



## Safeguarding Policy

Most recent update: 26 June 2024

### Overarching Approach To Safeguarding Within Skills And Employment

#### Scope

This Safeguarding Policy covers all provision delivered internally by Cheshire West and Chester Council's (CW&C) Skills and Employment (S&E) support delivery teams and externally by our contracted Adult Education partner providers. It covers all service participants referred to in this policy as 'learners/customers', namely, 16-24 year olds Supported Interns, 19+ adults within Adult Education and children within our Family Learning provision as well as beneficiaries on our range of employment support projects. This policy seeks to provide information on our overarching approach to safeguarding and our associated policies as well as covering referral procedures.

[The Care Act 2014](#) (adults) and [Working Together 2018](#) (children) set out our statutory responsibilities regarding safeguarding adults and children. We extend this requirement to all our service participants. All our staff, in whatever setting and role, are on the front line in preventing harm or abuse occurring including alleviating distress and taking action. This approach covers both current abuse and historic abuse and covers both adults and children.

#### Purpose

The purpose of detailing our approach to safeguarding is to ensure our learners/customers and staff, including volunteers, are safe when they are with us and that they have clear reporting mechanisms to alert us to actual and/or potential harm/distress going on in their lives with the knowledge that we will take appropriate and timely action to help them.

#### Roles And Responsibilities

The Skills and Employment management team will ensure that

- S&E has a contextualised Safeguarding Policy and appropriate procedures in place that are in accordance with guidance and legislation, is annually reviewed and is made available to all partners.
- S&E operate safer recruitment procedures in line with Local Authority guidelines and requirements and ensures all checks are carried out as appropriate.
- S&E has procedures for dealing with allegations of abuse against staff and service users and all commissioned partners comply with these procedures.
- A Designated Lead Safeguarding Officer and Designated Deputy Safeguarding Officers within the S&E team for staff/partner staff to report customer disclosures/concerns. See *Appendix A* for Quick Guide to reporting safeguarding concerns.
- There are clear and publicised methods of reporting concerns and a 'just report' ethos for staff and partners.
- Staff undertake appropriate safeguarding training including themed topics to maintain breadth of awareness and a dated record of this training is held centrally.





- There is a comprehensive induction programme for customers detailing our approach to safeguarding, disclosure channels and regular promotion.
- We embed personal development themes within our service interactions with customers including curriculum content including developing healthy relationships.
- There is a central log of disclosures maintained and managed.
- We provide support for dealing with distressing situations through the Safeguarding lead role and line management regular 'supervision' sessions. NB Supervision settings will provide an 'offloading' function and not share identifying safeguarding information.
- The Safeguarding Policy and associated policies cover our whole approach to safeguarding and that these are regularly reviewed to ensure they capture changes to national policy and procedures. Maximum review period of 1 year.
- There is a regular external audit of our Safeguarding Policy and approach.

### **The Legal Framework**

This policy reflects the principles contained within several legal frameworks including the Care Act 2014, Working Together to Safeguarding Children 2018, Human Rights Act 1998, the Mental Capacity Act 2005, the Children Schools & Families Act 2010, the Sexual Offences Act 2003 and the Public Interest Disclosure Act 1998. The policy and its associated procedures are also consistent with the Safeguarding Children Partnership's guidance in respect of the safeguarding of Children and Young People and the Local Safeguarding Adult Board guidance.

Further information is available from:

[CW&C Safeguarding Children Partnership](#)

[CW&C Adult Safeguarding Board](#)

### **What Is Safeguarding?**

Safeguarding means protecting people's health, wellbeing and human rights and enabling them to live free from harm, abuse and neglect. Safeguarding is about making people aware of their rights, encouraging them to have a dialogue with us over matters of concern to them and protecting them and taking the necessary steps to support them and keep them from harm and support them in distress.

Within safeguarding there is a continuum of need ranging from happy, thriving and able to take steps to protect themselves to people not having that capacity to protect themselves. We work to create an environment in which all customers feel comfortable talking to members of staff including partner staff about issues that are troubling them. All customers have our safeguarding approach explained to them at induction and there are posters up in all our venues highlighting key information and encouraging customers to talk to us. The Skills and Employment Manager will act as the Designated Lead Safeguarding Officer for the service for all disclosures coming in via staff and partners. Staff are trained in safeguarding but know that they just report the disclosure and the Designated Lead Safeguarding Officer will determine actions to be taken and will manage the





disclosure to close down. All disclosures are recorded and managed within a locked down folder. Disclosures may result in an official referral to our central Council Safeguarding Referral Portals but in others, actions to alleviate the situation will be taken and managed within the Skills & Employment team.

As a service, we will work together as a team and with our commissioned partners to safeguard our customers which will include:

- Protection from maltreatment/harassment/abuse including online abuse,
  - Preventing impairment to health or development,
  - Ensuring circumstances that are consistent with the provision of safe and effective care,
  - Taking action to enable all our customers to have the best outcomes from their time with us.
- This will include taking action to address:
- a. Harm/distress at the hands of another including bullying, harassment, exploitation including peer to peer both face to face and digital
  - b. Suicidal ideation (NB suicidal ideation in children will always be a safeguarding report to I-ART)
  - c. Addiction
  - d. Homelessness
  - e. Other issues not listed here but that pose a risk to our customers/learners.

### What is Abuse?

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take a variety of forms and can be either overt or covert. We recognise that many of these forms of abuse can be both face to face or within a digital environment. The table below describes the main types of abuse taken from the Care Act 2014:

Type of abuse	Definition
Physical abuse	Physical harm to an individual's body from, for example, hitting, restrictive practices and medication
Domestic abuse	Threats, violence and abuse between individuals that are family members or in an intimate relationship.
Sexual abuse	Sexual relationships or activities that an individual does not or cannot consent to.
Emotional/psychological abuse	Threats, humiliation, controlling behaviour, blaming, verbal abuse, harassment, intimidation



Type of abuse	Definition
Financial/material abuse	Use of an individual's money or possessions without permission. Includes theft, fraud, scamming, coercion, self-serving involvement in an individual's financial affairs.
Discriminatory abuse	Individuals being treated differently due to personal traits such as age, gender, race, sexual orientation etc.
Institutional/organisational abuse	When an organisation's needs are put above an individual's needs e.g. telling an individual that they must go to bed at a certain time
Self-neglect	An individual being unable to see to their own basic needs, such as nutrition or hygiene
Neglect by others	People responsible for an individual not seeing to their basic needs such as nutrition or hygiene either deliberately or inadvertently.

### Extremism and Radicalisation

CONTEST: The United Kingdom's Strategy for Countering Terrorism (2011). The strategy is based around 4 key workstreams:

1. Pursue: to stop terrorists.
2. **Prevent:** to stop people becoming terrorists or supporting terrorism.
3. Protect: to strengthen our protection against a terrorist attack.
4. Prepare: to mitigate the impact of a terrorist attack.

We have a duty under the Prevent agenda to respond to and address the threat of radicalisation and this duty forms a core component of our safeguarding approach.

### What is Prevent?

The Prevent work stream seeks to address the threat faced by the UK from domestic or international terrorism by tackling the factors that can cause people to become drawn into violent extremism and empowering individuals and communities to stand up to violent extremists.





Our responsibility in this is to protect our service participants and our staff from any forms of extremism and/or intent to cause harm or capability to cause harm by:

- Being alert to situations that could pose potential threat.
- Challenging any extremist ideology.
- Taking action to prevent people from being drawn into extremist activity.
- Reporting all incidents/concerns immediately.

Extremist ideology includes:

- Racially motivated extremism.
- Religious extremism.
- Animal rights extremism.
- Other forms of extremism.

We have a Prevent Action Plan that is reviewed annually.

#### **What Action Will We Take:**

1. Staff receiving a customer disclosure/or are concerned about a customer will submit a report to the Designated Lead Safeguarding Officer (DLSO) on our reporting template.
2. On receipt of the report, the DSLO will decide whether a formal safeguarding report needs submitting to either the Council's Access team (adults) or iART (children) or the Prevent team in the case of disclosures relating to relating to extremism/radicalisation.
3. For disclosures/concerns that can be managed within the service including signposting to other support services, the DLSO will liaise with the sender of the report regarding the initial actions taken and agree what other actions are necessary.
4. The DSLO will set up a review date and manage the disclosure to a point where no further actions are required, and it can be closed.
5. All records will be kept in a locked folder and tracked for completion.
6. All cases will be moderated for quality assurance and consistency purposes by either the DLSO or the Designated Deputy Safeguarding Officer (depending on who handled the original disclosure).

*See Appendix A for Quick Guide to Reporting Safeguarding Concerns*



## **Linked Skills And Employment Policies**

Providing a Safe and Secure Environment for learners/customers and staff

### **1. Safe Participation In Learning And Support Services**

Due to the nature of the work carried out by the Skills and Employment team, we have developed our own specific approach to managing the health and safety of our learners/customers, additional to the Local Authority Health and Safety Policy. The policy clarifies the specific duties and responsibilities for our staff and partner providers managing sub-contracted provision. Aligned to the Health and Safety Act 1974, there are certain duties placed upon workers including responsibilities towards each other and their duty to co-operate with their employer in the matter of safety that we detail in our approach. We are committed to the safety of our learners and service users and strive to ensure that as far as reasonably practicable, learning takes place in safe, healthy and supportive environments, which meet the needs of the learner.

Staff are trained in health and safety requirements and carry out risk assessments for all courses, venues and activities/visits. We vet all our commissioned provider partners and we vet any external speakers coming on our premises.

Equality of opportunity, inclusive practice and promoting the value of diversity are central to everything we do in from the way we commission, who we commission, the services and provision we provide and the support we give. Everyone is different and has something unique to offer. We respect and understand these differences and to make the most of everyone's talents. Every service participant has the right to respect and personal dignity and the responsibility to recognise this right of others and that people's beliefs and culture differ. Our staff work hard to develop an inclusive operating environment in which everyone feels safe. It is the responsibility of all staff to ensure that acceptable standards of behaviour/practice are adopted in all our learning environments. This also includes working with our partners to ensure that action is taken to encourage reporting of unacceptable behaviour and following a thorough investigation, an effective and appropriate response is swiftly expedited.

### **2. Online Learning**

As part of our overarching safeguarding approach, we need to ensure that our learners/customers are safe online. This includes use of the Internet, electronic communication and use of mobile devices for learners and service users within class settings, open access settings within council venues and our commissioned partner venues. It is our responsibility to educate learners/customers about the benefits and risks of using new technology and provides safeguards and raises awareness for users to enable them to control their online experiences. We recognise that technology is constantly evolving including tools used to access information, so this approach covers all hardware currently authorised for use within our provision eg iPad, mobile phones, virtual learning environment etc.

### **3. Harassment And Bullying – Face To Face And Online**

We strive to create a culture where harassment and bullying is not tolerated and is viewed as abuse. See Bullying & Harassment Policy. We live in a world where our lives are increasingly spent online





creating a raft of additional lines of contact for harm/distress beyond face to face. Of particular concern is the rise in sexual harassment, often peer to peer that has proliferated across a range of digital platforms now readily accessible and we acknowledge that this can be occurring in our settings at any time.

**4. Peer-On-Peer Sexual Abuse** – includes:

- Sexual violence such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Sexting (also known as 'youth-produced sexual imagery')

**5. Modern Slavery**

As part of our overarching safeguarding approach, we need to ensure that our learners and service users are protected from the effects of Modern Slavery. Where we have suspicions, we take action immediately through clear reporting within our disclosure procedures, and we take appropriate and timely action to help the individual.

Our approach to tackling Modern Slavery incorporates awareness raising about 'county lines' activity and the criminal exploitation of young children and vulnerable adults to supply drugs down a supply chain from major cities into distant towns/rural areas.

**6. Information Security**

As part of safeguarding, it is vital that we manage and protect the data we hold relating to customers aligned to GDPR legislation 2018. This requirement applies to all members of staff who have direct contact with data including:

- The provider – returning data electronically or by post. Full instructions will be issued by The LA Intelligence, Commissioning and Performance team and may be changed at short notice.
- The Local Authority teams – paper based personal records will be retained under lock and key or archived in a secure environment in accordance with contractual requirements.
- Learners/Service users – no data, unless explicitly specified, will be shared with a third party (refer to Learner Enrolment Form Data Protection statement).

GDPR does not take precedence over safeguarding and we will take action which may involve sharing information as required.

We will only keep safeguarding records for as long as required and all records will be deleted at the end of each academic year or when the case has been closed, whichever is the later event.



## **7. Safer Recruitment And Selection**

The Local Authority applies safe recruitment practices to all staff recruited to the council. This includes scrutinising applications, verifying right to work in the UK, checking previous employment history, verifying identity and academic and vocational qualifications and obtaining professional references and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and, where appropriate, undertaking criminal checks in line with statutory requirements.

### **Safe Working**

All staff

- Undertake a regular DBS check aligned to their Job Description. Tutors and other key staff are reviewed every 3 years.
- Receive a thorough induction and are managed within a performance management framework with regular 1:1s and annual appraisals with access to ongoing CPD.
- Complete mandatory annual corporate CPD including additional service safeguarding topics.
- Work within a management hierarchy.
- Complete annual declarations of interest.
- Work in an open and transparent way.
- Adhere to safe working practices.
- Comply with data protection requirements.
- Work with other colleagues where possible in situations open to question.
- Discuss and/or take advice from their manager over any incident which may give rise to concern.
- Have procedures to follow as applicable and record any incidents or decisions made.
- Are aware that breaches of the law and other professional guidelines could result in criminal and/or disciplinary action being taken against them.

### **Allegations Against Staff**

This policy will be used in all cases of allegations against paid employees and volunteers. The word 'employee' will be used to refer to both paid employees and volunteers. Allegations may be that an employee has:

- Behaved in a way which has caused harm to another.
- Possibly committed an offence against or related to another.
- Behaved towards a child/children in a way that indicates that they are unsuitable to work with children or vulnerable adults.

The management of any allegations against staff includes:

- Learners/service users and staff to be given clear information on reporting any concerns relating to members of staff to the service Designated Safeguarding Lead/Deputy Lead with alternative points of contact.
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- The service DSL will consider any allegation against staff with relation to:
  - A police investigation of a possible criminal offence.
  - Referral and assessment to CW&C adult/child Social Service teams about whether a child/adult is in need of protection or in need of services.
  - Referral to CW&C HR in respect of disciplinary action against the individual which will consider immediate suspension pending investigation.

#### **Linked CW&C Skills & Employment Policies and Procedures:**

- Health and Safety
- Disclosure Report
- Incident Reporting
- Equity Diversity and Inclusion
- Bullying and Harassment
- Cyber-bullying and Harassment
- Online Safety
- Screening Checklist - External Speakers
- Modern Slavery
- Information Security
- Venue Risk Assessment
- Course Risk Assessment
- Disciplinary

#### **Associated Local Authority Policies**

Due to the nature of the work carried out by the Skills and Employment team, we have developed our own approach to managing our specific area of work; this clarifies the specific duties and responsibilities for our staff and partner providers managing sub-contracted provision set within our context. In addition to these contextualised policies, the Local Authority has centrally maintained policies covering all aspects of our work as Council employees. We work within the context of the overarching council policies which are located on the council's intranet site. Key areas of council policy and procedure regarding staff management are as follows:

- Safeguarding Policy – Adults And Children
- Safe Recruitment Guidelines
- Code Of Conduct
- Whistleblowing Policy
- Disciplinary Policy
- Data Protection
- Performance Management Of Staff
- Information Security



## Appendix A

### Quick Guide to Reporting Safeguarding Concerns

#### 1 - RECOGNISE

**Abuse comes in many forms and more than one type of abuse may be happening at the same time**

You may suspect abuse because:

- You have general concerns about someone's well-being
- Someone tells you that something has happened or is happening to them, which could be abuse
- You may also have disclosures relating to personal distress including talk of self-harm and/or suicide. You still need to respond to these disclosures in the same way.

#### 2 - RESPOND

- ✗ Remember, it is not your role to investigate any concerns you may have – just report it.
- ✓ Where you suspect abuse or risk of abuse including the potential to be drawn into extremism, it is your role to pass on any concerns you may have even if the person has asked you not to.

- Make sure the person is safe.
- **If there is an immediate danger/threat or urgent medical attention is required seek medical help eg call 999 immediately.**
- Speak to your local Safeguarding Reporting Officer/Line Manager immediately for first line advice which may involve calling the police.
- Preserve any evidence.
- Do not discuss with alleged perpetrator.
- Do stay calm and try not to show shock.
- Listen carefully rather than question directly.
- If the customer reports abuse/distress reassure them that they are doing the right thing in telling you.

#### 3 - RECORD

- Write an account of what you have seen or heard as soon as possible using Skills & Employment Disclosure Report or available on our website under Safeguarding.
- Make sure the information is factual and accurate.
- Record what the person said, using their own words.
- Describe the circumstances and identify anyone else who was there at the time.
- Note any initial actions taken.
- Sign and date your report, noting the time and location.



## 4 - REPORT

- Step 1** Send the completed **Skills & Employment Disclosure Form** (available on the Skills and Employment webpages under Safeguarding) as soon as possible. This must be sent within 48 hours of the disclosure to the Skills & Employment Designated Lead Safeguarding Officer or the Designated Deputy Safeguarding Officer.
- Step 2** All Disclosures made by customers whether on internal provision or on our Adult Education commissioned provision must be reported to CW&C Skills and Employment Designated Lead Safeguarding Officer within 48 hours of the original disclosure.
- Step 3** Disclosure report actions are discussed between the report author and the CW&C Skills and Employment Designated Lead Safeguarding Officer. Further actions are agreed which may include a formal Safeguarding referral to the Council's Access team (for adults) or iART (for children). For other disclosures, a response will be agreed, recorded and monitored for completion by the Skills and Employment Designated Safeguarding Officers.

### Designated Lead Safeguarding Officer

Matthew Smith Telephone 07790 532840 [matthew.smith@cheshirewest.gov.uk](mailto:matthew.smith@cheshirewest.gov.uk)

### Deputy Safeguarding Lead

Ben Watts Telephone 07881 500226 [Benjamin.watts@cheshirewest.gov.uk](mailto:Benjamin.watts@cheshirewest.gov.uk)

### Deputy Safeguarding Lead

Jodie Ronan Telephone 07768 558858 [jodie.ronan@cheshirewest.gov.uk](mailto:jodie.ronan@cheshirewest.gov.uk)

The CW&C Lead Safeguarding Officer will advise and support you on an appropriate course of action and sources of support, but if required, advice can be obtained directly:

**For adults** – advice can be sought from the Access team, 8.30am-5pm Mon-Thurs (4.30pm Fri)

Telephone 0300 123 7034 [accesswest@cheshirewest.gov.uk](mailto:accesswest@cheshirewest.gov.uk)

Out of hours, telephone the Emergency Duty team on 01244 977277

**For children** – advice can be sought from iART, 8.30am-5pm from Monday to Thursday (4.30pm Fri)

Telephone 0300 123 7047 [i-Art@cheshirewest.gov.uk](mailto:i-Art@cheshirewest.gov.uk)

Out of hours, telephone the Emergency Duty team on 01244 977277

Alternatively contact **Cheshire Police**

Telephone **0845 458 0000** or **01244 350000** or in an emergency, **999**

For advice on radicalisation, the Local Adult Safeguarding Board can be contacted via [their web page](#)

Cheshire Prevent team

Telephone 01606 362121 [Prevent@cheshire.pnn.police.uk](mailto:Prevent@cheshire.pnn.police.uk)

