

DESIGNATED SAFEGUARDING LEAD: SYED USMAN SHAUKAT, DIRECTOR

STATEMENT OF PURPOSE

SUS Consultancy Services fully recognises its responsibility for the protection of children and adults at risk and for safeguarding and promoting welfare to all learners and staff. SUS Consultancy Services is committed to providing a secure environment for learners, and staff where learners feel safe and are kept safe. All staff at SUS Consultancy Services are aware and have explained that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

SUS Consultancy Services aims to create and maintain a safe environment for all learners, staff, volunteers, contractors and visitors to our training centre or delivery premises.

SCOPE

The policy applies to all staff at SUS Consultancy Services including contractors.

OBJECTIVES OF THE POLICY

- To promote an environment that is safe, where staff and learners treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff, teaching and non-teaching, of the need to safeguard young people and adults at risk and of their rights and responsibilities in identifying and reporting possible cases of abuse or neglect.
- To provide a systematic means of supporting young people and adults at risk, known or thought to be at risk of harm.
- To ensure that appropriate risk assessments are undertaken by SUS Consultancy Services and other managers to ensure that learners are safeguarded.
- To ensure that relevant safeguarding information about a young person or adult at risk is disseminated to appropriate staff within the centre on a 'need to know' basis.
- To ensure that partner organisations who support the delivery of our programmes have appropriate safeguarding and child protection policies and procedures in place.
- To involve learners in the decisions on safeguarding concerns and ensure they are shared with relevant agencies when appropriate. Also, with parents of children
(unless advised against this by the safeguarding team or in case of external contracts the client's safeguarding contacts.)

To ensure that all staff who have access to young people or adults at risk have been checked for their suitability through safer recruitment procedures.

- To ensure all staff will receive appropriate training over a period of time including an introduction at all staff inductions.

PREVENT

Prevent is part of a Government initiative to develop a robust counter terrorism programme, CONTEST.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health.

SUS Consultancy Services has been looking to do this prior to these requirements and refers to the following:

- Prevent Action Plan
- Safeguarding Policy and Procedure
- Wellbeing
- Safe learners Policy and Procedure
- Equality and Diversity and Equal Opportunity Policy and Procedure
- Prevent Policy and Procedure

LEGISLATION

This policy has been written to ensure our safeguarding arrangements comply with statutory requirements and current good practice, and pays particular regard to:

- Keeping Children Safe in Education (September 2020)
- The Children Act 1989
- The Children Act 2004
- UN Convention on the Rights of the Child
- Data Protection Act 1998
- Sexual Offences Act 2003

- Protection of Freedom Act 2012
- Working Together to Safeguard Children 2015 – Amended February 2017
- Equality Act 2010

DEFINITIONS

Safeguarding:

Preventative or precautionary planning and measures against potential harm or damage to someone.

Child Protection:

The policy and procedures in place to protect and/or remove a child from harm or risk of harm.

Abuse:

Any treatment that causes harm. This can include physical, sexual, emotional abuse, and/or neglect.

Child protection issue:

An issue raising a concern about harm or risk of harm to a child or young person.

Child:

A child is defined in law as a person under the age of 18 years.

Adult at risk:

An adult aged 18 and over who is unable to protect themselves from abuse and neglect, due to a care and support need which is permanent or temporary which is either met or not met by the local authority.

Young person:

A person aged up to 25 years old.

Staff:

‘Staff’ means all employees, full-time and fractional, and all agency, franchise, contract and volunteer staff working for SS group of companies.

DSO:

Designated Safeguarding Lead.

KEY SAFEGUARDING PRINCIPLES

- All learners have the right to be safeguarded from harm and exploitation so all complaints, allegations or suspicions must be taken seriously.
- The procedures laid out in this document must be followed whenever an allegation is made that a learner has been abused.

- Absolute promises of confidentiality should not be given as the matter may develop in such a way that these might not be able to be honoured.
- If the complaint comes directly from the learner, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must always be avoided.
- A full record of any discussions must be made immediately after any conversations with the learner and referred to the DSO that same day.
- SUS Consultancy Services have a responsibility to provide a safe environment and minimise risks of harm to learners' welfare

Keeping Children Safe in Education 2020

SUS Consultancy Services are aware of their responsibility to align their safeguarding practices with the statutory guidance Keeping Children Safe in Education 2020. All staff are issued with a copy of the document and confirmation of reading it is kept on file. All new staff that join the organisation will be issued with the document as part of their Induction, alongside the safeguarding policy and mandatory safeguarding training.

Definitions of Abuse

- Physical abuse may take many forms e.g., hitting, shaking or poisoning. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health.
- Emotional abuse is the persistent emotional ill treatment, such as to cause severe and persistent effects on emotional development. Some level of emotional abuse is involved in most types of ill treatment though emotional abuse may occur alone.
- Sexual abuse involves forcing or enticing someone to take part in sexual activities. This may include non-contact activities such as looking at, or in the production of pornographic materials, watching sexual activities or encouraging others to behave in sexually inappropriate ways.
- Neglect involves the persistent failure to meet someone's basic physical and/or psychological needs, likely to result in the serious impairment of their health and development. This may involve failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

THE CONTEXT OF ABUSE

Family Circumstances: Domestic Violence

Where there is domestic violence the implications for a learner or for younger children in the household must be considered. People from families with a history of domestic violence often have behavioural difficulties, absenteeism, ill health, bullying, and drug and alcohol misuse.

Drug and alcohol abuse

There is an increased risk of violence in families where this occurs. A young person may have to take on responsibilities for younger children in the family.

Modern Slavery

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Forced Marriages

Forced marriage is an entirely separate issue from arranged marriage. Forced marriage is abuse of human rights and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage are usually experiencing physical and/or emotional abuse at home.

Mental Health Issues

- i. Self-harming and suicidal behaviour
- ii. Self-harm, suicide threats and gestures by a young person or adult at risk must always be taken seriously and may be indicative of a serious mental or emotional disturbance. The possibility that self-harm, including a serious eating disorder has been caused or triggered by any form of abuse or chronic neglect should not be overlooked

Abuse by peer group: bullying, racism and abuse

- i. Bullying is a common form of deliberately hurtful behaviour, usually repeated over a period of time, when it is difficult for the victims to defend themselves.
- ii. It can take many forms, but the three main types are physical (e.g., hitting); verbal (e.g., threats); and emotional (e.g. isolating the individual).
- iii. It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour which is offensive to those with learning or physical disabilities.

- iv. Severe harm may be caused by the abusive and bullying behaviour of their peers. The damage inflicted by bullying is often underestimated and can cause considerable distress. In extreme cases it can cause significant harm, including self-harm.
- v. Initiation or hazing type violence occurs in a range of group situations such as gangs, sport teams. The initiation rites can range from relatively benign pranks to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct.

RESPONSIBILITY

Employees, self-employed and volunteers

- All employees are required to familiarise themselves with this policy and procedure and follow this at all times
- If you have concerns about the welfare of a child, young person or vulnerable adult and believe that they may be at risk of, you must share that concern confidentially with a local safeguarding lead immediately
- Any information shared should always be accurate, up to date and shared appropriately and securely with only the person or people who need to know and limited to information relevant for the purpose. If you have any doubts about when to share safeguarding information, discuss the situation with a safeguarding lead
- Everyone must complete their required Safeguarding Awareness and Prevent Training to help increase their knowledge of safeguarding and prevent issues
- Everyone working in a regulated activity must read and familiarise themselves with the statutory guidance Keeping Children Safe in Education (September 2020)
- If you feel that you could benefit from further training on safeguarding or child protection, then please contact your Safeguarding Lead

Line Managers

- Support and encourage the completion of required Safeguarding Awareness and Prevent Training
- Ensure all direct reports working in a regulated activity have read and familiarised themselves with Part 1 of the statutory guidance Keeping Children Safe in Education (September 2020)
- Adopt SUS Consultancy Services's culture of vigilance and lead by example

Senior Management Team

- The Senior Management Team are responsible for understanding the nature of the threat and

the risks of extremism and radicalisation within SUS Consultancy Services

- They will ensure that SUS Consultancy Services effectively manage risks and is able to deal appropriately with issues of radicalisation and extremism by:
 - creating an ethos which upholds core values of shared responsibility and wellbeing for all, while promoting respect, equality and diversity and understanding
 - adopting stringent and transparent safeguarding/prevent duty practices which recognise, support and protect individuals who might be susceptible to radicalisation
 - sharing information about safeguarding/prevent duty and good practice with other key stakeholders and external agencies

 - providing training opportunities for staff and volunteers to enable them to continually update their safeguarding and prevent knowledge
 - sharing information and concerns with agencies who need to know and ensuring we involve learners, parents, staff and others in an appropriate way
 - providing effective management for staff and volunteers through supervision, support and training
 - ensuring plans are in place to minimise the potential for acts of violent extremism.

Designated Safeguarding / Prevent Lead

- The designated lead Syed Shaukat is the single point of contact for Safeguarding and Prevent, to support the Senior Management Team to fulfil their responsibilities and to ensure that:
 - this policy is implemented across the organisation
 - any concerns are shared with the relevant organisations in order to minimise the risk of people becoming involved in terrorism
 - appropriate training is in place that is relevant and regularly reviewed and updated
 - develop and work with partners and support networks to ensure up to date information and resources are received, acted on and cascaded
 - practices are reported on for the Senior Management Team and the Board of Trustees on a quarterly basis

- reviews the implementation and effectiveness of the policy on an annual basis ○ Take lead responsibility for managing child protection issues and cases in their centre, operation or team.
- Provide advice and support to other staff, making referrals to and liaising with external parties as necessary, such as the local authority and other agencies, like the DBS or Police.
- Be aware of the Local Safeguarding Children's Board (LSCB) and Safeguarding Adults Board (SAB) be familiar with local referral procedures.
- Ensure that appropriate information is available at the time of a referral and that the referral is confirmed in writing, under confidential cover as quickly as possible (e.g. within a working day).
- Liaise with the local designated officer over safeguarding issues and in all cases where allegations relate to an employee or member of staff.
- Keep the Safeguarding & Prevent Risk Register updated at all times with all concerns, no matter how major or minor the concern
- Deal with the aftermath of an incident in the organisation. ○ Attend regular training and networking events relating to safeguarding issues.
- Ensure the effective and consistent communication and embedding of safeguarding policies within their operation/team.
- Ensure that learners/service users and their parents/guardians/carers know where to go if they need support or have concerns about the behaviour of an employee, contractor or volunteer.
- Provide regular briefings and updates at staff meetings to ensure that all staff are kept up to date and regularly reminded of their responsibilities.
- Have an awareness of vulnerable service users within their operation.
- Ensure that all staff know how to raise concerns about people who are vulnerable or at risk of abuse and neglect.
- Ensure that all staff know how to assess the risk of children being drawn into terrorism and understand how to identify individual children who may be at risk of radicalisation and what to do to support them.

HR Department

- The HR department monitors and records the DBS process for employees, casuals, volunteers and self-employed contractors
- The HR department also ensures that Safeguarding and Prevent training is provided and completion is monitored
- The HR department provides advice and guidance to managers on safeguarding issues in relation to recruitment, employees and volunteers

Training and Learning Staff

- Teaching and learning staff will be involved in the delivery of a learning and apprenticeship curriculum which promotes knowledge, skills and understanding to build the resilience of learners, promote British values and enable them to challenge extremist views. This will include: o embedding equality, diversity and inclusion, wellbeing and community cohesion o promoting wider skill development such as social and emotional aspects of learning and the strengthening of critical thinking skills
 - o recognising local needs, challenging extremist narratives, stereotypes and anti-social behaviour and by promoting universal rights
 - o encouraging active citizenship and participation
 - o promoting values of openness and respect and facilitating opportunities to contribute, challenge and debate
 - o responding appropriately to events in local, national or international news that may impact on learners and communities making sure that learners are supported and listened to and are helped to access support internally and/ or through community partner.

SAFER RECRUITMENT PROCEDURES

SUS Consultancy Services takes appropriate measures to ensure the appointment of new staff is in line with a safer recruitment practice which includes scrutinising applicants, verifying identity and qualifications, obtaining professional and character references, checking previous employment history and ensuring they have the health and physical capacity for the job. SUS Consultancy Services must ensure that they have the relevant DBS checks in place for all front-line trainers and personnel who come into contact with young adults under the age of 18. SUS Consultancy Services will see evidence of these checks as part of the safer recruitment process.

A designated member of SUS Consultancy Services involved with the recruitment of staff will undergo specific training on the safer recruitment procedures. All new staff will be inducted into the company which will include a briefing on safeguarding procedures. Training on safeguarding current practice must be completed within 2 weeks of starting with the organisation and must be updated every 2 years. A central record of this training will monitor compliance with this.

PROMOTING SAFEGUARDING AND THE WELFARE OF LEARNERS

The safeguarding agenda involves the protection of children and adults at risk but also requires providers to promote and encourage the welfare of learners as a preventative measure to harm. This is achieved at SUS Consultancy Services by:

- A culture of vigilance that is taken seriously by senior managers and included within meeting agendas
- Safeguarding training is included within staff and learner inductions and reinforced in both handbooks
- Embed into the curriculum including relevant focus topics such as; online safety, lone working, self-care and stress management, fraudulent activity and scams, harassment at work, financial abuse, the prevent agenda and health and safety.
- Embed into the curriculum the promotion of equality and diversity and British Values to reinforce the acceptance of a diverse community and following the expectations of a British citizen.

USE OF EXTERNAL AGENCIES AND SPEAKERS

At SUS Consultancy Services we encourage the use of external agencies or speakers to enrich the experiences of our learners; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our learners.

Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, our values and ethos. SUS Consultancy Services will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to learners are consistent with the ethos of the Company and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies
- Activities are matched to the needs of learners
- Activities are carefully evaluated by SUS Consultancy Services to ensure that they are effective

We recognise, however, that the ethos of our Company and learning is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers

to facilitate and support this. Therefore, by delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help learners develop the critical thinking skills needed to engage in informed debate.

CONFIDENTIALITY AND STORAGE OF SAFEGUARDING REPORTS

All staff must maintain confidentiality about safeguarding cases and are shared internally on a need to know basis. Learners must be informed that any disclosures or concerns that are raised cannot be kept secret and may have to be referred to the Designated Safeguarding Lead and external agencies. The safeguarding report (appendix 1) must be completed fully and accurately, using word for word information wherever possible. This must be saved using a password protection and emailed within the same day to the Designated Safeguarding Lead. The DSO will keep a central record of all safeguarding reports that are in a lockable cabinet or restricted access online folder that complies with GDPR. Active cases will be regularly reviewed and updated as necessary for each individual circumstance and closed cases will be signed off by the DSO and archived.

WHISTLE BLOWING

Whistle blowing protects all staff, contractors and learners from fear of victimisation or discrimination when raising serious concerns. It is intended to enable a safe environment to encourage discussions rather than allowing these to be overlooked or discussed externally. Anyone who raises a genuine concern will

have significant legal protection under the Employment Rights Act 1996 – Part IVA, Part V and Part X and the Public Interest Disclosure Act 1998. The concern should be raised with the Directors who will conduct any internal investigations in line with the organisation’s procedures.

MANAGING ALLEGATIONS AGAINST STAFF

Any suspicion, allegation or actual abuse of a learner by a member of staff must be reported to the Designated Safeguarding Lead as soon as possible and in any case that same day of the initial concern arising. The member of staff raising the concern should follow the standard safeguarding process and complete the report form.

The Designated Safeguarding Lead shall:

- Take such steps, as they consider necessary to ensure the safety of the learner in question and any other person who is considered at risk.
- Immediately notify the Directors who will follow procedures to inform the member of staff that they may be suspended on full pay pending an investigation. The length of any suspension will be in line with organisational policies and will be as short as possible while ensuring the safety of the learner.
- Report the matter to the Local Authority Safeguarding Board and if necessary, the DBS.
- Any investigation relating to a member of staff will follow organisational procedure
- Once the outcome is determined the Directors will take action in line with its disciplinary policies if necessary.

LONE WORKING

SUS Consultancy Services recognises it has a responsibility for the health, safety and welfare of all workers including contractors and those who are self-employed. The specific risks involved with lone working are assessed in consultation with employees and recorded in an annual risk assessment. Actions to reduce and control the risks will include as a minimum:

- Managers at SUS Consultancy Services use a system that clearly identifies where are all employees are located on each day, contact details, times of sessions, list of learners in the group
- Employees are accompanied to any new venues on the first day of delivery by another member of SUS Consultancy Services
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- The venue is aware of the employee's visit, number of learners expected and have contact details of managers at SUS Consultancy Services
- The employee and on duty Designated Safeguarding Lead have each other's contact details
- The employee is aware of the domestic and health and safety arrangements at the venue
- High risk learners are assessed, and team teaching/coaching is considered
- Vulnerable employees such as those with disabilities, medical conditions, pregnancy or English as a second language will require further measures put in place
- The staff induction and handbook include expectations and procedures for lone workers
- Managers at SUS Consultancy Services will periodically monitor lone workers through visits, observations and other contact via phone, text and email

MANAGING INFORMATION

Information will be gathered, recorded and stored in accordance with the following policies:

- GDPR / Data Protection Policy
- Confidentiality Policy

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by the designated senior manager.

All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

COMPLAINTS

If staff or learners have a complaint about this safeguarding policy, they should refer to the organisation's complaints policy.

If a member of staff or learner feels the organisation or other external agencies are not handling a safeguarding concern appropriately, they should contact the Local Authority Safeguarding Board.

MONITORING AND REVIEW OF THE POLICY

SUS Consultancy Services will review its policies and procedures to ensure that they comply with the relevant legislation. The Safeguarding Policy will be reviewed annually and updated in line with legal

or statutory requirements or to remedy any deficiencies or weakness in regard to child and adults at risk protection arrangements that are identified without delay.

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to COVID-19 and company risk assessment policies and processes.