



## HR-19 Safeguarding Policy

### 1. Overview

#### What is Safeguarding?

Safeguarding is defined by the Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as meaning that:

“Agencies [and organisations] working with children and young people take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and where there are concerns about children and young people’s welfare all agencies [and organisations] take all appropriate actions to address those concerns working to agreed local policies and procedures, working in partnership with other local agencies”.

#### Who are We Safeguarding?

Safeguarding practices are most commonly applied to children and young people under the age of 18 (eighteen). Throughout various pieces of legislation and guidance, the two terms are sometimes differentiated, where “children” refers to those under the age of eighteen who are still in full-time education, and ‘young people’ refers to those under the age of eighteen who have left full-time education. For the purpose of clarity, throughout this policy and related procedures documents, TDR uses the term ‘children’.

Key aspects of legislation have recently been extended to include similar standards of protection to “vulnerable adults”. A vulnerable adult is defined as a person aged 18 (eighteen) or over, who has either a dependency upon others in the performance of, or a requirement for assistance in the performance of basic functions; a severe impairment in the ability to communicate with others; or has a reduced ability to protect themselves from assault, abuse or neglect. This can be as a result of a learning or physical disability (not normally to include dyslexia); a physical or mental illness chronic or otherwise (including an addiction to alcohol or drugs); or a reduction in physical or mental capacity.

### 2. Statement of Policy

TDR is committed to providing a safe and secure environment for all learners, staff and individual visitors who access its facilities and services.

TDR recognises its particular responsibility to safeguard the wellbeing of children and vulnerable adults engaged in TDR’s activities by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure



environment and to deal with issues concerned with suspected or reported abuse of children and vulnerable adults.

TDR seeks to ensure that its policy and procedures comply with statutory duties, reflects guidance and good practice in safeguarding children and vulnerable adults, and that safeguarding arrangements are proportionate and based upon common sense.

TDR recognises that it has a duty to help staff and learners recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations (where possible) where abuse or neglect might be alleged. It is not intended that staff should be restricted from normal ways of working, but staff are advised to consider how an action may be misperceived.

### 3. Safeguarding Procedure

All employees working with learners needs to consider how to avoid putting themselves in positions where abuse might be alleged and also know what to do if they should suspect an individual is being abused. All staff should be aware of the dangers inherent in:

- Working alone with a child/vulnerable adult.
- Physical interventions.
- Cultural and gender stereotyping.
- Dealing with sensitive information.
- Contacting learners through private telephones (including texting), e-mail, MSN or social networking websites.
- Disclosing inappropriate personal details.
- Meeting learners outside of duties/business.

In order to ensure that learners are protected whilst participating in any of our programmes TDR will ensure that our staff:

- Are carefully selected, screened and supervised.
- Are DBS checked as appropriate.
- Receive basic information in relation to Every Child Matters and the Children Act 2004 and Safeguarding Vulnerable Groups Act 2006 during induction.
- Receive necessary training that will enable them to fulfil their responsibilities in respect of safeguarding children and vulnerable adults.



As one person is expected to have no sole responsibility for a learner during employment/work placement DBS checks will not be required.

Within the workplace a mentor will be appointed for each learner and the relevant TDR member of staff will work closely with this named person (i) to ensure learners receive the necessary support in order to complete all outcomes identified within their Individual Learning Plan and (ii) to have due regard for the learner's welfare.

Any suspicion with regard to a learner's welfare should be brought to the attention of TDR as soon as identified.

If an allegation is made that someone may have:

- Committed an offence against a learner.
- Placed a learner at risk of significant harm.
- Behaved in a way that calls into question their suitability to work with learners.

The allegation will be handled as a matter of urgency.

All allegations will be brought immediately to the attention of the Designated Person for child protection who will gather information about the allegation and report this without delay to the relevant authority. Any steps required to remove the learner from harm will be agreed with all interested parties and implemented with immediate effect.

#### 4. Personal Code of Conduct

- Respect all individuals whatever their age, developmental stage, ability, sex, sexual orientation or ethnicity.
- Place the safety and wellbeing of a child, young person or vulnerable adult first. It must be placed before any personal or organisational goals and before loyalty to friends and colleagues.
- Form appropriate relationships with children, young people and vulnerable adults. These should be based on mutual trust and respect.
- Be aware of the relative powerlessness of children, young people and vulnerable adults compared to staff members.
- Be committed to actively preventing the exploitation and abuse of children, young people and vulnerable adults.

#### 5. Guidelines for Working with Children, Young Person and Vulnerable Adults



- Conduct meetings with children, young people or vulnerable adults either with another staff member present or in an open environment (e.g. leave office door open and do not hold meetings when lone working i.e. when others are out of eyesight/earshot).
  - If physical contact is necessary e.g. for demonstration purpose, ensure it takes place only with the full consent of the child, young person or vulnerable adult and that its purpose is clear.
  - Do not use touch as a form of communication, even to comfort a child, young person or vulnerable adult who is distressed.
  - Consider implications transporting children, young people or vulnerable adults in your own vehicle, offer alternatives where ever possible so the student travels with peers.
  - Consider your expected behaviour in certain situations and what might be considered unacceptable, e.g. rough physical games, sexually suggestive comments, inappropriate language, doing things of a personal nature for a child, young person or vulnerable adult.
6. Recognising Abuse or Neglect
- Bruises or marks on the body of the learner.
  - Remarks made by the learner, another learner, friend, parent or adult.
  - Observations of the learner's behaviour or reactions, including self-harm.
  - Unexplained changes in the learner's behaviour or personality.
  - Evidence of disturbance through the behaviour or work of the learner.
  - Neglect, poor nutrition, continuing poor health, excessive fatigue or exposure to unnecessary risks.
7. Responding to an Observation or Disclosure
- Do not promise confidentiality.
  - Do not offer guidance or advise, this can only be done by trained professionals.
  - Listen to what is being said, without displaying shock or disbelief.
  - Accept what is said.
  - Reassure the learner but do not make promises that you may not be able to keep.
  - Questions should be kept to the minimum necessary to understand what is being alleged.
  - Do not interrogate the learner; it is not your responsibility to investigate.
  - Do not ask leading questions.
  - Do not ask the learner to repeat the information for another member of staff.
  - Explain what will happen next and who will be consulted.



- Take notes if possible, but ensure confidentiality is maintained.
8. Reporting Channels If You Have Concerns:
- If a child, young person or vulnerable adult discloses information to you about a possible abuse situation, either about another member of staff, another learner or a member of the external community (parent/guardian etc.) you must report their disclosure in accordance with the policy.
  - At the time of disclosure make accurate factual notes for your reference in the future.
  - Inform the learner that you are going to have to pass the information on through TDR's Safeguarding system so that they are suitably supported, and that you cannot guarantee confidentiality. It is important to remember that a child or young person (under 18) cannot refuse for this referral to occur if they have made an allegation of abuse.
  - Contact TDR Designated Person within 24 hours and give a detailed factual account of what the learner disclosed to you, include learner name, ID number and a brief description of the allegation.
  - The Designated Person will contact Human Resources who will arrange to meet with both you and the child, young person or vulnerable adult and will contact the appropriate external agencies e.g. Police, Social Services.

## 9. General Behaviour

### Staff Don'ts

- Staff must not spend excessive amounts of time alone with learners, away from others. If privacy is needed the door should remain open, or the room be visible through glass sections and other staff should be aware of the meeting.
- Staff are advised to not make unnecessary physical contact with learners.
- Staff should not meet with learners outside of the work environment.
- Staff should not show favouritism to any one learner, nor should they issue or threaten any form of physical punishment.
- Staff should not do things of a personal nature for learners that they can do themselves.
- Staff should never allow any allegation made by a learner to go without being reported and addressed.
- Staff should never make any promises to keep any disclosure confidential from relevant authorities.



- Staff should never (even in fun)
  - i. Initiate or engage in sexually provocative conversations or activities.
  - ii. Allow the use of inappropriate language to go unchallenged.
  - iii. Trivialise or exaggerate learner abuse issues.

### **Staff Dos**

- Staff must respect a learners' right to privacy and encourage learners to feel comfortable enough to report attitudes or behaviour they do not like.
- All pre-existing relationships between staff and learners must be declared.
- All staff should be aware of the procedures for reporting concerns or incidents, and should familiarise themselves with the contact details of the Safeguarding Designated Person.
- If a member of staff finds themselves the subject of inappropriate affection or attention from a learner they should make others aware of this issue.
- If a member of staff has any concerns relating to the welfare of a learner, be it concerns about actions/behaviours of another staff member or concerns based on any conversation with the learner. Particularly where the learner is a child, young person or vulnerable adult, when the concerns or allegation should be reported to Safeguarding Designated Person.

### **10. Safeguarding Structure and Responsibilities**

TDR has in place an organisational structure for safeguarding children and vulnerable adults. Human Resource with Designated Safeguarding Person are members of the Safeguarding standing group, that meets regularly and on an as-needs basis in order to monitor, review and develop the work of TDR in delivering its duty of care.

#### **Role of the Managing Director**

The Managing Director has overall accountability for safeguarding children and vulnerable adults at TDR and is a member of the Safeguarding standing group.

#### **Role of Human Resources**

Human Resources carries out a leadership and coordination role in the Safeguarding standing group.



Human Resources provides support for children and vulnerable adults who disclose that they have been or are being abused or are the victim of other inappropriate behaviour.

Where an allegation of abuse or inappropriate behaviour is made against a member of staff and relates to their actions as a member of TDR, Human Resources will advise and guide the line manager of the member of staff against whom allegations have been made in relation to employment issues.

Where an allegation of abuse or inappropriate behaviour is made against a learner and relates to their actions as a member of TDR, Human Resource will contact the department in relation to learner discipline issues.

### **Role of Designated Person**

In those areas where staff and learners work with children and vulnerable adults as part of their roles, the Designated Persons is nominated to have responsibility for safeguarding in their area of responsibility. The Designated Person will be the focal point for all safeguarding issues within that area.

### **Role of Employee**

Employee and learners working in direct contact with children and vulnerable adults on a day-to-day basis (i.e. staff involved in teaching and providing pastoral guidance to learners) may come across signs of harm and/or abuse. Employees need to ensure that significant concerns for the wellbeing of a child or vulnerable adult are reported to the appropriate Designated Person or the Lead within 24 hours. The Designated Person / Lead will invoke the appropriate procedures to protect the child or vulnerable adult, involving Social Service and or the Police as appropriate.

### **TDR Designated Persons:**

- Stephen Guppy.
- Gemma Yildirim.
- Paul Lund.
- Frank Devlin.
- Chris Turnbull.

### **11. Related Procedure:**

### **Safeguarding Procedure**

Issued: 10/07/2011  
Revised: 16/11/2015



TDR HR-19  
Revision No 7  
breatheHR/Company/Document





