



Safeguarding Policy

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1 INTRODUCTION

Skills North East (SNE) is committed to providing a safe and secure environment in which both Learners and Staff can flourish, and this is reflected in our Safeguarding Framework. This policy has been written to provide sufficient guidance to ensure that this commitment is embedded into the culture and ethos of the company. It is thus essential that all staff are aware of their duties regarding safeguarding /Prevent and report any concerns promptly.

We will refer to Adults at Risk throughout this policy, but SNE approach is to acknowledge that some adult learners will feel vulnerable/at risk at different points in their lives. These learners maybe outside what is recognised in statutory guidance as an adult at risk.

We believe that it is always unacceptable for an adult at risk to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all adults at risk. No adults at risk will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy.

This policy has been developed to describe the responsibilities of everyone for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this policy is to ensure that we fulfil its responsibilities towards the protection, welfare and safety of adults at risk.

2 Scope

This policy and its procedures will apply to:

- The board
- Employees of SNE
- Learners
- Contractors
- Employers providing an apprenticeship
- All other users of SNE
- All SNE Training activities

SNE recognises that any member of staff irrespective of role can be the first point of disclosure for a Learner. Therefore, all staff should:

- Be aware of the signs that a learner has been neglected or abused
- Listen to learners who tell them about abuse
- Report concerns effectively and in line with SNE Safeguarding procedure.

Designated Safeguarding Lead is referred to as DSL and Designated Safeguarding Officer is known as DSO within this procedure.

This policy has been agreed, sponsored, and approved by the SNE Board.

Name	Role
Michael Winship	Managing Director with overall accountability for Safeguarding and Prevent.
Donna Allison	Designated Safeguarding Lead
Tracey Parkins	Designated Safeguarding Officer
Jody Annandale-Hotte	Designated Safeguarding Officer
Michelle Brookes	Designated Safeguarding Officer

3 Context

- All complaints, allegations or suspicions of abuse or any disclosures must be taken seriously, and all colleagues must adopt a 'could happen here approach.'
- Absolute promises of confidentiality must not be given as the matter may develop in such a way that these might not be able to be honoured. This must be made clear at the outset to the individual who is making the disclosure, with reassurance that they are doing the right thing and information will only be passed on to those who need to know this to safeguard them and others.

If the complaint/allegation or disclosure comes directly from a learner, questions should be kept to a minimum necessary to understand what is being alleged. Leading questions must also be avoided.

This policy forms part of our Safeguarding framework and is in place to ensure that anybody who has cause to encounter any of our learners who may be at risk knows what is expected of them and can safeguard others.

4 POLICY STATEMENT

We are fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accept its corporate responsibility for the wellbeing and safety of its learners.

SNE will closely follow any locally agreed procedure as set out by the Local Authority and governmental direction within which we operate. SNE will promote the values of democracy, the rule of law, individual liberty, mutual respect, and tolerance for those with different faiths and beliefs. We will teach and encourage learners to respect one another and to respect and tolerate differences, especially those of a different faith or no faith.

It is our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will help support learners who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a learner is being directly affected by extremist materials or influences, we will ensure that the learner is offered mentoring and possibly through referral. Additionally, in such instances we will seek external support

from the Local Authority and/or local partnership structures working to prevent extremism (see our Prevent Policy)

Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

We are committed to reviewing our policies and good practice at least annually, unless there is a change to legislation, or if there has been a meaningful change within the organisation. The DSL is responsible for updating the policy with support from the Safeguarding team and the Managing Director

It is our intention to:

- Recognise that each provision may provide the only stability in the lives of Learners who have been abused, or who are at risk of harm.
- Provide a nurturing environment where self-esteem and self-assertiveness are promoted for all Learners including those that are vulnerable.
- Establish and maintain an ethos where Learners feel secure and are encouraged to talk and are listened to.
- We will adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with adults at risk from applying for or securing employment, or volunteering opportunities within SNE.
- We will ensure that relevant employment and security checks are undertaken within our safer recruitment practices that all adults at risk within SNE, who have access to learners, have been checked as to their suitability to work with learners. This will support in creating a culture that is safe and safeguards the welfare of learners.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct.
- Ensure that appropriate supervision is given, where required.
- Ensure that all stakeholders are protected from abuse, regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity, or because someone is married or in a civil partnership.
- To help promote an understanding that a Learner who is abused or who witnesses violence may be deeply affected.
- Take all suspicions and allegations of abuse and risks of radicalization extremely seriously and to respond to concerns with due speed and consideration.
- Develop and promote effective working partnership with other agencies and in accordance with organisations' procedures, where required, including Safeguarding Partners, the Channel multi-agency panel and the Police
- Regularly review and monitor our policies and procedures to ensure our legal, moral, and social responsibilities are met.
- Comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments.
- Have designated staff who support the safeguarding of learners within each location ,these are known as Designated Safeguarding Officers (DSO), they are in place to advise on and manage any concerns and referrals made and learners know there are responsible adults at risks within SNE whom they can approach if they are worried or in difficulty.
- Ensure that all personal information is confidential and should only be shared with the permission of the individual concerned, (and/or those with parental responsibility), unless

the disclosure of confidential information is necessary to protect adults at risk from serious harm or to promote their welfare. In circumstances, information must be confined to those people directly involved in the professional work of each individual adults at risk or adults at risk at risk and on a strict “need to know” basis.

- All staff and Directors believe that SNE should provide a caring, positive, safe, and stimulating environment, which promotes the social, physical, and moral development of the individual learner.
- Everyone who works for SNE have a responsibility to safeguard and promote the welfare of our learners and respond to concerns, incidents, or disclosures and should speak with their Designated Safeguarding Lead to inform them of any safeguarding or adults at risk protection concerns without delay.

If our learners feel safe and supported under the coaching and mentoring of SNE colleagues it will help their development in ways that will foster security, confidence, and independence as they continue to progress and achieve.

5 CONTENT

Statutory Obligations

SNE has a statutory duty under the following;

- The Care Act (2014).
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- The Prevent Duty 2015

SNE must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of adults at risk who may be at risk of harm or abuse. This policy sets out a framework for those arrangements and should be read in conjunction with the associated SNE policies and procedures listed, the web links provided, and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures.

This policy considers, amongst others, the following publications, including recent / relevant guidance and legislation in this area:

The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police, and other partner organisations. (Department of Health and Social Care)

https://www.legislation.gov.uk/ukpga/2014/23/pdfs/ukpga_20140023_en.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/365345/Making_Sure_the_Care_Act_Works_EASY_READ.pdf

The Prevent Duty:

[Prevent duty guidance: for further education institutions in England and Wales \(2015\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/365345/Prevent_duty_guidance_for_further_education_institutions_in_England_and_Wales_2015.pdf)

[Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Updated Dec 23

Safeguarding Vulnerable Groups 2006

[Safeguarding Vulnerable Groups Act 2006 - Explanatory Notes \(legislation.gov.uk\)](https://legislation.gov.uk)

Mental Capacity Act 2005

[Mental Capacity Act 2005 - Explanatory Notes \(legislation.gov.uk\)](https://legislation.gov.uk)

Meeting the digital and technology standards 2023 <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges>

The Prevent Duty: An introduction to those with SG responsibilities October 22

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/the-prevent-duty-an-introduction-for-those-with-safeguarding-responsibilities#:~:text=The%20Prevent%20duty%20requires%20all,from%20extremist%20ideologies%20and%20radicalisation.>

6 Policy Principles

We endeavour to safeguard learners at risk by:

- Valuing, listening to and respecting them.
- Adopting policies, guidelines, a code of conduct and behaviour for employees and volunteers.
- Sharing information about concerns with agencies which need to know.
- Ensuring that the DBS, in accordance with their guidelines, checks all staff and volunteers with responsibilities for learners, including relevant non-delivery roles.
- Recruiting staff, associates, volunteers and contractors who are aware of our Safeguarding and Prevent policy and procedures.
- Providing all staff and volunteers with safeguarding training.
- Ensuring that all learners at risk, are aware of our Safeguarding Policy and Prevent Policy and procedures.
- Ensuring that all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding.

We are committed to be alert to a learner who:

- is disabled and has specific additional needs.
- has special educational needs (whether they have a statutory Education, Health, and Care Plan)
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organized crime groups.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is at risk of being radicalised or exploited and access the Channel process, as detailed below.

7 Responsibilities

Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers (DSO)

We have a lead who has overall responsibility for issues related to safeguarding adults at risk and is supported by DSO's. The DSL is responsible for acting as a source of advice on adults at risk safeguarding matters, for coordinating action within the organization and for liaising with health, adults at risk services, and other agencies about suspected or actual causes of abuse. The DSL will be assisted by the MD and DSO's. Designated members of staff who are as part of their role carrying out the role of DSO have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of adults at risk and the promotion of a safe environment for learners.

The DSL reports to the SNE board and the MD has overall responsibility for safeguarding and Prevent at Board level, support by a Safeguarding link Board Member. The MD will ensure that resources, support, and all relevant training are available and in place for staff. The MD will support the Safeguarding and Prevent Team in meeting their responsibilities and will ensure that we meet these commitments. There is a clear and robust job description for the DSL and DSO, the DSL is responsible for reviewing the Safeguarding and prevent policy annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding and prevent policy and processes and procedures that support the embedding and working practices of this policy.

The Board

The SNE Board are responsible for ensuring we safeguard our learners in accordance with guidance and or legislation. This includes that:

- A member(s) of the Board is appointed to oversee safeguarding matters and undertake appropriate training in this.
- SNE has a Safeguarding Policy and Prevent Policy and associated procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- Effective training is in place for all staff, appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance.
- The Board receives and considers regular safeguarding update reports.
- SNE operates 'safer recruitment procedures' in accordance with statutory requirements and guidance.
- Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures.
- SNE contributes to multi-agency working in line with statutory guidance.
- Ensure that staff have the skills, knowledge and understanding to keep safe our vulnerable learners.

Designated Safeguarding Leads

Members of staff who are also DSOs, receive training in safeguarding adults at and interagency working as required by the Local Safeguarding Partners. They also receive refresher training annually as required by us. The team are required to keep up to date with developments in safeguarding adults at risk.

The appropriate DSO must be informed immediately in the following circumstances if:

- a) Suspicion that a learner is being harmed.
- b) There is evidence that a learner is being harmed.

The DSL will ensure records of concerns raised are recorded and supervise and support any referrals to the local authority Police if necessary.

Any member of staff or anyone who has knowledge of, or a suspicion that a learner is or has been suffering significant harm, or is at risk of significant harm, should discuss their concern with their DSO or the DSL. There should be no delay in communication once suspicion arises. The sharing of relevant information at the earliest opportunity within an environment of strict confidentiality is essential. All information from carers, members of the public and any of an anonymous nature must be acted upon and recorded appropriately.

- The DSL is responsible for ensuring the Safeguarding and prevent policy is available publicly.
- The DSL will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a learner.
- Being aware of how to make referrals to safeguarding partners, along with the role they might be expected to play in such assessments.
- The DSL will alert the police when a crime may have been committed.
- The DSO team refer all cases of vulnerable adults at risk, to the local authority adults at risk's social care or if deemed appropriate the police.
- The learner should be kept informed of actions taken at all stages of the procedure and maximum support offered/provided to them. Where the learner is competent to give consent, their agreement to the referral should be sought.
- If consent is refused the referral should still be made if it is considered necessary to protect the learner from significant harm.
- A written report of all discussions and action must be recorded and all referrals and subsequent documents/files will be retained securely by the team in the SNE Cause for Concern Referral Logs folders.
- All DSOs liaise with senior management to inform them of issues, especially ongoing enquiries, and police investigations.
- All DSOs maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral.
- All DSOs act as a source of advice, support, and expertise to staff on matters of safety and safeguarding.
- All DSOs liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved.
- Referrals to Statutory Agencies, including verbal referrals, should be followed up with a completed referral form within 24hrs of the original contact.

- The DSL provides information monthly to the Board setting about how we have discharged our duties.

All Employees / volunteers are responsible for:

- having a full and active understanding of all sections of the SNE Safeguarding policy - concerning adults at risk procedures, definitions, impact, indicators of abuse and referrals - in order to safeguard adults at risk at SNE effectively.
- reading the full SNE Safeguarding and Prevent policy. All staff will be informed of the procedures in place to address and manage any safeguarding concerns, allegations about staff members including low-level concerns and recording of these.
- providing a safe environment in which learners at risk of harm, abuse or neglect can learn in a safe environment.
- being prepared to identify learners at risk of harm, abuse, or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.
- sharing concerns - whether about adults at risk, colleague or another professional
- assisting in the assessment of possible adults at risk by sharing information and reporting concerns as outlined in this policy.
- acting in the 'best interests of the learner', when concerned about the welfare of adults at risk.
- making an immediate verbal referral to relevant Adults at risk service can be made. This will then be followed by a written referral within 24 hours.
- Never promise you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe.
- Always putting a learner first, it may be difficult or upsetting to report a concern and it is sometimes hard to accept that an adult at risk is being harmed. must always come first. It is the role of the DSO to support and listen to concerns.

If a learner tells you something that causes you concern:

- Listen to the learner.
- Never promise the learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe.
- Encourage the learner to talk, but do not prompt, or put words into their mouths, and do not ask leading questions.
- Do not ask the learner to repeat again and again.
- Explain what action you must take in a way that is age appropriate.
- As soon as you are able, write down what the learner has told you. Use the learner's exact words if possible. Record the date, time and place and any other people present at the time.
- Report concerns without delay to the DSL/DSO
- Do not worry you may be mistaken; it is better to discuss your concerns with someone who has the experience and the responsibility to make an assessment.
- Do not confront an alleged abuser.
- Try to remain calm and not to appear shocked by what they are telling you.
- A person who tells staff their concerns about adults at risk's welfare must never be expected to be asked to make a self-referral to social services or police.

If you have concerns about the behaviour of another colleague, do not dismiss these concerns. Action should be taken in accordance with the appropriate SNE policies. It is particularly important not to ignore or dismiss suspicions about another professional or colleague but approach the DSL with your concerns:

- Reporting to the DSL or the MD any concerns they may have about the conduct of colleagues in relation to Safeguarding and / or professional staff code of conduct.
- If a learner discloses a matter of concern to you it can be very upsetting, try not to take these feelings home with you. Talk to the DSL it is important not to ignore these feelings and to offload.

All concerns must be acted upon and categorised within the safeguarding categories or prevent concern, including well-being support requests. If the disclosure comes directly from the learner, then careful questioning must be undertaken, considering the four 'R's:

- **Recognise** – the signs and indications of abuse.
- **Respond** – as soon as possible.
- **Record** – everything you have heard, what was said, or any actions seen.
- **Refer** – to the designated person.

8 Responding to concerns

When dealing with safeguarding concerns, a person-centred approach should be adopted and in the case of adult safeguarding concerns the six principles as outlined in the Care Act 2014 should be followed which are empowerment, prevention, proportionality, protection, partnership, and accountability. We ensure and emphasise that everyone in the organisation understands and knows how to share any concerns immediately with the DSL or a DSO.

Remember, if an adult at risk tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, it does not make it any less real and distressing for the learner. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred on to the DSO as per this procedure to see if any further support required. Allegations against a tutor/instructor who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

9 Making a Referral

This is the email to use safeguarding@sne.org.uk

Name	Role	Email	Telephone
Donna Allison	Designated Safeguarding Lead	da@sne.org.uk	0191 2504590 07399465847
Tracey Parkins	Designated Safeguarding Officer	tp@sne.org.uk	0191 2504590 07399465845
Jody Annandale-Hotte	Designated Safeguarding Officer	jody@sne.org.uk	
Michelle Brookes	Designated Safeguarding Officer	michelle@skillsnortheast.org.uk	

If an adult at risk chooses to disclose, you should never:

- Take photographs of injuries.
- Examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate First Aid)
- Investigate or probe, aiming to prove or disprove possible abuse.
- Make promises to the individual about confidentiality or keeping secrets.
- Assume that someone else will take necessary action.
- Jump to conclusions or react in any way to what the individual is disclosing.
- Speculate or accuse anybody.
- Confront another person allegedly involved.
- Offer opinions about what is being said or about the people allegedly involved.
- Forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur.
- Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED, THEN IT IS ASSUMED THAT IT DID NOT HAPPEN!
- Fail to pass the information on to the designated safeguarding team.
- Ask the individual to sign a written copy of the disclosure or a statement.

Where learner at risk has communication difficulties or uses alternative/augmented communication system, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in the same manner as for vulnerable adults.

If the learner has personal needs, their requirements should be discussed prior to commencement of program and additional support plan implemented. We will respect personal privacy and dignity, ensuring that young people and adults are supported in meeting their own physical care needs, wherever this is possible.

If it is determined by the DSO that the concern is not a safeguarding one but rather the learner needs support services, then this should be discussed with the learner.

The DSO is responsible for following up any referrals made to social care teams to ensure that action has been taken. This should be done within 3 working days of having made the referral if social care has not been back to the DSO to confirm their actions. A record of actions being taken must be made by the DSO.

If there is concern that the action is not sufficient to safeguard the Learner, then the DSO must discuss with the DSL and escalate, if necessary, with social care or the police. The safeguarding team under local authority will have procedures to follow in this instance.

The DSL/DSO should refer to the local authority once all the information is collected and judged to be needed.

Northumberland Safeguarding arrangement for external referral are:

Contact OneCall: 01670 536 400

You should always call 999 in an emergency - for example when someone's life is at risk or someone is seriously injured or critically ill.

[Northumberland County Council - Adults safeguarding](#)

Professionals

If you are the DSL/DSO, you will be asked to complete a written referral form. You can do this by:

Downloading and completing the [Safeguarding Adults Enquiry Form](#).

And send it to: safeguardingreferrals@northumberland.gov.uk

Abuse Requiring Immediate Response

If you suspect, there is a risk of abuse or a danger to life you must contact the DSL/DSO immediately. If medical attention or police emergency action is required, then:

- The emergency services should be contacted on 999 immediately. The DSL/DSO team should be informed without delay.
- The DSL/DSO team should contact the relevant social care and/or police service.
- The DSL/DSO must consider if it is safe for the adult at risk to return home or to a potential abusive situation, seeking advice from social care or police, as required.
- Managers in the police or social care agencies will then advise about how to proceed to ensure the immediate wellbeing of the learner.
- The adult at risk should remain with staff if they are in immediate danger or in need of medical attention.

All colleagues have been given a copy of the Safeguarding and Prevent Policy and associated procedures which are accessible on Shared Drive and the website.

If no action has been taken after 48 hours, the DSL involved should utilize the escalation process with the social care team under the respective local authority.

Staff must also be aware that if they feel the referral has not been dealt with, no action has been taken, or that senior management is trying to disregard the referral, they should follow the procedures as set out in the Whistleblowing Policy.

External notification

We must inform ESFA if we are subject of an investigation by the local authority or the police relating to funded learners, in such circumstances the Chief Executive (or senior designated safeguarding lead) to email enquiries.EFA@education.gov.uk.

ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the police. If a referral has been made to the Disclosure and Barring Service, we are required to inform the ESFA.

Learners

Learners are responsible for:

- Maintaining vigilance and a proactive approach to the safety and welfare of themselves, their peers, and others on site.
- Reporting any concerns to a member of staff or directly to a DSL/DSO with whom they feel comfortable discussing these concerns.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

10 Safer Recruitment and Training for Staff

SNE will select and recruit in accordance with safer recruitment practices. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in SNE, including staff, volunteers and staff employed by external partners / contractors. The DSL will ensure that a single central record is maintained of all pre-appointment checks.

DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified.

Newly appointed staff will have a job role induction in line with our probation policy. We ensure that all employees are made aware of the standards expected of them and implement the appropriate support, training feedback to achieve these standards. Employees will be made aware of the relevant Safeguarding and Prevent procedures as part of that induction program and will have access to our Safeguarding Policy and Prevent Policy through our shared drives.

Individual / Group	Training	Frequency
All new staff and annual updating	<ul style="list-style-type: none"> • Safeguarding Policy and Prevent Duty Policy - mandatory reading. • Hot topics, Newsletter, videos and CPD • Training events by the DSO team 	At induction and annual updating or at time of changes.
Senior Safeguarding Leads and Designated Safeguarding Leads	<ul style="list-style-type: none"> • Identified essential reading. • Specialism divided by the team to ensure full coverage • DSL/DSO Training (2 years) 	Complete and appropriate updating.
Board and Senior Managers	<ul style="list-style-type: none"> • Annual training and updating 	Annual and where required (e.g. legislation updates)
Staff Recruiters	<ul style="list-style-type: none"> • Safer recruitment practices 	Annual and where required (e.g. legislation updates)

Confidentiality

Colleagues should never promise that they will not tell anyone about an allegation or disclosure, as this may not be in the best interests of the learner. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018), following government advice and guidance.

- Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Consider safety and well-being.
 - base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
 - ensure that the information you share is necessary for the purpose for which

Faith and worship

Any learners that attend our premises and require a quiet room for worship and prayer, this can be booked via any member of staff.

11 Safeguarding Code of Conduct

You SHOULD:

- Be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSL/DSO's.
- Treat all learners equally and listen to them, avoiding favouritism and gossiping.
- Ensure allegations or disclosures by adults at risk are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to learners on social media / network sites that is not in the course of normal business. Always use professional language when writing, phoning, emailing, or using social media / network to communicate with them.
- Immediately report concerns relating to the welfare of a learner at risk, whether these concerns are about actions / behaviours of another colleague or based on any conversation with the learner, particularly when they make an allegation.
- Set and monitor appropriate boundaries and relationships when working with learners, based on openness, honesty, and respect for them.
- Respect a learners' right to personal privacy but never agree to keep any information relating to their risk of harm confidential. Provide support to anybody making a complaint.
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSL/DSOs without delay and record all the facts.
- Ensure that if a distressed learner needs comfort, that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive.

You should NOT:

- Engage in flirting or innuendo, make suggestive terms or gestures, or indicate favouritism for adults at risk.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them.
- Broadcast or view any audio and / or visual material that has inappropriate content for adults at risk.
- Invite or allow a learner who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in or tolerate any inappropriate physical activity.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for adults at risk that they can do for themselves.
- Dismiss an allegation of any sort relating to a learner's welfare or delay the reporting of an allegation.
- Discourage anyone from reporting concerns or ask individuals to keep secrets.
- Make promises to keep secrets, keep any disclosure confidential, overreact or be judgmental, should you suspect abuse.
- Spend excessive amounts of time alone with adults at risk, away from others.
- Make unnecessary physical contact with adults at. However, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or

physical support in contact sports, etc. in all cases, contact should only take place with consent of the adults at risk

- Share, steal or otherwise disclose personal data relating to a learner to any other member of staff or learner.

Anti-Bullying and Harassment

Our policy on bullying and harassment is set out in a separate policy Learner Anti Bullying and Harassment Policy and acknowledges that allowing or condoning bullying or harassment may lead to consideration under safeguarding learners. All incidents of bullying and harassment, fake news, including cyber-bullying, [cyber flashing](#), racist, homophobic, and gender-related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that Learners at risk with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in our programs. Our policy on bullying and harassment is explained at the induction process for new learners

Communications

- When communicating with learners online, observe the same rules of behaviour as if speaking with them in person by being professional: polite, respectful, not swearing or saying anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Ask yourself whether the content of any online communication has a clear work purpose.
- Do not use any text speak abbreviations or symbols / emoticons, even if you ordinarily use these in your personal life.
- Never disclose non-public and confidential information about us, our staff, associates, volunteers, or the young people with whom we are working.
- Do not say anything or re tweet any posts that could be deemed offensive, controversial, or socially inappropriate in any way.
- Contact with young people or adults at risk online should only be a recognised element of your work and done strictly for business purposes.
- Do not send any illegal or inappropriate content (written, images or icons), including sexting via mobile phones

Openness and scrutiny

- Always communicate with learners in a way that is open for others to see.
- Do not use private messaging facilities on social networks or apps; if it needs to be private, then do this email exchange or phone and note the conversation afterwards.
- Ensure there is always a record of such communication that would be open for others to check, if necessary
- It should always be clear who the communication is from when we are communicating with a learner.
- There should be no use of anonymous apps, where the sender can remain anonymous.

Recording

- Only use social media and apps where there is a permanent record of what has been said and sent, thereby being open to scrutiny, e.g., the use of Snapchat is not appropriate.

Consent and Storage of Images

- If a learner does not give permission for photographs / videos to be taken, we will abide by this and we will not exclude a learner from completing activities if we do not have consent.
- All photographs and images of learners taken will be stored securely under our Data Protection Policy. If we keep hard copies of images, these will be stored securely in a locked cabinet or electronically in a restricted access folder.

Allegations of abuse made against a staff member

All allegations of abuse made against a member or members of staff, associates, volunteers or contractors will be managed in line with Safeguarding and employment policies and procedures. The procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with adults at risk in their present position or in any capacity. It is essential that any concerns for the welfare of an adult at risk arising from abuse or harassment by a member of staff, volunteer, or contractor should be reported immediately to the DSL.

We recognise that our staff are in a position of trust with the learners in our care and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all of those in positions of trust to understand the power this can give them over those they care for and to understand their responsibility.

It is essential that any concerns for the learner at risk arising from abuse or harassment by a member of staff are reported immediately to the DSL.

The procedures are, therefore, to be followed in respect of allegations that a member of staff has:

- Behaved in a way that has harmed, or may harm, an adult at risk.
- Possibly committed a criminal offense against, or related to, an adult at risk.
- Behaved towards a learner at risk in a way that indicates they might pose a risk of harm.
- Behaved towards a learner at risk in a way that indicates they are unsuitable to work with adults at risk (including transferable risk where the behaviour has occurred outside of the learning environment).

We will also support the person the allegation has been made against, ensuring they are treated fairly and with impartiality as detailed in our Disciplinary policy and procedures. They will include any support from the other agencies involved and manage any media interest. We will take a view as to whether Disciplinary procedures need to commence before any investigation by police

or social care has concluded but we will most likely take the lead from these bodies at all stages of the process and involve the relevant DSL, Senior Managers and HR team.
Any allegation against any members of the senior team should be directly referred to the MD.

When an allegation is made, against a member of staff, the member of staff to whom the allegation has been made known will immediately inform the DSL and MD

The initial enquires should establish.

- That an allegation has been made
- What is alleged to have occurred?
- When and where the incident/s are alleged to have occurred
- Any other parties who may have been involved
- Any other persons present

It is important to establish as much of the above information as practical in order to assist with on-going enquiries.

False or malicious allegations will be dealt with in line with SNE Policy.

These may include:

- Adult at risk Safeguarding Investigation – this will assess whether the adult needs protection or in need of services – led by social care.
- Criminal investigation – led by the relevant police force.
- A Disciplinary Investigation – in line with our disciplinary procedures

In the first two instances above, social care and / or the police will lead on investigations. Our DSL will notify the Disclosure and Barring Service (DBS) where:

- We have permanently removed a member of staff, volunteer, delivery partner or contractor from regulated activity. We think that the person has either:
- Engaged in relevant conduct, satisfied the harm text or
- Received a caution for, or been convicted of, a relevant offence.

For most cases, the DBS only has the power to bar a person who is, has been, or might in the future engage in regulated activity. The MD, as the Accounting Officer, holds responsibility to ensure SNE meets its statutory and legal requirements and delegate authority to the Senior Safeguarding Lead in handling allegations of abuse made against a member of staff in line with our current policy. The MD is there to provide direction and support if required. If the allegation concerns either DSL then the matter would be referred directly to the MD.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken, the individual the allegation was made against will be supported back into work and their team environment by the management team, with an agreed support plan put in place. The following definitions should be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Support for the Referrer

We will fully support and protect staff who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a learner at risk and reports his or her concern about a colleague's practice. This support may take the form of counselling or moving the person reporting the abuse/potential abuse to another workplace temporarily whilst the incident is investigated. Our Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately.

However, all staff have a duty to safeguard and promote the welfare of vulnerable adults. To investigate concerns robustly, it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Following a referral, staff may be involved in the assessment and management process led by the relevant social care team, may be invited to take part in any strategy meeting or may attend an initial Case Conference. Where there is a criminal investigation, they may be required to cooperate with the police. In all these circumstances, they will be offered sufficient time to prepare and attend meetings with the support of their line manager.

They will also receive appropriate senior management support and the DSL will continue to provide support and guidance as required/appropriate.

Records will be kept of every concern raised and they will be detailed in terms of what actions have been taken, whether an external agency has been involved and is leading on any investigation, and what the outcome has been, so that the file can be closed and then stored for legal purposes on the secure system.

Low Level Concerns

SNE prides itself on creating an open, transparent, and honest culture where all concerns will be listened to and dealt with promptly. When we receive a low-level concern, we will treat this in the same way we would any other concern and refer to our code of conduct, disciplinary policy and safeguarding policies.

Anyone who has a low-level concern should report this to their manager; senior manager, director, or to the DSL. A written record will be made of the allegation and appropriate investigations will be made into the allegations. Written notes will be saved in case there are future concerns raised which show a potential pattern of behaviour. Actions such as training might be deemed to be appropriate courses of action, but also more formal sanctions might be imposed depending on the situation.

12 APPENDIX 1 DEFINITIONS

For a full list of possible safeguarding themes refer to our safeguarding guide.

TERM	Explanation
Adult at Risk	Those aged 18 years and over who: are unable to safeguard their own wellbeing, property, rights, or other interests
DSL	Senior Safeguarding Lead
DSO	Designated Safeguarding Lead
Harm	Harm includes ill treatment (including sexual abuse, exploitation and forms of ill treatment which are not physical); the impairment of health (physical or mental) or development (physical, intellectual, emotional, social, or behavioural); self-harm and neglect; unlawful conduct which adversely affects a person's property, rights, or interests (for example, financial abuse).
Exploitation	Exploitative situations, contexts, and relationships where a person or persons receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) because of them completing a task on behalf of another individual or groups of individuals.
Victimisation	The action of singling someone out for cruel or unjust treatment
Welfare	The health and happiness of a person or group
Abuse	The violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act
Data Protection	Legal control over access to and use of stored data
Low Level Concern	Low level concern does not mean that it is insignificant, it means the behaviour towards a vulnerable adult does not meet the threshold of harm. It could be seen in ways such as being over friendly, having favourites, using inappropriate language
Allegation	a claim or assertion that someone has done

13 APPENDIX 2 – CENTRES: LOCAL SAFEGUARDING CONTACTS

Local council	Contacts/Procedures
	<p>If you think you or someone you know is being abused, or neglected it is important to tell someone you trust. This could be a friend, a teacher, a social worker, a doctor, a police officer or someone else that you trust. Ask them to help you report it and remember that you understand abuse or neglect is never your fault.</p> <p>Supporting people when concerns about abuse or neglect are raised can be very difficult and worrying for everyone involved. It is important to remember that you must not ignore abuse or neglect. You must report it. If you are not sure what to do you can always seek advice.</p> <ul style="list-style-type: none"> • If you have concerns about an adult in Allerdale, Carlisle or Copeland contact Cumberland Council on 0300 373 3732 • If you have concerns about an adult in Barrow, Eden or South Lakeland contact Westmorland and Furness Council on 0300 373 3301 <p style="text-align: center;"><u>Out of hours: 01228 526690</u></p> <p>(if you have a concern about a <u>child</u> in Cumbria, telephone 0333 2401727 (Cumberland) or 0300 3732724 (Westmorland and Furness).</p>
	<p>For general information, advice and guidance about safeguarding <u>adults</u>, call the safeguarding adults unit on 01302 737063.</p> <p>If you don't want to report a safeguarding issue over the phone, you can email SAH@doncaster.gov.uk</p> <p>SMS/Text Number (for people from the deaf community): 0797 903 1116</p> <p><u>Reporting safeguarding concerns for children or young people:</u> For urgent safeguarding concerns please call the Duty team, on <u>01302 737 777</u>. Urgent concerns regarding a child or young person's mental health If you have urgent concerns regarding a child or young person's mental health, please call the duty team on <u>01302 796 191</u>.</p>
	<p>If you have been or still are the victim of abuse, or you know someone who you think is being abused you can report your concern using the form on the hull.gov.uk safeguarding section.</p> <p>We recommend that you discuss your concerns with the Multi Agency Safeguarding Hub before completing and sending the concern form. A member of the team will be able to give you guidance and support and agree the next steps with you.</p> <p>You can contact them on telephone 01482 616 092 and ask for the adults safeguarding team duty officer or telephone 01482 300 304 after 5pm or weekends. You can also contact using the email address adultsafeguarding@hullcc.gov.uk</p> <p><u>Reporting safeguarding concerns for children or young people (under the age of 18):</u></p> <p>In an emergency or for urgent advice, please contact the Early Help and Safeguarding Hub (EHASH) or the Emergency Duty Team by telephone - EHASH - 01482 448 879 option four / Emergency Duty Team - 01482 300 304 (Out of hours)</p>



Cause for Concern Log

Part 1 (for use by any staff)

Person's Name:	Date of Birth:
Date and Time of Incident:	Date and Time (of writing):
Name of referrer:	Job Title:
<p>Record the following factually:</p> <p><i>What are you worried about? Who? What (if recording a verbal disclosure by a person use their words)? Where? When (date and time of incident)? Any witnesses?</i></p>	
<p>What is the person's account/perspective?</p>	
<p>Any other relevant information (distinguish between fact and opinion). Previous concerns etc.</p>	
<p>Is the risk to this person or is the risk to another person. (Please give details)</p>	
<p>What needs to happen?</p> <p><i>Note actions, including names of anyone to whom your information was passed and when.</i></p>	

Check to make sure your report is clear to someone else reading it.

Please email this form to
Safeguarding@sne.org.uk

Part 2 – (for use by Safeguarding Team (DSL or DSO))

<p>Any advice sought – if required (Internal, external and agencies)</p>	
<p>Follow up/ monitoring log with dates if need</p>	
<p>Are there others associated with the individual at risk at home?</p>	
<p>Key contacts (relatives, carers, friends, etc.)</p>	

Chronology of Individual Concerns

Part 3

Complete for all incidents of concern.

Name:			
DOB:		Date Closed:	
Date:	Ref No:	Information/Details of concerns or contact:	Print Name and Signature

Follow up Actions. (Who, What and When)	
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15 APPENDIX 4 - Flow Chart for raising safeguarding concerns

