

# SAFEGUARDING POLICY AND PROCEDURE

Issued by Gemma Kemp

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## Scope and purpose

Salutem is committed to safeguarding all and expect everyone who works for us to share this commitment. Safeguarding is not just about protecting children, learners, staff, associates, visitors and vulnerable adults from deliberate harm or neglect and failure to act; it relates to broader aspects of care and education. In relation to our learners, safeguarding and promoting their welfare is defined as protecting learners from maltreatment, preventing impairment of learners' mental and physical health or development, ensuring that learners are learning in circumstances consistent with the provision of safe and effective care. Salutem will take action to enable all learners to have the best outcomes and will always act in the best interests of a child.

This policy covers all Salutem learners, staff, associates and visitors; it covers all aspects of a learner's programme regardless of where it takes place. This policy is our overarching safeguarding one.

This policy covers the following areas:

- Legislative duty
- Policy Statement
- Safeguarding: identifying and reporting concerns
- Health and safety: particularly compliance with health and safety at work act
- Broader care
- Key principles
- Learner's entitlement
- Governance and reporting
- Modern slavery policy
- County lines

## Legislative Duty

Salutem has a moral duty and statutory obligation to provide a safe and inclusive learning environment for all, in order to comply with legislation such as the health and safety at work act (1974), equality act (2010), the education act (2002), Prevent duty, and additional legal responsibilities regarding children and vulnerable young adults. A key legal enforcement is in the safeguarding vulnerable groups act (2006) and the protection of freedoms act (2012) which stipulates our additional safeguarding responsibilities when children, vulnerable adults, learners with additional needs and/or disabilities undertake regulated activities.

Keeping children safe in education statutory guidance for schools and college: [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67222/Keeping-children-safe-in-education-statutory-guidance-for-schools-and-college.pdf)

## Children, young people, and Vulnerable adults

### Children and young people

We are committed to safeguarding and protecting the welfare of all children, particularly the need to satisfy legal requirements relating to regulated activities. Regulated activity with children can broadly be defined as:

- Teaching, training, instructing, caring for or supervising children, or providing advice/guidance on wellbeing, or driving a vehicle only for children.

- Any work establishments with opportunity for contact with children.

In accordance with the Children Act (1989 and 2004), a child is any person who has not reached their 18<sup>th</sup> birthday, but an exception related to any employed 16 and 17 years old; they are classed as a young person and not a child. For young people at work, health and safety law states that a child is anyone who has not yet reached the official minimum school leaving age (MSLA). Pupils will reach the MSLA in the school year in which they turn 16.

#### **Vulnerable adults**

We are committed to preventing the abuse and neglect of vulnerable adults. A vulnerable adult is defined by the Protection of Freedoms Act (2012) as a person 18 or over who is in receipt of regulated activity. Regulated activity for adults is divided into six categories, each with detailed sub-categories and a definition of who is to be treated as a vulnerable adult recipient in each case. 1. Providing health care. 2. Providing person care. 3. Providing social work. 4. Assistance with general household activities. 5. Assistance with conduct of a person's affairs. 6. Conveying (transporting from one place to another).

#### **Our Duty to safeguard and protect children, young people and vulnerable adults is to:**

Safeguard and promote the welfare of children, young people and vulnerable adults.

Work to provide an environment in which children, young people and vulnerable adults feel safe, secure, valued and respected and feel confident that any complaint, allegation or suspicion of abuse is taken seriously.

Ensure that there are adequate procedures and arrangements within Salutem to identify, assess, make referrals, and support children, young people and vulnerable adults who are suffering from harm.

Work in partnership with parents and agencies (e.g., police, social care and funding providers) to meet these obligations

Maintain a safe environment.

#### **Referrals**

Salutem recognises that it is an agent of referral and not investigation. It is not our responsibility to investigate abuse. Staff should not extend an offer of confidentiality but should clearly inform the person that if information about abuse is disclosed that there is a duty on staff to follow reporting procedures.

### **Policy statement**

Salutem will:-

- Appoint and train a designated safeguarding lead (DSL) who will co-ordinate Salutem's safeguarding policy and procedure and make these known to all. The DSL will attend regular update training (at least every 2 years).
- Ensure all staff and associates receive training on health and safety, safeguarding and prevent.
- Make all staff and associates aware of safeguarding issues through our induction process and ensure that appropriate screening and checks are conducted during the selection process.
- Select and train staff and associates to adopt best practice to safeguard our learners and themselves from false allegations.
- Provide opportunities for learners to talk about concerns relating to their welfare
- Provide support for learners who have disclosed abuse, and for staff who have experienced disclosure
- Develop and promote effective working relationships with other agencies
- Respond promptly to allegations of abuse or abuse of trust made against employees, or incidents of suspicious poor practice.
- Ensure all learners are aware of what safeguarding means.
- Ensure that learners, employers and other stakeholders are aware of and supported to understand the safeguarding policy and procedure.



## Procedure

### Selection, Pre-start, Vetting and induction

Salutem will:-

- Appoint and train a DSL and the nominated person must be displayed in all Salutem premises
- Screen applicants to assess suitability for the position applied for in conjunction with our safer recruitment policy
- On successful Completion of appointment, prestart and vetting process ensure that all new starters complete an induction which incorporates safeguarding requirements which is recorded in their personal file.

### Staff development

It is the responsibility of Salutem to provide all staff and associates with adequate safeguarding training, so they understand their role in supporting safeguarding across the company.

- All staff and associates safeguarding training that is undertaken is recorded in the CPD log.
- All individuals are expected to act professionally at all times and this includes the need to:-
- Behave, dress and talk to learners in an appropriate way (non-sexual, non-aggressive and not abusing a position of trust)
- Avoid situations where there may be a risk of false allegations or take actions to reduce that risk
- Report and seek the advice of the DSL if they are concerned about a situation, such as a learner having a crush on them or believe an incident may be misconstrued. (the DSL should seek the advice of their line manager if this instance occurs)
- Develop their own understanding of the signs and indications of abuse and be vigilant and sensitive to situations where a child, young person or vulnerable adult may be at risk.
- Know Salutem procedures including how to respond to a learner who discloses abuse
- Know and comply with the requirements for recording all concerns and comments and passing them onto the DSL
- Treat all information received with sensitivity and with due regard to confidentiality and its limits in safeguarding matters
- Respect and promote the rights, wishes and feelings of children, young people and vulnerable adults and be sensitive to their developmental needs and capabilities
- Regard all children, young people and vulnerable adults as having equal rights to protection
- Regard the interests and safety of a young person to be the prime concern. Where there is a conflict of interest between a young person and parent or other adult, the welfare of the person will be considered paramount
- Work in partnership with children, young people and vulnerable adults and their parents
- Contribute to the provision of a safe environment by raising concerns where any premises used by Salutem, and health and safety procedures appear to fall short of acceptable standards
- Be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues or recruitment process.

### Safeguarding: identifying and reporting concerns (appendix A contains further guidance on signs and symptoms, including FGM, Abuse and neglect)

Salutem operates within the following key safeguarding requirements. Please note that some of them relate specifically to children, young people and vulnerable adults, but anything linked to radicalization, extremist behaviour (Prevent), concerns about discrimination, harassment and victimisation linked to the nine protected characteristics under the Equality act (age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex, or sexual orientation) relates to any learner.

## Salutem will act when needed to protect learners from:-

- Neglect
- Physical abuse
- Sexual abuse/violence/harassment
- Emotional abuse
- Bullying, including online bullying and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Radicalisation and or extremist behaviour
- The ideological causes of terrorism
- Child sexual exploitation (and trafficking) and child criminal exploitation
- The impact of new technologies on sexual behaviour, for example "sexting" and accessing pornography
- Teenage relationship abuse
- Issues that may be specific to an area or a population for example county lines, gang activity and youth violence
- Domestic abuse
- Female genital mutilation
- Forced marriage
- Fabricated or induced illness
- Substance misuse
- Poor parenting, particularly in relation to babies and young children
- Honour based abuse. The concept of honour in some Communities deemed to be extremely important. To compromise a family's "honour" is to bring dishonour and shame and this can have severe consequences. The punishment for dishonour can be emotional abuse, physical abuse, family disownment and in some cases even murder.
- E-safety
- Peer on peer abuse: Salutem would address what support is needed for victims and what support might be needed for perpetrators.
- Children missing in education: poor or irregular attendance could be an indicator of abuse or neglect and must be followed up
- Other issues or behaviours that cause concern not listed here but pose a safeguarding risk to children, young people and vulnerable adults and an awareness that:
  - Mental health problems can indicate that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.
  - Children who have a social worker are potentially a greater risk of harm
  - Children with special educational needs and disabilities can face additional safeguarding challenges.

## Safeguarding incident reporting

If staff have a safeguarding concern regarding a learner or staff member, they should raise this immediately with the DSL. If they are not available staff should speak to a member of the board. The equality and diversity policy and Prevent should be referred to as applicable. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purpose of keeping children safe so allows you to share information without consent for a child. The DSL will access advice where required from external agencies; MASH, LADO, local authority children's board, Regional Prevent team

Updated guidance was produced on 4/6/24 as part of the Home Office response to the recommendations of the Independent Review of Prevent there is a new Prevent National Referral form that encourages the person submitting the form to provide as much information as possible about their concern to ensure that specialist officers can make an effective assessment of the Prevent risk and improve data recording. The questions and



terminology have been updated to reflect an updated understanding of susceptibility to radicalisation and to encourage the referrer to consider behaviours and circumstances that could form part of the concern.

**NOTE: We recognise that adults working at Salutem may harm children. Any concerns should be taken to the MD without delay (or where that is not possible to the DSL). Any concerns about the MD should be taken to another board member.**

### Health and Safety (Particularly compliance with Health and Safety at Work Act)

Staff members have designated responsibility for health and safety and first aid. Health and safety is very important to us and all our facilities, resources and health and safety policies and procedures comply with legislative requirements for health and safety. All our employers complete a robust health and safety sign up process. We carry out risk assessments for our training which include mitigating the risk to all staff, learners and visitors.

#### Health and safety reporting

Any injuries, diseases or dangerous incidents need to be logged in the accident book and reported to the Operations Director.

### Broader care and education

Salutem strives to ensure the following learner needs are met, and signposts learners to specialists, such as healthcare professionals, as appropriate:

- Learner's health and safety and wellbeing, including their mental health.
- Needs of learners who have special educational needs and/or disabilities are met
- Staff must use de-escalation techniques and promote a positive culture. Poor behaviour must be recorded and reported to the DSL as it could be a sign that the learner is suffering from harm or being traumatised by abuse.
- Needs of learners with medical conditions are met
- Adequate first aid is available
- Learners are safe on educational visits; includes the completion of pre-visit risk assessments
- Emotional well-being and intimate care
- Online safety and associated issues – please refer to Salutem IT Policy for full details
- Appropriate arrangements to ensure learners' security considering the local context
- Any learner with repeated or prolonged periods of absence will be contacted by the DSL

### Key principles

- All people will be treated with respect and with courtesy by staff and learners in an environment that is free from harassment or discrimination
- All training rooms, communal areas, facilities and equipment comply with legislative health and safety standards.
- Salutem will work with learners and other agencies to promote a safe and healthy culture.
- Salutem will proactively develop partnerships to protect young people and vulnerable adults at risk from abuse or neglect.
- Staff and associates will be trained and will have a clear understanding of personal safety and good safeguarding practices.
- Salutem will work with learners to promote their own personal health, well-being and safety including their safety on the internet so that learners are taught to recognise when they are at risk and how to get help if needed. Learners will be provided with advice on being safe online, inclusive or raising awareness of the Prevent duty and dangers of being drawn into radicalisation via online applications, and who to contact about concerns.
- Learners will be signposted to external agencies where specialist support is required.

**Learners' entitlement: to promote a healthy and safe environment. Our learners will be entitled to the following: -**

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively, and appropriately.
- To learn in an inclusive environment free from bullying or harassment; mutual respect for all is promoted through our Equality and Diversity and Prevent and British Values policies and training.
- To be made aware of the basic principles of safer learning and safeguarding relevant to the programme that the learner is completing though health and safety being embedded into all training programmes from induction onwards
- To be made aware of how to access support on health and safety issues.
- To be provided with up-to-date information around personal safety issues. Delivery programmes are designed to embed this information.
- The opportunity to comment and feedback on the extent to which Salutem and our courses promote and maintain well-being and personal safety. Particularly through learner feedback surveys.
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment.
- Empowered to create communities that are resilient to extremism and to protect those who may be vulnerable being drawn into violent extremism or crime. The values of respect and tolerance are embedded within teaching and learning sessions, and in accordance with our prevent and British Values policy, any learner who may be at risk from radicalisation including ideological causes of terrorism would be supported and signposted to further external sources of support where appropriate.
- To have a clear understanding of safeguarding, and what this means to them. Safeguarding awareness is delivered throughout the programme and recorded within the ILP and progress reviews.
- To have awareness and support to understand the safeguarding policy.
- Employers are made aware of the safeguarding policy through employer engagement at the start of the programme.

**Learner and staff/ associates safeguarding inclusive of prevent incident reporting:**

This is explained in the induction. Learners/staff/ associates are encouraged to raise a safeguarding concern with any member of staff and the disclosure will be forwarded to the DSL or in their absence the MD. Safeguarding concerns can be reported by learners directly to the DSL using the contact details below:

Emily Humphrey Tel 07701 353881 Email [Emily.Humphrey@salutem.co.uk](mailto:Emily.Humphrey@salutem.co.uk)

**Employer safeguarding, inclusive of prevent, incident reporting**

To fully comply with safeguarding and prevent requirements, we work with employers to raise awareness of safeguarding and the prevent duty. Complaints can be raised using our complaints form which is available by letter or email to Ross Green either through the email address above or via post marked confidential to:

Ross Green,  
Salutem,  
Catherine St,  
Aston  
B6 5RS

**IT Monitoring**

We are cyber essentials compliant and work with Croft who support us in ensuring we are compliant with the protocols we have in place.



We inform and educate our learners by issuing them with this policy on safeguarding and appropriate behaviour for staff and students, as well as our IT policy and all students sign to confirm they have received the policies and agree to abide by them as part of their very thorough induction process before they are allowed to access our IT.

We monitor their IT behaviour using Senso monitoring and we can track and trace individual users. We have robust controls including a firewall which stops access to sites to stop them from being subject to radicalisation including ideological causes of radicalisation, extremism, or sexual content which allows us to challenge and act against any inappropriate activity. Please refer to the IT policy for full details.

## Governance and Reporting

The directors work with the DSL to closely monitor and respond to any safeguarding issues; they are responsible for the approval of relevant safeguarding policies. The DSL is responsible for ensuring that processes and procedures for the protection of children, young people and vulnerable adults, and all learners are robust and consistently applied so that Salutem fulfils its legal duties. Salutem will work with Local Safeguarding children boards, local authority designated officer, and other agencies to seek advice when required to ensure a comprehensive Safeguarding network is in place.

Reporting to external bodies:

Reporting an incident or Safeguarding concern **see appendix 1** to record internal safeguarding concerns raised by Salutem staff/ associates and must be submitted to the DSL. On deciding how to proceed the DSL will follow the Safeguarding reporting process **See appendix 2** which explains how to make a referral to the appropriate external body.

- **The Directors**

Are responsible for ensuring that all staff have an understanding of safeguarding, receive appropriate training and development and that safe recruitment policy is followed at all times. They will ensure that safeguarding is given high priority within their teams.

- **All staff/ associates**

Are responsible for working in keeping with our core values and completing their safeguarding training, as requested by the DSL or directors, and must familiarise themselves with the policy. Once completed, training activities are recorded on the CPD log by the administrator and monitored for compliance.

- **All staff/ associates**

Keep up to date with HM government requirements through training and reading:

- **Keeping children safe in education:** statutory guidance for schools and colleges. [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/626212/Keeping-children-safe-in-education-2016.pdf)
- **The Prevent duty.** [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/626212/Keeping-children-safe-in-education-2016.pdf)
- **Channel Guidance.** [Channel and Prevent Multi-Agency Panel \(PMAP\) guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/626212/Keeping-children-safe-in-education-2016.pdf)
- **Contest Strategy.** [Counter-terrorism strategy \(CONTEST\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/626212/Keeping-children-safe-in-education-2016.pdf)

And any other related safeguarding policies, to ensure that they understand their own role in the promotion of safeguarding and the appropriate action should they receive a disclosure.

The DSL should complete designated safeguarding lead training every 2 years and any relevant training to reflect new legislation and updates where required. All delivery staff and associates complete:-

- Online safeguarding training every 2 years
- Prevent training annually
- Further training during standardisation/team meetings
- Relevant training to reflect new legislation and updates where required



**Salutem**  
Your training partner

Salutem Limited  
Catherine St  
Aston  
Birmingham  
B6 5RS

Tel: 0121 326 1450

All training is recorded in the CPD log.

### Modern Slavery policy

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Salutem recognises that as a commercial organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms. We are committed to preventing slavery and human trafficking in our activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

### County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one of more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county line gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Staff and associates will work with learners to raise awareness of this issue.

**Please see Appendix A for further guidance on signs and symptoms of abuse.**

Gemma Kemp  
Director