Safeguarding Policy

Our commitment

HTFT Partnership Limited (hereon HTFT) are committed to practices that protect all beneficiaries from harm and creating a 'safer' learning environment that promotes well-being and security.

HTFT will ensure all staff, and everyone working with us, recognise and accept their responsibilities to:

- develop awareness and understanding of Safeguarding issues
- maintain their knowledge of our Safeguarding policies and procedures
- act appropriately to address all Safeguarding concerns

This commitment has been determined by our Senior Management Team and is reflected throughout all levels of our organisation.

HTFT will work with all our partners to embed this commitment across all our delivery.

Scope

This policy and the associated guidance covers all HTFT training programmes involving the delivery of advice, guidance, employability, assessing or training to individual learners or beneficiaries or to groups.

Responsibility

HTFT's Managing Director is responsible for this policy.

HTFT's Senior Management Team are responsible for monitoring this policy.

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General statement

HTFT has a statutory and moral duty to ensure that the welfare of young people and vulnerable adults receiving education and training at HTFT is safeguarded and promoted.

The Senior Management Team is committed to ensuring that HTFT:

1 Provides a safe environment for young people and vulnerable adults;

2 Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm; and

3 Takes appropriate action to see that such young people and vulnerable adults are kept safe, both at home and at HTFT.

This policy provides advice for staff to help protect all beneficiaries from exploitation and abuse. Our policy is to ensure that all who work with us maintain a proper focus on safeguarding. An accessible version of our policy and approach to Safeguarding designed for use by beneficiaries is available (see Associated policies, procedures and guidance section).

Our Safeguarding approach is based on substantial guidance on the protection of beneficiaries from all forms of abuse including:

- physical
- sexual
- psychological/emotional
- financial or material
- neglect
- acts of omission and impairment to their personal and social development

Our current arrangements reflect the level of risk associated with each of our programmes. All staff are expected to subscribe to our Code of Conduct to fulfil our policy commitment.

HTFT Partnership is committed to being at the forefront of safeguarding and prevent agenda, therefore further support and guidance is accessible via the regional prevent coordinator at DfE. Our Safeguarding Lead has a duty to share and promote the additional guidance throughout the provision.

Our Safeguarding Team is on hand to provide one to one ongoing additional support where required.

Policy

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of a child, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2015) as:

- protecting children from maltreatment;
- preventing impairment of a child's health or development;

- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes (DfE, Sept 2020)

Definitions

Our Safeguarding approach is intended to protect all our beneficiaries with particular consideration to young people and vulnerable adults.

For the purposes of this policy young people are any learners under the age of 18.

The Safeguarding Vulnerable Groups Act 2006 defines a 'vulnerable adult' as:

A person aged 18 and over who is or may need to be:

- receiving a social care service
- receiving a health service
- living in sheltered accommodation
- detained in custody or under a probation order
- requiring assistance in the conduct of his/her affairs
- receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions

For the purposes of this policy staff includes anyone working with us, or on our behalf including sub-contractors' staff, associates, freelance staff or partners' staff.

HTFT recognises the following as definitions of abuse:

Abuse: a form of maltreatment of a child/young person. Somebody may abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm. Children/young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child/young person.

Emotional abuse: the persistent emotional maltreatment of a child/young person such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child/young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child/young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child/young person, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child/young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

HTFT recognises the following as specific Safeguarding issues:

In addition to the four categories of abuse, Keeping Children Safe in Education (DfE Sept 2020) identifies the following safeguarding issues:

- Bullying including cyberbullying
- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalisation
- Sexting

- Teenage relationship abuse
- Trafficking

HTFT will refer concerns that a young person might be at risk of significant harm to Children's Services, Multi-Agency Safeguarding Hub (MASH).

Designated person

The designated person for Safeguarding within HTFT is Victoria Taylor (Managing Director), support by Helen Lamb as our Deputy Safeguarding Officer.

Victoria is a senior member of HTFT's management team. Victoria has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of young people and vulnerable adults, and the promotion of a safe environment for the young people and vulnerable adults learning within HTFT.

Victoria is responsible for:

1. Overseeing the referral of cases of suspected abuse or allegations
2. Providing advice and support to other staff on issues relating to safeguarding
3. Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral)
4. Ensuring that employers and parents of young people trained by HTFT are aware of the this Safeguarding Policy
5. Liaising with the Education and Children's Service and the Local Safeguarding Children's Board, the Safeguarding Adults Board and other appropriate agencies such as those working to prevent radicalisation and violent extremism; and
6. Ensuring that staff receive training in safeguarding and are aware of the College safeguarding procedures.

HTFT's responsibilities

HTFT will:

- promote the health and welfare of beneficiaries by providing opportunities for them to take part in our programmes safely
- respect and promote the rights, wishes and feelings of beneficiaries
- promote and implement appropriate procedures to safeguard the well-being of beneficiaries and protect them from abuse.
- train and support staff to adopt best practice to safeguard and protect beneficiaries from abuse and to minimise risk to themselves
- require staff to adopt and abide by this policy
- respond to any allegations of misconduct or abuse of young people or vulnerable adults in line with this policy and procedure

Inform the ESFA (by contacting the Helpdesk [08000 150600 or helpdesk@manage-apprenticeships.service.gov.uk] of any referral of a safeguarding concern or allegation of abuse to local authority children's social care / adult social care and/ or the Police.

Learners/Apprentices and staff will use IT within their learning/Apprenticeship programmes, it is therefore our approach that we have effective monitoring software to prevent any internet/software misuse.

The IT team will monitor and report any misuse to the Apprenticeship Director and DSL.

Principles

Beneficiaries' welfare is everyone's responsibility, particularly when it comes to protecting them from abuse.

This policy is based on the following principles:

- The welfare of beneficiaries is our primary concern.
- All beneficiaries have the right to protection from abuse.
- It is the responsibility of all staff to report any concerns about abuse to the Designated Person in line with our guidance
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately
- All allegations of abuse or harm will be treated seriously and consistently. This may lead to an investigation of a possible criminal offence by the police, involvement of an appropriate social care worker or an investigation of our provision and consideration of disciplinary action on staff or learners.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998
- All delivery staff posts will be risk assessed to identify the appropriate CRB or vetting and barring clearance required, and checks will take place accordingly
- All staff will be recruited in line with 'safer recruitment' practices
- Project-specific Safeguarding requirements and training needs are established as part of the Project Implementation process

Dealing with Disclosure; and Procedure for Reporting Concerns

If a young person or vulnerable adult tells a member of staff about possible abuse:

- Listen carefully and stay calm;
- Do not interview the young person, but question normally and without pressure, in order to be sure that you understand what the young person is telling you;
- Do not put words into the young person's mouth;
- Reassure the young person that by telling you, s/he has done the right thing;
- Inform the young person that you must pass the information on, but that only those who need to know about it will be told. Inform him/her of to whom you will report the matter;
- Note the main points carefully in the young person's own words; and
- Make a detailed note of the date, time, place, what the young person said, did and your questions.

If a young person/ vulnerable adult is freely recalling events, the response should be to listen, rather than stop him/her; questioning of the information being given must be limited to confirming factual accuracy required to provide a quality referral, e.g. who are the people involved, what has actually happened and when and where did any incident occur.

If the young person/ vulnerable adult has an injury but no explanation is volunteered, it is acceptable to enquire how the injury was sustained.

However, the young person/vulnerable adult must not be pressed for information, led or cross-examined or given false assurances of absolute confidentiality. Such well-intentioned actions could prejudice Police investigations.

It is important that the young person should not be asked to repeat the information to a colleague or write the information down. Making an accurate and verbatim record of what the young person/ vulnerable adult has said (disclosure), (or evidence that has led to the concerns) recording the young person/ vulnerable adult's own words, is the responsibility of the person to whom s/he has disclosed. This should be recorded, in writing and sent directly to the DSL. If a member of staff has a concern about a student and calls in a safeguarding office then the safeguarding officer is responsible for the initial record as well as any follow on.

Staff should not investigate concerns or allegations themselves but should report them immediately to the DSL (Designated Safeguarding Lead).

Protection from Extremism and Radicalisation

HTFT will ensure that:

- Staff are adequately trained to recognise and refer concerns with regard to student radicalisation using normal safeguarding procedures
- Managers are trained in incident management
- Staff and students are trained in Stay Safe
- Learners are able to discuss radicalisation and extremism in a safe environment and know who to refer to if they have concerns

This should be read in conjunction with HTFT's Prevent policy and action plan.

Our commitment to reviewing our safeguarding practices

We will work in partnership with local safeguarding partnerships and committees, to include the Safeguarding Children's Boards and the Safeguarding Adults Boards, to seek guidance on developing our safeguarding practices and dealing with allegations of harm that may have occurred at home or in other situations outside of our remit.

All policies, procedures and guidance is reviewed and tested annually to ensure that we have we have sound systems in place to safeguard our beneficiaries. Requests for further guidance or information can be sought from Victoria Taylor (Managing Director) or Helen Lamb (Deputy Safeguarding Officer).

Communication

Our commitment and approach to Safeguarding is communicated to all staff by line managers during recruitment, at induction and through refresher training at least every two years. Safeguarding is promoted to beneficiaries by delivery staff at induction and at appropriate points in their journey. Our approach to Safeguarding is discussed with partners by delivery managers at the outset of our relationship.

This policy, associated documentation and any amendments are communicated to delivery managers in line with our Communications Strategy.