



SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY 2019

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1. Introduction

Nulogic Training is committed to the personal wellbeing of each learner and teacher by ensuring a safe environment for learning. Nulogic strive to innovate education and assist schools in building possibilities and achievements in young people.

As a company, we endeavour to create a positive and friendly working environment to implement learning and improve employment opportunities where everyone is treated with respect and dignity

Our vision is to give a high calibre, influential and comprehensive alternative provision choice for challenging and non-motivated young people with behavioural issues for whom standard education neglects to give the suitable open doors and learning preparations.

We strive to work closely with schools to understand our learner's specific and unique needs. We are also committed to working together with both Statutory and voluntary partners complying with interagency standards to ensure safeguarding remains a priority in the delivery of our services.

This Safeguarding Policy its associated Safeguarding Procedures seek to ensure that Nulogic Training undertakes its responsibilities with regard to protection of children young people and will respond to safeguarding concerns appropriately. The policy establishes a framework to support staff and teachers in their practices and clarifies the organisation's expectations.

The Policy and Procedures will be made available to all staff. Contravention of these Safeguarding Policy or Procedures and Nulogic Training Code of Conduct could lead to suspension and or disciplinary action.

They are supported by the Coventry and Warwickshire Safeguarding Children Board procedures Manual at:- <http://www.proceduresonline.com/covandwarksscbb/content.html>

Managing Director – (Aron Wint)

2. Basic Principles and Definitions- Safeguarding children and young people

Safeguarding is about protecting children and young people from significant and serious harm and keeping them safe. It involves identifying children who have unmet needs and protecting those who may be at risk of harm. Working together with learners, schools and other agencies in order to protect them from avoidable harms.

Definitions- What is Safeguarding? Safeguarding Children (under 18yrs)

Safeguarding Children is the process of protecting children and young people (under 18years) from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

A child is someone who has not yet reached their 18th birthday

In 'Working Together to Safeguard Children 2015' Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;

- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

3. Scope of the Policy

These Safeguarding Policy and Procedures apply to Nulogic Training staff delivering its services on behalf of Nulogic Training. The policy covers all service delivery by Nulogic staff on their own premises or on public or privately-owned premises. i.e. school premises

4. Purpose of the Policy

These policy and procedures are to safeguard and protect learners (children and young people) who are subject to, or at risk of child abuse or neglect.

Nulogic Training understands its responsibility for ensuring that all learners and staff are safeguarded during service delivery and will promote effective and early identification of all safeguarding concerns. It will promote a safer learning environment for learners and staff alike.

Its purpose is to ensure that good safeguarding governance and quality standards are maintained to establish best practice, guidelines and outcomes in safeguarding.

5. Safeguarding Policy Statement

“Nulogic considers safeguarding as a high priority throughout each department of the company. We promote the welfare of children and always want to protect them from harm.”

6. Safeguarding Governance- Roles and Responsibilities

Managing Director- Co-founder

The Managing Director has overall responsibility for ensuring that individuals are aware of and understand the principles of this safeguarding policy and associated procedures. They are ultimately responsible for ensure the following:

- Regularly review and approve safeguarding policy and procedures to ensure they are relevant, up to date and adequate to safeguard learners and staff.
- Ensuring adequate resources for effective safeguarding training.
- Ensure safeguarding training is consistent with the standards of Local Safeguarding Children and Adults Boards.
- Developing a culture that promotes effective safeguarding practices. i.e. quality assurance and review
- Ensure that any complaints / disputes between learners, customers (schools) and staff is handled efficiently and fairly without discrimination in accordance with the procedures set out in this document.
- Deal with reports of possible illegal activity promptly, ensuring the safety and wellbeing of learners and staff in accordance with the procedures set out in this document (see allegations against staff - procedures section).
- Ensure the Policy is accessible by staff and learners and implemented.
- Ensure clear and effective communication pathways in safeguarding to all staff
Review and Monitoring of all safeguarding concerns raised.

Designated Safeguarding Officer / Lead – Roles and Responsibility

A Designated Safeguarding Lead will be appointed to provide ready and accessible support and guidance to staff, learners, customers and parents on safeguarding matters and will have attended a higher level of safeguarding training (Level 2). Their main duty is for responding to initial concerns or disclosures raised by staff.

They are also responsible for:

- Ensuring that all Safeguarding Concerns are recorded
- Liaising with statutory services in an emergency situation i.e. Police
- Provision of a deputy safeguarding lead in his/her absence.
- Nominate relevant liaison staff member during any criminal or safeguarding enquiries/investigations
- Communicate regularly Safeguarding updates to the Managing Director and staff

The Nulogic Training Designated Safeguarding Officer / Lead and deputy are:-

- Bradley Reece-Jones 07864217608 or breece-jones@nulogictraining.co.uk
- Aron Wint 07864214687 or awint@nulogictraining.co.uk

Staff - Roles and Responsibilities (including sub-contracted staff)

All staff have a shared responsibility to safeguard and promote the welfare of children and adults at risk and need to know how to respond when they have a safeguarding concern about a client. All staff working with learners will have undertaken Level 1 Safeguarding Training.

All staff are responsible for reporting: -

- any dispute with a learner or parent/responsible adult
- suspected abuse or neglect of any child or adults at risk immediately to their Designated Safeguarding Officer.
- any inappropriate behaviour or illegal activity identified within a class session by the learner or third party

In an emergency situation staff may be expected to report urgent cases direct to statutory agencies, i.e. the Police 999. (see Emergency Procedures for more guidance.)

7. Sharing Information

All staff are subject to a Common Law Duty of Confidentiality and must abide by this. Personal information held by Nulogic Training is subject to a legal duty of confidentiality and will not normally be disclosed without the consent of the individual. However, the right to confidentiality and respect for private and family life (Article 8, Human Rights Act, 1998) is not absolute.

The only exceptions to this are where confidentiality can be overridden either by a court order or other legal authority (e.g. Prevent Duty), or in the public interest i.e. in order to safeguard a child.

Public interest justifications usually relate to disclosures to prevent significant or serious harm to third parties or to prevent or to prosecute a serious crime. e.g. suicide pacts, terrorist threats, unsupervised young child.

Nulogic Training will ensure all staff are clear about situations when they can share information with schools, statutory agencies and other appropriate professionals, working together within local information sharing protocols. i.e. when they believe a child has suffered or is likely to suffer serious or significant harm.

Nulogic Training staff will give due regard to relevant legislation, guidance and local information sharing protocols when making decisions on sharing information. They will update such protocol in line with new legislation as it is released. (Data Protection Bill 2017)

See Information sharing advice for safeguarding practitioners- DfE 2015 for more advice.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Privacy

All personal details about the learners and parents, including contact address and phone numbers, will remain private and confidential. All such data held will be in accordance with the Data Protection Act 1998.

8. Recruitment Selection and Training

The Safeguarding Vulnerable Groups Act 2006 requires Organisations to carry out specific vetting (enhanced DBS) and checks on 'references' on staff or volunteers if they are to perform 'regulated activity'. I.e. work closely with children. Nulogic Training will maintain a single Central record of Recruitment and Vetting Checks for up to date information.

The advertisement, recruitment and training of all Nulogic Training staff (including sub-contracted staff) will comply with current DfE Keeping Children Safe In Education National Guidance 2016.

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

(See also Safeguarding Procedures Code of Conduct and Recruitment Procedures)

Training

Nulogic Training identifies that raising awareness of safeguarding issues, policies and procedures is fundamental to the development and maintenance of a safe environment and safer service delivery.

It will ensure that appropriate safeguarding training is provided to all staff to assist them in:

- preventing abuse
- recognising abuse
- recording concerns
- responding appropriately to allegations of abuse
- know who to tell, and
- when information can be shared.

It will also ensure all staff will have access to and comply with its Safeguarding Policy and Procedures and its Code of Conduct in understanding the behaviour expected in the delivery of Nulogic Training services.

Nulogic Training will ensure that all staff and learners have read and understood these Safeguarding Policy and Procedures prior to delivery of services. It will also ensure that staff will be kept informed of all safeguarding updates annually.

9. Safeguarding Allegations against staff

Nulogic Training recognises its duty to report concerns or allegations against its staff by a parent, learner or school teacher (customer).

Staff must comply with their Code of Conduct during all communications with learners, parents and customers (schools) in order to promote safer working practices.

It will deal appropriately and promptly with such allegations or concerns and refer all safeguarding concerns or allegations about its staff immediately to

- the appropriate named school contact, and
- the local authority social services safeguarding team i.e. Local Authority Designated Officer (LADO).

Coventry Local Safeguarding Children Board (LSCB) - LADO

Email: LADO@coventry.gcsx.gov.uk

Tel: 024 7683 3443

Room 123

Civic Centre 1

Little Park Street

Coventry

CV1 5RS

For more information go to Coventry Safeguarding Children Board Procedures at http://www.proceduresonline.com/covandwarksscb/p_alleg_against_staff.html

DBS requirement and duty to Report

Nulogic Training has a legal duty to report any concerns about the 'relevant behaviour' or 'relevant harm / conduct' of its staff to the Disclosure and Barring Service (DBS).

i.e. Where they have:

- behaved in a way that has harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates that he or she would pose a risk of harm if they work regularly or closely with children.

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#how-to-make-a-referral>

Any staff member reported for illegal activity whilst delivering Nulogic Training services will be reported to police and immediately suspended pending a disciplinary investigation.

10. Complaints and Whistle-blowing

Nulogic Training takes seriously the conduct of staff and the standard of delivery of its educational services. Nulogic will make available its staff Code of conduct to learners, parents, Schools (customers) and visitors to Nulogic Premises.

Any complaint identified as a safeguarding concern will be forwarded to these safeguarding procedures for action. (see Complaints Policy)

The Public Interest Disclosure Act 1998 introduced protection for workers from reprisals for disclosing information in the public interest. It emphasises the importance that the role 'whistle-blowing' can play in deterring and detecting malpractice and abuse of children and adults at risks.

Nulogic Training will promote practical arrangements for whistle-blowing to enable their staff to voice their concerns, made in good faith, without fear of repercussion. Any staff member who uses the 'whistle blowing' procedure will be made aware that their employment rights are protected.

Staff members will be supported in this individual responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children and young people is concerned.

Nulogic Training will:

- Ensure they have appropriate whistle-blowing policies in place
- Ensure that they have clear procedures for dealing with allegations against staff.
- Encourage and support staff to report any behaviour by colleagues that raises concern regardless of source.

11. Quality and Review

Nulogic Training is committed to striving for excellence in the provision of all its services. It will actively engage in the review and monitoring of learner and parent questionnaires, and complaints. It will review and monitor all safeguarding concerns on a quarterly basis to identify any trends or themes.

12. Underpinning Legislation and Guidance

These policies and procedures aim to ensure that all persons using Nulogic Training services can do so safely within child and adult at risk safeguarding standards and UK law. Below is a list of the related legislation and National Guidance.

- **The Children Act 1989** places a legal duty on the local authority to make enquiries if they have reasonable cause to suspect a child is suffering or likely to suffer significant harm to enable them to decide whether to take any action in order to safeguard or promote the child's welfare.
http://www.opsi.gov.uk/acts/acts1989/ukpga_19890041_en_1
- **The Children Act 2004 Section 11** of the Children Act 2004 placed duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children, e.g. Police, NHS, Local Authorities, Probation, Prisons and Offending services.
<http://www.legislation.gov.uk/ukpga/2004/31/contents>
- **Working Together to Safeguard Children - HM Government 2015:** A Guide to inter-agency working to safeguard and promote the welfare of children. These documents define the categories of child abuse and provide a useful list of signs and symptoms.
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **The United Nations Convention on the Rights of the Child** - every child has the right to be loved and cared for and to be safe and well, to be offered a good standard of education, to be protected from exploitation and to have opportunities for rest and play (1991). Similarly, all children have the same rights and the same value, regardless of age, race, culture, gender, disability, or social/economic background.
<http://www.unicef.org/crc/>

- **What to do if you're worried a child is being abused (DOH 2015)**- The guidance is accompanied with flowcharts following the procedure from referral, initial assessment, emergency action that might need to be taken, through to what happens after a strategy discussion and child protection review conference.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
 - **Keeping Children Safe in Education DfE 2016**
This document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply in order to keep children safe. It should be read alongside statutory guidance.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf
 - **Safeguarding Vulnerable Groups Act 2006** – (as amended by the Protection of Freedoms Act 2012) Created the Independent Safeguarding Authority along with Vetting and Barring Scheme to help prevent unsuitable people from working (paid or otherwise) with children and Adult at Risks. In 2012 The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) merged into the Disclosure and Barring Service (DBS). CRB checks are now called DBS checks.
<http://www.legislation.gov.uk/ukpga/2006/47/contents>
<http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>
 - **Safer Working Practices DCSF 2009**- Whilst this practice guidance is archived, it continues to provide clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts.
<http://webarchive.nationalarchives.gov.uk/20100202180143/http://www.dcsf.gov.uk/evrychildmatters/resources-and-practice/IG00311/>
- A revised edition was published in 2015 by the Safer Recruitment Consortium, however this is specifically aimed at educational settings. There is however useful information within the guidance document.
<http://www.saferrecruitmentconsortium.org/GSWP%20Oct%202015.pdf>
- **Recruiting Safely – CWDC 2009** – Whilst this document is now archived it continues to provide an overview for individuals and organisations seeking to understand the task of safer recruitment within the wider safeguarding agenda. It provides a list of key issues that need to be considered when undertaking safe recruitment.
<http://webarchive.nationalarchives.gov.uk/20130403233802/https://www.education.gov.uk/publications/eOrderingDownload/summary%20guidance%20on%20safer%20recruitment%20nov%202009.pdf>
- This document needs to be read in conjunction with information on the below website for making safer recruitment decisions.
<https://www.gov.uk/government/policies/helping-employers-make-safer-recruiting-decisions>
- **The Equality Act 2010** - this puts a responsibility on public authorities to have due regard to the need to eliminate discrimination and promote equality of opportunity. This applies to the process of identification of need and risk faced by the individual child and the process of assessment. No child or group of children must be treated any less favourably than others in being able to access effective services which meet their particular needs.
<http://www.legislation.gov.uk/ukpga/2010/15/contents>

<https://www.gov.uk/guidance/equality-act-2010-guidance>

- **Data Protection Act 1998**

The Data Protection Act 1998 gives effect throughout the United Kingdom to an EC Directive of 1995. It requires compliance with eight Data Protection Principles which set out standards for processing and handling information.

Where you have concerns that the actions of some may place children at risk of significant harm or adults at risk of serious harm, it may be possible to justify sharing information with or without consent for the purposes of identifying people for whom preventative interventions are appropriate.

<https://www.gov.uk/data-protection/the-data-protection-act>

- **Sharing Information DCSF 2015**

This HM Government advice is non-statutory, and has been produced to support practitioners in the decisions they take when sharing information to reduce the risk of harm to children and young people. This advice is for all frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case by case basis. It might also be helpful for practitioners working with adults who are responsible for children who may be in need.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

- **Counter-Terrorism and Security Act 2015 –**

Section 26 of the Act places a duty on partners of Local authorities and certain bodies, in the exercise of their functions, to have “*due regard to the need to prevent people from being drawn into terrorism*”.

<https://www.gov.uk/government/publications/prevent-duty-guidance>

- **Prevent Duty Statutory Guidance HM Gov 2015**

The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

<https://www.gov.uk/government/publications/prevent-duty-guidance>

- **The Prevent Duty Guidance for schools and child care- DfE 2015**

This advice complements the statutory guidance and refers to other relevant guidance and advice. It is intended to help schools and childcare providers think about what they can do to protect children from the risk of radicalisation.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

- **The Children and Social Work Act 2017 (the Act)**

is intended to improve support for looked after children and care leavers, promote the welfare and safeguarding of children, and make provisions about the regulation of social workers.

<https://www.local.gov.uk/get-act-children-and-social-work-act-2017>

13. Glossary

For an up to date reference of acronyms and terms used in these Policy and Procedures go to the Coventry and Warwickshire Safeguarding Children Board Procedures Manual

http://trixresources.proceduresonline.com/nat_key/index.htm

14. Useful Websites

Coventry Local Safeguarding Children Board

Further guidance and support can be found on Coventry Local Safeguarding Children Board <http://www.coventry.gov.uk/lscb> with its Policies being accessed online at:-
<http://www.proceduresonline.com/covandwarksscb/>

West Midlands Safeguarding Adults

Coventry City Council also has The West Midlands Safeguarding Adults Policy and Procedures for more support and information about adult safeguarding at:-
http://www.coventry.gov.uk/downloads/download/3604/west_midlands_adult_safeguarding_policies_and_procedures