

Policy 9 - Safeguarding

Policy Statement

We recognise that the safety and welfare of children, young people and adults at risk, is paramount and that all have a right to protection. It is essential that Swarm staff do all we can to ensure a safe and caring environment through the duration of the apprenticeship or any other programme of learning.

Policy Aim

As members of SAFE, we aim at all times to attain best safeguarding practice through all our activities with children, young people, adults at risk, their parents, carers and/or families. We endeavour to provide a safe and friendly environment and celebrate all achievements.

Designated Safeguarding Lead:

Name: Rebecca Rivett

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Deputy Designated Safeguarding Lead:

Name: Teodora Apan

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Deputy Designated Safeguarding Lead:

Name: Pete Lewin

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Their role is to oversee and ensure that our safeguarding policy, which includes eSafety, is fully implemented and that we attain and enforce SAFE standards.

Their responsibilities are:

- monitoring and recording concerns
- making referrals to social care, or police, as relevant, without delay

- liaison with other agencies
- arranging training for all staff

The Deputy should be available to support or cover for the Lead. She would also handle any complaints or allegations against the Lead if these arose.

Why do we need a Safeguarding Policy?

All organisations that work or come into contact with children, young adults and/or adults at risk need to have safeguarding policies and procedures in place.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall under the remit of this policy.

To undertake these responsibilities we:

- have senior managers and governors committed to safeguarding
- are clear about people's responsibilities and accountability
- have a culture of listening to children, young people and adults at risk
- undertake safer recruitment practices for all staff
- have procedures for safeguarding children and young people and adults at risk
- have procedures for dealing with allegations against, and concerns about any staff
- make sure staff undergo periodic safeguarding training

Definition of a child/young person

There is no single law that defines the age of a child across the UK. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child "means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier" (Article 1, Convention on the Rights of the Child, 1989). A child is anyone who has not yet reached their 18th birthday (16th in Scotland).

Definition of an adult at risk

An adult at risk is a person over the age of 18 years and is:

- having needs for care and support, and/or;
- experiencing, or is at risk of, abuse and neglect and/or;
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Data Protection

We will treat any personal information by which an individual can be identified (i.e. name, address, email etc.) in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection

Regulation (UK GDPR) and will not share information with any third party, except where required by law.

Confidentiality

This policy is in line with government guidance about confidentiality and these details will be made available to all staff, children, young children, adults at risk, parents and carers.

We fully endorse the principle that the welfare of children, young people and adults at risk, override any obligations of confidence we may hold to others. No one working, or involved, with our organisation can promise absolute confidentiality. Individual cases will only be shared or discussed on a "need to know" basis.

Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within the organisation, which will affect others in an illegal and or harmful way.

Our organisation promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk as soon as possible with the Lead or Deputy for Safeguarding.

If individuals reporting their concerns within our organisation do not feel they have been acted upon then we support their right to report these concerns to social care services, the police, and /or the relevant Regulatory Authority e.g. Ofsted, CQC, Charity Commission, awarding bodies organisations.

Information Sharing

Timely and accurate written records play an essential role in safeguarding individuals, who may have suffered, are suffering or at significant risk of suffering harm. It is important that records are shared at the appropriate time when necessary. Within our organisation the decision to share written information, and with whom, will be undertaken by the Lead or the Deputy for safeguarding

Safer Recruitment

Our organisation is committed to safe recruitment. We do this by:

- assigning all posts detailed job descriptions
- obtaining full personal details including fitness to work with children, young people and adults at risk by application form (not CVs) with particular relevance to previous work with children, young people and adults at risk
- ensuring that when a candidate is selected for interview the relevant criminal declaration form will be sent for completion as set out by the Rehabilitation of Offenders Act 1974
- always taking up two written references, one from the most recent employer
- undertaking a rigorous interview process
- ensuring at least one person on each interview panel will have undertaken Safer Recruitment training, in line with the relevant regulatory authorities and safe recruitment guidelines.

- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable

Any appointment will only be confirmed subject to:

- a satisfactory criminal records check at the appropriate level
- a follow up of two written references
- a check of essential qualifications where needed

Induction and Training

We have a clear induction and training strategy with clear job descriptions and responsibilities and all relevant procedures. All new staff receive induction training which includes training in safeguarding and Prevent.

Staff receive safeguarding training, at the appropriate level at regular intervals.

A probationary period of 3 months with clear goals is in place which provides supervision/mentoring/appraisals at regular intervals.

Updated training is normally required every 2 years (on line) or three years (face to face).

Staff working directly with at risk groups will also undertake the free online government training for PREVENT/Channel and FGM

Working Practices

Consent

When consent is required for any activity we will, unless it is an emergency, obtain consent from the individual if of sufficient age and/or understanding.

Lone and One to One Working

We will avoid lone working and one to one working whenever possible to protect both individuals. A risk assessment will always be undertaken to ensure:

- the activity provided is suitable for one to one working
- the lone worker has been trained to undertake this particular role
- that potential health and safety issues have been identified and recommendations followed
- safeguards are in place to protect individual's rights to safe working practice
- safeguards are in place in relation to strategies for emergency situations

Home Visits

Staff should not undertake home visits with any apprentice or other learner.

Young People who work in our Organisation

Swarm does not have any staff or young persons under the age of 18 working for the organisation.

Codes of Conduct

We aim to provide a safe environment free from discrimination, upholding and promoting equality, diversity and inclusion. We undertake to:

- treat all children and young people and adults at risk with respect and dignity
- ensure that their welfare and safety is paramount at all times
- maintain professional boundaries both face to face and when using technology
- ensure any intimate touch required, to carry out care, treatment or training is within relevant guidelines and is safe and appropriate. Intimate touch and care will always be part of a plan, agreed with the individual concerned , their parents or carers.
- always listen to individuals and take account of their wishes and feeling
- always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- liaise openly with parents and carers
- only use physical contact if absolutely necessary
- avoid being alone with children , young people and adults at risk whenever possible
- listen to, and act upon, any disclosures allegations, or concerns of abuse
- participate in approved safeguarding training at appropriate levels
- ensure restraint is only used as part of an agreed plan by staff trained in the use of the particular restraint or as an emergency action to protect from harm. All use of restraint will be reported and recorded by the member of staff concerned to the Lead or Deputy lead for safeguarding and to the relevant manager.
- follow our safeguarding policy at all times
- make activities FUN and enjoyable
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Recognising Abuse in Children Young People and Adults at Risk

The following list is for guidance only. It is important to be observant, listen to what is being said and record. e.g. is what you are observing and being told about an injury consistent with the injury?

- Alcohol and Substance misuse
- Child criminal and sexual exploitation including County Lines
- Concealed pregnancy
- Criminal exploitation
- Discriminatory

- Domestic violence, including "honour" based abuse
- Emotional
- Exploitive use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Gangs
- Gambling
- Hate and "mate" crime
- Misuse of technology
- Modern slavery
- Neglect and acts of omission
- Organisational or institutional
- Peer on peer abuse including sexual violence and upskirting
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Spiritual abuse
- Trafficking
- Upskirting

Handling Disclosures

When a disclosure is made by a child, young person or adult at risk it is important to remember to:

- take what you are being told seriously
- stay calm and reassure
- do not investigate
- do not delay

and always

- seek advice from the Lead or Deputy for Safeguarding
- make a careful recording of anything you are told or observe, date and sign.

A disclosure may come from someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else

Responding to Concerns

If any member of the team is worried a child, young person or adult at risk has been abused because:

- They have seen something
- someone says they have been abused
- somebody else has told them they are concerned
- there has been an allegation against a colleague
- there has been an anonymous allegation
- an adult has disclosed that they were abused as a child
- a child, young person or adult say they are abusing someone else

The staff member will then check our safeguarding policy for guidance and talk to the Lead or Deputy for Safeguarding without delay.

The Lead or Deputy should refer the concern to the relevant adult or children's social care service and/or the Police and follow up the referral in writing within 24 hours.

For England and Wales in cases of allegations against a "person of trust" with a "duty of care", towards a child the Local Authority Designated Officer (LADO) will co-ordinate the next procedural steps.

Under "whistle blowing", anyone can refer directly to the police or social care services and all relevant Authorities, when they are concerned the organisation is not managing safeguarding concerns appropriately.

Record Keeping

Records will be:

- accurate and factual/based on fact, as a true record of:
 - what has been monitored/observed
 - what has been said and by whom
 - what has given cause for concern
 - what action has and/or will be taken including the reason for those actions
 - the reason stated for no action being taken and by whom
- non judgmental
- timely (within 24 hours)
- signed and dated by the writer and co- signed by the Lead or Deputy
- shared as appropriate by the Lead or Deputy for Safeguarding
- stored safely and securely by the Lead or Deputy for Safeguarding

Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

Where a complaint or allegation has been made with regard to any inappropriate behaviour or poor practice, the Lead or Deputy will discuss the situation with social care services (the LADO with regards to children England and Wales only) and / or the police before making a decision about the best way forward.

With regard to disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with social care services and / or the police. Any investigation will override the need to implement any such procedures. Our management are responsible for making referrals to the relevant:

- criminal records service
- Regulatory Authorities
- professional body.

Bullying and Harassment

Bullying and harassment can take many forms and include:

- physical violence including threats, verbal assaults and taunts, the destruction of property, extortion, unwanted sexual interest or contact
- indirect forms of bullying including ignoring a person and the withdrawal of friendship, malicious gossip and spreading rumours, abusive or oppressive graffiti, the use of social media, electronic messages and websites.
- it is often motivated by prejudice against certain groups for example on the grounds of race, religion, gender and disability

Whether directed at children, young people, adults at risk, staff, volunteers, parents and carers, bullying and harassment, physical and/or emotional abuse will not be tolerated. All such behaviour will be treated as a safeguarding concern when aimed at children, young people and or adults at risk.

We will:

- provide a culture of equality and respect for all with zero tolerance to any form of bullying or harassment
- report all incidents of bullying or harassment observed or disclosed, to the Lead or Deputy
- take immediate steps to stop the behaviour and mitigate the effects of bullying and harassment
- record all incidents with observations and witness statements, and action taken, signed, timed and dated

eSafety

Advances in technology has made access to web-based information increasingly easy. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, buying lottery tickets, shopping etc. Government guidance is clear, that all organisations working with children, young people, adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall under the remit of this policy

eSafety Code of Conduct:

We expect everyone in our organisation to:

- use the internet and other forms of communication in a sensible and polite way
- only access websites, send messages or access and use other resources that will not hurt or upset anybody
- seek permission to use personal information or take photographs of apprentices or other learners
- report any concerns to the Lead or Deputy

- be clear that we cannot maintain confidentiality if there is a concern about the welfare of a child, young person or adult at risk.

What are the Risks?

There are many potential risks including:

- accessing inappropriate or illegal websites
- receiving unwanted or upsetting texts, e-mail messages or images
- being “groomed” by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime
- viewing or receiving socially unacceptable material such as that which incites hatred or violence
- sending bullying messages or posting malicious details about others
- ignoring copyright law by downloading e.g. music, videos, homework cheat materials etc.
- overspending on shopping and gambling sites
- being at risk of identity fraud for money transactions
- inappropriate relationships or prostitution

What else might be of concern?

A child, young person or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting
- will not let you see what they are accessing online
- is using a webcam in a closed area, away from other people
- is accessing the web or using a mobile for long periods and at all hours
- clears the computer history every time they use it
- does not appear to have the money they should have

A person who:

- befriends a child, young person or adult at risk on the internet or by text messaging

- has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker
- is secretive about what they are doing and who they are meeting

What do I do if I am concerned?

If you have any concerns, speak to the Lead or Deputy for Safeguarding.

Remember:

- do not delay
- do not investigate
- seek advice from the Lead or Deputy
- make careful notes of anything you observe or are told

Minimising the Risks

We will:

- talk to children, young people and adults at risk about what they are accessing online
- ensure everyone uses PCs, iPads and other technology in a general space where we can monitor what is going on
- explain the risks of giving out personal details online
- talk about how people can be anyone they want to be online, e.g. by using misleading emails, photographs of other people, telling lies about their age, hobbies, school
- encourage children, young people and adults at risk to think carefully about what photographs or videos they use online. They can be used and tampered with by other people, or they may not be appropriate
- advise children, young people and adults at risk to only text, chat or webcam to people they know in real life
- talk about how to identify SPAM messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments
- discuss how people hide their identities online and the importance of never meeting new online “friends” in real life
- make sure children, young people and adults at risk understand they can always talk to us, or their parents and/or carers, about anything that makes them feel uncomfortable
- look on the internet together for information about how to deal with or report problems
- talk about how/when information or images get on to the internet, they can never be erased

Photography & Filming Guidance

Photographs and video recordings are an important element of assessment and evidencing apprenticeship learning. However, it is vital to remember that photography can be used and distributed inappropriately.

It is therefore important to be clear about:

- explaining to parents and carers why caution is necessary
- informing parents/apprentices and seeking their consent for any publication or media use
- publishing only limited details alongside individual's photos in newspapers etc
- taking photographs openly and away from changing areas
- the suitability of clothing e.g. swimsuits
- any group photos being taken only during the activity or on the premises

The above guidance applies to any photographic and filming equipment including camera phones, digital or video cameras, which and whose equipment is used should also be recorded on the registration form.

Buildings and Venues

Safeguarding risk assessments will be carried out on all buildings and venues used by our organisation.

The safeguarding risk assessment should cover

- access especially how people enter and leave the building
- signing in protocol
- use of keys
- toilets and changing rooms
- any outside space
- car parks
- any other relevant issues

Policy Date

This policy has been agreed and disseminated and will be reviewed annually or when there are substantial organisational or legislative changes.

Chris Perry - CEO

April 2023