



Safeguarding Policy

Version 14

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| Validated by: | Dan Howard- Deputy CEO Debra Forsythe-Conroy- Executive Board Lead for Safeguarding |
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This policy will be reviewed on an annual basis. Springfield Training reserves the right to amend this policy, following consultation, where appropriate.

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| Date created: | May 2023 |
| Date of last review: | February 2024 |
| Date of next review: | February 2025 |

1. Introduction

All Springfield Training staff, executive board, associates, third-party providers, employers and volunteers have a duty of care to safeguard and promote the welfare of learners.

Everyone working with learners, vulnerable adults and their families should be familiar with this document and with their role in reporting any safeguarding concern to the relevant local authority and also within Springfield Training 's internal recording procedure.

This policy is also available to learners and other stakeholders at the initial point of their engagement with Springfield Training, is readily available to all staff, learners and stakeholders during annual review and a copy can be requested from our Designated Safeguarding Officer katie@springfieldtraining.com. It is also available on our website at [Springfield Training](#)

Springfield Training approach to safeguarding all of our learners is founded on the nature of our relationships. We prioritise assessing and managing the needs of our services users and have a dynamic approach to the identification, assessment and response to risk. We have a commitment to ensuring that during all staff and learner induction, Health and Safety, Safeguarding, Prevent, Whistleblowing and Complaints procedures are fully covered.

As well as initial induction we ensure that all staff have annual refresher training on both Safeguarding and Prevent to promote our commitment to keeping learners safe.

Our organisational structure and approach places emphasis on collaborative relationships with our learners and our partners in delivery. This means our response to need, and risk is timely and effective. We ensure that we work together to learn the lessons from our practice and use them to inform our safeguarding.

Our staff are informed in terms of the indicators of possible harm and possible vulnerabilities. Staff know what to do, when possible, abuse or neglect is suspected or disclosed and are skilled in a range of interventions to prevent further or future risk to our learners.

Our goal is to enable the learner. This means that we focus on supporting them in finding their own solutions to challenges that pose a risk to their well-being, empowering them to make positive sustainable changes to their lives.

This policy outlines our organisational standards in safeguarding - Springfield Training uses these standards to measure our performance and achievements in safeguarding within all of our education provision. We also outline a range of behaviours that we encourage staff to embed in their approach to safeguarding that in turn, we believe, supports effective safeguarding practice and the prevention of harm.

This policy references key legislation and statutory guidance and outlines how we approach safeguarding at local delivery level. It addresses the need to safeguard in all of our practice contexts.

| Key Themes | Evidence of standards |
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| <p>1. Good Leadership and Accountability</p> | <ul style="list-style-type: none"> • A clear commitment to the safeguarding of all learners • A clear line of accountability within the organisation for safeguarding and promoting welfare • Leadership which ensures a dynamic and responsive approach to need and risk in safeguarding, so that we achieve positive outcomes for our learners • A shared strategic approach to safeguarding with our partners, through engagement in the activity of strategic partnerships |
| <p>2. Clear and embedded Policies and Procedures</p> | <ul style="list-style-type: none"> • A clear priority to safeguard all learners: we have defined outcomes for them, explicitly stated in contractual and delivery documentation and demonstrated through the impact of local delivery and individual outcomes. • We provide information and training and access to local procedures for safeguarding that staff are clear on their role and responsibilities in reporting abuse and neglect and on their involvement in safeguarding responses which prevent and protect. • We ensure that our policies and procedures are in accordance with national statutory guidance |
| <p>3. Best practice in safeguarding children and vulnerable adults 'at risk'</p> | <ul style="list-style-type: none"> • We ensure that our local practice that reflects our organisational approach and we monitor how this leads to positive outcomes for service users. • We support our staff in making effective and proportionate responses to specific safeguarding concerns that have the learner at the centre. • We prioritise effective multi-agency work with our partners in delivery to prevent harm and protect learners from risk, operating at the centre of local arrangements. • We prioritise outcomes for learners which evidence the reduction of risk; the minimisation of the impact of harm; their access to criminal, civil or social justice; and successful resolution and recovery. |
| <p>4. A commitment to all staff, prior to access with learners having a DBS check and registered on the updating service, including safe recruitment and selection practices</p> | <ul style="list-style-type: none"> • We have a Safer Recruitment policy and human resources management procedures that take account of the need to safeguard children and young people and adults at risk that include arrangements for appropriate checks as well the participation of staff and learners in the recruitment of new staff and volunteers. • We have clear procedures and practice that ensure an effective response to allegations of abuse or neglect against professional Springfield Training staff/ associates/volunteers. |

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| <p>5. A robust learning organisation</p> | <ul style="list-style-type: none"> • Springfield Training has a learning culture that acts upon the lessons from reporting, auditing and reviewing and ensures feedback into practice to ensure that improvements are made. • Our performance management framework ensures that the organisational centre understands safeguarding risks and the response at local delivery level to these risks. |
| <p>6. Staff Induction, Training and Development</p> | <ul style="list-style-type: none"> • All staff, including associates, temporary staff and volunteers who work with Springfield Training learners, are made aware of the organisational approach to safeguarding from induction onwards. • A robust initial induction for each staff member ensures that all Springfield Training staff undertake appropriate training to equip them to carry out their safeguarding responsibilities effectively, and keep this up-to-date with annual CPD for all staff i.e. by refresher training at regular intervals • That staff supervision and development addresses the workforce’s role in safeguarding and reviews workforce performance. This ensures reflecting upon practice to ensure that the safeguarding behaviours are evident. • We have a strong commitment to staff welfare, wellbeing and mental health and have a wide variety of training opportunities, welfare and wellbeing activities and an employee assistance programme. |
| <p>7. Listening to Learners and Apprentices</p> | <ul style="list-style-type: none"> • A commitment to co-design in safeguarding practice and delivery through a culture of listening to, and engaging in dialogue with learners and apprentices, seeking their views. We take account of those views in individual decisions to inform the establishment or development of services. |

2. Scope

This policy applies to all staff employed by the organisation, organisational partners, employers used for work-based placements, contractors, visitors, and the learners themselves.

It covers aspects of health and safety, to prevent accidental injury or harm, as well as the key areas relating to protection and radicalisation and online safety.

Issues relating to safe use of online safety, internet digital technology, and social media and cyberbullying are contained within our E Safety and IT policies.

3. Aims

The overall aim of this policy is to ensure that any child, young person or adult associated with Springfield Training is protected in accordance with the requirements of the following acts and guidance documents; (*The Children Act 2004 The Police Act 1997, The Criminal Justice and Court Services Act 2000, The Care Standards Act 2000, The UN convention on the Rights of The Child, , The Human Rights Act 1998 , The Sexual Offences Act 2000., Every Child Matters 2004, Safeguarding Vulnerable Groups Act 2006, working together to Safeguard Children 2013, the Equality Act 2010, the Protection of*

Freedom Act 2012, The Sexual Offences Act 2003 and the Data Protection Act 1998 (GDPR 2018), Keeping Children safe in Education 2023)

The Policy also aims to ensure that the measures outlined in the Prevent Duty Guidance for England and Wales reflects the requirements of the Counter Terrorism and Security Act 2015 (*updated April 2021*).

It is our intention that: all staff will know and understand their role and responsibilities in relation to:

- promoting the health and wellbeing of learners.
- safeguarding learners and preventing and minimising harm
- the actions required if inappropriate behaviour is witnessed or suspected.
- understand how to safeguard themselves from allegations of abuse.
- recognising and preventing extremist ideas.

All learners will:

- feel confident that we are concerned about their welfare.
- be aware of their rights.
- understand their role and responsibilities in relation to safeguarding themselves and other learners.
- know who to approach if they need support or guidance or wish to report any concerns.
- be aware of the risks of their vulnerability to extremist ideas.

4. Why is the safeguarding policy important?

Springfield Training believes that it is always unacceptable for any learner to suffer harm or experience abuse of any kind and recognises its responsibility to safeguard the welfare of all learners by commitment to the practice that protects them.

It is also important to protect learners from radicalisation and the public at large from the terrorist risks arising out of this. It is the duty of all staff to comply with this policy.

5. Who are we Safeguarding?

1) all learners but particularly those:

- aged under 18 years: (legally still defined as a child)
- over 18 years of age, regardless of gender, ethnicity, disability, sexuality, or religion. Since 2013 the term vulnerable is no longer used in the act as it is recognised that anyone may find themselves in a vulnerable position however the elderly, people suffering mental or other disability, age, illness; are at particular risk of harm or exploitation.

2) all staff collaborating with learners.

3) clients and the public at large.

6. Safeguarding against accidents.

Springfield Training has an established Health and Safety Policy which can be accessed by staff both on the "Springfield Document Repository" portal and in hard copy form on request. This is reviewed regularly. All staff are asked to contribute to an assessment of their working areas as part of their monthly performance review.

Springfield Training premises are monitored and inspected regularly in accordance with the health and safety policy, to ensure that the environment for both staff and any learner's attending Springfield is clean, safe, adequately heated, ventilated and lit and that the overall environment is conducive to learning and working.

Learners are encouraged to participate in maintaining communal areas such as the kitchen, toilets and classrooms/offices in a manner that is safe and compliant with Health and Safety and COSHH regulations.

All electrical equipment is subject to annual testing to ensure it is safe to use and compliant with regulations.

Premises where learners are employed (or placed) are vetted prior to any learner commencing training in accordance with the good practice guidelines issued by the ESFA.

7. What constitutes abuse?

Abuse is defined as a violation of an individual's human and civil rights by any other person or persons. It can be a single act, or repeated acts; it also includes acts of neglect or omission to act. Abuse can take many different forms and abusive situations rarely fit neatly into defined categories, but the following are the main forms of abuse identified:

Physical abuse, including hitting, shaking, slapping, pushing, kicking, drowning, burning scalding, suffocating or inappropriate restraint. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child or vulnerable adult who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen's syndrome by proxy'.

Domestic violence – an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse by someone who is, or has been, an intimate partner or family member.

Sexual abuse, including:

- rape and sexual assault or sexual acts to which the individual has not consented or could not consent or were pressured into consenting to.
- sexual harassment, online sexual abuse and sexual violence between children and learners.
- child sexual exploitation (CSE) where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual activities, in order to gain advantages (*financial or otherwise*) for themselves. There may be links to trafficking and other forms of child exploitation.

Psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial or material abuse, including theft, fraud, exploitation, or the misuse or misappropriation of property, possessions, or benefits.

Neglect and acts of omission, including ignoring medical needs, failure to provide appropriate access to educational services, the withholding of the necessities of life, such as inadequate meal breaks, heating etc.

Discriminatory abuse including bullying, online bullying and prejudice-based bullying racist, sexist, homophobic or transphobic remarks, comments based on a person's disability, and other forms of harassment, slurs, or similar treatment.

Radicalisation and/or extremist behaviour.

Human trafficking which can include forced labour, forced marriage, sexual exploitation, domestic servitude, drugs trade, benefit fraud and organ harvesting.

Child Criminal exploitation (CCE) is another form of abuse in which children (*off all gender identities*) are coerced into doing things, 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. It can include children who have been moved (*trafficked*) for the purpose of exploitation. Children involved in "County Lines" activities are victims of exploitation.

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage).

Institutional abuse, neglect and poor professional practice also need to be taken into account. This type of abuse may take the form of isolated incidents of poor or unsatisfactory institutional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. It is directly linked to poor leadership.

Misogynistic violence, hatred of, contempt for, or prejudice against women. It is a form of sexism that keeps women at a lower social status than men, thus maintaining the societal roles of patriarchy.

Forced marriage, forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (*if they have learning disabilities, for example*).

Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. The Forced Marriage Unit (*FMU*) has created: Multi-agency practice guidelines: handling cases of forced marriage and, multi-agency statutory guidance for dealing with

forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)

Springfield Training staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

8. How might abuse take place in a workplace supported by our organisation?

Abuse within our organisation could take any of the forms described above. It could occur within Springfield Training or in placement settings and could take place within/outside of normal working hours.

Learners travelling to and from work, especially at unsocial times of day, may also be vulnerable. Staff may be vulnerable if transporting individuals in their cars or providing tuition in closed rooms.

Bullying and harassment are forms of abuse as is radicalisation.

Cyber bullying (*via internet or mobile phones*) is becoming an increasing problem amongst young people and adults as are problems with "grooming behaviour" over the internet. This danger is reflected in Springfield's IT policies.

9. Who are we safeguarding against?

Abuse may take place within the family or community as well as within organisations by employees including those employed to promote the welfare of the child or adult.

Abuse can be perpetrated by anyone the child or adult trusts. This may include:

- parents and family members
- care staff /foster care staff
- teaching & support staff
- other learners - (Peer on peer abuse encompasses a range of abusive activities e.g. bullying, online abuse, prejudice based and discriminatory abuse, abuse in intimate personal relationships between peers, physical abuse, sexual violence and sexual harassment.)
- employers or placement providers
- colleagues and other professionals.

10.Preventing Abuse: Roles and Responsibilities

10.1 The Executive Board

Organisationally Springfield is committed to developing and maintaining a culture in which learner health and safety is promoted and safeguarding is embedded.

The Executive Board are accountable for ensuring that safeguarding, prevent and anti-radicalisation policies, procedures and systems are in place, which accurately reflect current legislation and guidance from government bodies and other organisations.

They will ensure that safeguarding issues are reflected in all other related policies and procedures and will consult with staff and learners when developing or reviewing policies. Policies must be monitored and updated regularly.

The Board is committed to ensuring that it:

- raises awareness of issues relating to safeguarding and promoting the welfare of children, young people, and adults at risk amongst the staff team, the learners themselves, their friends and relatives and the learner's employers.
 - provides a safe environment in which all individuals may learn
 - ensures staff receive appropriate training to enable them to identify children, young people and adults at risk who are suffering or at risk of suffering significant harm
 - has effective safeguarding policies, procedures, and systems for minimising the risk of abuse and takes appropriate action to see that such individuals are kept safe.
 - communicates the safeguarding approach to staff and learners.
 - operates safer recruitment and selection procedures.
 - designates a member of staff with sufficient authority to take lead responsibility for child and adult protection.
 - appoints a member of the Board of Governors with sufficient experience of safeguarding to monitor to review and manage overall processes.
 - remedies any deficiencies or weaknesses in respect of the protection of children, young people and adults at risk which are drawn to the Board's attention.
 - approves and annually reviews the safeguarding policies and procedures.
 - ensures that referrals are made to the DBS when there are concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children.
- increase data protection by ensuring Springfield Training meets the GDPR criteria

10.2 The Designated Safeguarding Leads

The role of the Designated Safeguarding Leads (*DSL's*) is primarily to support staff and to investigate, record and act on concerns raised by staff, learners or other individuals and to use their expertise to inform all discussions pertaining to the promotion of learner's welfare and the prevention of abuse.

Springfield Training have identified a DSL to manage issues relating to safeguarding and radicalisation: Katie Hackett- Head of Qualifications and Assessment (katie@springfieldtraining.com)

There are 2 Deputy Safeguarding Leads within the business: Andrea Martin, Head of Quality & Continuous Improvement (andrea@springfieldtraining.com) and Tina Redmond, Head of Teaching, Learning & Assessment (tina@springfieldtraining.com).

Safeguarding Governance: Debra Forsythe-Conroy- Executive Board

10.3 Managers and Team leaders

Issues relating to e-safety must be referred to the Head of Quality Andrea Martin (andrea@springfieldtraining.com) and Data Protection Officer Hannah Teasdale (hannah@springfieldtraining.com).

Heads of Department and Managers are responsible for ensuring that:

- policies, procedures, and systems are implemented and followed by the staff team and that all learners, their relatives where appropriate, and staff receive appropriate information about internal and external safeguarding policies and procedures, British values and warning signs of radicalisation and understand how to seek help.
- learning partners, including employers and placements, placement agencies and schools are made aware of, and share our commitment to safeguarding learners.
- the performance of each member of their staff/team, including their attitude and approach to safeguarding learners is properly monitored and reviewed through the formal processes of appraisal and supervision.

10.4 Staff

Staff KPIs and monthly performance reviews must demonstrate staff safeguarding training and development needs and how needs are being met. Line Managers will ensure that all staff receive safeguarding, abuse and radicalisation training commensurate with their role.

Line Managers will foster an open and inclusive management style that encourages people to voice any concerns and will ensure people know that their concerns, however minor, will be taken seriously and acted upon.

All staff within the organisation must recognise their responsibility to ensure learner wellbeing, be aware of the risks to learners and the importance of educating others, including employers and the learners themselves, about behaviours and practices which promote learner wellbeing and minimise the risk of abuse and/or radicalisation.

Staff must also be watchful for any signs which might suggest problems. Individual staff have a duty to follow the safeguarding policies, procedures and, systems when reporting any concerns or suspicions to the DSL.

As the learner's main contact with the organisation, tutors play a pivotal role in communicating and implementing the safeguarding systems and must:

- make every effort to ensure their learners understand the organisation's commitment to their health and safety as well as their wellbeing and welfare.
- be willing to listen to any suggestions that learners make which might improve their safety or any concerns that the learner might express.
- take responsibility for their own safety and wellbeing and report any concerns or issues promptly.

Staff must also ensure learners:

- understand the roles of the DSL who are also responsible for mental health, low level concerns and pastoral care, and know how to seek help/report concerns
- are educated about appropriate/inappropriate behaviour, both their own and that of others, and when that behaviour might be becoming abusive.

10.5 Learners and Apprentices

Both topics are addressed during the induction period, for apprentices during Sign up and Induction Interviews and adult skills learners during their induction. Understanding is reinforced at each learner review. Information relating to this is included in the Learner Handbooks.

Learners will also be given information about how to make a complaint and have access to Springfield's Complaints Procedure. Where appropriate this information may also be given to parents and carers.

Learners have a responsibility to:

- behave responsibly in respect of their own and others safety
- behave respectfully to staff and other learners at all times
- report concerns about themselves or others
- make constructive suggestions about ways to increase learners' safety.

10.6 Partner Organisations and Employers

Employers, Delivery Partners and Placement Providers have a responsibility to uphold the learner's welfare at all times while the learner is in placement or while travelling to and from work. Delivery Partners have a contractual responsibility to safeguard the learners (*outlined in the SLA*) and arrangements must be discussed and agreed with placement providers before learners are placed.

Employees are safeguarded by Employment Legislation however, to ensure that all employers understand and share our commitment to the welfare of learners and apprentices:

- staff conducting the initial placement check must satisfy themselves that Employers have suitable arrangements in place to safeguard learners and must ensure the organisation has a relevant Safeguarding Policy. Delivery Partners must provide Springfield Training with a copy of their Safeguarding and Prevent Policy documents and be supplied with a copy of Springfield's.
- employers will be given written information in respect of Springfield Training safeguarding policies and procedures and contact details of who to contact if they have any suspicions of inappropriate behaviour and will have the opportunity to discuss these with a tutor prior to the learner/apprentice commencing their programme.

Additional checks are undertaken in all settings involving a young person. All 16-18 learners and apprentices have a named mentor in the workplace and have contact details

for all tutors involved in the delivery of their programmes and/or supervising them in work placements.

Mentors are given instruction, and written copies of the procedures and the name and contact details of who they should contact if they have concerns or queries.

Springfield have dedicated Mentors allocated to learners who may have a learning difficulty or disability.

11. Recognising abuse and radicalisation

Abuse and radicalisation can be difficult to recognise since the person concerned may be too frightened or ashamed to seek help and may try to deny that anything is wrong. The vulnerable individual may not always realise the perpetrators behaviour for what it is. Constant vigilance is therefore required to pick up behavioural clues, however minor, that might indicate abuse/radicalisation from either the learner/apprentice or abuser.

The Designated Safeguarding Leads will consult the appropriate authorities in the geographical regions of our delivery for guidance in identifying which category of risk an individual is susceptible to. In work-based learning these may include:

- Changes in the learner's or apprentices' normal behaviour e.g., the learner or apprentice becoming fearful, withdrawn, isolated, erratic in relation to timekeeping/attendance, failure to meet deadlines, deteriorating quality of work.
- Inappropriate behaviour to others e.g., grooming/radicalising behaviours - favouritism, excessive attention, presents, favours and secrecy.
- Inappropriate conduct - e.g. conversations, lifts, meetings, phone calls, texts, e-mails
- Boundary violations – e.g., inappropriate touching and language
- Unexplained weight loss

Abusive behaviours may include:

- physical emotional or sexual abuse
- bullying due to race, faith, gender, sexuality and/or disability
- cyberbullying and internet grooming
- sexting (*sending unwanted, sexually explicit messages or pictures*)
- self-harm
- grooming
- cuckooing and counting lines activities
- unsafe activities (*NB this list is not exhaustive*)

Other forms of abuse include:

Trafficking and Modern Slavery

Recognising victims of modern slavery can be very difficult it is often hidden. Victims may be any gender, any age including adults and children, any nationality. The true extent and nature of modern slavery in Sussex is not presently known as this crime remains largely invisible to the general public.

Modern slavery includes exploitation in the sex industry, forced labour, domestic servitude in the home and forced criminal activity. Victims may:

- show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn
- rarely be allowed to travel on their own, seem under the control or influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- be living in dirty, cramped, or overcrowded accommodation, and / or living and working at the same address.
- have no identification documents, have few personal possessions, and always wear the same clothes day-in day-out. What clothes they do wear may not be suitable for their work.
- have little opportunity to move freely and may have had their travel documents retained, e.g. passports.
- be dropped off or collected for work on a regular basis either very early or late at night.
- avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family. For further information see: www.gov.uk/government/collections/modern-slavery

Criminal Exploitation

This too can be difficult to spot as once again victims may be any age or gender and may be too frightened to draw attention to themselves or fearful for their families if they attempt to leave the criminal/county lines network.

It is important to be suspicious if children:

- go missing and are subsequently found in areas away from their home (*particularly if this happens regularly*)
- have been the victim or perpetrator of serious violence (e.g. *knife crime*).
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Honour based abuse: It can also be difficult to spot children who are the victims of so-called 'honour'-based abuse, involving incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. This type of cultural abuse may include female genital mutilation (*FGM*), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic when deciding what form of safeguarding action to take. All forms of HBA are abuse (*regardless of the motivation*) and should be handled and escalated as such. Professionals, individuals, and groups in relevant communities, need to be alert to the possibility of a child being at risk of, or already having suffered, HBA. Concerns must be reported to the DSLs.

The DSL is responsible for reporting activating local safeguarding protocols for multi-agency liaison with police and children's social care

Misogynistic abuse: often operates through sexual harassment, coercion, and psychological techniques aimed at controlling women, and by legally or socially excluding women from full citizenship.

Teachers along with regulated health and social care professionals in England and Wales, have a mandatory duty to report FGM conducted on girls under 18, to the police. Those failing to report such cases may face disciplinary or criminal sanctions.

Forced marriage, forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (*if they have learning disabilities, for example*).

The Forced Marriage Unit (*FMU*) has created: Multi-agency practice guidelines: handling cases of forced marriage and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) Springfield staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

12. Procedure for responding to abuse/concerns re radicalisation.

12.1- Aims

The aim of this section is to provide procedural guidance for Springfield Training staff so that they know how to respond to suspected or actual incidents of abuse of learners. Springfield's primary concern is the protection of the children, young people, and vulnerable learners of any age to whom we owe a duty of care. We must ensure that we discharge our legal and moral responsibilities equitably in the event of a suspected or actual incident of abuse.

The Designated Safeguarding Lead is responsible for ensuring that any suspected or actual incident of abuse is dealt with immediately and is reported to the local authority safeguarding team when necessary.

12.2- Responding to disclosures of abuse – all staff

Any allegation or suspicion of abuse, however minor, must be taken seriously and reported immediately to a Designated Safeguarding Lead or in their absence to a member of the management team. However difficult a situation may seem it must never be ignored.

Staff working in Education and Care environments

Staff working in Education and Care environments should in the first instance ensure any child protection incidents are reported to the organisations Safeguarding Officer in accordance with their safeguarding policies and procedures and should subsequently inform the Springfield DSL.

Disclosures of abuse by learners

Staff should listen quietly and non-judgementally to any concerns expressed or disclosures made by learners and make a written record, at the earliest opportunity, of what the learner says and does: this must be factual and objective. If the disclosure arose from a conversation detail of the context in which this took place should be included. The date and time of the disclosure should be noted, and the report should be signed by the author.

No attempt should be made to investigate the complaint and care should be taken not to ask any direct questions.

Staff must not promise confidentiality but should reassure the learner that only those individuals with a need to know will have access to the information disclosed.

Staff should then explain what will happen next.

The concerns **must** then be reported to a DSL or in their absence one of the SMT. Once the concerns have been reported responsibility for any further action lies with the DSL. Permission to refer and share information must be obtained in writing if the learner is over 18 years of age.

No further action must be taken by the person receiving the disclosure and no further conversation/discussion on the matter should take place with the learner as the evidence trail may become polluted.

If the allegation is made against a member of staff the same procedure should be adopted as above but under no circumstances should the accused member of staff be informed about the allegation.

12.3- Staff witnessing or suspecting abuse:

In situations where staff witness or suspect that abuse is taking place staff must ensure the immediate safety and welfare of the learner concerned and summon medical assistance if required. Paramedic staff and/or the examining doctor should be informed of the suspicion of abuse and informed that a written report may well be required.

In cases of serious abuse where there is evidence to suggest criminal activity, physical or financial, the police should also be summoned. Any incident involving alleged sexual abuse or involving alleged physical abuse which has resulted in injury should be reported immediately to the police.

Staff must also consider whether there is an immediate risk to other learners and take steps to secure their safety.

Where a serious incident has taken place, it is essential that evidence that may be important to a police investigation is not disturbed.

No attempt should be made to question the learner, but they should be allowed to give information if they wish or express distress or fears. Comfort and reassurance should be offered.

If the alleged perpetrator is a child or other vulnerable adult, staff should ensure they too are safe and supported, by allocating another member of staff to be with them.

At the earliest opportunity a record should be made containing as much detailed information as possible. This should be signed and dated by the member of staff making the record and the matter reported to a DSL or member of SMT.

12.4- Immediate actions by the DSL:

Any serious incident of abuse which is substantiated or witnessed should be referred to the appropriate local authority safeguarding team by the DSL at the first available opportunity and within 24 hours. If in doubt about whether an incident should be referred, the DSL should consult with the appropriate local authority safeguarding team and if requested complete the relevant form.

If the police have not already been informed, the DSL should decide whether to do so or not. This will depend upon whether or not a crime appears to have been committed.

If in doubt, the police should be consulted so they can determine whether or not their involvement is required. The DSL will need to follow instructions from the police to ensure that any police investigation is not hindered. Where the police are informed, the DSL must also refer the matter to the local authority safeguarding team.

Unless instructed otherwise by the police, the DSL should immediately inform the family or next of kin about the incident. In serious situations, where the learner is injured or distressed, the DSL should communicate the information carefully and sensitively. The DSL should support family members to visit the learner.

If a vulnerable person reports abuse happening at home or elsewhere the matter should be discussed with the police and/or the local authority safeguarding team before contacting any relatives or friends.

If the alleged abuser is a child or vulnerable adult their family should be informed and supported in the same way.

The local authority safeguarding team will decide whether there has been an incident of abuse that requires a safeguarding assessment and will advise the DSL what steps should be taken next. The DSL should provide as much information as possible to the local authority safeguarding team.

12.5- Additional Actions if the alleged abuser is:

A member of staff

If a serious allegation is made against a member of staff, the DSL must contact the Deputy CEO and/or CEO immediately so that appropriate action can be taken in line with the Disciplinary Policy and Procedure. This will be supported by our HR Business Partners.

This may involve the DSL suspending the member of staff from duty on full pay for a limited period whilst the matter is investigated. This is without prejudice to the outcome of any investigation and is based on the need to protect learners and the member of staff and to ensure an unhindered investigation into the allegation. Another Senior Manager will undertake this role if the allegation is made against the DSL.

Where the allegation is against a member of staff, any safeguarding investigation undertaken by the company must dovetail with the disciplinary process and all employment legislation. HR Business Partners will be asked for advice throughout the process.

Another Learner

If the allegations are made against another learner, the DSL should take immediate steps to separate the perpetrator from the Learner who is the victim of the abuse.

The place of work or placement

The employer or placement supervisor will be informed of the allegation made by the learner, unless circumstances suggest this is inadvisable, and will be expected to initiate appropriate action in respect of the allegation. The Learner may need to be removed from the workplace pending an investigation.

12.6- Investigations

Where the local authority safeguarding team are involved, they will decide whether to deal with the matter in the context of the multi-agency safeguarding procedures. If it is so decided, a safeguarding strategy meeting/ discussion will be arranged by the local authority usually within five working days of the referral being made although timescales may vary. The safeguarding strategy meeting/discussion will determine who carries out the required investigations. If the police are involved, they will be part of any strategy meeting/discussion. Springfield may or may not be invited to the initial meeting. Springfield Training can offer their premises as a neutral venue for investigatory meetings, which some learners have found useful and can support learners to find an appropriate adult who can support them during meetings.

Springfield Training will need to carry out its own investigation, however the DSL must not embark on any investigations until advised by the safeguarding team to do so. In some cases, the local authority will give permission for this to proceed straight away. If so, the DSL, will co-ordinate the investigation process.

12.7- Providing support

All affected individuals should be reassured and sensitively supported throughout the investigation process as they are likely to experience a wide range of emotions. No

individuals should be interviewed without express instruction from the local authority safeguarding team and from the DSL.

Staff witnessing and/or reporting an incident of abuse may themselves need considerable support. Others may be affected when learners they know are victims of abuse and they may become distressed during and following a safeguarding investigation. The DSL may refer staff to external sources of support if required, in the first instance the confidential staff counselling service provided by Westfield Health, HR Business Partners and/or their GP service.

12.8- Dealing with outcomes

Once investigations have been completed the local authority safeguarding team will usually prepare a safeguarding action plan ensuring that any risks are identified, managed and minimised. Springfield Training will co-operate with any safeguarding action plan and will complete any actions required.

12.9- Reviewing Actions

The DSLs should ensure that the actions taken are reviewed as soon as possible after the event to see whether lessons can be learned and to ensure improvements are made wherever possible to prevent further or to deal more effectively with incidents of abuse.

13. Multi Agency Working

Local authority social services departments are responsible for the development and co-ordination of local multi-agency codes of practice for safeguarding children and adults at risk.

The arrangements for safeguarding children and adults at risk are complex. Springfield will operate in accordance with the local multi-agency safeguarding policies, procedures and guidance, and will refer all incidents of abuse to the relevant local safeguarding team.

Springfield will work cooperatively with all relevant agencies where safeguarding issues arise. This includes the police as well as social services staff with responsibility for safeguarding issues.

Learners with special educational needs, protected by an Educational Health Care Plan (EHCP) or a Learning Disability Assessment (LDA) will continue to be supported. Plans are revised annually or more frequently as required and also when learners progress.

Springfield Training may also request an assessment if a need is identified.

Springfield Line Managers must ensure that all relevant staff are required to comply with the local multi-agency code of practice, and know how to find, and the in-house safeguarding policies and procedures that are in place.

If an individual enrolling on a programme of study at Springfield discloses that they are already under the supervision of the Children and Young Person or Adult Team,

Springfield will work in partnership with the relevant agency to ensure the individual's wellbeing is safeguarded.

14. Good Practice

14.1- Confidentiality

In principle, staff should respect confidentiality and should not divulge information given to them in confidence. However, where a member of staff suspects that a learner or apprentice has been harmed, or is at risk of being harmed, they have a duty to pass on the information to the DSL. This means staff are not at liberty to keep concerns to themselves and must not promise to keep secrets.

When an incident of actual or suspected abuse is reported, all staff involved have a duty to ensure that information is not shared with anyone unless they have a need to know. The DSL should pay particular attention to protecting the identities of alleged victims, perpetrators and witnesses from colleagues and others with whom they may have contact with.

Any approach from the press or media must be referred to Dan Howard or Noel Johnson.

14.2- Equality and Diversity

This policy and the way it is implemented by staff should take into account the diversity and individuality of learners or apprentices and should reflect Springfield's Equality and Diversity policies and the organisation Values.

Staff should take account of individual communication needs and barriers, such as language, hearing or visual impairment, or cognitive dysfunction, and should find communication methods which enable individuals to express their views and give information.

Staff should be sensitive to the fact that individuals may have different approaches and views about relationships, and this may affect their understanding of what constitutes abuse. However, the principles and procedures within this policy should always prevail.

Where a situation is considered to be abusive, but not necessarily considered so by the child/ vulnerable person concerned, staff should seek advice from people who can support the vulnerable person through any investigation.

14.3- Record keeping

All information should be accurately and clearly recorded and should include as much detail as possible. It is good practice for staff or witnesses to write statements immediately whilst it is fresh in their minds, unless directed not to by the police or by the local authority safeguarding team. Staff should not confer with each other when doing so. There may be a requirement to take further statements from staff at a later date, to support any safeguarding, police or disciplinary investigations into the allegation. Records will be stored securely.

As with all record keeping, staff must ensure that any records concerning actual or alleged incidents of abuse are sufficiently detailed, accurate, concise, up-to-date, legible, factual, dated and signed. Opinions should be kept to a minimum, recorded as such, and backed up by factual evidence.

Records must be stored securely and separately in a manner that protects individual rights to privacy and security. Only people with a right to know will be allowed access to the records. Records concerning a Learner or apprentice (*not including third party information*) are available to them on request and may also be used as evidence in civil or criminal proceedings, safeguarding investigations and proceedings, disciplinary proceedings or ISA referrals.

14.4- Recruitment and selection

To deter applications from unsuitable individuals all advertisements and documentation used in relation to recruitment and selection will clearly indicate that Springfield is committed to safeguarding and promoting the welfare of learners or apprentices and expects all staff to share this commitment.

Recruitment and Selection processes will be conducted in accordance with the requirements of the Safeguarding Vulnerable Groups Act and best practice guidelines as outlined in the Springfield Training Safer Recruitment and Selection Policy.

14.5-Training

All staff will receive safeguarding training in house as part of induction, and as part of their ongoing professional development. Training will be updated annually in accordance with Springfield's Training and Development Plan.

The DSL(s) will receive additional training to ensure they are competent and confident to respond quickly and appropriately in the event of an incident of abuse. Training should include the local multi-agency safeguarding arrangements and procedures and their role and responsibilities within it.

16.6- Whistleblowing (*public interest disclosure*)

Staff are strongly encouraged to take action and report concerns if they suspect a child/vulnerable person is being abused, regardless of the setting or who the perpetrator is. Springfield respects those who stand up for anyone who they suspect or know is being abused, and staff are assured that they will not be victimised or treated unfairly as a result of reporting malpractice.

If a member of staff feels unable to report concerns to the DSL for whatever reason, they should still disclose their concerns to a member of the Senior Management Team.

The law (Public Interest Disclosure Act 1998) protects anyone making certain disclosures in the public interest. Staff should refer to Springfield's Whistle Blowing Policy in their employee handbook.

14.7- Abusers who themselves are adults at risk

In some cases, another learner or apprentice who is themselves a child or who is considered a vulnerable person may be the suspected perpetrator of abuse. In essence the procedure for protecting the victim and for reporting and investigating the incident is the same, but special care will be needed when dealing with and supporting the alleged perpetrator.

14.8- Prevent Agenda

Springfield Training will implement measures to prevent people being drawn into terrorism as advised in the Department of Education Prevent Duty in the Counterterrorism and Security Act 2015. (*Publication ref: DFE-0174-2015*) and Springfield's Information Technology Policy and annexes and ensure "Prevent" awareness training.

15. Putting the Policy into Practice

Springfield Training are committed to the principle of safeguarding and the importance of embedding safeguarding throughout the organisation and will communicate this commitment to all staff, learners or apprentices and partner organisations. The Executive Board will ensure that:

all staff-

- understand their roles and responsibilities in respect of safeguarding
- have the time and resources to fulfil their safeguarding responsibilities
- have the support that they need from the organisation to carry out their duties effectively
- are appropriately inducted and trained
- are involved in the creation and review of the organisations approach to safeguarding
- all learners or apprentices (and where appropriate their relatives/carers)
- are aware of our commitment to our learner's or apprentices welfare
- understand their rights and responsibilities in respect of safeguarding
- understand what constitutes abuse (including cyber bullying)
- understand how, and feel safe, to report abuse occurring either to themselves or to other learners or apprentices
- are involved in the formulation and review of the organisations approach to safeguarding

our organisational partners are aware of-

- our commitment to the health, safety and welfare of our learners or apprentices and share our values
- our policies and procedures for safeguarding learners or apprentices in work placements in particular:
 - whilst travelling to and from placements
 - whilst in the placement our procedures for reporting suspected or actual abuse occurring in placement settings
- our Prevent Policy

Springfield Training will continue to maintain a single central record showing the recruitment and vetting checks undertaken in relation to staff identity, qualifications and criminal records.

This policy should be read alongside the document entitled Leeds Multi-Agency Safeguarding Adults Policy and Procedures (*updated July 2021*)

(<https://leedssafeguardingadults.org.uk/safeguarding-adults/multi-agency-policy-and-procedures>) The Policy sets out the safeguarding adult procedures that all staff must follow.

16. Legislation

The Safeguarding Vulnerable Groups Act 2006 remains the key piece of legislation for both children and adults and the following stipulations still apply.

- Any person who is barred from working with children or adults at risk will be breaking the law if they work or volunteer or try to work or volunteer with those groups.
- Any organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law.
- Any organisation working with children or adults at risk which dismisses a member of staff or a volunteer because they have harmed a child or vulnerable adult or believe they would have done so if they had not left, must inform the DBS of their suspicions.

Keeping children safe in education 2023 Statutory guidance for schools and colleges September 2023

This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Education and Training (Welfare of Children) Act 2021. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

This guidance replaces Keeping children safe in education 2022 updated September 2023

The provisions of the Safeguarding Act have been modified by The Protection of Freedoms Act 2012, designed to bring a more common-sense approach to safeguarding, and the Working together to Safeguard Children Guidance Document 2013 which led to the formation of the Disclosure and Barring service to:

- a) process requests for criminal records checks at either basic, standard or enhanced level (which also includes children's and/or adult's barred list check(s)) Only staff with close and unsupervised contact with children and adults at risk, i.e. those in regulated activity, need an Enhanced Check.

- b) investigate and make judgements in respect of individuals suspected of abusive behaviour referred to them
- c) place or remove people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland
- d) provide an online update service for employers

Staff DBS checks must be repeated every five years unless the individual has subscribed to the online updating service.

Care Act 2014

The Care Act 2014 and the Care Act guidance sets out the statutory requirement for local authority social services, health, police and other agencies to both develop and assess the effectiveness of their local safeguarding arrangements. This is founded on the six key principles:

Empowerment

People being supported and encouraged to make their own decisions and give informed consent.

Prevention

It is better to take action before harm occurs.

Proportionality

The least intrusive response appropriate to the risk presented.

Protection

Support and representation for those in greatest need.

Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

Accountability

Accountability and transparency in delivering safeguarding.

The **Mental Capacity Act 2005** sets out in law each person's rights regarding making their own decisions and protects their rights regarding this in law. Where a person is unable to make a specific decision for themselves, the Act sets out a clear process that must be followed before a decision can be made on their behalf.

17. Confidentiality

It is extremely important that when an allegation is made, that providers make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Parents and carers of under 18's should also be made aware of the requirement to maintain confidentiality about any allegations made against staff or stakeholders whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 213-214). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

KCSiE identifies GDPR and withholding information:

'Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.'

18. Safer Recruitment and Selection (see our Safer Recruitment Policy)

The Company pays full regard to safer recruitment processes and best practice:

<https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>

We ensure that all appropriate measures are applied in relation to everyone who works in the Company e.g. volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining references satisfactory to the Company, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews, reference checks and undertaking Disclosure and Barring Service (DBS) checks and ensuring staff are registered on the updating service.

No new member of staff is to be employed without an enhanced DBS check.

Statutory changes, underpinned by regulations, are that:

- ✓ A DBS Enhanced Disclosure is obtained for **all** new appointments to the Company's workforce.
- ✓ The Company will keep a single central record detailing a range of checks carried out on staff.
- ✓ All new appointments to the Company workforce who have lived outside the UK are subject to additional checks as appropriate.
- ✓ The Company will satisfy itself that supply/temporary staff have undergone the necessary checks.
- ✓ Identity checks must be carried out on all appointments to the workforce before the appointment is made.

Single Central Record- the Company maintains a single central record of all checks on Company staff and, where appropriate, governors, volunteers and other people who may come into routine contact with vulnerable learners or apprentices through the course of their studies.

19. General Statement

Everyone referred to within the scope of this policy are required to adhere to its terms and conditions.

Employees must understand that this policy is also incorporated into their contract of Employment and that they must undertake training on safeguarding children and adults at risk, which includes understanding, recognising and dealing with abuse.

Queries about the application or interpretation of this policy should be discussed with the DSL Leaders or SMT.

20. Monitoring and Review

This policy will be reviewed as deemed necessary through changes in law and/or good practice but at least annually.

21. Data Protection (please also see Data Protection policy for further detail)

In deciding what information to disclose, careful consideration should be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

- Be clear
- Ensure you include the key details of the learner or apprentice and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

What happens to the recording of the disclosure and other information gathered?

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally, the Springfield Training reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure which includes review of best practice.

22. Whistleblowing and Complaints (please also see associate policies)

"What do I do if I am worried that another member of staff is acting in a way that may be unsuitable in practice, or may be causing harm to another person or even committing a criminal offence against another person?"

Where an allegation is made against a staff member, either employed or associate, the matter is reported immediately to the CEO in line with this policy and KCSiE guidance. The CEO will inform the Director (s) as appropriate, and the incident will be dealt with under Springfield Training Policy in line with KCSiE guidance. Allegations of a safeguarding nature may constitute one or all of the below:

- A concern which may mean the employee is not suitable to practice with children, young people and vulnerable adults
- A concern which has led to the possible harm to a learner or apprentice
- A safeguarding concern which may be criminal in its nature or intent

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

The NSPCC's dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

23. Safeguarding and Ofsted (Extract taken from the Inspection Handbook).

As part of assessing safeguarding, inspectors will consider how colleges and provider that have learners or apprentices who are children manage concerns about harmful sexual behaviour towards or between learners or apprentices who are children and young people (including sexual harassment and violence and online sexual abuse). This includes considering whether the college or provider has followed the relevant DfE guidance about peer-on-peer abuse between children, and whether:

- the provider has appropriate provider-wide policies and procedures in place that make it clear that all harmful sexual behaviour is unacceptable and that assume that sexual harassment and online sexual abuse are happening in the provision, even when there are no specific reports
- the provider's policies are reflected in their curriculum, which specifically addresses sexual harassment and violence, online sexual abuse and language and consent
- all staff are clear as to the provider's relevant policy and procedures, and this is supported by relevant training
- all learners are supported to report concerns about sexual harassment and violence and online sexual abuse
- concerns are taken seriously and dealt with swiftly and appropriately, and learners are confident that this is the case
- comprehensive records of concerns are kept
- the provider has taken into account the findings and recommendations of Ofsted's review of sexual abuse in schools and colleges

Inspectors will also look at how providers work to prevent sexual harassment and violence and online sexual abuse between learners using a whole-provider approach that includes an effective behaviour policy, pastoral support and a carefully planned curriculum with respect to relationship and sex education. Inspectors will expect providers to be alert to factors that increase the vulnerability or potential vulnerability of learners, such as mental ill health, domestic abuse, children with additional needs, and learners from groups at greater risk of harm (including vulnerable adults). Inspectors will also seek to understand how any barriers that could prevent a learner or apprentice from making a disclosure, for example communication needs, are identified and addressed.

As set out in '[Inspecting safeguarding in early years, education and skills settings](#)' inspectors will expect, among other things, providers to:

- understand how to handle reports of harmful sexual behaviour between learners, both on and outside college or provider premises, in line with the DfE's guidance, and train their staff accordingly
- have good awareness of the signs that a child/young person who is a learner is being neglected or abused, as described in '[What to do if you're worried a child is being abused](#)'
- be confident about what to do if a learner or apprentice reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another learner
- ensure that learners are taught about safeguarding risks, including online risks
- support learners to understand what constitutes a healthy relationship, both online and offline

Inspectors will not investigate concerns of sexual harassment and violence and online sexual abuse themselves but will ensure that allegations are reported to the appropriate authority as appropriate, where that has not already happened.

Where providers do not have effective policies and processes in place, it is likely that safeguarding will be considered ineffective. This is likely to impact on the leadership and management judgement. We will assess these arrangements in an age-appropriate way, taking account of the age and vulnerability of the learners involved. Inspectors may also, depending on the circumstances, take this evidence into account when considering the behaviour and attitude and personal development judgements (*particularly in respect of learners feeling safe and pastoral support respectively*).

Sources of evidence specific to leadership and management

Inspectors will gather a range of evidence from meetings with leaders, managers and governors and first-hand evidence of their work across the provider, including in subcontracted provision.

Inspectors will use documentary evidence that the provider supplies to evaluate the impact of the work of leaders, managers and governors, both currently and over time. They will use this in conjunction with first-hand evidence. This includes, but is not limited to:

- meetings with leaders and those responsible for governance, to evaluate how well they fulfil their statutory duties with respect to equality and safeguarding
- documentary evidence that demonstrates the effectiveness of the provision for all learners or apprentices and its continuous and sustainable improvement
- interviews with staff and learners or apprentices to evidence how well leaders have created a positive culture
- first-hand evidence gathered during the inspection

- responses to the staff, learner, apprentice, employer and parent/carer questionnaires. These will be particularly useful for judging the culture that leaders and managers have established
- any evidence the provider has from surveying the staff and the way in which leaders and managers have responded to concerns raised by staff, parents or employers
- considering the overall aims of bodies giving strategic direction to providers on skills and economic needs, such as mayoral and combined authorities for devolved adult education
- records and analysis of safeguarding concerns, including those relating to sexual harassment and violence and online sexual abuse

24. Related policies

There are other specific policies that have our approach to safeguarding embedded within them.

These include:

- Prevent
- Whistle Blowing
- Bullying and Harassment
- Health and Safety Policy
- I.T. User
- E- Safety Policy

A handwritten signature in black ink, appearing to read 'Dan Howard', is centered on a light-colored rectangular background.

Signed:

Deputy CEO: Dan Howard

Date: 02 February 2024

Appendix 1: I.T. Acceptable Use Agreement Version 1 For over 18s only

I understand that I must use Springfield Training systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users.

For my own personal safety:

- I understand that Springfield Training will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

I understand that everyone has equal rights to use technology as a resource and:

- I understand that the systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the systems or devices for online gaming, online gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube) unless I have the permission of a member of staff to do so.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

I recognise that Springfield Training has a responsibility to maintain the security and integrity of the technology it offers me

- I will only use my own personal devices (mobile phones / USB devices etc) if I have permission and I understand that, if I do use my own devices, I will follow the rules set out in this agreement, in the same way as if I was using Springfield Training equipment.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software; however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any Springfield Training device, nor will I try to alter computer settings.
- I will only use social media sites with permission and at the times that are allowed

When using the internet for research or recreation, I recognise that:

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download copies (including music and videos)
- I understand that Springfield Training also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of education and where they involve my membership of the education

- community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action.

Please complete the section to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to systems and devices.

I have read and understood the above and agree to follow the policy.

Name of learner or apprentice

Course:

Signed: Date:.....

Appendix 2:

Parent / Carer I.T Acceptable Use Policy and Agreement version 1 For Under 18's only

Digital technologies have become integral to the lives of children and young people, both within schools and work-based learning and outside. These technologies provide powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy and agreement is intended to ensure:

- that Springfield Training as a duty of care to Safeguard learners
- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school, colleges and work-based learning and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their online behaviour

Springfield Training will ensure that *learners* will have good access to digital technologies to enhance their learning and will, in return, expect the *learners* to agree to be responsible users. A copy of the Learner Acceptable Use Policy is attached to this permission form so that parents/carers will be aware of Springfield Training expectations of the young people in their care.

Parents are requested to sign the permission form below to show their support of Springfield Training in this important aspect of learner safety.

Parent / Carers Name:

Learner Name:

As the parent/carers of the above *learner*, I give permission for my son/daughter to have access to the internet and to ICT systems with Springfield Training.

I know that my son/daughter will sign the Acceptable Use Agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of education

I understand that Springfield Training will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that Springfield Training cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's / daughter's activity on the systems will be monitored, and that Springfield Training will contact me if they have concerns about any possible breaches of the Acceptable Use Policy. I will ensure my child adopts the safe use of the internet and digital technologies at home and will inform Springfield Training if I have concerns over my child's online safety.

Signed: Date:.....

Appendix 3

I.T. Acceptable Use Agreement

For learners or apprentices under 18

I understand that I must use Springfield Training systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users.

For my own personal safety:

- I understand that Springfield Training will monitor my use of the systems, devices and digital communications and have a responsibility to keep me safe under legislation including Keeping Children Safe in Education
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- If I arrange to meet people off-line that I have communicated with online, I will do so in a public place.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

I understand that everyone has equal rights to use technology as a resource and:

- I understand that the systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the systems or devices for online gaming, online gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube) unless I have the permission of a member of staff to do so.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

I recognise that Springfield Training has a responsibility to maintain the security and integrity of the technology it offers me

- I will only use my own personal devices (mobile phones / USB devices etc) if I have permission, I understand that, if I do use my own devices, I will follow the rules set out in this agreement, in the same way as if I was using Springfield Training equipment.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software; however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any Springfield Training device, nor will I try to alter computer settings.

I will only use social media sites with permission and at the times that are allowed

When using the internet for research or recreation, I recognise that:

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

I understand that I am responsible for my actions, both in and out of Springfield Training:

- I understand that Springfield Training also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the education community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action which may result in termination of my learning programme.

Please complete the section to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to systems and devices.

I have read and understood the above and agree to follow the Policy and Agreement

Name of learner or apprentice:

Course:

Signed:

Date: