



Global Skills Services Ltd

KEY CONTACTS

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GLOBAL SKILLS SERVICES SAFEGUARDING POLICY

STATEMENT OF PURPOSE

Global Skills Services fully recognises its responsibility for the protection of young people or vulnerable adults and adults at risk and for safeguarding and promoting welfare to all learners and staff. Global Skills Services is committed to providing a secure environment for learners, and staff where learners feel safe and are kept safe. All staff at Global Skills Services is aware and have explained that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

Global Skills Services aims to create and maintain a safe environment for all learners, staff, volunteers, contractors and visitors to our training centre or delivery premises.

SCOPE

The policy applies to all staff at Global Skills Services including contractors.

OBJECTIVES OF THE POLICY

- To promote an environment that is safe, where staff and learners treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff, teaching and non-teaching, of the need to safeguard young people and adults at risk and of their rights and responsibilities in identifying and reporting possible cases of abuse or neglect.
- To provide a systematic means of supporting young people and adults at risk, known or thought to be at risk of harm.
- To ensure that appropriate risk assessments are undertaken by Global Skills Services and other managers to ensure that learners are safeguarded.
- To ensure that relevant safeguarding information about a young person or adult at risk is disseminated to appropriate staff within the centre on a 'need to know' basis.
- To ensure that partner organisations who support the delivery of our programmes have appropriate safeguarding and young person / adult protection policies and procedures in place.
- To involve learners in the decisions on safeguarding concerns and ensure they are shared with relevant agencies (e.g., LADO) when appropriate. Also, with parents of young people or adults (unless advised against this by the Local Safeguarding Partnerships (LCSP))
- To ensure that all staff who have access to young people or adults at risk have been checked for their suitability through safer recruitment procedures.
- To ensure all staff will receive appropriate training over a period of time including an introduction at all staff inductions.



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- The Directors will be responsible for the implementation of the young person / adult and adults at risk protection policy and procedures.

PREVENT

Prevent is part of a government initiative to develop a robust counter terrorism programme, CONTEST. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health.

Global Skills Services has been looking to do this prior to these requirements and refers to the following:

- Prevent Action Plan
- Safeguarding Policy and Procedure
- Wellbeing
- Safe learners Policy and Procedure
- Equality and Diversity and Equal Opportunity Policy and Procedure
- Prevent Policy and Procedure

LEGISLATION & GUIDANCE

This policy has been written to ensure our safeguarding arrangements comply with statutory requirements and current good practice, and pays particular regard to:

- Keeping Children Safe in Education (September 2021)
- UN Convention on the Rights of the Child
- Data Protection Act 1998
- GDPR 2018
- Sexual Offences Act 2003
- Protection of Freedom Act 2012
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2015 – Amended February 2017
- Equality Act 2010

DEFINITIONS

Safeguarding: Preventative or precautionary planning and measures against potential harm or damage to someone.



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Child Protection: The policy and procedures in place to protect and/or remove a young person / adult from harm or risk of harm.

Abuse: Any treatment that causes harm. This can include physical, sexual, emotional abuse, and/or neglect.

Child protection issue: An issue raising a concern about harm or risk of harm to a young person / adult or young person.

Child: A young person / adult is defined in law as a person under the age of 18 years.

Adult at risk: An adult aged 18 and over who is unable to protect themselves from abuse and neglect, due to a care and support need which is permanent or temporary which is either met or not met by the local authority.

Young person: A person aged up to 25 years old.

Staff: 'Staff' means all employees, full-time and fractional, and all agency, franchise, contract and volunteer staff working for Global Skills Services.

DSO: Designated Safeguarding Lead.

LADO: Local Authority Designated Officer (London only).

KEY SAFEGUARDING PRINCIPLES

- All learners have the right to be safeguarded from harm and exploitation so all complaints, allegations or suspicions must be taken seriously.
- The procedures laid out in this document must be followed whenever an allegation is made that a learner has been abused.
- Absolute promises of confidentiality should not be given as the matter may develop in such a way that these might not be able to be honoured.
- If the complaint comes directly from the learner, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must always be avoided.
- A full record of any discussions must be made immediately after any conversations with the learner and referred to the DSL that same day.
- Global Skills Services have a responsibility to provide a safe environment and minimise risks of harm to learners' welfare.

Keeping Young people or adults Safe in Education 2021

Global Skills Services are aware of their responsibility to align their safeguarding practices with the statutory guidance Keeping Young people or adults Safe in Education 2021. All staff are issued with a copy of the document and confirmation of reading it is kept on file. All new staff that join the organisation will be issued with the document as part of their Induction, alongside the safeguarding policy and mandatory safeguarding training.

Definitions of Abuse

- Physical abuse may take many forms e.g., hitting, shaking or poisoning. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health.
- Emotional abuse is the persistent emotional ill treatment, such as to cause severe and persistent effects on emotional development. Some level of emotional abuse is involved in most types of ill treatment though emotional abuse may occur alone.



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- Sexual abuse involves forcing or enticing someone to take part in sexual activities. This may include non-contact activities such as looking at, or in the production of pornographic materials, watching sexual activities or encouraging others to behave in sexually inappropriate ways.
- Neglect involves the persistent failure to meet someone's basic physical and/or psychological needs, likely to result in the serious impairment of their health and development. This may involve failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

THE CONTEXT OF ABUSE

Young people or adults who are particularly vulnerable.

Global Skills Services recognises that individuals are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some young people or adults. We understand that this increase in risk is due more to societal attitudes and assumptions or young person / vulnerable adult protection procedures which fail to acknowledge young people or adults' diverse circumstances, rather than the individual's personality, impairment or circumstances.

Some young people or adults may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Any individual may benefit from early help, but all staff should be particularly alert to the potential need for early help for a learner / apprentice who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the young person / vulnerable adult, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- has an imprisoned parent
- is experiencing mental health, wellbeing difficulties
- is persistently absent from education
- is at risk of 'honour' based abuse such as FGM or Forced Marriage

Anti-Bullying/Cyberbullying



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Our company policy on anti-bullying is set out in a separate document. This includes all forms e.g., cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the Board of Directors. All staff are aware that young people or vulnerable adults with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Director and the DSL will consider implementing young person / vulnerable adult protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

RADICALISATION AND EXTREMISM

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other young people or vulnerable adults' services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Some young people or vulnerable adults are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

Global Skills Services is clear that exploitation of vulnerable young people or vulnerable adults and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for company and training providers on preventing young people or vulnerable adults and young people from being drawn into terrorism¹.

Global Skills Services seeks to protect young people or vulnerable adults and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable learners / apprentices to discuss issues of religion, ethnicity and culture as part of promoting British Values.

The Board of Directors, Director and the Designated Safeguarding Lead (DSL) will assess the level of risk within the company and put actions in place to reduce that risk. Risk assessment may include the use of company premises by external agencies, anti-bullying policy and other issues specific to the company's profile, community and philosophy.

When any member of staff has concerns that an individual may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff to raise concerns around Prevent (020 7340 7264).

DOMESTIC ABUSE

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs



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regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to young people or vulnerable adults and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Young people or vulnerable adults who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a young person / vulnerable adult suffering or witnessing domestic abuse (See Appendix 5).

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive someone into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or young people or vulnerable adults (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

CSE can occur over time or be a one-off occurrence. CSE can affect any young person / vulnerable adult, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.

Any concerns that a young person / vulnerable adult is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. The DSL will use the on all occasions when there is a concern that a young person / vulnerable adult is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a young person / vulnerable adult who is being or who is at risk of being sexually or criminally exploited. In all cases if the assessment identified any level of concern the DSL should contact their local Safeguarding Board. If the individual is in immediate danger the police should be called on 999.

Global Skills Services is aware that sometimes the individual is unable to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, they may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Learners / apprentices will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

FEMALE GENITAL MUTILATION (FGM)



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Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of young person / vulnerable adult abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.

The duty applies to all persons in Global Skills Services who is employed or engaged to carry out 'teaching work' in the company, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty should be reported as per IC Training Centre's young person / adult protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female learners / apprentices about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

FORCED MARRIAGE

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/young person / adult abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a company or through a third party. Contact should be made with MASH.

HONOUR-BASED ABUSE

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion



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- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

MENTAL HEALTH

Staff will be aware that mental health problems can, in some cases, be an indicator that someone has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst we recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of young people or vulnerable adults and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a young person / adult that is also a safeguarding concern they will share this with the DSL or deputy.

Looked after young people or adults and previously looked after young people or adults

The most common reason for young people or adults becoming looked after is as a result of abuse and neglect. Global Skills Services ensures that staff have the necessary skills and understanding to keep looked after/previously looked after young people or adults safe. Appropriate staff have information about a young person / adult's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the young person / adult and contact arrangements with birth parents or those with parental responsibility.

The designated teacher for looked after young people or adults and the DSL have details of the individual's social worker and the name and local contact details responsible for young people or adults in care.

YOUNG PEOPLE OR ADULTS MISSING EDUCATION

Attendance, absence and exclusions are closely monitored. The company will hold more than one emergency contact number for learners / apprentices where reasonably possible. A young person / adult going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absences and take appropriate action. Staff must be alert to signs of young people or adults at risk of travelling to conflict zones, female genital mutilation and forced marriage.

ONLINE SAFETY

Our learners / apprentices increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, Snapchat.

Unfortunately, some people use these technologies to harm young people or adults. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing young people or vulnerable adults to engage in sexual behaviour such as webcam photography or face-to-face meetings. Learners / apprentices may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Global Skills Services has an online safety policy which explains how we try to keep learners / apprentices safe and how we respond to online safety incidents. Global Skills Services will also provide advice to parents when learners being asked to learn online at home and consider how best to safeguard all learners and staff.

Learners / apprentices are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.



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PEER ON PEER ABUSE INCL SEXUAL VIOLENCE AND SEXUAL HARASSMENT

The DSL, Board of Directors and Director will take due regard to Part 5, KCSiE 2021

In most instances, the conduct of learners / apprentices towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Global Skills Services recognise that young people or adults are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer-on-peer abuse are outlined below.

- domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- young person / adult sexual exploitation – young people or adults under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18
- harmful sexual behaviour – Young people or adults and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 2)
- upskirting – which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- serious youth violence³ – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e., murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that young people or vulnerable adults are at risk from or involved with serious violence and crime.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).

The term peer-on-peer abuse can refer to all of these definitions and a young person / adult may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer-on-peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

Global Skills Services aims to reduce the likelihood of peer-on-peer abuse through:

- the established ethos of respect, friendship, courtesy and kindness
- high expectations of behaviour
- clear consequences for unacceptable behaviour
- providing an appropriate curriculum which develops learners / apprentices' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.



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- systems for any learner / apprentice to raise concerns with staff, knowing that they will be listened to, valued and believed.
- robust risk assessments and providing targeted work for learners / apprentices identified as being a potential risk to other learners / apprentices and those identified as being at risk.

Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, Global Skills Services will also educate learners / apprentices in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the company and what services they can contact for further advice.

Any concerns, disclosures or allegations of peer-on-peer abuse in any form should be referred to the DSL using IC Training Centre's set procedures. Where a concern regarding peer-on-peer abuse has been disclosed to the DSL(s), advice and guidance will be sought from MASH and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the company will respond to the unacceptable behaviour. If an individual's behaviour negatively impacts on the safety and welfare of other learners / apprentices, then safeguards will be put in place to promote the well-being of the learners / apprentices affected and the victim and perpetrator will be provided with support.

YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

The practice of young people or adults sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given young people or vulnerable adults the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a young person is young person / adult sexual abuse and should be responded to accordingly. If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the young person / adult protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate company staff and subsequent interviews with the young people or adults involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the young person / adult at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to MASH or the Police as appropriate.

Immediate referral at the initial review stage should be made to MASH/Police if:

- The incident involves an adult



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- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the individual's development stage or are violent
- The imagery involves sexual acts
- The imagery involves anyone aged 12 or under
- There is reason to believe someone is at immediate risk of harm owing to the sharing of the imagery, for example they are presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to learners / apprentices involved and may decide, with input from the Director, to respond to the incident without escalation to MASH or the police. Such decisions will be recorded.

In applying judgement, the DSL will consider if:

- there is a significant age difference between the sender/receiver
- there is any coercion or encouragement beyond the sender/receiver
- the imagery was shared and received with the knowledge of the individual in the imagery
- the individual is more vulnerable than usual i.e. at risk
- there is a significant impact on the young people or adults involved
- the image is of a severe or extreme nature
- the situation is isolated or if the image been more widely distributed
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e., difficult home circumstances
- the young people or vulnerable adults have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our young person / vulnerable adult protection procedures, including reporting to the police or **MASH**. Otherwise, the situation will be managed within the company. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

CONFIDENTIALITY

- Global Skills Services recognises that in order to effectively meet a young person's / vulnerable adult need, safeguard their welfare and protect them from harm , we must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard young person / vulnerable adults and that the Data Protection Act 2018⁴ is not a barrier to sharing information where the failure to do so would place an individual at risk of harm.
- All staff must be aware that they cannot promise to keep secrets which might compromise the person's safety or wellbeing.



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- However, we also recognise that all matters relating to protection of an individual are personal. Therefore, in this respect they are confidential, and the Director or DSLs will only disclose information about an individual or members of staff on a need-to-know basis.

If in any doubt about sharing information, staff should speak to the DSL or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and vulnerable adults. (KCSIE 2021)

CONFIDENTIALITY AND STORAGE OF SAFEGUARDING REPORTS

All staff must maintain confidentiality about safeguarding cases and are shared internally on a need-to-know basis. Learners must be informed that any disclosures or concerns that are raised cannot be kept secret and may have to be referred to the Designated Safeguarding Lead and external agencies. The safeguarding report must be completed fully and accurately, using word for word information wherever possible. This must be saved using a password protection and emailed within the same day to the Designated Safeguarding Lead. The DSL will keep a central record of all safeguarding reports that are in a lockable cabinet or restricted access online folder that complies with GDPR. Active cases will be regularly reviewed and updated as necessary for each individual circumstance and closed cases will be signed off by the DSL and archived.

RESPONSIBILITIES

Senior Management Team

- The Senior Management Team are responsible for understanding the nature of the threat and the risks of extremism and radicalisation within IC Training Centre
- They will ensure that Global Skills Services effectively manage risks and is able to deal appropriately with issues of radicalisation and extremism by:
 - o creating an ethos which upholds core values of shared responsibility and wellbeing for all, while promoting respect, equality and diversity and understanding
 - o adopting stringent and transparent safeguarding/prevent duty practices which recognise, support and protect individuals who might be susceptible to radicalisation
 - o sharing information about safeguarding/prevent duty and good practice with other key stakeholders and external agencies
 - o providing training opportunities for staff and volunteers to enable them to continually update their safeguarding and prevent knowledge
 - o sharing information and concerns with agencies who need to know and ensuring we involve learners, parents, staff and others in an appropriate way
 - o providing effective management for staff and volunteers through supervision, support and training
 - o ensuring plans are in place to minimise the potential for acts of violent extremism. **Designated**

Safeguarding / Prevent Lead

- The designated lead Ranjeet Seerha, Managing Director, is the single point of contact for Safeguarding and Prevent, to support the Senior Management Team to fulfil their responsibilities and to ensure that:
 - o this policy is implemented across the organisation



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- any concerns are shared with the relevant organisations in order to minimise the risk of people becoming involved in terrorism
- appropriate training is in place that is relevant and regularly reviewed and updated
- develop and work with partners and support networks to ensure up to date information and resources are received, acted on and cascaded
- practices are reported on for the Senior Management Team and the Board of Trustees on a quarterly basis
- reviews the implementation and effectiveness of the policy on an annual basis

Take lead responsibility for managing young person / vulnerable adult protection issues and cases in their centre, operation or team.

- Provide advice and support to other staff, making referrals to and liaising with external parties as necessary, such as the local authority and other agencies, like the DBS or Police.
- Be aware of local safeguarding and referral procedures, the Local Safeguarding Young people or vulnerable adults' Board (LSCB) and Safeguarding Adults Board (SAB).
- Ensure that appropriate information is available at the time of a referral and that the referral is confirmed in writing, under confidential cover as quickly as possible (e.g., within a working day).
- Liaise with the local designated officer over safeguarding issues and in all cases where allegations relate to an employee or member of staff.
- Keep the Safeguarding & Prevent Risk Register updated at all times with all concerns, no matter how major or minor the concern
- Deal with the aftermath of an incident in the organisation.
- Attend regular training and networking events relating to safeguarding issues.
- Ensure the effective and consistent communication and embedding of safeguarding policies within their operation/team.
- Ensure that learners/service users and their parents/guardians/carers know where to go if they need support or have concerns about the behaviour of an employee, contractor or volunteer.
- Provide regular briefings and updates at staff meetings to ensure that all staff are kept up to date and regularly reminded of their responsibilities.
- Have an awareness of vulnerable service users within their operation.
- Ensure that all staff know how to raise concerns about people who are vulnerable or at risk of abuse and neglect.
- Ensure that all staff know how to assess the risk of young people or vulnerable adults being drawn into terrorism and understand how to identify individual young people or vulnerable adults who may be at risk of radicalisation and what to do to support them.

The Deputy Designated Safeguarding Lead(s):

- Parvinder Kaur, centre coordinator is trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of learners / apprentices. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

HR Department



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- The HR department monitors and records the DBS process for employees, casuals, volunteers and self-employed contractors
- The HR department also ensures that Safeguarding and Prevent training is provided and completion is monitored
- The HR department provides advice and guidance to managers on safeguarding issues in relation to recruitment, employees and volunteers

Line Managers

- Support and encourage the completion of required Safeguarding Awareness and Prevent Training
- Ensure all direct reports working in a regulated activity have read and familiarised themselves with Part 1 of the statutory guidance Keeping Children Safe in Education (September 2021)
- Adopt IC Training Centre's culture of vigilance and lead by example

Training and Learning Staff

- Teaching and learning staff will be involved in the delivery of a learning and apprenticeship curriculum which promotes knowledge, skills and understanding to build the resilience of learners, promote British values and enable them to challenge extremist views. This will include:
 - embedding equality, diversity and inclusion, wellbeing and community cohesion
 - promoting wider skill development such as social and emotional aspects of learning and the strengthening of critical thinking skills
 - recognising local needs, challenging extremist narratives, stereotypes and anti-social behaviour and by promoting universal rights
 - encouraging active citizenship and participation
 - promoting values of openness and respect and facilitating opportunities to contribute, challenge and debate
 - responding appropriately to events in local, national or international news that may impact on learners and communities making sure that learners are supported and listened to and are helped to access support internally and/ or through community partner.

Employees, self-employed and volunteers

- All employees are required to familiarise themselves with this policy and procedure and follow this at all times
- If you have concerns about the welfare of a young person / vulnerable adult, young person or vulnerable adult and believe that they may be at risk of, you must share that concern confidentially with a local safeguarding lead immediately
- Any information shared should always be accurate, up to date and shared appropriately and securely with only the person or people who need to know and limited to information relevant for the purpose. If you have any doubts about when to share safeguarding information, discuss the situation with a safeguarding lead
- Everyone must complete their required Safeguarding Awareness and Prevent Training to help increase their knowledge of safeguarding and prevent issues
- Everyone working in a regulated activity must read and familiarise themselves with the statutory guidance Keeping Children Safe in Education (September 2021)



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- If you feel that you could benefit from further training on safeguarding or young person / vulnerable adult protection, then please contact your Safeguarding Lead

SAFER RECRUITMENT PROCEDURES

Global Skills Services takes appropriate measures to ensure the appointment of new staff is in line with a safer recruitment practice which includes scrutinising applicants, verifying identity and qualifications, obtaining professional and character references, checking previous employment history and ensuring they have the health and physical capacity for the job.

We will prevent people who pose risks to children, young people and vulnerable adults from working at our company by making sure that all individuals working in any capacity at Global Skills Services have been subjected to relevant safeguarding checks and risk assessment in line with [*Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2021*](#). We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working at the company. The single central record must cover the following people: all staff, agency and third-party and supply staff who work at IC Training Centre.

Applicants seeking employment under the Skilled Worker Route (replaces existing Tier 2 route) for education, health or social care sectors will be required to provide a criminal record certificate. Guidance will be checked regularly for any updates

Every job description and person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. The company website will echo this within our 'work for us' section.

We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 5 years and will ask a min of 2 safeguarding questions. Training on safeguarding current practice must be completed within 2 weeks of starting with the organisation and must be updated every 2 years.

We have a procedure in place to manage allegations against members of staff, supply staff and volunteers. There is an agreed staff behaviour policy code of conduct which is compliant with 'Safer Working Practices', and includes - acceptable use of technologies, staff/learner relationships and communications including the use of social media.

RECRUITMENT OF STAFF WITH CRIMINAL CONVICTIONS

The Rehabilitation of Offenders Act 1974 (ROA) entitles all employers to take into account unspent convictions when determining whether an applicant is suitable for the role applied for. IC Training will not discriminate unfairly against applicants with a criminal record. Having a criminal record will not necessarily bar an applicant from working for IC Training, the nature of a disclosed conviction and its relevance to the post in question, will be considered.

Where a conviction has been disclosed in an individual's application for a post at the company, a discussion will take place regarding the offence and its relevance to the position. Failure to reveal information relating to convictions could lead to withdrawal of an offer of employment.

IC Training uses the Disclosure and Barring Service (DBS) to obtain information to enable it to assess the suitability of applicants for employment in positions of trust. The company complies fully with the DBS code of practice and does not discriminate unfairly against any subject of a DBS disclosure on the basis of conviction or other information revealed.

The only circumstances in which an employer may not legally recruit a person with a certain type of offending history, is where the offending history has led to the individual being barred from regulated activity with either children, adults or both. If you are recruiting for a role that is defined as regulated activity with children or



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adults, it is your responsibility to check the barred status of your employees and you may not employ a person who has been barred from working with the relevant group.

IC Training complies with the DBS code regarding the secure storage, handling, use, retention & disposal of DBS disclosures and disclosure information and with its obligations under the Data Protection Act.

STAFF LEARNING AND DEVELOPMENT

Learning about safeguarding is given a high priority at IC Training Centre. Expertise is extended effectively, and internal capacity is built up through performance management. Managers ensure that all staff regularly undertake a comprehensive range of learning to promote safe practice in and off site.

All new staff to the company have a comprehensive induction, this includes reading and understanding:

- i. Information sharing: advice for practitioners who are providing safeguarding services
- ii. Part one and Annex A of 'Keeping children safe in education 2021'
- iii. Company Behaviour Policy
- iv. Staff Code of Conduct
- v. This Safeguarding & Child Protection Policy
- vi. The role of the designated safeguarding lead

Designated staff are trained in specialist areas of work, such as:

- i. Designated Safeguarding Lead
- ii. Mental Health Champion
- iii. Domestic Abuse Champion etc.
- iv. Designated Teacher for Looked After Children

A variety of learning materials on safeguarding are made available to ensure staff continually develop their understanding and practice around safeguarding, these include:

- i. Safeguarding in Education Bulletins
- ii. Multi-Agency Learning and Development Programme
- iii. Leaflets
- iv. Mentoring
- v. Online learning
- vi. Posters in the staff room detailing referral processes and key topics
- vii. Shadowing
- viii. Staff handbook
- ix. Staff induction pack
- x. Standing agenda item staff meetings
- xi. In-house training
- xii. Video
- xiii. Workbooks



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xiv. NSPCC (monthly) and email updates for staff and governors

All learning and training is documented as part of the member of staff's personnel file, which also helps us map learning needs across the staff team for further development. A checklist is used as part of the induction process, and thereafter in the performance management process to ensure all compulsory learning has taken place. Safeguarding is always re-visited at least on an annual basis in staff performance management sessions, to ensure they are as confident and competent in carrying out their safeguarding responsibilities as they possibly can be.

All staff should know what to do if a young person / vulnerable adult tells them he/she/they are being abused, exploited or neglected including peer on peer abuse. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead. Staff should never promise a young person / vulnerable adult that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the young person / vulnerable adult.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

2. All staff should be aware that young person / vulnerable adult can abuse other young person / vulnerable adult (often referred to as peer-on-peer abuse). And that it can happen both inside and outside of the training centre and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.
3. All staff should understand, that even if there are no reports in company it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should speak to their designated safeguarding lead (or deputy).
4. As and when required, other external agencies may be consulted to assist with staff learning and development.

PROMOTING SAFEGUARDING AND THE WELFARE OF LEARNERS

The safeguarding agenda involves the protection of young people or vulnerable adults and adults at risk but also requires providers to promote and encourage the welfare of learners as a preventative measure to harm. This is achieved at Global Skills Services by:

- A culture of vigilance that is taken seriously by senior managers and included within meeting agendas
- Safeguarding training is included within staff and learner inductions and reinforced in both handbooks
- Embed into the curriculum including relevant focus topics such as online safety, lone working, self-care and stress management, fraudulent activity and scams, harassment at work, financial abuse, the prevent agenda and health and safety.
- Embed into the curriculum the promotion of equality and diversity and British Values to reinforce the acceptance of a diverse community and following the expectations of a British citizen.

USE OF EXTERNAL AGENCIES AND SPEAKERS

At Global Skills Services we encourage the use of external agencies or speakers to enrich the experiences of our learners; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our learners.



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Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, our values and ethos. Global Skills Services will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to learners are consistent with the ethos of the company and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies
- Activities are matched to the needs of learners
- Activities are carefully evaluated by Global Skills Services to ensure that they are effective

We recognise, however, that the ethos of our Company and learning is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this. Therefore, by delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help learners develop the critical thinking skills needed to engage in informed debate.

WHISTLE BLOWING

Whistle blowing protects all staff, contractors and learners from fear of victimisation or discrimination when raising serious concerns. It is intended to enable a safe environment to encourage discussions rather than allowing these to be overlooked or discussed externally. Anyone who raises a genuine concern will have significant legal protection under the Employment Rights Act 1996 – Part IVA, Part V and Part X and the Public Interest Disclosure Act 1998. The concern should be raised with the Directors who will conduct any internal investigations in line with the organisation's procedures.

MANAGING ALLEGATIONS AGAINST STAFF

Any suspicion, allegation or actual abuse of a learner by a member of staff must be reported to the Designated Safeguarding Lead as soon as possible and in any case that same day of the initial concern arising. The member of staff raising the concern should follow the standard safeguarding process and complete the report form.

The Designated Safeguarding Lead shall:

- Take such steps, as they consider necessary to ensure the safety of the learner in question and any other person who is considered at risk.
- Immediately notify the Directors who will follow procedures to inform the member of staff that they may be suspended on full pay pending an investigation. The length of any suspension will be in line with organisational policies and will be as short as possible while ensuring the safety of the learner.
- Report the matter to the Local Authority Safeguarding Board and if necessary, the DBS.
- Any investigation relating to a member of staff will follow organisational procedure
- Once the outcome is determined the Directors will take action in line with its disciplinary policies if necessary.

LONE WORKING

Global Skills Services recognises it has a responsibility for the health, safety and welfare of all workers including contractors and those who are self-employed. The specific risks involved with lone working are assessed in



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consultation with employees and recorded in an annual risk assessment. Actions to reduce and control the risks will include as a minimum:

- Managers at Global Skills Services use a system that clearly identifies where all employees are located on each day, contact details, times of sessions, list of learners in the group
- Employees are accompanied to any new venues on the first day of delivery by another member of IC Training Centre
- The venue is aware of the employee's visit, number of learners expected and have contact details of managers at IC Training Centre
- The employee and on duty Designated Safeguarding Lead have each other's contact details
- The employee is aware of the domestic and health and safety arrangements at the venue
- High risk learners are assessed, and team teaching/coaching is considered
- Vulnerable employees such as those with disabilities, medical conditions, pregnancy or English as a second language will require further measures put in place
- The staff induction and handbook include expectations and procedures for lone workers
- Managers at Global Skills Services will periodically monitor lone workers through visits, observations and other contact via phone, text and email

CONFIDENTIALITY, SHARING INFORMATION AND GDPR

All staff will understand that protection issues warrant a high level of confidentiality, not only out of respect for the individual and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

All staff at Global Skills Services should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of young people and vulnerable adults when problems are first emerging, or where a young person / vulnerable adult is already known to local authority social care.

Staff should only discuss concerns with the DSL, Director. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Information will be stored and handled in line with the Data Protection Act 2018 ⁷ and HM Government Information Sharing and Advice for practitioners providing safeguarding services to young person / vulnerable adults, parents and carers, July 2018

Information sharing is guided by the following principles:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of young people and vulnerable adults (KCSIE, 2021).



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COMPLAINTS

If staff or learners have a complaint about this safeguarding policy, they should refer to the organisation's complaints policy.

If a member of staff or learner feels the organisation or other external agencies are not handling a safeguarding concern appropriately, they should contact the Local Authority Safeguarding Board.

MONITORING AND REVIEW OF THE POLICY

Global Skills Services will review its policies and procedures to ensure that they comply with the relevant legislation. The Safeguarding Policy will be reviewed annually and updated in line with legal or statutory requirements or to remedy any deficiencies or weakness in regard to young person / vulnerable adult and adults at risk protection arrangements that are identified without delay.

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to COVID-19 and company risk assessment policies and processes.

REVIEW

Global Skills Services will store all records relating to safeguarding matters safely and securely and use them for the purpose of quality assurance and monitoring. This will allow for the dissemination of best practice; assist in improving provision; and inform the review of this policy. Global Skills Services will review its policies and procedures to ensure that they comply with the relevant legislation. The Safeguarding Policy will be reviewed annually and updated in line with legal or statutory requirements or to remedy any deficiencies or weakness in regard to young person / vulnerable adult and adults at risk protection arrangements that are identified without delay.

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to COVID-19 and company risk assessment policies and processes.

This policy has been approved & authorised by:

Name:	Ranjeet Seerha	Position:	Managing Director
Signature:		Date:	04.01.2025



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APPENDIX A

APPROVAL OF AN EXTERNAL SPEAKER: Application Form

Event Title:			
Event Date:		Start Time:	
Name of Event Organiser:			
Event Organiser's contact details:			
	Tel:		Email:
NOTE: If more than one speaker, please complete a separate form for each speaker.			
Speakers Name:			
Is the speaker known by any other name?			
Speakers Organisation: (Include full title & website URL)			
Speakers contact details: (Address)	Tel:		Email:
Title of talk:			
Subject matter:			
Language the talk will be delivered in:			
Does the event have any controversial subjects?	Yes ☐ No ☐		
	If yes, provide date and details:		
Arrival date:		Time:	
Departure date:		Time:	
Has the speaker spoken at IC Training Centre previously?	Yes No		
	If yes, provide date and details:		
Has the speaker been refused to speak publicly or at any educational establishment before?	Yes No		
	If yes, provide date and details:		
Have any previous speeches by this speaker generated media interest?			



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Who is the event open to?	Staff ☐ Students ☐ General public ☐ <u>OR</u> a restricted group/society ☐		
Expected number of attendees:		How many of these are likely to be external to the company?	



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Is the event being sponsored?	Yes ☐ No ☐
	If yes, provide date and details:
How will the event be advertised?	Email ☐ Social Media ☐ Leaflets ☐ Posters ☐
	Other ☐ No Advertising ☐
	If other, please provide details:
Are there any other details that should be noted?	
(Security required & informed / Marketing informed / entry by ticket only)	
ORGANISER TO SIGN:	DATE:

employees and others, including members of the public.



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APPENDIX B – ROLES REQUIRING DISCLOSURES (DBS CHECKS)

Guidance has been issued by the Home Office enabling organisations to identify which level of Disclosure is most appropriate for different members of staff or volunteers whose roles involve working with children, young people and vulnerable adults. **Anyone whose role does or is likely to involve working with children, young people and vulnerable adults will be asked to complete a code of behaviour and a self-declaration relating to criminal convictions, cautions and disqualification information.**

Standard Disclosures

Those roles that have regular or occasional supervised contact with vulnerable adults, children, young people and vulnerable adults and require the post holder to have a **Standard** Disclosure are:

- Additional staff running focus groups involving children, young people and vulnerable adults
- Members of the Press/Comms/ Media Team

Enhanced Disclosures

The criteria used at Global Skills Services to identify positions requiring Enhanced Disclosures are as follows:

- Does the position involve one-to-one contact away from the vulnerable adult/child's home?
- Is the position unsupervised?
- Is the situation an isolated one, i.e., the vulnerable adult, child or young person is away from their family?
- Is there regular contact with the same vulnerable adult /young person?
- Is the adult in a counselling role with the vulnerable adult /child or young person?
- Does the role include a responsibility to act as a safeguarding officer?

At the present time, the roles within Global Skills Services that qualify as involving regular work with children, young people and vulnerable adults and/or require the post holder to have an **Enhanced** Disclosure are:

- Staff and volunteers working in the Participation team
- Staff who are designated safeguarding officers

Code of Behaviour and Self-declaration form

Those roles that have occasional contact with children, young people and vulnerable adults and do not require the post holder to have a Disclosure but do require a thorough awareness of child protection issues acknowledged by submission of a **signed Code of Behaviour and Self-declaration.**



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APPENDIX D – USEFUL CONTACTS

The following contacts are sources of support for staff and volunteers as well as Safeguarding Officers when unsure of what action needs to be taken. Please note, as a member of staff or volunteer, your first point of contact will always be one of Global Skills Services' Safeguarding officers, who will be responsible for liaising with social services local to the child/ young person's home.

Global Skills Services Safeguarding Officer:

Name: Ranjeet Seerha

Email: ranjeet@globalskillsservices.com

In writing:

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FAO: Safeguarding Officer/s

100 Gabrielle House, 332-336 Perth Road, Ilford IG2 6FG

Social services contact details for London:

Child Protection Advice Line: 020 7364 3444 (9.00 – 17.00)

Outside office hours - EMERGENCY ONLY: Children's Social Care Emergency after 17.00: 020 7364 4079

Other charities (24 hours/7 days a week):

NSPCC Helpline (for adults with concerns about children) 0808 800 5000

NSPCC whistle-blowing helpline: 0800 028 0285

Childline (help for children, young people and vulnerable adults) 0800 11 11;

<http://www.childline.org.uk>



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APPENDIX E - INCIDENT REPORTING FORM

Please complete in your own handwriting and pass to the relevant person	
Name of person/child/young person :	
Address:	
Date of birth:	Age:
Name of parent(s) / carer(s):	
Telephone number:	
Disability:	
First language:	
Yes / No	
If yes please provide details:	
Are you reporting your own concerns or passing on those of someone else? Please give details:	
Brief description of what has prompted the concerns (including dates, times of any specific incidents):	
Are there any physical, behavioural or indirect signs?	
Have you spoken to the individual? If so please give details of what was said:	
Have you spoken to the parent(s) / carer(s)? If so please give details of what was said:	



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Has anyone been alleged to be the abuser? If so please give details:	
Have you considered that the abuser could be someone else? If so please give details:	
To whom was the incident reported?	Date of reporting:
Name of person completing the form:	Position:
Signature of person completing the form:	Today's date:
Further action (if any) taken by a Safeguarding Officer:	



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APPENDIX F – PROCEDURE FOR DEALING WITH ALLEGATIONS OF ABUSE

This procedure applies to all staff, whether teaching, administrative, management or support, as well as to volunteers. The generic term “staff” is used for ease of description and refers to all the staff groups.

Global Skills Services recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true.

If an allegation has been made against a teaching or other member of staff within Global Skills Services that indicates that they may have:

- Behaved in a way that has harmed or may harm, a child, young person or adult
- Possibly committed a criminal offence against or related to a child, young person or adult
- Behaved towards a child, young person or adult in a way that indicates that he/she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, young person or adult

The Designated Safeguarding Lead (or their nominee) should be informed of all allegations that come to the company’s attention so that they can consult Police and Children’s Social Care services as appropriate.

If the Designated Safeguarding Lead (or their nominee) does not feel that the case meets the threshold to be referred to Police/Social Care, the case will be passed to the HR Department to conduct their own investigation. The Designated Safeguarding Lead should receive regular updates.

The Designated Safeguarding Lead (or their nominee) should inform the Managing Director (or their nominee) and the Chair of Governors when an allegation is made against a member of staff with regard to safeguarding. They should also be kept up to date on the case is progressing and any outcomes.

The Designated Safeguarding Lead (or their nominee) will collect the details of referral and will call the Local Area Designated Officer (LADO) for advice on how to proceed as mentioned in 6.4.

If advised that the case needs investigating by the Police and/or Social Care, the company will support the investigation, but will not conduct an internal investigation. To do otherwise may prejudice the investigation.

If the LADO advises the company to conduct the investigation, the Designated Safeguarding Lead (or their nominee) should contact the HR Manager who will appoint an independent Investigating Officer.

The Investigating Officer will keep a detailed account of investigation to include, interviews, telephone calls and any contact in relation to the case.

Subject to no objections from the Police or other investigating agency, the Designated Safeguarding Lead (or their nominee) shall:



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- Inform the young person or child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the child, young person or adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made that an investigation is taking place and what the likely process will involve.

The Designated Safeguarding Lead (or their nominee) shall keep a written record of the action taken in connection with the allegation. Detailed guidance is available in the DFE “Keeping Children Safe in Education” regarding people living with perpetrators.

OUTCOMES

The definitions that should be used when determining the outcome of an allegation are set out below:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Options will depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person’s services in future. Suspension should not be the default position; an individual should be suspended only if there is no reasonable alternative

SUSPENSION OF STAFF

Suspension should not be automatic. In respect of staff (other than the Managing Director) suspension can only be carried out by the Managing Director. If the allegation is against the Managing Director, suspension can only be carried out by the Chair of the Board of Governors.

Suspension can be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- Where children or adult is at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.



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- Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a Trade Union.

If the Managing Director, considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within three working days.

Where a member of staff is suspended, the Managing Director should address the following issues:

- The Board of Governors should be informed of the suspension although the name of the individual concerned will not be disclosed until an allegation is deemed to be proved.
- The Board of Governors should receive a report that a member of staff has been suspended pending investigation; the detail given to the Governing Body should be minimal.
- Where the Managing Director has been suspended, the Chair of the Board of Governors will need to take action to address the management of the company
- The parents/carers of the child or young person making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child or young person making the allegation of the suspension.
- Senior staff members that need to know the reason for the suspension should be informed.
- Depending on the nature of the allegation, the Managing Director should consider, with the nominated Governor, whether a statement to the learner / apprentice / apprentice of apprentice of the company and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.
- The Managing Director shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The relevant MASH and relevant external investigating authorities should be consulted.
- The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments of the case at regular intervals.
- The suspension should remain under review in accordance with the company disciplinary procedures.

THE DISCIPLINARY INVESTIGATION

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

- The disciplinary charge against him/her.



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- His/her entitlement to be accompanied or represented by a Trade Union representative or workplace colleague.
- The following definitions should be used when determining the outcome of allegation investigation:
- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with “DFE Guidance Keeping Children Safe in Education 2020”.

The Global Skills Services has a legal duty to refer to DBS anyone who has harmed, or poses a risk of harm, to child or adult where:

- The harm test is satisfied in respect of that individual
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- The individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The child, children or adult(s) making the allegation and/or their parents should be informed of the outcome of the investigation and the proceedings. This should occur prior to the return to Global Skills Services of the member of staff (if suspended).

The Managing Director (or designated person) should give consideration to what information should be made available to the general population of the company

ALLEGATIONS WITHOUT FOUNDATION

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the LSCP in order that other agencies may act upon the information.

In consultation with the designated senior member of staff and/or the designated Governor, the Managing Director (or designated person) shall:



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- Inform the member of staff against whom the allegation is made verbally and in writing that no further disciplinary or Safeguarding action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child other than the alleged victim, consider informing the parents/carers of that child.

Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

RECORDS

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the company's statutory duty to inform the Disclosure and Barring Service and complete the investigation.

Details of allegations that are found to be malicious will be removed from the member of staff's record.

All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

MONITORING EFFECTIVENESS

When an allegation has been made against a member of staff, the nominated Governor, together with the senior staff member with Lead Responsibility should, at the conclusion of the investigation, consider whether there are any matters arising from it such as:

- An improvement of the company's procedures and/or policies which should be drawn to the Board of Directors
- Training needs
- Mentoring
- Risk Analysis
- Good Practice
- Procedural anomalies



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APPENDIX G – POLICY ON THE HANDLING OF AND SAFEKEEPING OF DISCLOSURE INFORMATION

POLICY STATEMENT

Global Skills Services is committed to complying with the DBS Code of Practice and GDPR 2018 concerning the correct and safe handling, use, storage, retention and disposal of Disclosures and Disclosure information.

This policy sets out the procedure for handling, using, storing, retaining and disposing of Disclosure information relating to the recruitment and selection process or current members of staff and volunteers.

STORAGE AND ACCESS

Disclosure information will be held separate from an applicant's application form or on an employee's or volunteer's personal file. It will be kept separately and securely in lockable, non-portable storage containers.

Access to Disclosure information will be strictly controlled and limited to those who are entitled to see it as part of their duties.

HANDLING

In accordance with the Police Act, 1997, Disclosure information will only be passed to those who are authorised to receive it in the course of their duties.

A record of all those to whom Disclosures or Disclosure information has been revealed is kept by human resources and Global Skills Services acknowledges that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

USAGE

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant, employee or volunteer's full consent has been given.

RETENTION

Once a recruitment or other relevant decision has been made, Global Skills Services will not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to 6 months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than 6 months, the Managing Director will consult the relevant authorities and will give full consideration to the Data Protection and Human Rights of the individual subject before doing so. During this process, the usual conditions with regards to safe storage and strictly controlled access will apply.

DISPOSAL

Once the retention period has elapsed, Global Skills Services will ensure that any Disclosure information is immediately suitably destroyed by secure means (i.e. shredding, pulping or burning).

While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential shredding tray).

Global Skills Services will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of Disclosure. However, a record may be kept of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken or in the case of existing employees and volunteers, whether or not the outcome was satisfactory.



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BREACH OF POLICY

Any member of staff or volunteer who is found to have breached the policy will be taken through Global Skills Services' Disciplinary Procedure.

CODE OF BEHAVIOUR AND SELF-DECLARATION FORM

Those roles that have occasional contact with children, young people and adults and do not require the post holder to have a Disclosure but do require a thorough awareness of child protection issues acknowledged by submission of a **signed Code of Behaviour and Self-declaration**.

APPENDIX H – CATEGORIES AND SIGNS OF ABUSE

The term 'abuse' is used to describe a range of ways in which people harm children, young people and adults. Abuse may be carried out by an adult or adults or another child or children, young people and adults.

THE CONTEXT OF ABUSE

Family Circumstances: Domestic Violence

Where there is domestic violence the implications for a learner / apprentice / apprentice or apprentice or for younger children in the household must be considered. People from families with a history of domestic violence often have behavioural difficulties, absenteeism, ill health, bullying, and drug and alcohol misuse.

DRUG AND ALCOHOL ABUSE

There is an increased risk of violence in families where this occurs. A young person may have to take on responsibilities for younger children in the family.

MODERN SLAVERY

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

FORCED MARRIAGES

Forced marriage is an entirely separate issue from arranged marriage. Forced marriage is abuse of human rights and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage are usually experiencing physical and/or emotional abuse at home.

MENTAL HEALTH ISSUES

- i. Self-harming and suicidal behaviour
- ii. Self-harm, suicide threats and gestures by a young person or adult at risk must always be taken seriously and may be indicative of a serious mental or emotional disturbance. The possibility that self-harm, including a serious eating disorder has been caused or triggered by any form of abuse or chronic neglect should not be overlooked

Abuse by peer group: bullying, racism and abuse



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- i. Bullying is a common form of deliberately hurtful behaviour, usually repeated over a period of time, when it is difficult for the victims to defend themselves.
- ii. It can take many forms, but the three main types are physical (e.g. hitting); verbal (e.g. threats); and emotional (e.g. isolating the individual).
- iii. It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour which is offensive to those with learning or physical disabilities.
- iv. Severe harm may be caused by the abusive and bullying behaviour of their peers. The damage inflicted by bullying is often underestimated and can cause considerable distress. In extreme cases it can cause significant harm, including self-harm.
- v. Initiation or hazing type violence occurs in a range of group situations such as gangs, sport teams. The initiation rites can range from relatively benign pranks to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct.

There are four commonly recognised categories of abuse, each of these is outlined below along with some of the signs that children, young people and adults who are suffering from abuse might display.

PHYSICAL ABUSE

The physical injury to a child, or a failure to act to prevent physical injury or suffering, e.g. hitting, shaking, throwing, poisoning, drugging, burning. This also includes situations where the injury may not be visible, e.g. drowning and fabricated induced illness (previously known as Munchausen syndrome) by proxy where a parent or carer feigns symptoms or deliberately causes ill health to a child in their care. Recognising this possibility is particularly important where children, young people and adults are receiving medication or have an illness, disorder or disability.

Signs of physical abuse include:

- Unexplained injuries
- Inadequately treated or untreated injuries
- Injuries on parts of the body where accidental injuries are unlikely
- Cigarette burns, bite marks or scalds

NEGLECT

Neglect is defined as the persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold, starvation and lack of supervision. It can also mean an extreme failure to carry out important aspects of care, resulting in a significant impairment of the child's health or development including "non-organic failure to thrive" (the failure to develop physically, emotionally or mentally for reasons other than disability). For example, providing them with an inadequate diet and clothing or denying proper health care, natural love and affection.

Signs of neglect include:



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- Constant hunger, loss of weight, consistent fatigue, stealing food
- Inappropriate clothing considering the weather
- Untreated medical conditions

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child, or young person over the age of consent, to take part in sexual activities that are inappropriate to their age, that they do not truly comprehend and to which they are unable to give their informed consent. Activities may be physical or non-contact, such as looking at or producing pornographic material, watching sexual acts or encouraging a child to behave in sexually inappropriate ways. Signs of sexual abuse include:

- Stomach pains or discomfort when a child is walking or sitting down
- Bruising or other injuries on areas of the body that are not normally seen
- Overtly sexual behaviour (e.g., using language inappropriate to their age) and/or inappropriate relationships with adults/peers

SEXUAL ABUSE AND EXPLOITATION

- **Child Sexual Exploitation (CSE)** - sexual abuse involves a child, young person or adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or adult to be aware that the activity is sexual, and the apparent consent of the child, young person or adult is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.
- **Child Criminal Exploitation (CCE)** - Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however



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professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

EMOTIONAL ABUSE

Emotional abuse exists where a child is persistently denied proper love and affection or where actions or omissions are likely to have a severe adverse effect on the emotional and behavioural development of the child. This may include situations where the child is constantly shouted at or verbally abused, or where s/he is overprotected, leading to retarded social and emotional development. It may also include racial and other forms of harassment that undermine a child's self-esteem and prevent them from developing a positive self-image.

Signs of emotional abuse:

- Delayed physical or emotional development
- Sudden speech disorders and/or compulsive nervous behaviour
- Reluctance to have parents contacted
- Lack of confidence and need for approval, attention or affection

Staff and volunteers should be prepared for the various ways in which they could become aware of the actual or likely occurrence of abuse, using the above information as guidance. The following points are also useful to remember:

- A child may tell or use alternative ways to communicate that they are being abused, such as drawing or acting out.
- Particular sensitivity is required where children, young people and adults have a disability or where their first language is not English.
- There may be occasions where someone else may say that a child has told them, or that they strongly believe a child has been or is being abused. It may be that an adult or child has observed one child abusing another.
- Something disturbing about the behaviour of one of the adults or the way in which an adult relates to a child may alert you to the fact that abuse has taken place.

As well as these forms of abuse, adults may be abused by a wide range of people including relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit people and strangers. The types of abuse could include:

- sexual abuse, including rape and sexual assault or sexual acts to which the adult has not consented, or could not consent or was pressured into consenting.
- psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation
- or withdrawal from services or supportive networks.
- financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property,



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- possessions or benefits.
- neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities
- of life, such as medication, adequate nutrition and heating; and
- discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment:
- physical abuse, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- Children, young people and adults who abuse other children, young people and adults

Financial Abuse - where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

Significant Harm - some children may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

Honour-based violence

Honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.

FGM mandatory reporting duty

From October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales. Professionals must make a report to the police, if, in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM.
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

Forced Marriage

Forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

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



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marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage> Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk

Mental Health Issues

- iii. Self-harming and suicidal behaviour
- iv. Self-harm, suicide threats and gestures by a young person or adult at risk must always be taken seriously and may be indicative of a serious mental or emotional disturbance. The possibility that self-harm, including a serious eating disorder has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.

Abuse by peer group: bullying, racism and abuse

Peer on peer abuse is most likely to include, but may not be limited to the following:

- vi. Bullying is a common form of deliberately hurtful behaviour, usually repeated over a period of time, when it is difficult for the victims to defend themselves.
- vii. It can take many forms, but the three main types are physical (e.g., hitting); verbal (e.g., threats); and emotional (e.g., isolating the individual).
- viii. It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour which is offensive to those with learning or physical disabilities.
- ix. Severe harm may be caused by the abusive and bullying behaviour of their peers. The damage inflicted by bullying is often underestimated and can cause considerable distress. In extreme cases it can cause significant harm, including self-harm.
- x. Initiation or hazing type violence occurs in a range of group situations such as gangs, sport teams. The initiation rites can range from relatively benign pranks to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct.

Global Skills Services ensure all staff should be clear as to the policy and procedures with regard to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Sexting

If staff are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), they must report it to the Safeguarding Team immediately.

Staff must **not**:

- View, download or share the imagery yourself, or ask a learner / apprentice / apprentice or apprentice to share or download it. If staff have already viewed the imagery by accident, this must be reported to the Safeguarding Officer.
- Delete the imagery or ask the learner / apprentice / apprentice or apprentice to delete it.
- Ask the learner / apprentice / apprentice or apprentice(s) who are involved in the



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incident to disclose information regarding the imagery (this is the Safeguarding Officer's responsibility)

- Share information about the incident with other members of staff, the learner / apprentice / apprentice or apprentice(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Staff should explain that they need to report the incident and reassure the learner / apprentice / apprentice or apprentice that they will receive support and help from the Safeguarding Officer.

Up skirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Up skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The information given above is not exhaustive and aims only to give an indication of the types of behaviour, which may give rise to concern.

Furthermore, signs may be seen over a period of time and therefore raise concern cumulatively, making it important to report and record concerns however minor they may seem at the time.

Many children, young people and adults will demonstrate one or more of the behaviours described above at some stage, so it is important not to jump to conclusions. Any member of staff or volunteer who is concerned in any way should ask for help and advice from one of Global Skills Services' Safeguarding Officers.

APPENDIX I – Code of Behaviour

No member of staff or volunteer will physically, sexually or emotionally abuse or neglect a child or young person or adult and the following guidelines should be followed at all times:

- DO** respect a child or young person's right to personal privacy
- DO** ensure that boundaries between staff, volunteers and children/ young /vulnerable people are clearly defined and there is no contact outside of these roles
- DO** take seriously all allegations made by children, young people and adults and act on suspicions immediately in accordance with Chapter 5 of the child protection policy
- DO** encourage children, young people and adults to approach an independent person to discuss any problems they may be having
- DO** provide access for children, young people and adults to talk to others about any concerns
- DO** abide by Global Skills Services' policies and guidelines at all times



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- DO** encourage children, young people and adults and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- DO** remember that someone else might misinterpret your actions, no matter how well intentioned
- DO** recognise that caution is required even in sensitive moments such as counselling, dealing with bullying, bereavement or abuse
- DO** plan activities so that they involve more than one person being present, or at least in sight or hearing of others
- DO** maintain the confidential information of the organisation and of its clients.
- DO NOT** contact children, young people and adults outside the project or activity or swap correspondence or personal contact details
- DO NOT** permit abusive youth peer activities like initiation ceremonies or bullying
- DO NOT** allow or engage in inappropriate language, suggestive remarks, gestures or touching of a kind that could be misunderstood
- DO NOT** show favouritism to any individual
- DO NOT** allow yourself to be drawn into inappropriate attention seeking behaviour such as tantrums or crushes
- DO NOT** exaggerate or trivialise child-abuse issues
- DO NOT** deter a child from making allegations through fear of not being believed
- DO NOT** allow yourself to be left alone with a child or young person at any time
- ALWAYS** immediately share concerns on any of these matters with your manager/supervisor and Safeguarding Officer or if not contactable social services or, in the event that a criminal activity is suspected, the police.

I agree to adhere to the guidelines in the code of conduct, during my involvement in Global Skills Services' work.

Signed (Name):.....

Printed (Name):

Date:



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APPENDIX J – Responsibilities of Safeguarding Leads (DSLs)

The joint responsibilities of the DSLs are:

Safeguarding Policy

- To ensure that the Safeguarding Policy is communicated throughout the organisation
- To ensure that the Safeguarding Policy is regularly reviewed and kept up-to-date
- To ensure that the Safeguarding Policy monitoring procedures are implemented

Cases of allegation or disclosure of abuse

- Take appropriate action to report complaints or disclosures to the authorities verbally and in writing and follow these up with the social care authorities as appropriate.
- To investigate breaches of the Code of Behaviour and take appropriate action
- To ensure that accurate records of any incident, disclosure or complaint in relation to child protection are maintained
- To act promptly to protect the reputation of the company, in consultation with the other DSLs, invoking disciplinary action where appropriate in accordance with procedure

Supporting staff and volunteers

- To ensure that staff involved in recruitment are aware of child protection issues
- To ensure that staff or volunteers reporting suspected abuse are appropriately advised and supported
- To provide support to staff and volunteers accused of abuse along with the individual's line manager and human resources, where appropriate
- In conjunction with the relevant line manager/supervisor and human resources, to assist staff and volunteers who have been the victims of malicious or false abuse claims to reintegrate into their team/voluntary activities
- To ensure that appropriate training is provided to staff and volunteers working with children, young people and adults.

APPENDIX J – Safeguarding children and young people and adults during the COVID-19 crisis

As a training organisation we are facing unprecedented challenges to support and safeguard children and families, especially as we head into the new period of national lockdown. During this time of uncertainty, it is particularly important to safeguarding children who may be at an increased risk of abuse, harm and exploitation from a range of sources.

However, it is equally important to safeguard families, with parents facing significant pressures to continue to protect and promote the welfare of their children. These parents may already be struggling and so with additional pressure the likelihood of harm or significant harm may increase.



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RISK FACTORS

POVERTY

We have long recognised the relationship between poverty and the safeguarding of children and families. Where families are unable to meet the basic needs of children, this can, in some cases, lead to an increased likelihood of abuse, neglect and harm. During the COVID-19 outbreak, where paid work is threatened or has been lost or where families are forced to isolate, this risk of poverty increases and challenges the ability of families to be able to follow Government health advice.

TAKING ACTION

Think about the children and families that you work with and how they are managing in the current context:

- Has anything changed within the family which may lead to financial concerns (for example, a family member may have lost their job and the family could be struggling to pay bills or buy food)?
- Do the family know how the latest Government plans could support them?
- Are the family having to isolate, and so unable to attend education or get supplies from shops?
- Are they aware of local mutual aid support networks and foodbanks?
- If children in the family would usually access free school meals, how is the school continuing to provide this (for example, through supermarket vouchers or food parcels)?
- How might children and families be maintaining their networks in the context of staying indoors?
- Do the family have access to the internet? The internet can be helpful in supporting citizens to stay connected with their loved ones. Using apps like [Houseparty](#), [Skype](#) and [Whatsapp](#) can enable virtual connection.
- Think about families who have limited networks, could they develop new networks in their neighbourhood? We have seen creativity and positivity in recent weeks with communities using technology to communicate and mobilise the support those who need it.
- Do families understand how to keep themselves and children safe online, including how to use parental controls, from the risk of exploitation, bullying and grooming?

SUPPORT NETWORKS

From experience, it is clear that children who are abused and harmed are often unseen and unheard. When we explore this in more depth it can become clear that the whole family system is isolated. Support networks provide help in being able to manage and overcome difficulties and challenges. Due to the current social distancing measures, the ability of children and families to access the usual range of traditional, face-to-face, social networks



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will be hampered and new means may need to be explored to retain contact as an important protective factor.

TAKING ACTION

Think about the children and families that you work with and how they are navigating these challenges in the current context:

- If a family are staying indoors in limited space, do they have a clear routine to each day? Children respond well to routines and boundaries; having a sense of how your time is going to be spent indoors will help a family manage the challenge of a lack of personal space.
- Are the family clear on Government guidance with regard to exercise? How are the family thinking about how daily exercise outside can provide stimulation and, potentially, health benefits?
- Where problems arise with the family's accommodation, are they aware of when and how to seek support or emergency assistance?
- Where problems with paying rent occur, are the family aware of their legal protections under emergency coronavirus laws?

ACCOMMODATION

Vulnerable children and families can often face challenges with their accommodation. They may have temporary accommodation or a lack of space, for example the sharing of one room. During the COVID-19 outbreak, the exposure of children and families to unsuitable accommodation will increase as adults may work from home and members of the household are unable to be outside. Whilst children should all be able to access school, this may not always be true of all children in the household who may be forced to self-isolate due to local outbreaks within their schools or school 'bubbles'.

ABUSE AND HARM

Different types of abuse and harm are likely to be more prominent during this time. This does not mean that risk will definitely increase when working with pre-existing concerns. However, practitioners should show curiosity to explore how the risk may become exacerbated.

DOMESTIC ABUSE

We know that conflict and violence can escalate when families face greater pressure and stress, and the order to limit social contact and stay home can cause anxiety for those at risk. The current situation disrupts routines and behaviours, both positively and negatively and it is important to be aware of how the tension can escalate to violence and abusive behaviours between families, parents and children.

If we have a concern of domestic abuse, consider how the current situation may further impact on relationships in the household and how effective any mechanisms to diffuse conflict are in the new context. For example, if a previous strategy involved leaving the family home to see or stay with friends or family, how can you support them to adapt and modify their strategies? Victims must also be aware that the order to stay at home during



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this second national lockdown does not apply to those escaping danger or harm, including domestic abuse and violence.

SUBSTANCE ABUSE

Unhealthy coping mechanisms can involve a reliance on substances that provide relief and escapism by adults and children alike. Substances alter the behaviour of parents and create a lack of safety for children and young people. It is important to understand how families are managing the stresses that they face, which are likely to be exacerbated under the current pressures - with associated worries around employment, finances and health.

Where there is an existing dependency or use of substances in the household, it is important to consider how the current context may escalate use. If a parent or individual is reliant on prescription medication, how might stretched national resources affect their capacity to stay well and abstain from using dangerous substances?

Similarly, efforts in health promotion and education with children and young people on the risks of substance abuse remains of paramount importance.

NEGLECT

Isolation can place children at a greater risk of neglect. This is compounded by the increased economic challenges and poverty that families may be facing, and by the increased exposure of children to neglectful environments as they spend more time in the home. Even with education and training centres remaining open, children and young people may still have reduced contact with the usual range of professionals who may further limit the contact that children have with professionals who can identify the signs of neglect and take steps to intervene and report concerns.

Neglect may become a source of harm for children, even if not the initial reason for social care involvement. Practitioners should maintain a professional curiosity and keep a holistic view of the family and emerging risks.

CHILDREN WITH ADDITIONAL NEEDS (including SEND)

We know that children and young people with additional needs and disabilities are up to three times more likely to be abused or neglected than non-disabled children, and less likely to disclose harm due to communication and other difficulties. Even though these children and young people may have been able to access education throughout the pandemic, the availability of access to learning services provides an important safeguard for them. However, with localised outbreaks that affect the opening of education or training venues or require self-isolation, families may still find increased time at home and additional caring responsibilities, where external support opportunities may be limited, a strain.

Global Skills Services will consider how we seek the voice of the child, young person or adult during these times, and whether online or telephone contact is enough to ensure their wellbeing and safety. This is especially important where communication difficulties make these means less effective.



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EXPLOITATION

Child exploitation and associated grooming comes in many forms. In times of crisis, those who might seek to exploit children and young people can be quick to act and prey on vulnerabilities facing fewer barriers to do so with a reduction in online moderators that work to keep children safe.

Online social media and gaming sites become a lifeline for parents and children adapting to spending more time at home and for addressing social isolation. However, this may come with reduced access to personal, social and health education on how to stay safe.

Practitioners should consider if parents and families are able to monitor activity, recognise the signs of exploitation and take action, and what support they might need to promote good online safety and safeguarding through conversations and discussion with children.

Helping families to establish clear boundaries, controls and expectations with children about internet, mobile phone and social media usage can be a protective factor.

Whilst continuing to work to safeguard children, young people and adults, local Child and Adolescent Mental Health Services (CAMHS) may have ongoing changes to the way that support is accessed, including moving face-to-face appointments to telephone consultations and reducing community visits to only those deemed high-risk. Where concerns are held that a child or family need CAMHS review or support, the local team or key worker can be contacted in the first instance to seek advice and further discussion.

WHAT CAN YOU DO TO HELP?

As a training provider we are the eyes and ears that may first pick up any signs of abuse, neglect and other harm. Here is a checklist of things you can do:

- Think about virtual relationship-based practice: how can you use technology to add value to your practice? Remember, however, this should not replace the statutory responsibilities you may have.
- Be proactive with children and families, speak with parents about your hypotheses about risk in a respectful way and include them in your planning to address this risk, where possible.
- Where domestic abuse and violence is a risk, try to assess the current situation and make sure that they know what support is available.
- Advocate for social connection and interaction where safe and possible for families. Encourage families to think about how they can mitigate against staying indoors to continue to interact with others.
- Empower and enable families to safeguard children by sharing advice and information that they can use. For example, signposting to online safety resources or support with boundary setting.
- Consider how you, families and children may be able to continue to access the local supports and safeguards around them, for example through schools, CAMHS and local outreach services.



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APPENDIX K ONLINE SAFETY

Advice for governing bodies/proprietors and senior leaders

- [Childnet](#) provide guidance for schools on cyberbullying
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of online safety arrangements
- [NSPCC](#) provides advice on all aspects of online safety arrangements
- [Safer recruitment consortium](#) “guidance for safe working practice”, which may help ensure staff behaviour policies are robust and effective
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
- [South West Grid for Learning](#) provides advice on all aspects of online safety arrangements
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on, and an [Online Safety Audit Tool](#) to help mentors of trainee teachers and newly qualified teachers inductmentees and provide ongoing support, development and monitoring
- Department for Digital, Culture, Media & Sport (DCMS) [Online safety guidance if you own or manage an online platform](#) provides practical steps on how companies can embed safety into the design of their online platforms. It offers information on common platform features and functions (such as private messaging) and their risks, as well as steps that can be taken to manage that risk.
- Department for Digital, Culture, Media & Sport (DCMS) [A business guide for protecting children on your online platform](#) provides guidance to businesses on how to protect children on their online platform. It outlines existing regulatory requirements and provides best practice advice on how to protect children’s personal data, ensure content is appropriate for the age of users, ensure positive user-to-user interactions and address child sexual exploitation and abuse.

Remote education, virtual lessons and live streaming

- [Case studies](#) on remote education practice are available for schools to learn from each other
- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
- [London Grid for Learning](#) guidance, including platform specific advice
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing
- [National cyber security centre](#) guidance on how to set up and use video conferencing
- [UK Safer Internet Centre](#) guidance on safe remote learning



Global Skills Services

Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content
- [CEOP](#) for advice on making a report about online abuse

Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Government advice](#) about security and privacy settings, blocking unsuitable content, and parental controls
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- [Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- [National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online
- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online
- [Parent info](#) from Parent zone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online