SAFEGUARDING
SCCU LIMITED
VERSION 6.0

Contents

Version Control

Version	Reviewer Name	Date	Next Review	Comments
2.0	Liam Morrissey	August 2021	01/08/2022	Update to previous.
3.0	Liam Morrissey	August 2022	03/07/2023	
4.0	Liam Morrissey	03/07/2023	01/09/2023	
5.0	Policy Pros	08/09/2023	08/09/2023	Updated to reflect KCSiE 2023.
6.0	Policy Pros	05/03/2024	01/09/2024	Updated to strengthen policy.

Introduction

1. Safeguarding means protecting a person's right to live in safety, free from abuse and neglect.

2. Children and vulnerable/at-risk adults are particularly vulnerable groups in society due to:

   - Their possessing personal characteristics may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in the functioning of the mind or brain.

   - Their life circumstances may include, but are not limited to, isolation, socio-economic factors, and environmental living conditions.

   - Their inability to protect their own well-being, property, assets, rights, or other interests.

   - Where the action or inaction of another person or persons is causing or is likely to cause them to be harmed.

3. Safeguarding is everyone's responsibility, and as a provider of services to children and young people, we expect our approach to be a Company-wide one.

4. The purpose of this policy is to protect children, young people and vulnerable adults accessing SCCU's services or in our employment and to provide workers with the overarching principles that guide our approach to the protection of children and vulnerable adults.

5. We promote ethical behaviour, providing children/vulnerable adults with a sense of being valued and having an open-door policy where our employees and learners feel able to raise any concerns they have.

Scope

6. This document applies to all SCCU staff, including directors, managers and third-party contractors working for or on behalf of SCCU.

7. The act of safeguarding applies to any child or vulnerable adult our staff have contact with, including our own staff, learners and any other stakeholder.

Roles and Responsibilities

8. The Designated Safeguarding Leads hold the relevant training and experience in keeping children, young people, and vulnerable adults safe and are responsible for receiving and acting upon reports of safeguarding concerns.

9. SCCU Designated Safeguarding Leads (DSL):

    ● Liam Morrissey: lmorrissey@sccu.uk.com, telephone 07525931267

    ● Alison Wood-Still: awoodstill@sccu.uk.com, 07984539508

    ● Craig Jones: cjones@sccu.uk.com, telephone 07446010415

10. Alternatively, any safeguarding concerns can be reported to safeguarding@sccu.uk.com

11. As aforementioned, it is the responsibility of all SCCU staff to remain vigilant and to report any concerns related to safeguarding to the DSLs or safeguarding email address.

Definitions

Safeguarding

12. The term 'safeguarding' embraces both the act of child/vulnerable adult protection and a preventative approach to keeping these groups safe.

13. Working Together to Safeguard Children, HM Government 2023 states that:

    ● "Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

        a. Protecting children from maltreatment.

        b. Preventing impairment of children's health or development.

        c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

        d. Taking action to enable all children to have the best outcomes."

    ● In addition, the same guidance sets out that SCCU, as a provider of post-16 education, we are subject to the guidance and are classed as a college.

14. Vulnerable adults must be afforded similar protections, and SCCU play an important role in alerting the local authorities to adult safeguarding concerns.

Children

15. For the purposes of safeguarding, a child is anyone under the age of 18. (KCSiE 2023)

16. Child protection guidance points out that even if a child has reached 16 years of age and is living independently, in further education, a member of the armed forces, in hospital or in custody in the secure estate they are still legally children and should be given the same protection and entitlements as any other child (Department for Education, 2023).

Vulnerable Adults

17. An adult at risk is someone over 18 years old who is 'at-risk':

   ● Has or had had care and support needs.

   ● Is experiencing, or is at risk of, abuse or neglect.

   ● As a result of their care and support needs is unable to protect themselves against actual (or risk of) abuse or neglect.

Note: Individuals who do not currently receive care/support from a health or care service (but have care/support needs) may still be considered at risk.

Underpinning Legislation and Guidance

18. Safeguarding Children: In the UK, there are multiple pieces of legislation underpinning the safeguarding of children, including The Children Act 1989 (as amended), The Children and Social Work Act 2017, The Safeguarding Vulnerable Groups Act 2006, Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2023 (KCSiE) (described below).

19. The Department for Education (DfE) issues the Keeping Children Safe in Education statutory guidance. Schools and colleges in England must have regard to this statutory guidance when carrying out their duties to safeguard and promote the welfare of children. All staff must read and understand Part 1 and Annex A of Keeping Children Safe in Education.

20. Safeguarding Vulnerable / At-Risk Adults: Under the Care Act 2014, Local Authorities are responsible for protecting at-risk and vulnerable adults and investigating safeguarding reports. This act works alongside multiple other UK legislation and acts, including the Children and Families Act 2014, Mental Capacity Act 2005, Safeguarding Vulnerable Groups Act 2006, Sexual Offences Act 2003 and many more.

Aims and Objectives

21. To provide safety, protection, and security to children/vulnerable adults throughout our operations, we will adhere to our Safeguarding Policy and aim to:

- Protect all children and vulnerable adults from abuse, whatever their protected characteristics, life choices or backgrounds.

- Establish a safe environment in which learners can learn and develop.

- Raise awareness of child and vulnerable adult protection issues and promote good practice.

- Develop and then implement procedures for identifying and reporting cases, or suspected cases, of abuse.

- Conduct risk assessments to minimise potential hazards to children's and vulnerable adults' welfare.

- Provide support to learners who have been abused and act proactively by preventing any similar incidents through risk assessment.

- Ensure that adults working on behalf of SCCU Ltd will provide a safe, positive, and fun experience for all those involved.

- Ensure that all staff are aware of and supported in their roles and their responsibility towards the duty of care and receive the appropriate training, education and updates in terms of best practice and how to manage welfare issues.

- Ensure that all accusations and concerns are taken seriously and will be dealt with swiftly and appropriately by the DSLs and staff involved.

- Ensure that we monitor the conduct of staff to identify any inappropriate behaviour and act accordingly and, if necessary, in accordance with our disciplinary procedures and UK law.

- Ensure that we will not allow staff to have access to children or vulnerable adults where there is any knowledge of that person or persons having any criminal conviction involving children or who is disqualified from working with children.

- Ensure that we remind all staff of their duties to disclose such information, as required by the Criminal Justice and Court Services Act 2000.

- Keep detailed statements and evidence of events should they take place which is relevant to safeguarding concerns, incidents or allegations under this policy and will ensure that any relevant safeguarding information is immediately passed on to the appropriate authorities.

- Ensure we practice safe recruitment in checking the suitability of staff and volunteers.

- Take the necessary measures to comply with the Criminal Justice and Court Services Act 2000 and all other relevant Acts and Regulations.

- Review this policy and procedures annually.

22. We recognise that because of the day-to-day contact with learners, SCCU staff are well placed to observe the outward signs of abuse and will, therefore:

- Establish and maintain an environment where learners feel secure, are encouraged to talk, and are listened to.

- Ensure learners know that there are adults within the organisation whom they can approach if they are worried.

- Include opportunities in the training programmes for learners to develop the skills they need to recognise and stay safe from abuse.

- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL.

- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters, including attendance at case conferences.

- Keep written records of concerns about learners, even where there is no need to refer the matter immediately.

- Ensure all records are kept securely; separate from the main learner's file, and in locked locations.

- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.

- Ensure safe recruitment practices are always followed.

Procedures

Signs of Abuse

23. Obvious signs of abuse may be something that you have seen or heard, or an individual may disclose to you that they are at risk of abuse or are being abused.

24. Other signs may be less obvious and may not be noticed unless an individual has direct contact with the person being abused over a period of time.

25. We also recognise that learners who are abused or witness violence may find it difficult to develop a sense of self-worth and may feel a sense of helplessness, humiliation or blame.

26. SCCU may be the only stable, secure and predictable element in the lives of learners at risk, and they may have little contact with organisations that can provide guidance and support.

27. One or more signs do not necessarily mean that an individual is being abused, as there could be other things happening in their life that are affecting their behaviour or explain what you can see outwardly. However, signs must be noted, and where there is a genuine concern, they must be reported.

28. The only thing SCCU do not want our staff to do if they are concerned about an individual or suspect abuse or neglect is to do nothing.

29. It is therefore important that staff:

   ● Recognise common signs of abuse; and

   ● Ensure that learners are welcomed and supported in disclosing abuse; and

   ● Know our procedure for reporting suspected or disclosed abuse.

Types of Abuse

30. Safeguarding action may be needed to protect children and vulnerable adults from:

   ● Physical abuse

   ● Sexual abuse

   ● Emotional abuse

   ● Neglect

- Substance misuse

- Fabricated or induced illness

- Forced marriage

- Female genital mutilation (FGM) - Staff are directed to the NSPCC's website for guidance on signs and symptoms of Female Genital Mutilation (FGM) - NSPCC website. The school recognises and adheres to its mandatory duty to report any suspected or known cases of FGM of a female under 18 years old to the Police.

- Radicalisation and/or extremist behaviour

- Child criminal and/or sexual exploitation and trafficking (which often takes advantage of an imbalance in power to coerce, manipulate or deceive the victim into taking part in sexual or criminal activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence)

- Domestic abuse (which includes psychological, physical, sexual, financial or emotional abuse and also includes coercive control, such as being told where to go, what to wear or being isolated from friends and family)

- Teenage relationship abuse

- Bullying, including online bullying and prejudice-based bullying

- Poor parenting (particularly concerning babies and young children)

- Racist, disability and homophobic or transphobic abuse

- The impact of new technologies on sexual behaviour (e.g. sexting)

- Gender-based violence/ violence against women and girls

- Issues that may be specific to a local area or population, for example, gang activity and youth violence

- Other issues not listed here but pose a threat to children, young people or vulnerable adults.

Red Flags for Children

31. Common Signs/Red Flags that there may be something concerning happening in a child's life include:

   ● Failing to thrive – not meeting educational, growth or other milestones

   ● Unexplained weight loss or weight gain or appearing under or overweight

   ● Multiple recurrent bruises, scars, cuts, blisters

   ● Contracting sexually transmitted diseases

   ● Becoming pregnant under the legal age of consent

   ● A dramatic change in personal appearance, including wearing a 'uniform'

   ● Crying, hiding, or shaking in the presence of others or in seemingly routine situations

   ● Not disclosing the nature of the visits/activities or persons involved

   ● Multiple illnesses or injuries or frequent visits to the hospital, dentist or doctor

   ● Unexplained changes in behaviour or personality

   ● Abnormal amount of money or excessive gifts being received

   ● Becoming withdrawn or anxious

   ● Becoming uncharacteristically aggressive

   ● Lacks social skills and has few friends, if any

   ● Poor bond or relationship with a parent or carer

   ● Knowledge of adult issues inappropriate for their age

   ● Running away or going missing

   ● Always choosing to wear clothes which cover their entire body

Red Flags for Adults

32. Possible signs of neglect or abuse in adults:

   ● Poor environment – dirty or unhygienic

   ● Poor or inadequate equipment for comfort or protection

- Poor physical condition and/or personal hygiene

- Pressure sores or ulcers

- Bruising, lacerations, or other injuries

- Malnutrition or unexplained weight loss

- Untreated injuries and medical problems

- Inconsistent or reluctant contact with medical and social care organisations

- Accumulation of untaken medication

- Uncharacteristic failure to engage in social interaction (personal or digital)

- Inappropriate or inadequate clothing

- Over-sedation

- Unnecessary or unexpected anxiety or distress

- Completing actions which are out of character or are degrading or humiliating

- Not having access to money or other necessities of life

- Being under the control of another and having to follow strict 'rules'

33. Indicators of self-neglect:

- Extremely poor personal hygiene

- Unkempt appearance

- Lack of essential food, clothing, or shelter

- Malnutrition and/or dehydration

- Living in squalid or unsanitary conditions

- Neglecting household maintenance

- Hoarding

- Collecting a large number of animals in inappropriate conditions

- Non-compliance with health or care services

- Inability or unwillingness to take medication or treat illness or injury

How to Report a Concern

34. Learners and stakeholders may make a disclosure or report a concern via our website through this link.

35. Alternatively, learners and stakeholders may make a disclosure directly to a member of staff.

Procedure in The Event of Cause for Concern

36. On becoming aware of a potential safeguarding issue where a child or vulnerable adult is suspected of being or being abused, SCCU Ltd staff will:

- Meet with the child or vulnerable adult in a private and safe place where appropriate and possible to begin the support process and complete a report in the "My Concerns" portal.

  o Where the staff member cannot meet with the individual, they should record any information already known.

  o Note: Staff should attempt to gain consent to share information outside of SCCU from individuals aged 16 or over.

- Discuss the contents of the form and details of the concern with the Designated Safeguarding Leads (DSLs).

- Where appropriate, the relevant senior manager is to be notified and included in discussions.

- The interests of the child or vulnerable adult are paramount, and any urgent medical need should be addressed as a priority.

- Where agreed with the DSLs, concerns will be referred to the Local Safeguarding Children Board (LSCB), local social services and/or Police if a crime has been committed, life is in danger, or a child is at risk (see Appendix 5).

- Where further external advice and guidance are required, the following can be contacted:

  o NSPCC – 0808 800 5000

  o Multi-Agency Safeguarding Hub (Children) - 024 7678 8555

  o Adult Social Care Direct - 024 7683 3003

  o Emergency Duty Social Worker - 024 7683 2222

  o Police – 101 (non-emergency)

How to Manage a Disclosure

37. If an individual has reported to you that they have been abused, are being abused or are at risk of abuse, you should follow the guidance in Appendix 2 – Actions to Take in a Disclosure.

Missing and Absent Learners

38. Where a learner is missing or absent, particularly repeatedly and/or for prolonged periods, this may be considered a safeguarding concern.

39. To effectively manage our strategy to identify and safeguard learners who are missing and/or absent, we will:

- Wherever possible, hold more than one emergency contact number for each learner.

- Attempt to contact the absent learner and/or their emergency contacts to conduct a welfare check on that day.

- If absent for five or more working days (or sooner should other safeguarding concerns be present) and marked as an unauthorised absence (no contact has been made), inform the local safeguarding board.

- If there are any suspicions as to the learner's safety, immediately inform the authorities.

Logging a Concern

40. Staff should log all safeguarding concerns in the "My Concerns" portal using their login.

Managing Allegations Against Staff Procedure

41. Centre personnel/learners/individuals identifying possible abuse or receiving a disclosure or allegation relating to a past or present staff member must report it to:

- Designated Safeguarding Leads

- Vll Orchard Court, Harry Weston Road, Binley, Coventry, CV3 2TQ

- Tel: 02467 936969

- Email: safeguarding@sccu.uk.com

42. Disclosures can come directly from a child/vulnerable adult or a third party or may be raised through the suspicion of staff based on a variety of symptoms and knowledge of possible indicators of abuse.

43. Allegations will be taken seriously and dealt with as soon as practicable, in line with the recognised centre's Safeguarding Policy.

44. The Designated Safeguarding Lead is also responsible for conducting any investigation and reporting to all parties.

45. Throughout this procedure, records will be maintained and kept securely and confidentially, separately from the learner's files.

46. When receiving a disclosure, the Designated Safeguarding Leads must find time as soon as possible to take account of the allegation and undertake any necessary investigation.

47. In the event of an allegation of child/vulnerable adult abuse being committed by any SCCU Ltd personnel or tutors/assessors/internal verifiers who appear on an SCCU Ltd partner list (where applicable), the Designated Safeguarding Lead is required to follow the relevant investigation and reporting procedures (reporting to the Company Director).

48. Throughout this procedure, records will be maintained and kept securely and confidentially, separately from the learner's files.

49. It is ultimately the responsibility of the Quality and Curriculum Manager (QCM) to ensure that this policy is published and accessible to all personnel, learners and any relevant third parties. However, the Internal Quality Assurers (IQA) specific to each qualification are responsible for ensuring this information is fully understood by their qualification team and by the learners who commence courses/programmes in their area.

Do I Need Consent to Report a Concern or Disclosure?

50. You DO NOT need the permission of a child under the age of 16 or over the age of 16 who lacks the mental capacity to consent to the report being made.

51. You DO NOT need the permission of anyone to report a crime where there is a threat to life or where there is a concern that a child is in danger to the Police.

52. You DO need to try and obtain the consent of a person aged 16 or over if you believe that they have the mental capacity to consent (although information may still be shared under certain conditions – see Appendix 5).

53. A person lacks mental capacity where they have a reduced ability to make informed decisions in the moment.

54. This may be transient (e.g., due to fear, shock, injury, or illness) or long-term (e.g., due to learning differences, disability, or mental health issues).

55. You should always try to use plain language and aid the individual wherever possible to understand your concern, weigh up the pros and cons of the situation and give or deny their consent.

56. Whilst capacity to consent is a complex issue, it should not get in the way of genuine concerns going unreported. Staff should seek the help of a Senior Manager or contact the local Safeguarding Board or the NSPCC for advice if they are unsure whether an individual has capacity.

Should I inform the Parent or Guardian of Concerns About a Child?

57. It is good practice to inform the adult present that you have concerns and that you are required to report the incident; however, it is not always appropriate to do this.

58. If you believe that informing the parent, guardian, or others present would put the child or children in immediate danger, or if the matter is a serious crime, it is important to make a referral to Social Services without disclosure.

59. The following are circumstances where disclosure to a parent or guardian is not appropriate:

   ● Where sexual abuse or sexual exploitation is suspected.

   ● Where organised or multiple cases of abuse are suspected.

   ● Where Fabricated or Induced Illness (previously known as Munchausen Syndrome by Proxy) is suspected.

   ● Where Female Genital Mutilation is the concern.

   ● In cases of suspected Forced Marriage.

   ● Where contacting or discussing the referral would place a child, yourself, or others at immediate risk.

What we do to Safeguard our Staff and Learners

Summary of the Personnel Recruitment Procedure

60. In achieving our policy aims, we have developed procedures related to the recruitment of personnel and ensure safe recruitment practices in line with national legislation.

61. This involves checking the suitability of personnel to work with children and vulnerable adults and ensuring any unsuitable behaviour is reported and managed using relevant allegations procedures as per our Safer Recruitment Policy.

62. New members of personnel are then required to confirm their agreement to abide by the SCCU Ltd policies and procedures, including this policy and related procedures, in writing.

63. All members of personnel who work with children and vulnerable adults are required to adhere to this policy.

Staff Training

64. Where new staff are recruited, arrangements are made for induction and any relevant training, which includes clarification of activity requirements, responsibilities and reading child/vulnerable adult safeguarding procedures and this policy.

65. This policy and procedure also form part of the staff handbook.

66. Where staff take greater responsibility for safeguarding, such as DSLs, further training will be provided in-house or by an external training provider as appropriate.

67. Awareness of child/vulnerable protection and safeguarding practices and procedures will continue to be addressed via ongoing training and updates, and DSLs will have their training renewed as necessary.

68. Safeguarding training for staff is organised with local authorities.

Bullying

69. Bullying is behaviour that hurts someone else.

70. It includes name-calling, 'banter', hitting, pushing, spreading rumours, threatening, or undermining someone.

71. It can happen anywhere, is usually repeated over a long period of time, and can hurt individuals both physically and emotionally.

72. SCCU does not tolerate bullying of any kind, regardless of who is involved, and any individual found to be bullying or harassing a learner or staff member may face disciplinary action or an appropriate sanction.

73. This includes online bullying via any means.

Safe Use of ICT

74. Internet: use of the internet at SCCU Ltd is a privilege, not a right. Internet use will be granted to staff, volunteers and learners upon joining SCCU Ltd. Learners must not access or share inappropriate content.

75. Email: all staff are reminded that emails are subject to Freedom of Information requests. This means emails should be of a professional, work-based nature and, as such, written appropriately. Emails of a personal nature are not permitted. Learners are permitted to use the email system and, as such, will be given their own SCCU email address.

76. Use of photos and videos by SCCU: parents or guardians should sign a digital media (such as photos and videos) release slip on their child's entry to the academy. Non-return of the permission slip will not be presumed as acceptance. You should also refer to the Social Media Policy for more information. Images focusing on individuals are personal data and must be controlled and processed as per the GDPR Data Security Policy.

77. Sharing of photos: Learners should not share images of others without their permission. As mentioned above, images focusing on individuals are personal data. Learners must not share inappropriate images containing violence, nudity, sexual content, graphic detail or anything which could be considered harmful.

78. Mobile phones and hand-held electronic devices: staff, volunteers and learners should ensure that mobile phones and hand-held devices are used in accordance with the SCCU Code of Conduct and in line with the following:

   ● Mobile phones should only be answered and in sight of administration areas of the building.

   ● Work-based tutors should store their mobile phones in a safe place away from the setting and should not access them during learner visits. It is recommended that mobile phones are password protected and insured.

79. Sexting: in this case, refers to 'youth produced sexual imagery' as defined by Sexting in schools and colleges: Responding to incidents and safeguarding young people, UKCCIS 2016. Imagery includes both moving and still images.

- We will ensure learners are taught in an age-appropriate manner the legal, social and moral issues around sexting. Learners will be encouraged to report all incidents of sexting. Staff, volunteers and learners will inform the DSL who will act according to this policy and the guidance outlined in the Sexting in Schools and Colleges: Responding to incidents and safeguarding young people, UKCCIS 2016.

80. Radicalisation and Extremism: SCCU Ltd ensures staff, volunteers, and learners are safe from terrorist and extremist material when accessing the internet; this includes establishing appropriate levels of filtering.

- If a concern arises, staff, volunteers and learners will know who to go to and should inform the DSLs, who will act according to the SCCU Ltd Safeguarding and Child Protection Policy and the guidance outlined in the Prevent and Channel Duty Guidance. The Curriculum will ensure pupils are prepared positively for life in Modern Britain.

81. Social Networking: there are many social networking services available, and SCCU Ltd is fully supportive of social networking as a tool to engage and collaborate with prospective clients and learners and to engage the wider community, but staff and learners must use it appropriately.

82. Notice and Take-Down Policy: should it come to attention that there is a resource that has been inadvertently uploaded and is inappropriate, or SCCU Ltd does not have copyright permission to use that resource, it will be removed within one working day.

83. Incidents: any e-safety incident is to be brought to the immediate attention of the DSLs or, in their absence, the company director. The DSLs will assist you in taking the appropriate action to deal with the incident and fill out an incident log.

84. Training and Curriculum: it is important that the wider academy community is sufficiently empowered with the knowledge to stay as risk-free as possible whilst using digital technology. This includes updated awareness of new and emerging issues, including sexual exploitation and extremism.

- As such, SCCU Ltd will provide information to stakeholders regarding e-safety on request and promote e-safety where possible (e.g., bulletins posted in newsletters and e-portfolios). Consideration should be given to the delivery of key messages to pupils with additional learning support or a disability, including specific examples for those issues directly relating to them.

- E-safety for learners is embedded into the PDBW curriculum, and wherever ICT is used at SCCU Ltd, staff will ensure that there are positive messages about the safe use of technology and risks as part of the learner's training and development.

- As well as the programme of training, SCCU Ltd will establish further training or lessons as necessary in response to any incidents.

- The DSLs are responsible for recommending a programme of training and awareness for staff. Should any member of staff feel they have had inadequate or insufficient training generally or in any particular area, this must be brought to the attention of the company director for further CPD.

Filtering and Monitoring

85. Whilst SCCU does not provide a physical base for learners to train at, learners do access the internet at their respective placements. Therefore, we will work with employers to ensure that appropriate filtering methods are in place to ensure that apprentices are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material, making them aware of their duty to:

- Report all concerns to our Safeguarding Officer.

- Review filtering and monitoring provisions at least annually.

- Block harmful and inappropriate content without unreasonably impacting teaching and learning.

- Have effective monitoring strategies in place that meet their safeguarding needs (both technological and physical).

86. Where SCCU provides devices to staff and learners, these devices will have filtering and monitoring software installed, which meets the Department for Education standards.

87. This filtering will not "over block" but will ensure that those devices will not have access to potentially harmful and inappropriate online material.

88. Our IT team will ensure that all "flagged "searches are immediately reported to the Safeguarding Officer.

89. Our directors and senior leadership will ensure that:

- Appropriate filtering and monitoring systems are procured in accordance with a risk assessment; and

- All decisions to block content are recorded and justified; and

- The effectiveness of our provision is regularly reviewed (at least annually or when a safeguarding concern or risk is identified.); and

- All reports are overseen by the Safeguarding Officer and relevant leadership team.

Data Protection

90. The information provided within a safeguarding report is likely to be sensitive, and therefore, we will store information appropriately and only disclose this information where we have a legal obligation, under the Safeguarding Vulnerable Groups Act (SVGA) 2006, and only to appropriate individuals within Local Safeguarding Children Board and to Designated Safeguarding Leads and/or Management within SCCU Ltd.

91. SCCU Ltd and its staff shall treat all incidents with absolute confidentiality.

92. The organisation shall comply with the Data Protection Act 1998 for the safe and secure storage of all information relating to an individual's personal and sensitive data or details resulting from any incident or allegation arising within the scope of this policy.

Supporting Learners

93. When at SCCU, a learner who has been abused may display behaviour that is challenging, defiant or withdrawn.

94. We will endeavour to support the learner through:

- The content of the training programme.

- Supporting learners via our Additional Learning Support Policy.

- The company ethos promotes a positive, supportive and secure environment and gives learners a sense of being valued.

- The SCCU Ltd Staff Code of Conduct is aimed at supporting learners in the training centre.

- Ensuring that the learner knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.

- Liaison with other agencies that support the learner, such as the Multi-Agency Safeguarding Hub (MASH), Social Services, Adult Safeguarding Team, Child and Adult Mental Health Service, and the Education Welfare Service.

- Ensuring that where a learner on the child protection register leaves, their information is transferred to the new provider immediately and that the learner's social worker is informed.

Signed:

Name: Liam Morrissey

               Designated Safeguarding Lead

Appendix 1 - Safeguarding Reporting Flow Chart
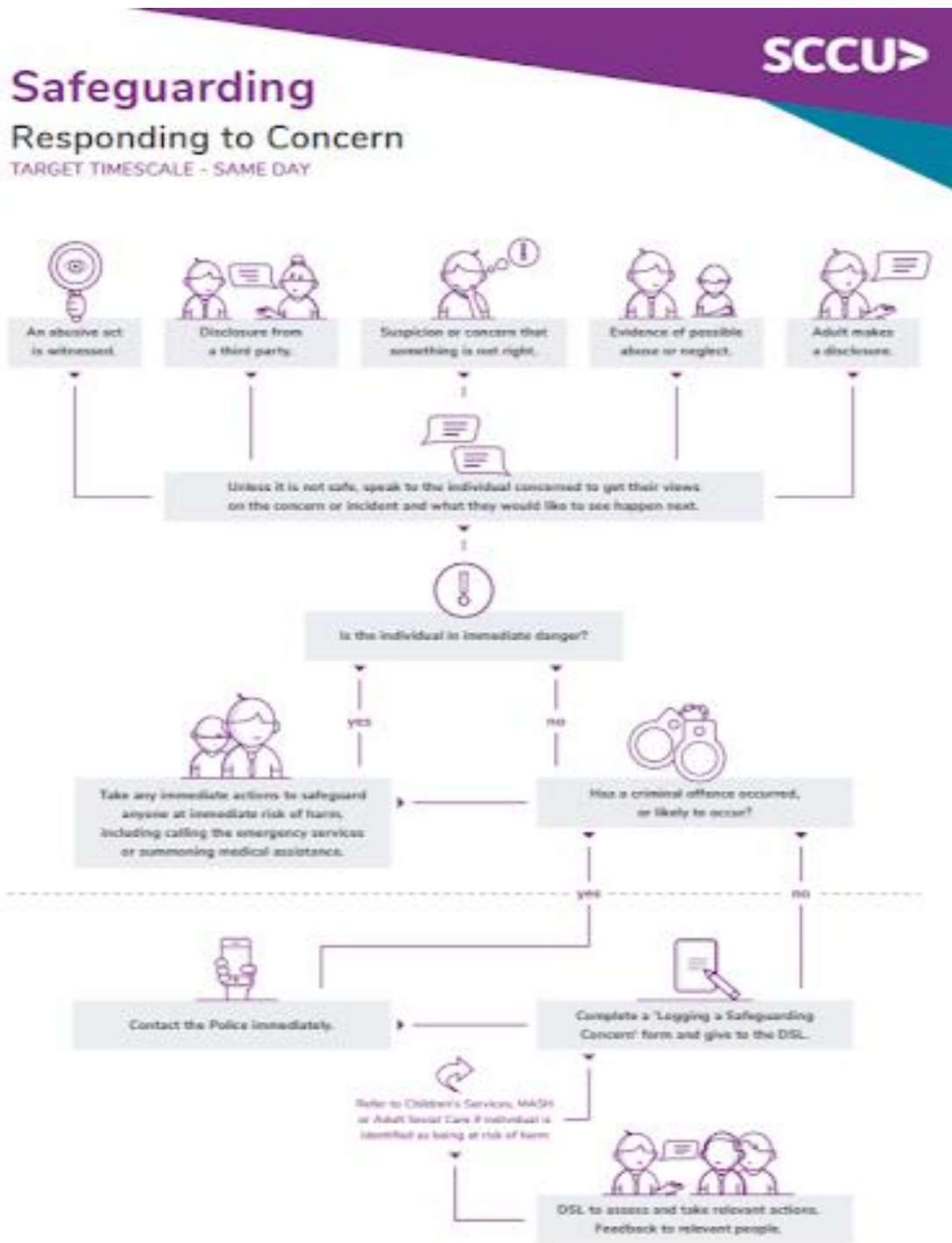
Appendix 2 – Actions to Take in a Disclosure

If an individual chooses to disclose information of a safeguarding nature to you:

Do	Do not
❏ React calmly so as not to frighten the individual.	❏ Dismiss the concern.
❏ Get another adult to accompany you while you gather more information.	❏ Panic or try to resolve the issue yourself.
❏ If you are with the individual – make the area safe and call the Police if necessary.	❏ Allow your shock or distaste to show.
	❏ Probe for more information than is freely offered to open questions.
❏ Take what the person says seriously, recognising the difficulties inherent in interpreting what is being said by a person who has, for example, a speech impairment and/or differences in language – seek communication aids or an interpreter where required.	❏ Speculate or make assumptions about what may have happened.
	❏ Make any comments about the alleged abuser.
	❏ Make promises or agree to keep secrets.
❏ Ask open questions - Avoid asking leading or direct questions other than those seeking to clarify your understanding of what the person has said by repeating information back to them where it needs confirmation. They may be subsequently formally interviewed by the Police and/or Social Care Services, and they should not have to repeat their account on several occasions. The first person told may become a witness at court if they have asked/gained direct relevant information.	❏ Delay telling the Designated Safeguarding Lead.
	❏ Ask the person or any witnesses to sign your written information, as this may be significantly detrimental to any subsequent police investigation.
	❏ Take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner following referral.

❏ Try to reduce any questions you may choose to ask to an absolute minimum and concentrate on listening to the person. Questions should only consist of Who ..? Where ..? When ..? What ..?

❏ Reassure the individual that they are right to tell and are not to blame.

❏ Explain to them that concerns will have to be shared with someone within SCCU who is in a position to act and try and gain the consent of the adult or individual over 16 years of age to refer to the authorities.

❏ Make a written record of what has been disclosed at the earliest opportunity of what has been said, heard and/or seen as soon as possible (preferably on the day that the concern/disclosure was first identified/made) using the 'Logging a Safeguarding Concern' form.

❏ Inform and discuss the incident report with the Designated Safeguarding Lead (DSL).

❏ If you need guidance, seek help from the DSL.

❏ Discuss the issue with anyone other than the Designated Safeguarding Lead (DSL) or the Company Director unless advised by the DSL, and it is to the local authority or Police.

Appendix 3 - Key Contact Information

SCCU Ltd Designated Safeguarding Leads (DSL):

Liam Morrissey		**Alison Wood-Still**	
Email:	lmorrissey@sccu.uk.com	Email:	awoodstill@sccu.uk.com
Telephone:	07525931267	Telephone:	07984539508

Craig Jones

Email: cjones@sccu.uk.com

Telephone: 07446010415

Alternatively, any safeguarding concerns can be reported to safeguarding@sccu.uk.com

Service	Coventry	Birmingham	Northamptonshire	Leicestershire	Worcestershire
Children's Services	024 7678 7980	0121 303 1888	0300 126 1000	0116 232 3232	01905 822666
Adult Social Care	024 7683 3003	0121 675 4806	0300 126 1000	0116 305 0004	01905 768053
MASH / Local Safeguarding Team	024 7678 8555	0121 303 1888	0300 126 1000 (option 1)	0116 454 2440	01905 822666
Childline	0800 1111				
NSPCC	0808 800 5000				
FGM Helpline	0800 028 3550				
Radicalisation, extremism and/or terrorism	0800 789 321				
Child Exploitation and Online Protection Centre	0370 496 7622				
Police Emergency	999				
Police Non-Emergency	101				

Appendix 4 – Filtering and Monitoring Employer Guide

As providers of education, it is your duty to ensure that:

1. You have appropriate filtering* and monitoring provisions in place. These include:

    - Systems or software that will restrict access and block potentially harmful online content (these will usually be applied to your Wi-Fi access**); and

    - systems or software that flag potentially harmful or inappropriate content being searched for any attempt to access a blocked or illegal site; and

    - the use of physical monitoring of online activity amongst your learners (for example, watching screens of users).

2. Any filtering will be appropriate in that it will not be excessive and prevent learners from accessing legitimate content.

3. Any flags/alerts are identified in a timely manner.

4. Any concerns are immediately reported to our Safeguarding Officers/Designated Safeguarding Leads.

5. These systems are reviewed regularly.

* Your filtering provider must be:

- a member of the Internet Watch Foundation (IWF)

- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)

- blocking access to illegal content, including child sexual abuse material (CSAM).

**Please note, however, that where learners use your devices or access your networks, these should also have appropriate filtering and monitoring provisions applied.

For further information on how filtering and monitoring provisions should be implemented, please refer to the Department for Education guidance here.
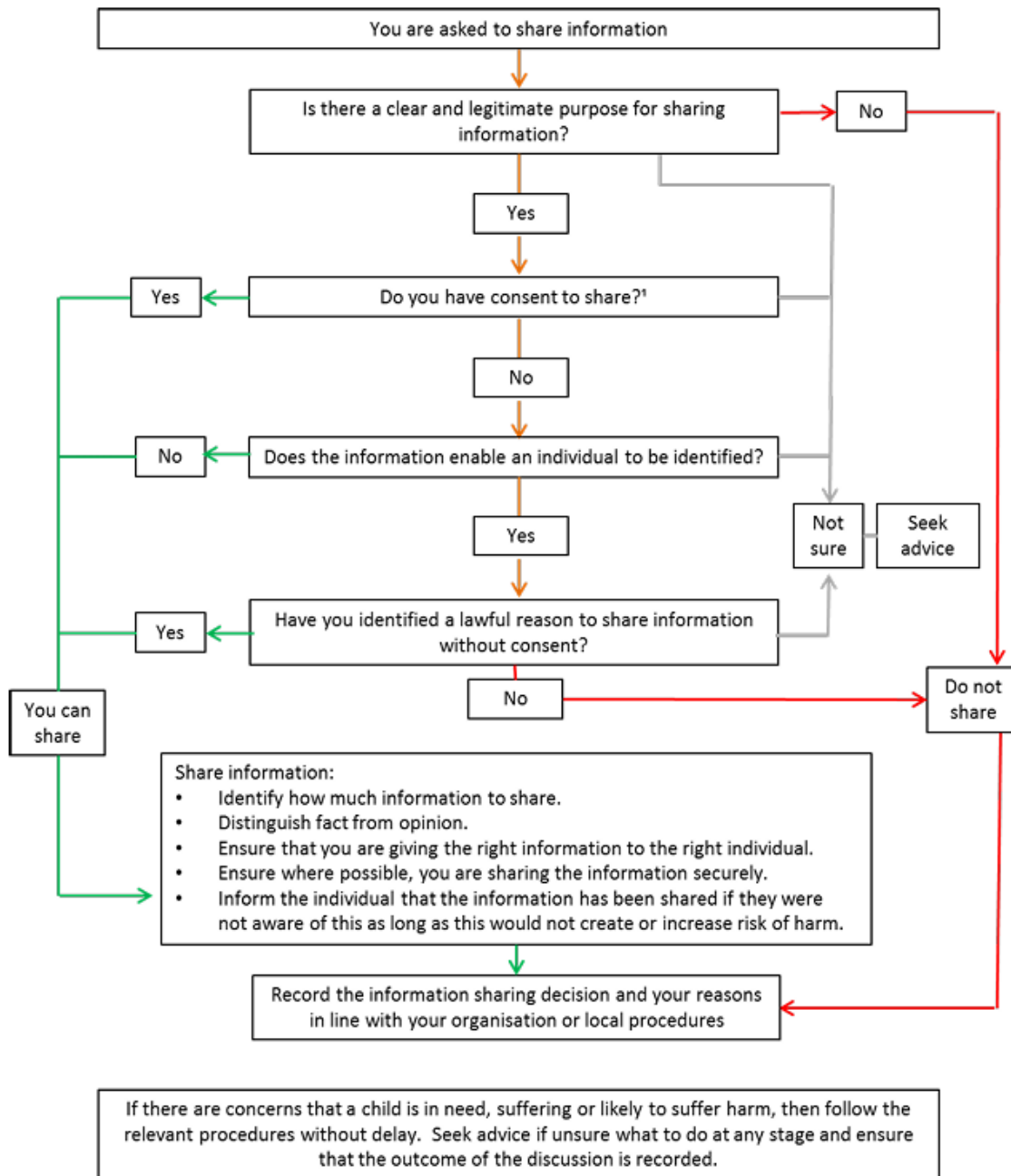
Appendix 5: Information Sharing

As per: Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers, HM Government, July 2018.

The seven golden rules to sharing information

1. 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.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Flowchart of when and how to share information

You are asked to share information

Is there a clear and legitimate purpose for sharing information? → **No**

Yes

Do you have consent to share?[1] → Yes

No

Does the information enable an individual to be identified? → No

Yes

Not sure → Seek advice

Have you identified a lawful reason to share information without consent? → Yes

No → Do not share

You can share

Share information:
- Identify how much information to share.
- Distinguish fact from opinion.
- Ensure that you are giving the right information to the right individual.
- Ensure where possible, you are sharing the information securely.
- Inform the individual that the information has been shared if they were not aware of this as long as this would not create or increase risk of harm.

Record the information sharing decision and your reasons in line with your organisation or local procedures

If there are concerns that a child is in need, suffering or likely to suffer harm, then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

1. Consent must be unambiguous, freely given and may be withdrawn at any time

Please note that children under the age of 16 DO NOT need to give their consent to share information if there is lawful reason (see below).

What is a lawful reason to share information without consent?

- Where practitioners (professionals) need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent.

- Information <u>can</u> be shared legally without consent if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if gaining consent could place a child at risk.

- Relevant personal information <u>can</u> be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm or if it is protecting their physical, mental, or emotional well-being.

(Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers, HM Government, July 2018)

Further guidance:

- If the designated safeguarding lead (or deputy) decides to go ahead and make a referral to local authority children's social care and/or a report to the Police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim, and appropriate specialist support should be offered.

- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the Police remains. The Police will take a welfare rather than a criminal justice approach in these cases.

(KCSiE 2023)

Appendix 6: DBS Checks on Learners

If the activity undertaken by a learner on work experience takes place in a 'specified place', such as a school or sixth form college, and gives the opportunity for contact with children, this may itself be considered to be a regulated activity relating to children.

In these cases, and where the learner doing the work experience is 16 years of age or over, SCCU should consider whether an enhanced DBS check should be requested for the learner in question. (DBS checks cannot be requested for children under the age of 16.) KCSiE 2023.

The same is true for those learners working in places where they have contact with vulnerable adults.