

## Safeguarding Policy

Tolley is committed to provide a secure environment for learners where they both feel, and are kept, safe. Wherever possible, we teach learners how to recognise when they are at risk and exactly how to get help when they need it.

Most of our apprentices will be over the age of 18- however, we recognise that we need to have a policy and procedure in place to cover all eventualities, including the possibility of an apprentice being under 18.

### Introduction

What is safeguarding?

For the purpose of this policy, safeguarding covers:

- The protection of children and adults with additional needs from maltreatment;
- The prevention of impairment of health and development, ensuring circumstances consistent with the provision of safe and effective care to ensure best possible life chances;
- Taking action to enable children and adults with additional needs to have the best outcomes;
- Additionally, we recognise its duty in a wider context to safeguard all learners.

**Child Protection:** Child protection refers to the processes undertaken to protect children identified as suffering or being at risk of suffering significant harm.

The term 'child' includes everyone under the age of 18. This policy also includes all adults but who could be defined as 'vulnerable'.

Safeguarding is everyone's responsibility. Tolley's Learner Safeguarding and Child Protection Policy applies to all of our learners, in particular learners who are children and adults with additional needs. This policy considers contextual safeguarding by taking into account all environmental factors in a learner's life that might be a threat to their safety and or welfare, (Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024)). The key objectives of the policy are to:

- Promote a safe environment for all of our learners to learn and achieve;
- Actively promote the welfare of learners;
- Identify any learners who may be experiencing abuse or harm in the workplace, at home, or in relationships;
- Take appropriate action to ensure learners safety (Child and Adult Protection).

Tolley is committed to ensuring that every learner has the right to learn free from fear and safe from abuse. This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004 and related guidance.

## Policy statement

All staff at Tolley have a duty to identify any learners who may be experiencing abuse or harm in the workplace, at home, through on-line computer networks, or in relationships, and take appropriate action in accordance with this guidance. Tolley includes in these procedures reporting and dealing with allegations of abuse against members of staff.

- We acknowledge that education staff have a crucial role to play in helping identify welfare concerns and indicators of possible abuse or neglect at an early stage.
- It is not the responsibility of any member of staff at Tolley to investigate suspected cases of abuse. Instead, all cases should be referred to the Tolley Designated Safeguarding Lead (DSL), who will decide on the appropriateness of making a referral to outside agencies (Children's Services, Police, Adult Services). Where appropriate, the DSL will make relevant inquiries within the organisation.
- We hope that all learners will feel confident that their concerns will be taken seriously and that disclosure to any member of staff will be treated in a sensitive manner.
- All children regardless of age, gender, ability, culture, race, language, religion, or sexual identity have equal rights of protection.

## Staff responsibilities

The Board of Tolley is committed to ensuring all duties relating to safeguarding and protecting children and adults with additional needs are fulfilled. All safeguarding policies will be reviewed on an (minimum) annual basis by the Board, which has responsibility for the oversight of Tolley safeguarding and child protection systems. The Board will receive quarterly reports on safeguarding activities and systems.

Claire Oglesby is the Designated Safeguarding Lead (DSL), with special responsibility for safeguarding and child protection systems and paying special attention to children and adults with additional needs. To carry out this role effectively, the DSL will undertake appropriate and specific training to provide them with the knowledge and skills required to carry out this role. The DSL's training will be updated formally every 2 years, but their knowledge and skills will be updated through a variety of methods, e.g. bulletins, conferences, local meetings, and other training at regular intervals, at least annually, to keep up with any developments relevant to their role.

Amanda Chichevo is the Designated Safeguarding Officer (DSO). The DSO will deputise in the absence of the DSL. The DSO will also be available to liaise with and make referral decisions alongside the DSL.

The Designated Safeguarding Lead is responsible for:

- Liaising with the Board over matters relating to Safeguarding and Protecting Children and Adults with Additional Needs;
- Maintaining a confidential recording system for safeguarding and child protection concerns;
- Ensuring the Board considers the Tolley Learner Safeguarding Policy annually;
- Lead responsibility for ensuring that Tolley carries out its duties in relation to safeguarding all learners;
- Informing the Board of how Tolley and its staff have complied with the policy. An annual report of how duties have been discharged, including (but not limited to) the training that staff have undertaken;

- Overseeing the liaison between agencies, such as the police/children's services, in connection with any allegations against staff. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries;
- Undertaking ongoing training in relation to safeguarding;
- Ensuring that parents and or carers of learners under the age of 18 are aware of Tolley Learner Safeguarding and Child Protection Policy;
- To ensure that all staff receive awareness training in safeguarding and protecting children and adults with additional needs, and are aware of Tolley procedures and policies in relation to this;
- Ensuring that Tolley deals with allegations in accordance with these procedures;
- To resolve any inter-agency issues;
- To ensure that Tolley liaises with workplace employers and relevant external agencies so that appropriate safeguarding procedures are in place.

All members of staff have a responsibility to:

- Identify and recognise children and adults with additional needs who may be in need of extra help, who are suffering, or who are likely to suffer significant harm;
- Provide help for children and adults with additional needs where appropriate;

- Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the Tolley safeguarding arrangements;
- Where appropriate, contribute towards, read, and adhere to Tolley policies;
- Respond and refer any concerns about children and/or adults in accordance with this policy;
- Maintain an attitude of “it could happen here” where safeguarding is concerned and to always act in the best interests of the learner.

## Actions

What to do if you are concerned that a peer is being abused or harmed:

- All staff at Tolley are expected to take seriously the duty to be aware of, and respond to, concerns regarding learners who are, or may be, experiencing abuse and harm in any part of their lives. These concerns are to be passed on to the Designated Safeguarding Lead;
- Where the learner is not a child or adult with additional needs, the learner will need to agree to the passing on of this information. The only exception to this is if the concerned member of staff considers the learner to be at risk of serious harm or danger.

If a learner informs you that they are experiencing abuse:

- Respond calmly and listen carefully to what the learner is telling you;

- Explain as early as possible that you cannot keep total confidentiality on such matters, and that you may need to speak to the Designated Safeguarding Lead and/or Officer;
- If the learner then decides not to continue talking to you, offer them advice about confidential helplines;
- Advise the learner to find a quiet area to speak where they can avoid interruption. Do not deter the learner by asking them to call back later;
- Encourage the learner to Tell, Explain or Describe (TED) as clearly as possible, but do not ask leading questions;
- Record what the learner has told you or ask them to write it down themselves (if you think this is appropriate under the circumstances). This is because they may not want to tell anyone again what they have shared with you. Record times, locations, and any other relevant facts. Do not include your own opinions or views about the disclosure, although you can describe the manner or state of the learner when they present themselves to you;
- Ensure the learner is safe at work. Try to ascertain how safe they will be if they leave the workplace or return home;
- Respect confidentiality and do not discuss the disclosure with anyone other than the Designated Safeguarding Lead / Officer. It may be appropriate to talk to your line manager in some circumstances, but you do not automatically need to do so. Be clear with the learner about who you are speaking to and when. Keep the learner informed of what is happening as a result of their disclosure and ascertain their wishes and feelings where possible;

- Where a learner has made a disclosure of abuse, or a staff member has concerns about abuse, no contact should be made with the learner's parents or carers without consultation with the Designated Safeguarding Lead;
- You may have concerns that a learner is experiencing abuse because of their behaviour, changes in their presentation, or that they are missing from work. Contact the Designated Safeguarding Lead/Officer to discuss your concerns;
- A learner may disclose information that leads to concerns that another child and/or adult with additional needs is experiencing abuse. You need to inform the learner that you will need to tell the DSL/DSO;
- The DSL/DSO may need to contact you to request information about a learner. This is because Tolley may need to contribute information to Children's Services for an assessment or child protection investigation. The DSL will ensure that we are adhering to the government Information Sharing Guidance and will discuss with you what to inform the learner. Wherever possible, we will be as open as possible with the learner;
- If you continue to be concerned about a learner after you have informed the DSL/DSO, contact the DSL/DSO again to let them know and request feedback;
- In the event that you have only raised your concern to the DSO, you continue to feel concerned about the learner and you feel that the DSO has not followed the concern up appropriately, you may contact the DSL directly. If you feel the DSL is not following up your concern appropriately then you may raise your concern further to the Board.

## Indicators of abuse and neglect

Abuse is defined as a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

### Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm.

### Emotional abuse

The persistent emotional maltreatment of a person such as to cause severe and adverse effects on the emotional development or wellbeing of a person. It may involve conveying to a 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 person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve serious bullying (including cyberbullying), causing a person to feel frightened, exploited, or in danger.

### Sexual abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, not necessarily involving violence, whether or not the 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 a person looking at, or in the production of, sexual images, watching sexual activities, encouraging a person to behave in

sexually inappropriate ways, or grooming a young person in preparation for abuse.

Sexual abuse can take place online and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse.

### Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

## **Indicators**

Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that a person is at risk.

Other safeguarding issues include Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate, or deceive a child into consensual image sharing. Whilst it might not be abusive it is illegal, whilst non-consensual is illegal and abusive. More information on CSE and CCE can be found here: [Keeping children safe in education 2024](https://publishing.service.gov.uk) ([publishing.service.gov.uk](https://publishing.service.gov.uk)).

## **Peer on peer abuse**

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- Physical abuse (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence and harassment.

Peer on peer abuse may take place in a physical classroom or in an online environment. Inappropriate behaviour between peers will be challenged and reported in line with Tolley's safeguarding policy.

## **Supporting learners at risk**

Statistically young people or adults with identified needs e.g. behavioural difficulties and/or disabilities are more vulnerable to abuse. Tolley staff who work in any capacity with young people or adults with profound and multiple disabilities, sensory impairment, and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.

### Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a learner is suffering or is at risk of suffering significant harm. The learner (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

### Looked After Children (LAC)

The most common reason for children becoming looked after is abuse or neglect. Upon enrolment Tolley ensures that appropriate staff have, information about learners looked after status and care arrangements. The DSL will keep details of the learner's social worker and the name and contact details of the local authority's head for children in care.

### Staff training and information

At induction, all staff must read and store a copy of a mandatory list of policies and documents, Learner

Safeguarding and Child Protection Policy, Behaviour/Disciplinary Policy.

We will monitor the usage of website and other online resources to ensure that learners of any age are not accessing materials of an inappropriate nature or materials that are not relevant to their learning outcomes.

All staff must undertake online child protection training within one month of starting at Tolley. In-house training on safeguarding children and adults with additional needs is provided for all new staff and is ongoing throughout employment. This includes Safeguarding in FE e learning, Prevent in FE e-learning and, where relevant, safeguarding and safer recruitment e-learning.

### **Keeping records**

Confidential chronology records will be securely held for all concerns relating to abuse. They should be passed to the Designated Safeguarding Lead/Officer and kept in the confidential store. The referring member of staff should keep no other records, including electronic records, which should be deleted upon referral.

### **Questions/concerns**

Any questions or concerns should be addressed to the DSL/DSO in the first instance.



Jonathan Scriven – Director of Tax Markets