



Child Protection, Safeguarding and Prevent Policy

Policy Statement

KEITS Training Services Ltd aspires and endeavours to ensure that all necessary steps are taken, to protect learners and staff from harm.

This policy establishes KEITS's position, role and responsibilities regarding child protection, safeguarding and Prevent and clarifies what is expected from everybody involved in KEITS Ltd. operations. It clearly highlights the importance placed by Governors and Senior Management in the protection and education, of its learners, employers who work with KEITS Ltd. and our staff team.

KEITS Ltd. undertakes to educate all learners and staff with regard to British Values and their role in helping to underpin Prevent Duty.

KEITS Ltd. is required, in line with Section 26(1) of the Counter Terrorism and Security Act 2015 ("the Act"), to have due regard to the need to prevent people from being drawn into terrorism, when exercising their functions. Our duty as an independent training provider, is to help prevent people being drawn into terrorism, which includes not just violent extremism, but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. We also understand our contractual obligation to report any significant learner welfare issues and Prevent referrals we make to the Department of Education.

Policy Responsibility

Every learner who undertakes a training programme managed by KEITS Ltd. or anyone employed by KEITS Ltd. should be able to participate in an enjoyable and safe environment and be protected from harm. This is the responsibility of all KEITS Ltd. staff, employers, stakeholders and contractors. KEITS Ltd. recognises the importance of working with learner's employers to support them to recognise and respond appropriately when their apprentices/learners may be feeling vulnerable and may be at risk of abuse or being drawn into potentially harmful situations.

KEITS Ltd. recognises that harassment and abuse can be an emotive subject and it is important therefore, to understand the feelings involved and not to allow them to interfere with judgment, regarding any action that needs to be taken.

KEITS Ltd. recognises its responsibility to safeguard and promote the welfare of children, young people and vulnerable adults by protecting them from physical, sexual or emotional abuse, neglect, bullying, harassment or victimisation.

The Children Act 1989 defines a child as anyone who has not reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a Young Offenders' Institution does not change his or her status or entitlement to services or protection. This also applies to vulnerable adults and particularly care leavers.

This policy is written in accordance with (local) Safeguarding Children Board Procedures and current Keeping Children Safe in Education Guidance.

This policy and all associated guidance will encompass the Prevent Strategy and Channel Programme, to safeguard vulnerable people from being drawn into violent or terrorist behaviour.

All learners and KEITS Ltd. staff members whatever their race, disability, sex, gender reassignment, age, religion or belief, sexual orientation, marriage or civil partnership status, pregnancy or maternity status, in line with Single Equality Legislation, have the right to be protected from harm.

The welfare of the learner or KEITS Ltd. staff member remains paramount. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately, including allegations made against KEITS Ltd. staff. Allegations against staff will be referred to the Designated Local Authority Officer and where necessary, or in case of doubt, allegations or suspicions will be brought to the attention of the police. Information on whistleblowing and the protections afforded to whistleblowers can be found in the KEITS Ltd. Whistleblowing Policy.

Core Responsibilities

Governors

To ensure there are policies and procedures in place, for appropriate action to be taken in a timely manner, to safeguard and promote children's welfare.

To ensure safer recruitment policies and procedures are in place and adhered to.

Undertake appropriate safeguarding and Prevent Training

Designated Safeguarding and Prevent Leads (DSPL)

To keep abreast of changes to legislation and best practice and update policies, procedures and guidance accordingly and disseminate as needed.

To make referrals as necessary.

To organise and monitor appropriate training for all staff.

To provide guidance to DSPOs and Training Consultants in specific cases as needed.

To maintain the Safeguarding log, case folders and single central register.

To provide information and data to governors.

To provide a point of escalation as needed.

Designated Safeguarding and Prevent Officers (DSPO)

To provide first point of contact for Training Consultants or others raising a safeguarding or Prevent concern.

To read initial reports and advise on course of action.

To escalate cases to DSPLs as appropriate and in every case where a referral may be necessary.

To follow up cases to conclusion or until learner leaves their programme.

To add new cases to safeguarding log and update as necessary and save all relevant documentation to the case folder.

Training Consultants

To provide first point of contact for learners wishing to make a disclosure or raise a concern. To complete a report form for all safeguarding and low-level concern cases and forward to the DSPO or DSPL via email within 48 hrs., or immediately if a high-risk disclosure (serious risk of harm including potential suicide, incidents of self-harm, potential radicalisation, physical abuse, sexual exploitation).

To follow up actions as agreed with DSPO or DSPL, report back and update reports as necessary.

Policy Key Features

Promotion of Child Protection, Safeguarding and Prevent Policy to include on-going protection and guidance:

- KEITS Ltd. will work with the relevant local safeguarding partners to safeguard and promote the welfare of children including identifying and responding to their needs.
- Safeguarding partners comprise:
 - the local authority (first port of call)
 - the chief officer of police for a police area
 - a clinical commissioning group for an area
 - the appropriate regional Prevent Officer
- Where a potential learner has an EHC plan, KEITS Ltd. will hold a preliminary meeting with all other invested parties, to establish if we are in a position to support the individual learner going forward and will be able to keep them safe, given their additional needs.
- This policy is promoted to all learners, learner's employers, staff members and contractors as part of the initial engagement process.
- It is covered with learner's employers as part of the initial contracting process. They are provided with a copy of this policy and associated guidance, which form a significant part of the contract agreement for services, to ensure their understanding and commitment to keeping learners safe. They provide a named point of contact for safeguarding matters and are provided with details of relevant KEITS Ltd. staff, for them to report any potential incidents.
- For learners it forms an integral part of their introductory activities with training and guidance supported through the e-learning portal and includes an assessment to gauge the learner's initial understanding. All aspects of safeguarding, British Values and Prevent are embedded into vocational sessions as appropriate throughout the learner's course. This is regularly followed up by Training Consultants at progress reviews to develop a learner's awareness, to ensure that their understanding is refreshed, to provide opportunity for one-to-one discussion and to highlight topical and local developments that will help to make it real and relevant to the learner and to confirm understanding. There is also further specific online training for all under 18-year-old learners, to inform them of sexual abuse, harassment and consent in line with current guidelines. They will be provided with contact details for Designated Safeguarding and Prevent Officers for them to contact independently, should they have any concerns at any time during their course. Learners and their employers can also use the dedicated, secure email address which is monitored by DSPO/DSPL staff on a daily basis. This address is clearly shown on e-learning portal and in all staff email signatures.

- Online safety and appropriate use of IT is covered with all learners, at an appropriate level for their age and level of learning, as part of their curriculum. Learners are encouraged to develop the skills of research and critical thinking to assist them with identifying appropriate sources of reliable information, to assist them with their studies and to develop them to become an active and effective member of society, during and after their programme of study.
- All safeguarding cases (including low level concerns) will be reported, investigated, actioned, recorded and reviewed/risk assessed in line with company procedure.

Staff are provided with specific in-house induction to raise understanding of safeguarding, Prevent and British Values and how they are embedded throughout KEITS Ltd. practice. This specifically includes information on recognising, reporting and recording suspected and actual incidents that may be safeguarding and/or Prevent related. This is supported by e-learning modules to include Prevent for FE practitioners according to their job role and responsibilities. Specific update training is provided on a regular basis as part of the annual CPD programme as determined by the performance review cycle, local needs and legislative requirements.

Promotion for all stakeholders is further supported by the Equality Matters newsletters which are often related to safeguarding, Prevent and British Values topics and the Quarterly Newsletter which includes relevant articles. The website contains relevant information to promote and raise awareness.

Designated Safeguarding and Prevent Officers contact details are provided within all employer and learner information packs provided at sign up.

KEITS Ltd. Staff recruitment

KEITS Ltd. utilises 'safer recruitment' procedures in line with current Keeping Children Safe in Education guidance, as part of their standard recruitment policy. KEITS Ltd. staff roles and responsibilities are reviewed, to determine the level of risk and appropriate DBS checks are undertaken and references obtained before employment opportunities are confirmed. All staff who have direct contact with learners or potential learners are required to join the DBS update service to allow monitoring by KEITS Ltd. management as required.

Commitment to provide safeguarding for all throughout the organisation, is embedded within all of KEITS Ltd. processes from recruitment to achievement. All staff and learners must agree to abide by the relevant Code of Conduct, and it is implicit within employment contracts and terms of employment.

Raising, Recording and Investigating Possible Incidents

- All staff (paid or unpaid) working in the organisation, contractors and learner's employers have a responsibility to report concerns to the KEITS Designated Safeguarding and Prevent Officer's (DSPO) within 48 hours of any concern being identified, unless it is regarded as a 'high risk' disclosure, when reporting must be immediate. If the Designated Safeguarding and Prevent Officers or Leads are not available for any high-risk disclosure, ALL STAFF are aware of emergency reporting procedures, to the Police and/or specialist external support.

- Safeguarding reports are to be made on the Safeguarding Report Form, this gathers all necessary information in standardised format. This ensures that all information may be reviewed in an efficient manner to enable any further action to be undertaken in a timely fashion. It also provides continuity and consistency if it becomes necessary to hand over to different staff.
- Safeguarding information is held only within a secure folder located in the cloud and access is limited to Designated Safeguarding and Prevent Leads and Officers only, to comply with Data Protection Regulations.
- Concerns are to be raised as soon as is reasonably practicable to DSPO and/or to a DSPL if no DSPOs are available.
- DSPOs/DSPLs will work with the individual who has reported the potential incident to undertake a detailed investigation of the case and will determine the course of action to be followed. Any updates to the case will be recorded and filed with the initial report so that all relevant actions and updates are securely saved in one place to avoid breaches of confidentiality.
- Information advice and guidance will be made available for all KEITS Ltd. stakeholders to enable them to recognise and respond in an appropriate manner, to all situations where a learner or member of KEITS Ltd. staff may feel unsafe, harassed or abused.
- Staff and apprentices have access to a free Health Assured provided helpline.
- Information through signposting to a range of on-line sites and sources to meet employers, staff and learners' requirements for specialist information, advice and guidance, is also available.

Policy Implementation

For Employers

- Training Plans
- Employer contracts for services/training
- Prevent and Anti-Radicalisation Information
- Behaviour reviews and appraisal meetings with learners and Training Consultants
- General newsletter & Equality Matters & Wider Curriculum newsletters
- Website
- Regular reviews with Training Consultants and /or Account managers

For Learners

- Training Plans
- Curriculum Plans
- Initial Learning Activities
- Safeguarding, Prevent and anti-radicalisation training
- Embedding of Safeguarding, Prevent & British Values in teaching resources
- Regular one to one Training & Progress reviews with Training Consultant
- Behaviour reviews with employers, line managers and training consultants
- E-Learning modules relating to sexual harassment, abuse and consent for under 18's
- General newsletter and Equality Matters & Wider Curriculum newsletters
- Website

- Development of Digital Skills to include independent research and critical thinking skills

For staff

- Induction training to include E-learning modules for child safety & Prevent for FE Practitioners according to role and responsibilities
- On-going in-house CPD in line with Performance review cycles
- DBS checks at recruitment and updates in line with job role and responsibilities

All safeguarding concerns should be raised with the Designated Safeguarding & Prevent Officers or Leads:

Karen.Hampshire@keits.co.uk (DSPL) , Kate.Skirrow@keits.co.uk (DSPL),
Jane.Clarke@keits.co.uk (DSPL), Gemma.Catling@keits.co.uk (DSPO),
Jeremy.Curtis@keits.co.uk (DSPO), Jo.OConnell@keits.co.uk (DSPO).

Links to Associated procedures and guidance documents

- Confidential Safeguarding Report Form
- Safeguarding IAG for KEITS Employees
- Safeguarding for Learners
- Safeguarding for Employers
- KEITS Employee Manual
- Dealing with Allegations Against Staff Policy
- Complaints Policy and Procedure
- E-Safety Policy
- Suicide Prevention Guidance

Policy Monitoring, Evaluation and Review

- This policy is monitored and reviewed by the KEITS Ltd. Safeguarding Team.

Further references:

- Safeguarding Children Board's Child Protection Procedures.
- Current Keeping Children Safe in Education Guidance
- Working Together to Safeguard Children - A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children (DCSF 2006).
- Safer Working Practice for Adults who work with Children and Young People.
- (DCSF 2007) Safeguarding Children and Safer Recruitment in Education (DCSF 2007).
- Prevent Duty Guidance for England & Wales_ HM Government

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