

## **Safeguarding Policy**

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### **1. Introduction**

This Policy and associated procedures have been developed in response to the Government Legislation and Guidance in respect of safeguarding children/young people and vulnerable adults:

- The Education Act 2002 (Section 175) which requires Training Providers and Colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children attending programmes. In addition, we must have regard to any guidance issued by the Secretary of State in considering what arrangements we need to make for that purpose of the section.
- The Children Act 2004 Section 11 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract to others, are discharged with regard to the need to safeguard and promote the welfare of children.
- Keeping children safe in education 2018 includes preventing radicalisation under the Counter Terrorism and Security Act 2015 (updated September 2021).
- Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children (2018) sets out statutory guidance and covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children including private organisations like Portland Training
- DfES/NIACE publication “Safer Practice, Safer Learning” (2007). The guidance applies to all education providers of post-16 learning and skills. Education providers of post-16 learning and skills (referred to in this guidance as ‘provision’ or ‘providers’) have responsibilities to ensure the safety of children, young people and those adults deemed ‘vulnerable’.  
Crown Prosecution Service (CPS): Violent extremism
- Counter Terrorism and Security Act 2015

This policy sets out Portland Training’s approach to Safeguarding and promoting the welfare of all its learners, staff, volunteers and visitors. The Managing Director, Management Team and staff recognise that a safe environment combined with clear lines of communication and decisive action ensures the best outcomes for all learners.

Portland Training is committed to ensuring that it:

- Provides a safe environment for learners to undertake their courses
- Takes appropriate steps to ensure work placements are adequately equipped to support the learner in their training and safeguard the learner’s welfare
- Has a robust system of reporting that engages with appropriate agencies who are able to fully support the learners’ wellbeing and safety
- Actively promotes safe practices and encourages learner to identify potential risks

In pursuit of these aims, the Management Team and Safeguarding Team will:

- Raise awareness of issues relating to the welfare of learners and ensure they know how to protect themselves from all forms of risk, including but not limited to, grooming, radicalisation, bullying, extremism, forms of abuse and cyber-crime.
- Identify more vulnerable learners and those at risk of potential harm
- Adhere to the safe recruitment of staff and safe use of contractors
- Promote culture of openness where reporting lines are clear
- Promote culture that values the opinions of learners
- Review policies and procedures and ensure they are communicated
- Engage effectively with external agencies/partners
- Establish clear reporting lines and accountability through the Safeguarding Team.

### **1.1 Definition of Safeguarding**

Portland Training uses definitions of the term 'safeguarding' from statutory guidance.

Safeguarding children is defined in [Working together to safeguard children](#) as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding vulnerable adults is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

### **1.2 Definition of Young People and Vulnerable Adult**

- A child is defined as under the age of 18 years; for the purpose of this policy, in the context of a post 16 environment, children are referred to as young people
- Vulnerable Adult is defined as someone 18 years of age or over who is or may be unable to protect him or herself against significant harm or exploitation.

### **1.3 Radicalisation and Acts of Terrorism**

The Counter-Terrorism and Security Act 2015 imposes a duty on Post 16 Providers to have due regard to the need prevent people from being drawn into terrorism. This is known as the Prevent Duty. In order to comply with the duty Post 16 Providers are expected to work in close partnership with agencies such as the police and local authority; have procedures in place with regard to external speakers; take a risk assessed approach to Prevent with action plans in place to manage risk; have procedures in place with regard to the use of IT facilities and access to the web; and provide staff training and development to enable tutors and those supporting the curriculum to utilise learning opportunities to educate and challenge extremism and for all staff to exemplify British values.

In addition to statutory duties, Portland Training will endeavour to adopt best practice wherever possible by adhering to Government guidance (issued at national or local level) and also the requirements of any enforcement or regulatory authority that has a vested interest in the safeguarding of Vulnerable Individuals.

### **3. Scope of the Policy**

This policy applies to:

- All learners
- All staff, volunteers and partners carrying out activity on behalf of Portland Training
- All Portland Training activity

### **4. Aim of the Safeguarding Policy**

Portland Training ensures all learners are safeguarded by:

#### **4.1 Prevention and Promotion**

- Robust staff recruitment;
- Policies and procedures that support safeguarding and the promotion of British Values;
- Close working relationships with partners who share a common purpose with regard to safeguarding; Social Care; Police; Local Authority Safeguarding teams; schools; health services; referral agencies
- Staff awareness – how to promote welfare and safety of young people and vulnerable adults;
- Implementation of the Acceptable Use ICT Policy and e-Safety and Social Media Policy;
- Implementation and monitoring of Portland Training’s Prevent Strategy;
- Raising the awareness of safeguarding amongst learners through induction, learner information, promotional materials and our curriculum offer

#### **4.2 Protection and Support**

- Portland will identify young people and adults who are suffering or likely to suffer significant harm, including those at risk of radicalisation.

- Portland Training will ensure all staff understand their role in identifying those at risk. Definition of abuse and signs of abuse can be found on DfE; <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- Portland Training carries out risk assessments of learners who declare a prior criminal conviction
- Where a young person or vulnerable adult is suffering significant harm, immediate action will be taken in accordance with the **Children Act 1989/2004**
- Action will also be taken to protect the welfare of learners where it is recognised that additional support is needed, even if the learner is not at immediate risk of harm.
- The development of skills to enable learners to keep themselves safe, through teaching and learning opportunities as part of the broad curriculum.

#### **4.3 Allegations of abuse against members of staff**

- Portland Training will act in accordance with the DfE guidelines 'Dealing with allegations of abuse against Teachers and other Staff, 2011, published March 2012. <https://www.gov.uk/government/publications/allegations-of-abuse-against-teachers-and-non-teaching-staff>

### **5. Responsibility for Safeguarding**

The Managing Director ultimate responsibility for the safeguarding of young people and Vulnerable Individuals whilst they are on programme. The Managing Director ensures the Safeguarding Policies and Processes are adhered to by all staff. The Managing Director receives bi-monthly Safeguarding reports and delegates responsibility to the Designated Safeguarding and Prevent Leads and deputy lead. This policy applies to all Portland Training employees as the organisation recognises that safeguarding is everyone's responsibility.

The Management team ensure that Portland Training works closely with the relevant Safeguarding Children Boards and other agencies in line with statutory guidance '**Working together to safeguard children 2018**' <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Portland Training's management team and staff determine how to promote the welfare of learners so they understand and respond to risk effectively including knowing where to get support. All staff and volunteers actively promote a culture of mutual respect and tolerance and are vigilant for signs of abuse.

#### **5.1 The Designated Safeguarding and Prevent Lead, broad areas of responsibility are:**

- Implementation of the Prevent duty;
- The Safeguarding and Prevent Policy and Procedures;
- Ensure the Portland's policies are disseminated and implemented consistently;
- Monitoring effectiveness of the policies and actions taken
- Oversee the referrals of cases of abuse to SCSB and RCSB;
- Support designated Safeguarding Representatives;

- Inter-agency working with Local Authorities, Social Care, police; schools and referral agencies.
- Referral to and working with Local Authority Designated Officer (LADO) where allegations against staff have been made;
- Referral to the Police where a crime has been committed;
- Ensure training and development for safeguarding complies with the statutory guidance; **DFE Keeping Children Safe in Education for School and College September 2021 Part 1** [Keeping children safe in education 2021 \(part one only\) \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101333/keeping-children-safe-in-education-2021-part-one-only.pdf)
- Ensure the publication of the Safeguarding Policy and Procedures on Portland Training's website
- Ensure the Recruitment Policy is effective in protecting young people;
- Inform the Managing Director of key issues/police involvement;
- Act as a source of support, advice and expertise to staff on matters of safeguarding.
- Provide face to face training to staff or delegate to other staff/external partners where appropriate

### **5.2 The designated Deputy Safeguarding and Prevent Lead, broad areas of responsibility are:**

- To deputise for the Safeguarding and Prevent lead, as above; except where there are allegations against members of staff, in which case these will be referred to the HR Officer.
- Inform staff working with individual learners of known potential risk to the individual, other learners or staff (the consent of the individual learner will be sort in all cases, although there may be occasion where information may be shared without the consent of the individual, in which case the learner will be told what information is to be shared).
- Act as a point of referral for Prevent issues; reporting to the Prevent Lead.
- Risk assess the disclosure of learner criminal convictions
- Support the designated Safeguarding Leads on the review of policies and procedures
- Advise the leadership team of key safeguarding issues;
- Produce a monthly report of open Safeguarding cases to the Designated Safeguarding Leads
- Act as a source of support, advice and expertise to staff on matters of safeguarding.
- Raise awareness of staff and learners locally;
- Liaise with JC+/probation/referral agencies to receive information about individual learners and ensure appropriate arrangements are in place to safeguard those learners.
- Maintain appropriate, confidential, and accurate records of safeguarding referrals, actions and concerns and Portland's confidential safeguarding electronic and paper records.

### **5.3 Other staff with safeguarding responsibilities (Safeguarding Representatives)**

- A number of additional staff are identified to support individuals who may be at risk of harm and to promote the welfare of individual learners. These staff will act as first point of call for learners or parents/carers; for bullying and other issues related to safeguarding, for example mental health.
- Local safeguarding staff will receive regular training on safeguarding and maintain strong links with external and internal supportive organisations.
- They will refer to designated Deputy Safeguarding Lead for all cases where significant harm has been disclosed and/or where the potential for significant harm is likely to escalate.

#### 5.4 All Portland Training staff

Safeguarding is 'Everyone's Responsibility' - All staff receive an induction and regular updates. A safeguarding organisation chart is provided in Appendix A

#### 5.5 Safeguarding Team Responsibilities

- To demonstrate a practice attitude in assessing safeguarding risks and swiftly, taking actions to prevent them
- To raise awareness among staff of safeguarding issues and increasing vigilance and acting on learners' concerns
- To ensure that clear and robust reporting procedures remain in place for the safeguarding of learners' welfare and wellbeing
- Safeguarding representatives will provide support to peers, advice to learners and colleagues on signposting to appropriate support agencies and will contribute to the evaluation and review of policies and procedures.

#### Main Areas of Focus:

- Promoting all forms of equality, ensuring learners and staff are protected from harassment, bullying and discrimination.
- Promoting British Values
- Regularly evaluating of the effectiveness of safeguarding practice, including the prevention of radicalisation of learners and compliance with the Prevent Duty.
- Supporting delivery staff to promote equality, raise awareness of diversity and tackle discrimination, victimisation, harassment, stereotyping, radicalisation and bullying in their training sessions.
- Providing strategies and guidance on how to educate learners on how to protect themselves from the risks associated with radicalisation, extremism, forms of abuse, grooming and bullying, including through the use of the internet, and how well they understand the risks posed by adults or young people who use the internet to bully, groom or abuse other people, especially children, young people and vulnerable adults
- Providing guidance to delivery staff on how to educate learners on how to keep themselves fit and healthy, both physically and emotionally

#### 5.6 Attendance reporting

Where a child, young person, or vulnerable adult, fails to attend a course at Portland Training, contact must be made with parent, carer, or external agency, to ascertain reasons and ensure the person is safe and people are aware.

Dedicated Welfare Officer in place to ensure this is facilitated within 30 mins of start of the day and should also take place at any point during the day where a learner is absent from a session without prior explanation. Any concerns to be reported immediately to AEB Manager or Safeguarding Officer.

## 6. Information Sharing and Record Keeping

- Information Sharing is vital to safeguard young people and vulnerable adults. There can be significant and occasionally life threatening consequences to not sharing information. Therefore, where there has been significant harm or there is potential for significant harm staff are required to share information
- Safeguarding staff use professional judgement regarding the potential for significant harm, keeping the needs of the individual young person paramount. Consent to share information will be sought, however, there are occasions where information is shared without consent. Guidance for information sharing for safeguarding purposes are found in Appendix B.
- Safeguarding records (paper and electronic) are kept securely by Lead and Deputy Safeguarding officers
- Portland Safeguarding staff use a secure section of the shared drive to store all electronic and paper safeguarding information.

## 7. Safer Recruitment

- Portland Training adopts recruitment, selection and pre-employment vetting procedures in line with legislation and best practice available. The majority of Portland's activity is 'regulated activity' as set out in <https://www.gov.uk/government/publications/dbs-workforce-guidance>
- Portland has a robust process of risk assessment for positive DBS's or where staff should need to commence employment prior to their DBS being received back. Portland is committed to rechecking individuals DBS's every 3 years
- Portland holds a single central register for all staff and volunteers, which lists the checks that have been carried out and the date they were completed.

### 7.1 Volunteers

Whilst not a legal duty, Portland does require supervised volunteers that are undertaking frequent supervised activity at Portland to provide an enhanced DBS certificate. Portland will not require a barred list check.

## 8. Learner Recruitment

Safer recruitment extends to learners as well. Portland Training requests all prospective learners to disclose whether they have a criminal conviction. Following disclosure, the designated Safeguarding Leads/and or Deputy Safeguarding Officer assess the risk to others and identify any support for the individual. Some placements, such as those that involve working with children, also require a DBS check.

## 9. Health and Safety

- Portland recognises that learners and staff want to feel safe in their learning and working environment.

- Our sites have intercom access and the external doors will be shut at all time with access only being gained when reception staff have confirmed identity and allowed it.
- Where we use temporary accommodation to deliver training, a risk assessment will be carried out beforehand to ensure learner and staff safety.
- Thorough risk assessments are carried out on all premises. Further details are available in Portland's Health & Safety Policies and Procedures.
- Portland requires all staff to wear an identity card during working hours. Learners are required to bring valid photo ID on their first day of learning.

## 10. Online Safety

The digital revolution has transformed the way that people now have the opportunity to learn using the internet and mobile technologies. Portland Training is committed to the availability of digital technology in order to enhance the learning experience. However, with these new technologies (particularly internet based) comes risks associated with invasion of privacy, cybercrime and safeguarding/prevent issues. It is imperative that a dynamic approach is used in order to adapt to the rapidly changing digital landscape, and that a balance is struck between guaranteeing learner safety whilst still ensuring availability of quality digital provision.

Online safety is central to what being 'digitally included' means. It is especially important for people who are new or limited users of the internet (often older people and working-age adults with low educational attainment and low incomes) and those in vulnerable situations.

During the coronavirus (COVID-19) pandemic, people are relying even more on online technology.

Portland training have designed an innovative curriculum which embeds Online Safety into each course, learners are taught the importance of staying safe online, and partake in activities, sharing best practise and discussing personal experiences. Learners benefit from learning top tips and are taught free to use tools which can help them stay safe online and identify different types of online fraud. Online safety is a focus of delivery within all delivery areas ensuring learners have the skills, knowledge, and behaviours to stay safe whilst online, educationally, socially, and domestically.

Full details of how Portland Training safeguard learners online can be found in Portland Training's e-safety and Social Media Policy.

## 11. Staff Training

- All staff must familiarise themselves with: Keeping Children Safe in Education, Part 1 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741315/Keeping\\_Children\\_Safe\\_in\\_Education\\_2018\\_Part\\_One\\_14.09.18.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741315/Keeping_Children_Safe_in_Education_2018_Part_One_14.09.18.pdf)
- All new employees are required, as part of their induction, to complete an on-line safeguarding course, and an on-line Prevent awareness course; the exception being if alternative face to face training is provided.
- Established staff receive regular updating; through on-line refresher courses or in house training; by designated Safeguarding staff; regular emails; external training

- They are also required to update their issues led knowledge, i.e. Child Sexual Exploitation. Designated staff are expected to organise and/or deliver sessions to raise awareness of emergent issues.

## **12. Developing Learner's Skills and Awareness**

- Portland Training has a duty to develop learner's abilities to keep themselves safe and to recognise when others are at risk, as well as to know how to report concerns and access support.
- All learners must agree to adhere to the expected levels of behaviour whilst at Portland Training.
- Portland Training raises the learners' awareness of safeguarding at induction, through information given to them and through the use of promotional materials and campaigns.
- Safeguarding is an important aspect in the delivery of the curriculum.
- Portland Training uses a wide range of resources to deliver safeguarding, approved by the designated leads, and teaching staff are expected to use opportunities as they arise to develop the learners understanding.

## **13. Monitoring and Evaluation**

13.1 Safeguarding incidents, actions taken and staff training are monitored regularly through:

- Bi - Monthly report to the Managing Director and Management team

13.2 The effectiveness of the policy is evaluated through:

- Learner feedback;
- Regular safeguarding officer meetings;
- Review of the safeguarding policy and processes
- Quality Improvement Plan
- Ofsted inspection.

## **14. Related Policies and Procedures**

- Preventing Extremism and Radicalisation Safeguarding Policy
- E-Safety and Social Media Policy
- Appropriate Use ICT Policy
- Staff Code of Conduct
- Health & Safety Policies and procedures
- Equality, Diversity and Inclusion Policy
- Prevent Action Plan
- Safe Recruitment Policy

## **Appendix A**

**Safeguarding Organisation Chart**

<u>Safeguarding and Prevent Lead</u>	Hollie Warren <a href="mailto:Safeguarding@portlandtraining.co.uk">Safeguarding@portlandtraining.co.uk</a> 0114 2055515 / 07427 158632
<u>Designated Deputy Safeguarding Officer</u>	Victoria Sendall <a href="mailto:Safeguarding@portlandtraining.co.uk">Safeguarding@portlandtraining.co.uk</a> 0114 2055515 / 07540 968836
<u>Designated Safeguarding Representative</u>	Andy Ferguson <a href="mailto:Safeguarding@portlandtraining.co.uk">Safeguarding@portlandtraining.co.uk</a> 0114 2055515 / 07739 627448

**Appendix B**

## Information Sharing for Safeguarding Purposes Guidance

All staff are provided with training at induction and receive regular updates. All staff should be familiar with the signs of abuse.

Safeguarding is the responsibility of everybody. If staff have any concerns that a young person or vulnerable adult is at risk of, or is being abused, they **MUST** report this.

This also applies if staff have concerns that somebody is being bullied or is a Safeguarding risk due to other factors i.e., homelessness, exploitation, financial crisis, mental or physical health etc

All Safeguarding concerns must be reported to a member of the Safeguarding team either face to face or by completing a Safeguarding Cause for Concern form.

If a learner tells you about possible or actual abuse

### **You must:**

- Stay calm and reassuring
- Listen, let the learner speak unprompted and take what the learner is saying very seriously
- Explain that you must involve other people and why
- Make a written record and then complete the SG Cause for Concern Form or SG Incident Form
- Inform any designated member of Safeguarding Staff as soon as possible, or if in an emergency or there is a risk of serious or immediate harm, anyone can make a referral to Social Services or the police
- Speak to Safeguarding staff if you require support yourself

### **Do not:**

- Promise to keep it confidential
- Make promises or reassurances you cannot keep
- Investigate further
- Keep the information to yourself

If the allegation of abuse is against a member of staff, inform the Designated Safeguarding Leads or the HR Officer.