



Sysco Group

Prevent and Safeguarding Strategy

Date: August 2018

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## **Introduction**

This strategy covers the provision of Sysco Business Skills Academy and Brighter Futures Merseyside which sits under the umbrella of the Sysco Group.

Sysco is committed to achieving the highest standards of safeguarding and well-being of all learners and fully recognises its responsibilities for protecting vulnerable groups.

Sysco promotes a multi-agency approach which emphasises the need to recognise the vulnerability of children and young people to radicalisation, work to safeguard those at risk, and work together to provide the skills, understanding and support to children and young people to make critical choices.

### **What does Safeguarding actually mean?**

- Safeguarding is a proactive process of protecting and ensuring the safety and well-being of young and vulnerable learners & adults at risk, whether from crime, other forms of abuse or from being drawn into extremism activity.
- Safeguarding may involve instances in which a young or vulnerable learner is suffering or likely to suffer from harm, or at risk from radicalisation.
- Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

### **What are the benefits of effective Safeguarding?**

- When learners feel safe and secure they can concentrate on learning.
- Learners can rely on those people in positions of trust.
- Staff are protected from malicious and misplaced allegations.
- Staff are clear about individual responsibilities, roles and boundaries.
- Learners are appropriately protected and all issues are dealt with effectively.
- Learners and Staff are protected from risks associated with radicalisation and forms of extremism.

This Strategy applies to staff, learners, Sub-contractors, Employers, visitors and multi agencies working on behalf of or in conjunction with the Sysco Group.

Sysco have a dedicated Safeguarding team that are responsible for reviewing and updating this strategy as well as accompanying policies, procedures and monitoring the impact of Safeguarding support.

## **Policies**

Sysco has a number of policies and procedures in place specific to safeguarding. There are separate policies in place for Learners and Employees all of which are saved on the company intranet site to ensure staff have the most up to date records at all times.

Sysco promotes an ethos where young people feel secure, are encouraged to talk and are listened to. Sysco recognise the positive contribution it can make towards Objective

3 of the Prevent Strategy “supporting vulnerable individuals who are being targeted and recruited to the cause of violent extremism”.

There are nine main elements to both policies, the Sysco Group will endeavour;

- To ensure the company operates safer recruitment practices in accordance with legislative requirements.
- To raise awareness of Safeguarding & Prevent throughout the organisation and ensure that staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.
- To raise awareness of safeguarding to all learners and ensure that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe.
- To ensure employers are aware of Safeguarding & Prevent and provide guidance on policies to put in place.
- To continuously review and improve Safeguarding & Prevent procedures.
- Maintain safe environments in which vulnerable groups can learn and develop.
- To measure and monitor the impact of Safeguarding to support Learner achievement.
- To ensure prevent legislation and policies are effectively implemented.
- Where there are potential issues with learner attendance, key staff will liaise with the relevant emergency contacts and follow procedures. Also referred to in the parental involvement strategy, retention and achievement strategy.

It is our intention to ensure all Learners feel safe and have adequate information to allow them to raise concerns. Sysco will ensure that the priorities detailed are actively promoted.

In addition to the above and to support safeguarding and prevent at Sysco we will adhere to the following:

**Counter Terrorism and Security Act 2015,**

Section 26 Applies to schools and other providers;

To have due regard to the need to prevent people being drawn into terrorism.

**Working Together to Safeguarding Children (2018)** covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of Children. It also provides the framework for Local Safeguarding Children Boards (LSCB's) to monitor the effectiveness of local services, including safeguarding arrangements in schools.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)

**Prevent Duty Guidance – England and Wales**

Covers the duty of schools and other providers in section 29 Counter Terrorism and Security Act 2015, to have due regard to the need to prevent people being drawn into terrorism.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799 Revised Prevent Duty Guidance England Wales V2-Interactive.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

## **Responsibilities**

It is the responsibility of all staff at Sysco and sub-contractors to be aware and promote the principals of the Safeguarding & Prevent policies and procedures. Sysco recognise and adhere to the statutory requirements within safeguarding legislation and we will continue;

- Constitute and operate a Safeguarding Focus Team to be chaired by the Managing Director.
- Ensure there our Designated Safeguarding and Deputy Officers in place that will receive ongoing appropriate training and support for this role.
- Ensure the Safeguarding and Deputy Officers roles are communicated via our staff and learner induction process, internal training and awareness sessions, via the learner review process and via posters located throughout the centre.
- Continue to ensure that all staff are aware and understand their responsibilities in relation to Safeguarding and in being alert to the signs and indicators of abuse and radicalisation and for referring any concerns directly to the Designated Safeguarding Officer.
- Ensure that effective Safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of Recognition, Response, Record, Report, and Refer.
- Ensure that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters. Which would include Local Safeguarding Board, Local Prevent Officer and Local Police.
- Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Maintain up to date risk assessment following the 157 framework.
- We will monitor the impact of Safeguarding support during the Senior Managers and Safeguarding Meetings.
- Ensure all records are stored securely and in accordance with the Data Protection Act.
- We will robustly vet employers with regard to placement or work experience and pro-actively engage with these employers with regard to relevant policies.
- Refresher training will take place annually and Sysco will review staff Safeguarding qualifications every two years.
- All staff will complete an enrichment workbooklet on the area of prevent and also complete on line Channel training.

Furthermore, Sysco recognise that because of the ongoing contact with learners, staff are well placed to identify areas of concern.

The Sysco Group will therefore;

- Establish and maintain an environment where learners feel secure and are encouraged to communicate with our staff.
- Ensure learners know that there are designated staff within the company whom they can approach if they are concerned or worried.
- Include opportunities within our ongoing assessment process and classroom delivery for learners to develop the skills they need to recognise and stay safe.
- Ensure Employers are well informed and that they are actively committed to ensuring there are Safeguarding policies in place and Learners will be protected.

## **Safeguarding Procedures**

Sysco recognises that effective procedures and systems are required to safeguard young and vulnerable people. To support this strategy, Sysco has a Safeguarding Policy for staff and a separate one issued to all learners as part of their welcome pack.

Sysco has a Safeguarding Focus Team, the team meets quarterly and is responsible for the implementation and continuous improvement of Safeguarding systems and procedures. The team is built up of the Managing Director, Senior and Middle management across the organisation, Human Resources, the Safeguarding and Deputy Officers and Recruitment staff.

A dedicated Safeguarding information section is available on the company intranet site. This includes a procedure flow chart, work instructions and documentation for the complete safeguarding journey. The procedure defines the systems for reporting and recording accidents, incidents, complaints or cases of suspected or informed abuse.

As part of the induction process learners are given information on Safer Learning and a guide on what to do if they feel that their health, safety and general welfare is affected. All learners will be encouraged to complete Channel Awareness training in order to enhance their knowledge on radicalisation and extremism. Learners are also given an ICT policy, use of image form, a Zero Tolerance commitment and guidelines on staying safe whilst online. Learners are also issued with a comprehensive list of support referral agencies. Sysco will continue to review this list on a regular basis to ensure it remains current.

The ICT policy has been revised to incorporate any associated risks with radicalisation and extremism. Sysco has also obtained advice from an appropriate external organisation on enhanced web filtering systems and has developed systems due to this, resulting in less associated risks with staff and learners accessing extremist material.

Employers are provided with IAG and where required support on implementing a Safeguarding Strategy.

Training Advisors & Tutors hold the responsibility for ensuring learners fully understand the information and are aware of Sysco's commitment in Safer Learning and promote awareness as part of the Learner Review process, using Hot Topics and also by learners completing workbooklets on Safeguarding and Prevent.

Sysco's Safeguarding and Deputy Officers are responsible for providing information, advice and guidance to staff on Safeguarding issues. They will ensure complaints of abuse, unfair treatment, harassment, bullying or suspected radicalisation continues to be dealt with promptly and in accordance with set procedures.

Sysco will endeavour to ensure employers are provided with information on safer learning, the primary purpose of this is to raise awareness; disseminate 'best or better' practice and confirm the respective rights and responsibilities with all related stakeholders.

Sysco will ensure that sub-contractors working with young, inexperienced or vulnerable people have appropriate procedures and systems in place to ensure they comply in the same way as Sysco and review procedures, practices and safe systems to ensure compliance. Sysco will also ensure DBS checks take place and are monitored where

necessary. Where identified individual risk assessments may be undertaken to prove the company's commitment to health and safety and to ensure that suitable arrangements are considered and implemented prior to the young or vulnerable person starting work.

### **Learning Materials**

Sysco will develop Safeguarding resources on an ongoing basis. We will ensure that learning materials are consistent with the principals of Safeguarding and Prevent Policies and that the material is appropriate to the Learner needs.

Learning Material will be used to raise awareness of Safeguarding to young people and adults at risk. Safeguarding awareness will also flow through the delivery of the programme.

Handouts in the form of Hot Topics will be shared on a quarterly basis to continuously raise awareness to staff, learners, employers and sub-contractors.

The learner Review process will be used to clarify the understanding of Safeguarding and check Learner well-being.

All Staff will have appropriate Safeguarding Training, which will be reviewed annually.

In 2017 all staff have completed further Safeguarding, Prevent and Radicalisation training, all members of staff and the board have completed safeguarding in education training (annual refresher). The Safeguarding Focus Team have also all attended L3 Advanced Safeguarding Training for Designated Leads in 2016. The Safeguarding Officers also attend regular spotlight sessions arranged by the Liverpool Safeguarding Childrens Board. Sysco will also ensure that Learners on all programmes complete training to raise their knowledge.

### **Communication**

Safeguarding forms part of the Company Communication Strategy. The focus team meet quarterly to review the aim of the strategy and ensure systems and procedures are reviewed.

A number of people have clearly defined roles and responsibilities in relation to child protection, appropriate to the level at which they operate. These duties will be reviewed annually.

CPD of Safeguarding will be monitored by HR and the Safeguarding Officer; updates will be communicated during full team meetings. All Client/learner facing staff have completed a Safeguarding Adults and young people training course along with an annual refresher on safeguarding in education. The Safeguarding and Deputy Officers have both completed a Level 2 qualification called Leading on Child Protection along with training on L3 Advanced Safeguarding Training to prepare them for the role and enhance and refresh their knowledge further.

During 2016 all staff completed Channel Awareness training module. Staff also attended training on tackling radicalisation and extremism. Staff joining after this date also complete all required training.

Safeguarding Officers and the Safeguarding Focus Team review and update the safer learning procedures and communicate this with all staff. Ongoing developments will be discussed at team meetings and forwarded to higher management for consideration. It is the responsibility of all Sysco employees who have young, inexperienced or vulnerable persons in their care to ensure that learners feel safe and happy whilst learning with Sysco and report any concerns as they arise.

Ongoing developments will be discussed at Sub-contractor meetings. Subcontractors will continue to be monitored to ensure their systems and procedures are updated and in order.

Employers will be given an introduction into safer learning as part of the Employers guide with relevant information and guidance on dealing with issues and the assigning of responsibilities. Employers will be encouraged to request support from Sysco if necessary and provide feedback if they feel it is appropriate.

Learners within Sysco's care will be allocated a Training Advisor or Tutor to support Sysco's Personal Development and Wellbeing Framework.

- Sysco will continue to promote health and wellbeing, safety awareness and empowering learners with learning which could encompass; physical and mental health, sexual health, drugs awareness, alcohol awareness, resilience, equality and diversity, safe from accident or injury, safe from abuse, safe from bullying and discrimination, being safe online, enjoying & attending, good educational standards, achieving qualifications, excellent support facilities.
- Sysco are working in partnership with other organisations in relation to child protection and will support this commitment by providing training to key staff to help and support learners with any issues they may face.
- Employer Responsiveness – Sysco will provide ongoing information, advice and guidance to raise awareness of Safeguarding. Sysco will ensure Learners are aware of Safeguarding procedures and the route to follow when raising concerns.
- Sysco will continue to monitor sub-contractor safeguarding systems, procedures and incident handling. Sysco will also share best practice with sub-contractors to ensure that all learners are aware of the support available to them.

### **Monitoring of Safeguarding and Prevent Strategy**

Sysco will monitor the impact of the Safeguarding Strategy and Policies during the Senior Managers and Safeguarding meeting.

Records of Safeguarding incidents will continue to be audited regularly to assess the support provided and establish if the correct procedures have been followed. Results of audits will be logged and common themes or areas of improved will be addressed on an ongoing basis.

Sysco will continue to log and monitor the volume of Safeguarding incidents and the impact of the support provided. Safeguarding data will be analysed by the Senior Management and Safeguarding teams. Where necessary improvement action plans will be put in place.

Sysco will produce data on safeguarding to assess the impact of support and where necessary improve systems and procedures.



## **Safeguarding Information, Advice and Guidance**

### **How do we define Young / Vulnerable learners?**

- Young learners are defined as any learner who has not yet reached their 18th birthday
- The Safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that particular time.

### **Definition and types of Abuse and/or Neglect**

This section closely reflects the procedures and guidance in the Liverpool Safeguarding Children Board and the Home Office document "*Working Together to Safeguard Children*" 2018.

'Child abuse and neglect' is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the persons health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young or vulnerable learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

The four broad categories of abuse are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed in them.

These may include interactions that are beyond the person's developmental capacity, as well as over-protection and limitation of exploration and learning, or preventing them participating in normal social interactions. It may involve serious bullying causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

## **Sexual Abuse**

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including Prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

## **Neglect**

Neglect involves the persistent failure to meet person's basic or physical and/or psychological needs, likely to result in the serious impairment of the person's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a person's basic emotional needs.

Additional types of abuse and unsafe activities which we recognise and which have become more prevalent in recent times are:

- Bullying and Harassment
- Alcohol and Drugs
- Crime
- Cyber Bullying
- Discriminatory Abuse
- Financial Abuse
- Domestic Violence

## **Identifying Indicators of possible abuse**

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, there are a number of possible indicators. However there may also be a perfectly reasonable explanation so it is important to remain vigilant but not be over zealous nor jump to conclusions. There may also be no signs or indicators of abuse, however this does not necessarily mean that a report of abuse is false.

## **Identifying Indicators of physical abuse**

- Any injuries not consistent with the explanation given for them
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because of playing a contact / rough sport etc
- Injuries that have not received medical attention

- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, unkempt appearance, dirty clothes etc
- Changes in routine.

### **Identifying Indicators of sexual abuse**

- Any allegation made by an individual
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Sexual activity through words, play or drawing
- Individuals who are sexually provocative or seductive
- Severe sleeping disorders
- Eating disorders

### **Signs suggesting emotional abuse**

- Changes or regressions in mood or behaviour
- Nervousness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention seeking behaviour
- Persistent tiredness
- Running away

The following indicators also need to be considered:

### **Identifying Indicators of radicalisation**

- Being overly secretive about online viewing
- Displaying feelings of isolation or expressions of an 'us and them'
- Becoming more argumentative or domineering in their viewpoints, being quick to condemn those who disagree and ignoring views that contradict their own
- Questioning their faith or identity.
- Downloading or promotion extremist content.
- Social isolation – losing interest in activities they used to enjoy, distancing themselves from friends and social groups
- Altered appearance – change in style of dress and/or personal appearance.
- Abnormal routines, travel patterns or aspirations

### **Some current issues**

Online safety is exceptionally important and will continue to receive a high priority as an issue, as it is often how issues are facilitated radicalisation, bullying etc. Appropriate filters and monitoring are in place, as well as education of staff and learners.

### **Sexting**

Sexting is the sending of provocative or sexual photos, messages or videos. They are generally sent using a mobile phone but can also include posting this type of material online.

While sharing suggestive images or text messages may seem like innocent flirting or be

considered funny for young people, sexting can have serious social and legal consequences.

Sysco will follow the updated guidance;

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551575/6.2439\\_K\\_G\\_NCA\\_Sexting\\_in\\_Schools\\_WEB\\_1\\_.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_K_G_NCA_Sexting_in_Schools_WEB_1_.PDF)

### **Child Sexual Exploitation CSE**

Involves exploitative situations where a child, male or female, receives something from an adult as a result of engaging in sexual activity. This can be seemingly 'consensual' relationships to serious organised crime gangs. There will be an imbalance of power where the perpetrator holds power over the victim. Technology is often used. This is a serious crime. The police team can be contacted for extra support and information.

Sysco will follow the updated guidance;

<https://www.merseyside.police.uk/advice-and-protection/crimes-against-people/child-sexual-exploitation/>

### **Criminal Exploitation of children and adults at risk**

Criminal exploitation of children and adults at risk is a geographically widespread form of harm that is a typical feature of county lines activity. County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

Sysco will follow the updated guidance;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/626770/6\\_3505\\_HO\\_Child\\_exploitation\\_FINAL\\_web\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626770/6_3505_HO_Child_exploitation_FINAL_web_2_.pdf)

### **Private Fostering**

Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'. The local authority need to be satisfied that the placement is suitable and the child is safe

Sysco will follow the updated guidance;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/274414/Children\\_Act\\_1989\\_private\\_fostering.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf)

## **Honour Based Violence HBV – e.g. FGM/Forced Marriage.**

### **Female Genital Mutilation FGM**

This is illegal and a form of child abuse. It involves a procedure to remove all or some of the female genitalia or any other injury to these organs. A mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police. The FGM duty came into force on 31 October 2015.

Multi agency guidelines;

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/512906/Multi\\_Agency\\_Statutory\\_Guidance\\_on\\_FGM\\_-\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf)

### **Forced Marriage**

Is illegal and a form of child abuse. A marriage entered into without the full and free consent of one or both parties, where violence or coercion is used.

Multi agency guidelines;

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

## **Safer Recruitment Processes**

Sysco will take all possible steps to prevent unsuitable persons working with young or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007) and the Safer Practice, Safer Learning document produced by NIACE.

When interviewing potential staff we will ensure that:

- There is an open recruitment process
- There is a rigorous interview with specific questions relating to Safeguarding
- Applicants identity and claims to academic or vocational qualifications will be verified
- References will be taken up by direct contact with referees
- Evidence of the date of birth and address of the applicant will be obtained

**Enhanced Disclosure and Barring Service Check (DBS) will be conducted in all instances.**

All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

## Post Appointment

All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this will be to:

- Provide awareness and explanations of relevant policies and procedures
- Provide support for the role in which they have been engaged
- Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities
- Enable individual line managers and colleagues to recognise any concerns about the person's ability or suitability from the outset and address them if deemed appropriate
- Ensure that individuals are aware of reporting concerns and who the Designated Persons for Safeguarding are
- Ensure that individuals are aware of other relevant policies and procedures; i.e. disciplinary procedure, E&D Policy

## Steps to take following a young or vulnerable learner confiding about or suspecting a case of abuse or neglect

Where a young or vulnerable learner seeks out a member of staff to confide in and share information about abuse or neglect or talks spontaneously individually or in groups, our staff will:

- Listen carefully to them, don't directly question him/her Give them time and attention.
- Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events.
- Make an accurate record of the information given taking care to record the timing, setting and people present, the person's presentation as well as what was said. Do not discard this as it may be later needed as evidence.
- Use the persons own words where possible.
- Explain that they cannot promise not to speak to others about the information they have shared.

## Reassure the person that:

- You are glad that they have told them
- That he / she has not done anything wrong
- What you are going to do next
- Explain that help will need to be sought to keep them safe
- The person should be asked NOT to repeat his / her accounts to anyone.

**The Designated Person for Safeguarding must be informed immediately**, who will investigate the concern and take appropriate action, all records of the investigation, will be kept strictly confidential and stored in a secure place.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. 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. If the designated person for safeguarding has concerns regarding a young person or adult at risk welfare

they should share the information with the appropriate agencies in line with the Sysco Group and local procedures. Security of information sharing must always be considered. If it is considered a crime has been committed at the child or adult at risk is at immediate risk, the police should be notified immediately.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

## **Steps to take when dealing with allegations against staff**

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:-

- Behaved inappropriately in a way that has harmed or may have harmed a learner.
- Possibly committed a criminal offence against or related to learner.
- Behaved towards a learner in a way that indicates he/she is unsuitable to work with them.

The Designated Person for safeguarding should be informed of the matter immediately. (Where the Designated Person nominated for safeguarding is involved in the allegation, the most senior member of staff should be informed).

A formal review will take place which:

- Will determine if the police need to be involved immediately to protect the person further.
- Will record all details received and secure them safely.
- Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation.
- Will determine whether suspension is appropriate whilst undertaking the investigation.

All allegations will be acted upon, however due to the variance in the risk levels, all allegations will be treated individually and the appropriate actions assigned on a case by case basis.

## **Anonymous Allegations**

Concerns raised anonymously tend to be far less effective, and depending on the level of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

- The seriousness of the matter
- Whether the concern is believable
- Whether an investigation can be carried out on the information provided

## **Staff Code of Conduct**

The code of conduct should guide all actions taken by staff and anyone else working on behalf of Brighter Futures Merseyside Limited. If it is necessary to act contrary to it (for example visiting a learner in their home) you should only do so after discussion and approval with your line manager.

- Place the safety and well-being of learners first – before any organisational or personal goals and before any loyalty to colleagues and friends

- Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been inappropriate
- Be committed to actively preventing the exploitation and abuse of young or vulnerable learners
- Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual learner with respect and dignity.
- Respect each learners boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem.

The focus of your relationship with a learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Face book or Twitter.

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners.

- Do not make sexual or discriminatory comments of any kind
- Engage in rough or sexually provocative games
- Make sexual comments / innuendos
- Lending or borrowing money or property
- Exclusive or secretive relationships
- Inviting young or vulnerable learners into your home
- Inappropriate reading materials / internet use

### **Confidentiality and sharing information**

Staff will only discuss concerns with a member of the safeguarding team or Managing Director. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

#### The Seven Golden Rules for Safeguarding Information Sharing 2015

- Data Protection/Human rights laws are not a barrier.
- Be open and honest. (unless unsafe or inappropriate)
- Seek advice. (anonymise if necessary)
- Share with consent if appropriate.
- Consider safety and wellbeing.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure.
- Keep a record of decision and reason for it.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>



The Data Protection Act does not prevent staff from sharing information with relevant agencies, where that information may help to protect a child. Ideally information sharing will be done in writing so that there is an evidence trail . Where information is shared the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.