

Quality System



Policy Number

SAF001

Policy Title

Safeguarding Policy



1. Introduction

NC Group is strongly committed to practices that protect children, young people and vulnerable adults from abuse, neglect, or significant harm. Abuse is defined generally as: physically, sexually, or emotionally harming someone. Child abuse is defined as physically, sexually, or emotionally harming a child either with intent or through neglect.

Types of abuse may include:

Abuse relating Adults:

- Discriminatory
- Psychological
- Emotional
- Financial or material
- Organisational
- Neglect and acts of omission
- Physical
- Sexual
- Domestic
- Modern slavery
- Self-neglect

Abuse relating to Children and Young People:

- Emotional abuse
- Bullying and Cyberbullying
- Online abuse
- Child Trafficking
- Criminal Exploitation & Gangs
- Domestic abuse
- Child Sexual Exploitation
- Grooming
- Female Genital Mutilation
- Neglect
- Physical abuse
- Sexual abuse

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1.1 Possible indicators of abuse include:

- Any injuries not consistent with the explanation given for them
- Injuries which have not received medical attention
- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity

1.2 NC Group recognise and accept their responsibilities to develop the awareness of the risk and issues involved in safeguarding. NC also recognises that it has a responsibility to protect staff from unfounded allegations of abuse. The company is committed to working with existing Local Safeguarding or Adult Safeguarding Boards and other health and social care partnerships to ensure the safeguarding of its learners.

2. Aims of Policy

- To establish a clear framework of principles and procedures which will maximise the prevention of harm, or further harm, to adults at risk and children.
- That through the communication and operation of this policy, all possible steps are taken to safeguard young people and vulnerable adults at risk, to promote the welfare of all who are connected with NC and to respond effectively when situations of safeguarding concern arise.
- Although the safeguarding process will be used when abuse has occurred, the aim is to be proactive rather than reactive.

3. Implementation

- The overall responsibility for the implementation of this policy lies with the Directors.
- Commitment to this policy is firmly supported by NC's Management team who will be responsible for monitoring its implementation.

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- All staff and volunteers are expected to embrace the policy and comply with associated procedures.
- NC’s Designated Safeguarding Officer is Liam Noble
- NC’s Deputy Designated Safeguarding Officer is Thelma Clark

4. Who it applies to:

4.1 A Vulnerable Adult is defined as:

“a person who is or may be for any reason unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”

4.2 An adult at risk is defined as.

“Aged 18 years or over; Who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

(NHS England – Safeguarding Adults Handbook)

4.3 A child is defined as.

In England a child is defined as anyone who has not yet reached their 18th birthday (Working Together to Safeguard Children, 2018)

*Child protection guidance also points out that **even** if a child has reached 16 years of age and is:*

- *living independently*
- *in further education*
- *a member of the armed forces*
- *in hospital; or*
- *in custody in the secure estate*

they are still legally children and should be given the same protection and entitlements as any other child (Department for Education, 2018a).

For the purposes of safeguarding, a child is anyone under the age of 18. Safeguarding and promoting the welfare of children is defined for the purposes of this Policy as:

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- Protecting children from maltreatment.
- Preventing impairment of children’s mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

This policy and associated procedures are applicable to all children and adults at risk regardless of gender, ethnicity, disability, sexuality, or religion. Furthermore, we recognise that adults who are not technically ‘at risk’ may at times be vulnerable and we are committed to treating all with respect and dignity. This includes but is not limited to learners on commercial training courses, pre-employment learners, apprentices, and prospective learners on any of the aforementioned courses.

5. Inclusions

All children and vulnerable adults who undertake employment, work placement, training, apprenticeship, or education directly or indirectly with NC are covered by the Safeguarding and Protecting Children and Vulnerable Adults Policy.

6. Exclusions

There are no exclusions to this policy.

7. Commitment

NC’s policies for the protection and safeguarding of children and adults at risk are underpinned by two key principles

- Safeguarding is everyone’s responsibility: for services to be effective each professional and organisation should play their full part.
- Every individual has a right to respect, dignity and not to be abused by another person or organisation.

8. The role of the designated Safeguarding Lead

- The designated safeguarding lead is the person appointed to take lead responsibility for child protection issues. The person fulfilling this role must be a senior member of the leadership team, and the DSL role must be set out in the post holder’s job description.

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- NC Group follow good practice and nominate a deputy to cover the role of the designated safeguarding lead when they are unavailable.
- The lead responsibility for safeguarding and child protection remains with the DSL

8.1 Work with others

The DSL should:

- Work with the Senior Leadership Team to ensure safeguarding is at the heart of the organisations ethos and that all staff are supported in knowing how to recognise and respond to potential concerns.
- Liaise with the directors to keep them informed of any safeguarding issues especially ongoing enquiries and police investigations.
- As required, liaise with the local authority case manager or the designated officer at the local authority if a concern has arisen regarding a member of staff.
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice, and expertise for staff.

8.2 Manage referrals

The DSL should:

- Refer cases of suspected abuse to Children's Social Care, and support staff who have raised concerns about a child or vulnerable adult
- Where there are concerns about radicalisation, to make referrals to the Channel programme and offer support to other staff who have concerns about radicalisation (England and Wales only)

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- Refer cases to the Disclosure and Barring Service (DBS), Disclosure Scotland, or Access NI where a member of staff has been dismissed following concerns they posed a risk to a child or vulnerable adult.
- Refer cases to the police where a crime has been or may have been committed.

8.3 Undertake training and develop knowledge

In addition to formal training, the DSL should keep knowledge and skills up to date via online training, e-bulletins, opportunities to network with other DSLs, and attend locally arranged briefings. These opportunities should be taken up at least once a year but more regularly if possible so that the DSL:

- Understands the referral and assessment process for early help and intervention
- Knows about child protection case conferences and reviews and can contribute to these effectively when required
- Is aware of the needs of any vulnerable children or adults ie; those with special educational needs, young carers and those receiving support from the local authority including a child in need, a child on a child protection plan or a looked after child
- Keeps detailed, accurate and secure records of concerns and referrals.
- Understands the role of the organisation in terms of the Prevent duty where required.
- Attends refresher and other relevant training.
- Encourages a culture of listening to all. Taking into account wishes and feelings in terms of what the organisation does to protect them.

8.4 Raise awareness

The designated safeguarding lead's role is to:

- Work with the governing body to ensure the organisation's Safeguarding Policy is updated and renewed annually and that all members of staff have access to it and understand it.
- Provide regular briefings and updates to staff, to help ensure that everyone is kept up to date on latest policy developments and reminded of their responsibilities.
- Ensure the Safeguarding Policy is available publicly.

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- Link with the LSCB and LSAB, to keep up to date with training opportunities and the latest local policies.

8.5 Record keeping

It is also the designated safeguarding lead's responsibility to keep detailed, accurate and secure written records of safeguarding concerns. These records are confidential and should be kept separately from learner records. They should include a chronology of concerns, referrals, meetings, phone calls and emails.

8.6 Training of other staff

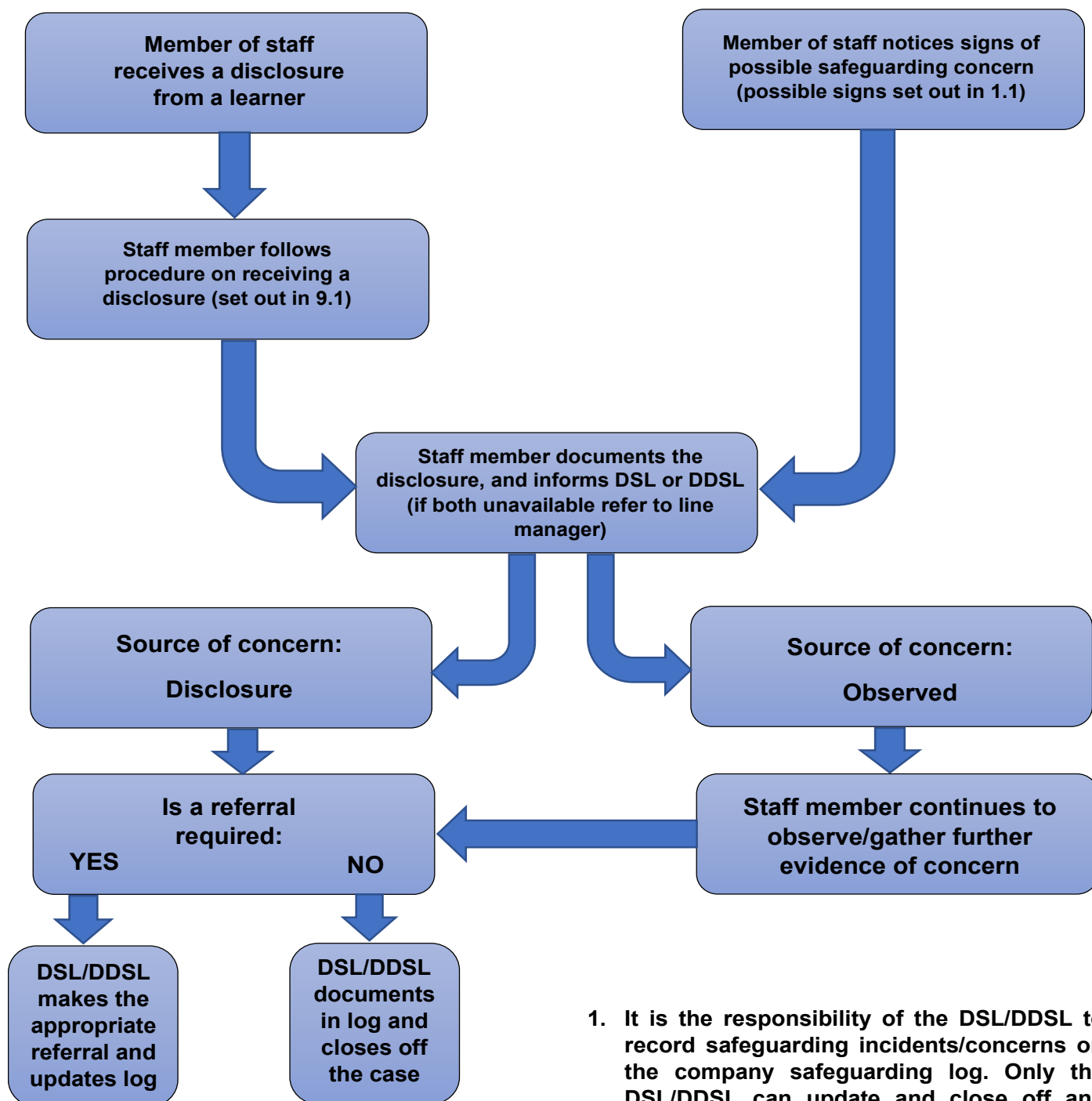
It is the role of the designated safeguarding lead, working with the directors, to ensure all staff:

- Have induction training covering Safeguarding, an understanding of safeguarding issues including the causes of abuse and neglect.
- Are able to identify the signs and indicators of abuse, respond to disclosures appropriately and respond effectively and in a timely fashion when they have concerns.

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9. Actions where there are concerns:

NC Group Safeguarding Procedure



1. It is the responsibility of the DSL/DDSL to record safeguarding incidents/concerns on the company safeguarding log. Only the DSL/DDSL can update and close off any logged incident.

2. In any safeguarding case, the staff member who has observed, or received the disclosure should continue to monitor even after a referral decision has been made.

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9.1 Disclosures

If you are approached by a child, young person or vulnerable adult, with a disclosure that s/he is being, or has been harmed or abused, or you are informed of such a disclosure by a staff member, student or member of the public:

9.1.1 Things to do:

- Stay calm.
- Provide a listening ear and an open mind.
- Be reassuring, particularly that the individual is doing the right thing by telling you.
- Record the information you are provided with and report as quickly as possible (must be within 24 hours) to your line manager or Designated Officer who will decide what further action will need to be taken. This information is likely to be passed to the Designated Officer and/or an external agency and should include a record of the time, date, and persons present.

DSL Contact Details: Liam Noble, liam.noble@ncgrouppltd.co.uk, 07590 486843

DDSL Contact Details: Thelma Clark, thelma.clark@ncgrouppltd.co.uk, 07932 085787

9.1.2 Things not to do:

- Promise to keep the information secret. Make it clear that you have a duty to refer the matter on.
- Stop the individual who is freely recalling significant events.
- Make the individual tell anyone else. S/he may have to be formally interviewed later and it is important to minimise the number of times information is repeated.
- Make any suggestions to the individual about how the incident may have happened.
- Question the individual, except to clarify what they are saying.
- Discuss the information with anyone other than your line manager, a Safeguarding Officer, or an appropriate external agency.

9.1.3 If you are concerned that a child, young person, or vulnerable adult is, or may be subject to, abuse or harm:

- Make a written, dated, note of observations.
- Inform your line manager or Safeguarding Officer as soon as possible, within 24 hours, who will, within 24 hours, either make enquiries without raising the question of abuse and evaluate the matter and/or make a referral to the Safeguarding Officer and/or appropriate external authority.

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9.1.4 The following outlines the steps you should take if you are concerned that the behaviour of a member of staff or other person is threatening, or potentially threatening the well-being of a child, young person or vulnerable adult.

- If you are concerned that a member of staff is harming or abusing a child or vulnerable adult, you must report your concerns immediately to the Designated Officer.
- If you suspect any other person is harming or abusing a child or vulnerable adult, you should contact your line manager or Designated Officer. However, you can contact Children’s Services, Adult Services, or the police.
- In all situations, you may be asked to provide an outline of your concerns in writing. If the matter is referred to Children’s Service, Adult Services, or the police, you may be asked to provide a formal statement of your concerns for subsequent external investigations.
- If you have urgent concerns about the safety of a child or vulnerable adult and are unable to contact your line manager or Designated Officer, do not hesitate to contact Children’s Services, Adult Services or the police. These external agencies will be in a position to determine an appropriate course of action.

9.1.5 Upon receiving a report of suspected abuse from a member of staff or learner, the Designated Officer will contact the Safeguarding Board of the relevant Local Authority with 24 hours.

If a crime is taking place:

- Dial **101** to inform the police (or **999** if it is a serious crime / an emergency)
- Call **999** if you believe any other emergency service is needed

9.2 Dealing with safeguarding allegations relating to a member of staff

If an allegation or suspicion of abuse by a member of staff is received, the Designated Officer must:

- Obtain written details of the allegation, signed and dated by the person receiving the allegation.
- Record any other information in relation to time, dates and location of incident(s) and names of any potential witnesses.
- Countersign and date the written record.

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9.2.1 The Designated Officer must report an allegation to the Local Authority within 1 working day if the allegation suggests a person who works with children/vulnerable adults has:

- Behaved in a way that has harmed a child/vulnerable adult or may have harmed a child/vulnerable adult.
- Possibly committed a criminal offence against or involving a child or vulnerable adult.
- Behaved towards a child or vulnerable adult in a way that indicates s/he is unsuitable to work with children or vulnerable adults in connection with his/her employment or voluntary activity.

9.2.2 Peer to Peer abuse

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

9.2.3 Mental Health Support

All staff should be aware that mental health problems can, in some cases, be an indicator that a child or adult has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children and adults day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#).

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9.3 Training

All staff employed by NC, who come into contact with learners, must complete annual advanced Safeguarding for practitioners training with foundation-online.

Designated Safeguarding Officers and the DSL are required to hold up to date L3 Designated Safeguarding lead qualifications. These must be reviewed and updated on a maximum of a 2-year cycle.

Annual CPD refreshers will be delivered during NC Group CPD days and via teaching and learning conferences at Partner colleges. All staff are required to attend these training sessions.

9.4 Recruitment

All NC Group vacancies are advertised as requiring a L1 safeguarding qualification.

NC Group use their recruitment and selection process to challenge the current knowledge and understanding of safeguarding and practices.

Those applicants who do not currently possess a suitable qualification, or without suitable levels of knowledge of safeguarding practice will be required to undertake mandatory CPD and training within the first month of their employment.

9.5 Response to a child missing from education

If a learner is absent, all providers have a responsibility to contact the parent or carer on the first day of absence and continue to make every effort to locate the learner. When you have identified the child is not in the session, please follow the procedure below.

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Day 1 - Phone call

A staff member trained to do so, telephones the child’s home to seek reasons for the absence and reassurance from a parent or carer that the child is safe at home.

Response from parent	Next step
There is no answer at the home or on mobile numbers	Call back. Risk assess after 2 hours
The parent/carer answered the call, the child is safe with them	Ask for reason for absence and record with the safeguarding lead
The person answering is not the parent/carer and you are not reassured that the child is at home or safe	The designated lead for child protection should be consulted on a risk assessment and the degree of vulnerability of the child
The parent/carer answered the call, the child is not with them or safe and the parent is concerned	NC Group to advise the parent to: Contact the local police station to inform them that the child is missing Contact all people and places the child is known to talk to and visit, to tell them that the child is missing and ask if they can help to find the child by providing information which may shed light on the child’s whereabouts, or actively searching for the child. Contact the family GP and Accident and Emergency Centres near where the child lives, in case he/she has sustained an injury and been taken in for medical treatment Report back to DSL if the child is found or remains missing

Day 2 - Follow up phone call

A subsequent telephone call must be made either from the landline phone or preferably a mobile phone.

Day 3 – Write/email parents

Write or email to the parent in plain English, asking for contact to be made with NC Group immediately. Please give the parents/carers 3 working days to make contact and if you are aware that English may not be the parent’s first language, copy the letter into a language that may be more accessible.

Day 5/6 - Home visit

Arrange a visit to the home address ensuring that risk assessments are in place

Once you have completed these checks (or within 10 days, whichever is earlier)

If the learner has not been seen and the parents or carers have not contacted either, NC Group must report the child as missing from education.

To report a child missing from education you must contact the designated safeguarding officer immediately.

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10. Monitoring of IT

All resources of NC group including computers, tablets, phones, external drives, USB drives, email, voicemail etc. are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of the Company then, at any time and without prior notice, the Company maintains the right to scrutinise any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only.

10.1 Protection against the risk of radicalisation and extremism

It is essential that staff are able to identify people who may be vulnerable to radicalisation and know what to do when they are identified (refer to NC Groups Prevent Policy).

Possible indications of radicalisation are (not an exhaustive list):

- Concerning things the person may say
- Having strong values and beliefs
- A strong view with no room for manoeuvre
- Fostering hatred, causing inter-community conflict
- Engaging in physical violence against conflicting values
- Presenting threatening behaviour
- A move to action

If a member of staff has a concern about a particular person, they should follow the safeguarding procedures.

For further details on this, please see NC Group's Prevent policy.

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11. Sexual harassment and violence and online sexual abuse between learners

It is vital in the protection of its learners that NC Group and its staff make it clear that all harmful sexual behaviour is unacceptable, therefore it is assumed that sexual harassment and online sexual abuse is happening within any learning environment, even when there are no specific reports. As a result any IT equipment used by any stakeholder involved with NC Group will be subject to monitoring of any NC Group owned equipment. Further support can be found on this from DfE advice for schools: [teaching online safety in schools](#)

As a result NC Group is committed to ensuring:

- all staff are clear as to the organisations relevant policy and procedures, and this is supported by relevant and regular training
- all learners are supported and confident to report concerns about sexual harassment and violence, and online sexual abuse, and are aware of the correct channels to do this
- all stakeholders know that concerns are taken seriously and dealt with swiftly and appropriately, and learners are confident that this is case
- comprehensive records of concerns are kept for the appropriate length of time required

12. Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

12.1 Why is all of this important?

It is important for all learners to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.

Examples of poor practice include:

- Failing to act on and refer the early signs of abuse and neglect.
- Poor record keeping.
- Failing to listen to the views of the person.
- Failing to re-assess concerns when situations do not improve.
- Not sharing information.
- Sharing information too slowly.
- A lack of challenge to those who appear not to be taking action.

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13. Promoting the Policy

This policy will be promoted continually by NC group through the below mechanisms:

- Safeguarding and Prevent posters are to be displayed in all work areas and classrooms.
- Safeguarding to be included in all standard NC presentations.
- Learners to be asked about NC Groups safeguarding practices on all end of course evaluations.
- The policy will be referenced in all NC Group's internal CPD activities
- All staff are required to undertake annual internal CPD on safeguarding and prevent.
- All staff are required to read and be aware of their responsibilities as set out in the teachers Standards July 2011 (*introduction updated June 2013, terminology updated July 2021*)

14. Infringement

NC will take appropriate disciplinary action against individuals who do not adhere to this policy.

15. Review Process

This policy will be reviewed on a regular basis, and as and when incidents or new legislation leads to a required policy update. It will be reviewed on an annual basis as a minimum.

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16. Record of Policy Changes / Amendments

Section	Note of changes	Revision Date	Person Responsible
9	Addition of NC Group Safeguarding Procedure	26/10/2020	L. Noble
9.1.1	Reporting period amended to 24 hours from 48 hours. DDSL contact details added.	29/10/2020	L. Noble
9.1.3	DSL Reporting period amended to 24 hours from 48 hours	29/10/2020	L. Noble
Appendix 2	Reporting channels process	16/03/2021	L. Noble
11	Sexual harassment and violence and online sexual abuse between learners	30/06/2021	L. Noble
4.3	Update to definition taken from 'Keeping Children Safe in Education 2021'	09/08/2021	L. Noble
9.2.2	Peer to Peer Abuse taken from 'Keeping Children Safe in Education 2021'	09/08/2021	L. Noble
9.2.3	Mental Health Support taken from 'Keeping Children Safe in Education 2021'	09/08/2021	L. Noble
11	Addition of DfE advice for schools: teaching online safety in schools 'Keeping Children Safe in Education 2021'	09/08/2021	L. Noble
4	Definition of a child updated Definition of an adult at risk updated Definition of a vulnerable adult updated	29/09/2021	L. Noble

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