is most at risk?

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

#### Definitions of Cyber bullying

<b>Flaming</b>	Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
<b>Denigration</b>	Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
<b>Exclusion</b>	Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
<b>Outing</b>	Sharing secrets about someone online including private information, pictures, and videos.
<b>Impersonation</b>	Tricking someone into revealing personal information then sharing it with others.
<b>Harassment</b>	Repeatedly sending malicious messages to someone online.
<b>Cyberstalking</b>	Continuously harassing and denigration including threats of physical harm.

## **21. Upskirting ( is now a form of peer-on-peer abuse in KCSiE 2019)**

It's a criminal offence and is now listed in paragraph 27 of the new 2019 KCSiE guidance.

**Definition:** upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

## **22. Serious violent crime (pages 29-30 KCSiE 2019)**

The recent update states that all staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school/ training
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

## **23. Data Protection (also see General Data Protection Regulations policy)**

All details and actions taken are recorded on the personal file of the apprentice or learner. There may be different recording requirements dependent on the context of your work; however, to remind you, here are the key principles:

- Be clear
- Ensure you include the key details of the apprentice or learner and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

### **What happens to the recording of the disclosure and other information gathered?**

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally, the Pendersons Limited reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure.

## 24. Whistleblowing and Complaints (please also see associate policies)

*"What do I do if I am worried that another member of staff is acting in a way that may be unsuitable in practice, or may be causing harm to another person or even committing a criminal offence against another person?"*

Where an allegation is made against a staff member, either employed or associate, the matter immediately to the DSL. If there is a risk arising to operational delivery, then key partners should then be informed. The DSL will then decide whether the incident is a potential safeguarding matter or should be dealt with under Pendersons Limited, Complaints Policy and disciplinary procedures.

If the allegation is of a safeguarding nature and constitutes:

- A concern which may mean the employee is not suitable to practice with children, young people
- A concern which has led to the possible harm to an apprentice or learner
- A safeguarding concern which may be criminal in its nature or intent

Then this should be reported as per local procedures, to the (Local Authority) and Designated Lead

## 25. Related policies

There are other specific Pendersons Limited policies that have our approach to safeguarding embedded within them. These include:

- Prevent Policy
- Whistle Blowing Policy
- Appeals & Complaints Policy & Procedure
- General Data Protection Regulations
- Health & Safety
- Recruitment & Selection
- Employment & Equal Opportunities
- Equality & Diversity

## 26. Key National guidance and legislation

There are numerous publications and evidence around best practice in safeguarding in education These include:

- Keeping Children Safe in Education (KCSiE) 2019
- The Children Act 1989
- The Children (Northern Ireland) Order 1995
- The Human Rights Act 1998
- The Data Protection Act 2018
- The Female Genital Mutilation Act 2003
- Female Genital Mutilation mandatory reporting 2015 – Procedural Information
- The Children Act 2004
- The Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Channel Duty Guidance 2015
- Prevent Duty for Schools and Childcare Providers 2015
- Working Together to Safeguard Children 2018

This policy will be reviewed where:

- There are significant changes to legislation or regulation
- There are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations that Pendersons Limited may be working with
- On a 12 monthly basis, as part of our annual review of all policies within the business.

The Director can be contacted by sending an email to-

[info@pendersons.com](mailto:info@pendersons.com)



**Mark Pender**  
**Company Director**

Review due by 31<sup>st</sup> January 2021