

SAFEGUARDING POLICY



Policy Group: Health & Safety and Environment

Effective: September 2023

Approved: The Safeguarding Board

Responsible Officer: Steve Williams, Head of Risk

Next Renew Date: September 2024

Ref no: 2.8



GUIDANCE

Vision

Transform lives through learning

Values



PASSIONATE - We are passionate about inspiring young people, adults and our Purple People to be their best and we take pride in creating a positive learning environment to fulfil their potential.



UNSTOPPABLE - We are unstoppable in our quest for the pursuit of excellence. We are dedicated and resilient to develop ourselves and our learners.



RIGHT - We treat each other with respect and strive to do the right thing through insight, inclusion, honesty, growth and trustworthiness.



PARTNERSHIPS - We support the people surrounding us in our everyday lives, building effective partnerships with businesses, learners and all stakeholders where we can pass on our knowledge and skills to help them meet their goals.



LEARNERS - Learners are at the centre of everything we do and we are driven to provide life-changing and life-long learning for them.



EMPOWERED - We encourage our Purple People to be independent and autonomous to maximise their goals surpassing their barriers and targets. Feel it, believe it, live it.

Tone of voice

Our tone of voice takes its direct influence from our core values. We are passionate about people and learners and are driven to get the best out of everyone by understanding them. We are caring and supportive, as well as being determined and striving for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.

Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

SUMMARY CHANGES

Date	Page	Details of Amendments
06/09/2019	2	Updated contact names and phone numbers. Review wording on supply chain/subcontracting
06/09/2019	27	Update legislation Keeping Children Safe 2019
12/12/2019	All	Update DSL specialisms and review against WBL and Prevent statutory Duty 2018
14/01/2020	21, 31, 33, 37	Update of DSL specialisms, legislation additions, monitoring, and training update
25/02/2020	31	The Care Standards Act changed to Care Standards Act 2014 to comply with legislation
25/02/2020	31	Added Care Act definition
25/02/2020	49	Added Safeguarding details for Gateshead
16/06/2020	2, 34 12, 33	COVID-19 influences New DSL
25/10/2020	All	Reflect new teams from LHAA and Ripley Academy
June 2021	All	Reflect change in DFE guidance regarding Keeping Children safe in education and RoATP review
August 2021	All	Streamline whole policy and create procedures and guidance documents. Ensure KCSE and EIF requirements are explicit regarding guidance on sexual harassment. Reflect practice from sexual harassment working group
June 2022	Whole Policy	Changes to update integration and ensure statutory guidance correct along with LCG procedures
August 2022	Whole Policy	Changes to update and ensure regulatory changes and guidance updated in line with KCSIE 2022
January 2023	Appendix 1	Contacts updated

May 2023	Appendix 1	Contacts updated
September 2023	Whole Policy	Annual review to ensure regulatory changes and guidance updated along with input for team changes to SDSLs.
December 2023	Appendix 1	Role changes updates
January 2024	Whole Policy	Update from revised Legislation Guidance WTSC Dec 23 Prevent Duty Guidance 2015 - update Dec 23. DSL Changes.

INTRODUCTION

Learning Curve Group (LCG) is one of the largest national training providers in the UK, providing education and training nationally. All companies within the LCG family uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

LCG is committed to providing a safe and secure environment in which both learners and staff can flourish, and this is reflected in our Safeguarding Framework. This policy has been written to provide sufficient guidance to ensure that this commitment is embedded into the culture and ethos of the company. It is thus essential that all staff are aware of their duties regarding safeguarding and report any concerns promptly.

We believe that it is always unacceptable for a child or adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and adults at risk will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy and Social Inclusion Strategies.

LCG recognise that 'Safeguarding' is equally applicable to both children and vulnerable adults and unless specifically indicated makes no differentiation between them LCG is committed to a whole organisation approach to safeguarding and promoting the welfare of all its students, staff, volunteers, visitors, contractors, and partners. Any reference in the policy to a child applies to all those aged under 18. The Group's legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone over the age of 18 who may, for a variety of reasons, require community services and / or be unable to protect him or herself from significant harm or exploitation.

This policy has been developed to describe the responsibilities of everyone for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this policy is to ensure that we fulfil its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

The following policies demonstrate and support a shared commitment to safeguarding and promoting the welfare of its stakeholders:

- Bullying and Harassment
- Code of Conduct
- Grievance
- Data Protection (GDPR)
- Equality and Diversity
- E-Safety
- Public Interest Disclosure (Whistleblowing)
- Safer Recruitment and Selection
- Learner Behaviour
- Lone Working
- Complaints
- IT Security and Information
- Health and Safety

This policy has been agreed, sponsored, and approved by the LCG Board Executive and Senior Management Safeguarding and Prevent Team.

Name	Role
Brenda McLeish	CEO – Overall accountability for Safeguarding and Prevent
Gail Crossman	Non-Executive Director
Louise Clough	Director of People -Exec Safeguarding
Steve Williams	Named Strategic Safeguarding Officer for Safeguarding and Prevent

Applies to

This Policy applies to all LCG Staff, Associates, Volunteers, and Delivery Partners (for the purpose of this procedure we will use the term staff).

Within LCG, the term learner will relate to all individuals undertaking a course of study irrespective of whether they are a child or adult.

LCG recognises that any member of staff irrespective of role can be the first point of disclosure for a learner. Therefore, all staff should:

- Be aware of the signs that a learner has been neglected or abused;
- Listen to learners who tell them about abuse;
- Report concerns effectively and in line with LCG Safeguarding procedure

Reason for policy

LCG acknowledges that children and adults at risk are amongst the most vulnerable in society. Therefore, adults in positions of trust have a duty to ensure that the rights of children and young people to protection from abuse are taken seriously and effective action is taken in response to any signs or abuse or neglect.

This policy forms part of our Safeguarding framework and is in place to ensure that anybody who has cause to encounter any of our learners who may be at risk knows what is expected of them and can safeguard others.

LCG has a legal duty of care for the health, safety, security and wellbeing of their learners and staff always when in the respective workplaces. This duty of care incorporates the duty to safeguard all learners from subjection to any form of harm, abuse, or nuisance. It is the responsibility of the Directorate and Senior Management to ensure that this duty is always discharged.

Context

- All complaints, allegations or suspicions of abuse or any disclosures must be taken seriously, and all colleagues must adopt a 'could happen here approach'
- Absolute promises of confidentiality must not be given as the matter may develop in such a way that these might not be able to be honoured. This must be made clear at the outset to the individual who is making the disclosure, with reassurance that they are doing the

right thing and information will only be passed on to those who need to know this to safeguard them and others

If the complaint/allegation or disclosure comes directly from a learner, questions should be kept to a minimum necessary to understand what is being alleged. Leading questions must also be avoided.

This policy and procedure do not form part of your terms and conditions of employment and can be changed at any time as we deem appropriate.

POLICY STATEMENT

We are fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and LCG accepts its corporate responsibility for the wellbeing and safety of its learners.

We recognise our responsibility and acknowledge that it is the duty of our workforce in its entirety to uphold British Values and Safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation.

Therefore, employees, apprentices, volunteers, subcontract partners and contractors will show respect and always understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values, and cultures of our organisation.

They will also be aware of and follow current legislation regarding the safeguarding of all learners. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

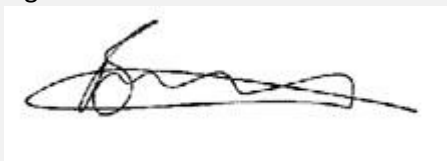
It is our intention to:

- Recognise that each provision may provide the only stability in the lives of learners who have been abused, or who are at risk of harm
- Provide a nurturing environment where self-esteem and self-assertiveness are promoted for all learners including those that are vulnerable
- Establish and maintain an ethos where Learners feel secure and are encouraged to talk and are listened to
- We will adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities within LCG
- We will ensure that relevant employment and security checks are undertaken within our safer recruitment procedures, that all adults within LCG, who have access to learners, have been checked as to their suitability in line with statutory requirements and as outlined in KCSIE 2023 Part Three: Safer Recruitment. This will support in creating a culture that is safe and safeguards the welfare of learners
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Ensure that appropriate supervision is given, where required
- Ensure that all stakeholders are protected from abuse, regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity, or because someone is married or in a civil partnership
- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk
- To help promote an understanding that a Learner who is abused or who witnesses violence may be deeply affected and this may manifest itself in several ways and linked to Adverse Childhood Experiences (ACEs)
- Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration

- Develop and promote effective working partnership with other agencies and in accordance with organisations' procedures, where required, including Designated Person/s in Local Authority, Safeguarding Partners, Safeguarding Adults Boards, and the Channel multi-agency panel, the Police and Children's Services;
- Regularly review and monitor our policies and procedures to ensure our legal, moral, and social responsibilities are met
- Comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments
- Have designated staff who support the safeguarding of learners within each region these are known as Designated Safeguarding Leads (DSLs), they are in place to advise on and manage any concerns and referrals made and learners know there are responsible adults within LCG whom they can approach if they are worried or in difficulty
- Ensure that all personal information is confidential and should only be shared with the permission of the individual concerned, (and/or those with parental responsibility), unless the disclosure of confidential information is necessary to protect a child or adult at risk from serious harm or to promote their welfare. In circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict "need to know" basis
- Work with our Subcontract Partners to ensure that they implement an effective Prevent Strategy. Our Sub-Contracting Policy partners, robust procedures in place to ensure that in appointing any subcontract partners we are not inadvertently funding extremist organisations
- All staff and Directors believe that LCG should provide a caring, positive, safe, and stimulating environment, which promotes the social, physical, and moral development of the individual learner
- Everyone who works in or LCG have a responsibility to safeguard and promote the welfare of our learners and respond to concerns, incidents, or disclosures and should raise and record concerns on LCG MyConcern as well as speak with their Designated Safeguarding Lead to inform them of any safeguarding or child protection concerns without delay
- This Policy incorporates five main elements:
 - 1) Protection through teaching and pastoral support offered to learners
 - 2) Procedures for identifying and reporting cases, or suspected cases of abuse
 - 3) The day-to-day contact with learners means delivery staff are uniquely placed to observe signs of abuse
 - 4) Provide support to learners who may be at risk of abuse or neglect;
 - 5) Ability to identify concerns in relation to anyone who may abuse a position of trust

If our learners feel safe and supported under the coaching and mentoring of LCG colleagues it will help their development in ways that will foster security, confidence, and independence as they continue to progress and achieve.

Signed



Brenda McLeish OBE DL
Chief Executive Officer – Learning Curve Group

POLICY

Statutory Obligations

LCG fully recognises its responsibility for safeguarding and has a statutory duty under the following as well as adhering to other statutory guidance and bodies:

- Section 175 of the Education Act (2002)
- Care Act 2014
- The Social Services and Wellbeing Act (Wales) 2014
- Working Together to Safeguard Children 2023
- The Education (Independent School Standards) Regulations 2014
- Non- Maintained Special Schools (England) Regulations 2015
- Keeping Children Safe in Education as amended versions (2023)
- All Wales Child Protection Procedures (Wales)
- Education (Wales) Act 2014
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended) and the Education and Training (Welfare of Children) Act 2021.
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (2020)
- Sexual Offences Act 2003
- NPCC When to Call the Police (2020)
- Preventing and Tackling Bullying, DfE (2017)
- Prevent Duty guidance for further education revised (2023)
- Prevent Duty guidance higher education revised (2023)
- LCG Safeguarding Policies and Procedures'
- Meeting digital and technology standards in schools and colleges, Filtering and monitoring standards for schools and colleges" (2023)
- Working with all statutory partners to ensure the safeguarding of Learners under LCG control.

LCG must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of children, young people and adults who may be at risk of harm or abuse. This policy sets out a framework for those arrangements and should be read in conjunction with the associated LCG policies and procedures listed, the web links provided, and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures.

This policy considers, amongst others, the following publications, including recent/relevant guidance and legislation in this area:

Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges (Department for Education, September 2023).

[Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf](#)

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (Her Majesties Government, July 2018).

[Working Together to Safeguard Children 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721442/Working-Together-to-Safeguard-Children-2023.pdf)

The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police, and other partner organisations (Department of Health and Social Care).

https://www.legislation.gov.uk/ukpga/2014/23/pdfs/ukpga_20140023_en.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/365345/Making_Sure_the_Care_Act_Works_EASY_READ.pdf

The Prevent Duty: Departmental advice for schools and childcare providers (Department for Education. June 2015). (Revised Dec 2023)

[Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/671117/Revised_Prevent_duty_guidance_for_England_and_Wales_-_GOV.UK.pdf)

All Wales Child Protection Procedures.

<https://safeguarding.wales>

Wales Safeguarding Guidance.

<https://gov.wales/safeguarding-guidance>

Wales: Keeping Learners Safe The role of local authorities, governing bodies, and proprietors of independent schools under the Education Act 2002.

<https://gov.wales/sites/default/files/publications/2018-11/keeping-learners-safe-the-role-of-local-authorities-governing-bodies-and-proprietors-of-independent-schools-under-the-education-act-2002.pdf#radicalisation>

Policy Principles

We endeavour to safeguard learners at risk by:

- Valuing, listening to and respecting them
- Adopting policies, guidelines, a Code of Conduct and behaviour for employees, volunteers, Subcontract Partners, and contractors
- Sharing information about concerns with agencies which need to know and involving parents and children appropriately
- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers and Subcontract Partners with responsibilities for children and adults at risk, including relevant non-delivery roles
- Recruiting staff, associates, volunteers, Subcontract Partners, and contractors who are aware of our Safeguarding and Prevent Policy and procedures
- Providing all staff, volunteers, and Subcontract Partners with safeguarding training
- Ensuring that all learners at risk, their parents and carers are aware of our Safeguarding and Prevent Policy and procedures
- Ensuring that all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding

We are committed to be alert to a learner who:

- Is disabled and has specific additional needs

- Has special educational needs (whether they have a statutory Education, Health, and Care Plan)
- Is a young carer
- Is a Looked After Child (LAC)
- Is an apprentice
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organized crime groups
- Is frequently missing / goes missing from care or from home
- Is at risk of modern slavery, trafficking, or exploitation
- Is at risk of being radicalised or exploited
- Is in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

We are committed to reviewing our policies and good practice annually, unless there is a change to legislation, or if there has been a meaningful change within the organisation. The Lead SSO/SDSL is responsible for updating the policy with support from the strategic management Board.

We operate a culture of openness and transparency and embeds the principles of the '4 R's' (Recognise, Respond, Record and Refer) across all our services, ensuring that all staff, volunteers, subcontract partners, and contractors understand their responsibilities with regards to safeguarding.

Responsibilities

The Strategic Safeguarding Officer (SSO), Senior Designated Safeguarding Lead (SDSL) and DSLs (Designated Safeguarding Leads) and the Safeguarding Board

We have appointed a Lead and a Safeguarding Board who have overall responsibility for issues related to safeguarding children and vulnerable adults and are supported by a team of DSLs. The DSL is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within the organization and for liaising with health, children's service, adult services, and other agencies about suspected or actual causes of abuse. The SSO and SDSL will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff who are as part of their role carrying out the role of DSL have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.

The SSO/SDSL has governance over safeguarding and Prevent matters across the business, and the CEO has overall responsibility for safeguarding and Prevent at Board level. The CEO will ensure that resources, support, and all relevant training are available and in place for staff. The CEO will support the Safeguarding and Prevent Team in meeting their responsibilities and will ensure that we meet these commitments. There is a clear and robust job description for the SSO/SDSL and DSL roles within the business which can be accessed on the system, the SDSL is responsible for reviewing the Safeguarding and Prevent Policy annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding and Prevent Policy and processes and procedures that support the embedding and working practices of this policy.

The Learning Curve Group Board

The LCG Board are responsible for ensuring we safeguard our learners in accordance with the statutory guidance set out in Part Two of KCSIE (2023) and related guidance or legislation. This includes that:

- A member(s) of the Board is appointed to oversee safeguarding matters and undertakes appropriate training in this, supported by another member of the Board to act as their deputy
- LCG has a Safeguarding and Prevent Policy with associated procedures in place that are in accordance with statutory requirements and local authority guidance. These are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay
- Effective training is in place for all staff, appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance
- The Board receives and considers regular safeguarding update reports
- LCG operates 'safer recruitment procedures' in accordance with statutory requirements and guidance
- Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures
- LCG contributes to multi-agency working in line with statutory guidance
- Ensure that staff have the skills, knowledge and understanding to keep safe our vulnerable learners

Designated Safeguarding Leads

Members of staff who are also DSLs receive training in safeguarding children and adults at risk and interagency working as required by the Local Safeguarding Partners.

They also receive refresher training annually as required by us. The team are required to keep up to date with developments in safeguarding children and adults at risk.

The appropriate DSL must be informed immediately in the following circumstances if:

- a) Suspicion that a learner is being harmed
- b) There is evidence that a learner is being harmed

The SDSL will ensure record of concerns raised are recorded and supervise and support any referrals to Local Safeguarding Partners, Children's Services Social Care/Police if necessary.

Any member of staff or anyone who has knowledge of, or a suspicion that a learner is or has been suffering significant harm, or is at risk of significant harm, should discuss their concern with their DSL or the SDSL, and record on LCG MyConcern. There should be no delay in communication once suspicion arises. The sharing of relevant information at the earliest opportunity within an environment of strict confidentiality is essential. All information from parents, members of the public and any of an anonymous nature must be acted upon and recorded appropriately.

- The DSL team/relevant contract manager is responsible for ensuring the Safeguarding Policy is available publicly and to parents and carers, that parents and carers are aware that suspected abuse referrals may be made, and our role in this
- The DSL team will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a learner

- Being aware of how to make referrals to safeguarding partners, children's social care and adult's social care for statutory assessments via the local authority multi-agency safeguarding units, along with the role they might be expected to play in such assessments
- The DSL team will alert the police when a crime may have been committed
- All DSLs foster strong links with Safeguarding Partners and Designated Local Authority Person
- The DSL team refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority adult's social care
- Whenever possible the issue should be discussed with parents/carers except where to do so would jeopardise future enquiry or would not be conducive to the learners' welfare
- If it is agreed that the issue puts the learner at risk of significant harm it must be reported directly to the SSO/SDSL or in the case of an emergency to the Police
- The SSO/SDSL will refer to the ESFA or Local Authority as required should we be subject to an investigation regarding our safeguarding practices
- The learner should be kept informed of actions taken at all stages of the procedure and maximum support offered/provided to them. Where the learner is competent to give consent, their agreement to the referral should be sought
- If consent is refused the referral should still be made if it is considered necessary to protect the learner from significant harm
- A written report of all discussions and action must be recorded and all referrals and subsequent documents/files will be retained securely by the DSL in the LCG Safeguarding Referral Logs folders within MyConcern
- The SDSL will refer all reportable safeguarding matters to the funding partner, where we are not the funder
- All DSLs liaise with senior management to inform them of issues, especially ongoing enquiries, and police investigations
- All DSLs maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral
- All DSLs act as a source of advice, support, and expertise to staff on matters of safety and safeguarding
- All DSLs liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved. DSLs ensure that we work with employers and other training organisations that provide apprenticeships and or work placements for children or adults at risk, to ensure that appropriate safeguarding's are in place
- Referrals to Statutory Agencies, including verbal referrals should be followed up with a completed referral form within 24hrs of the original contact
- The Director of People, with support from the Head of Risk ensures that all staff, associates, volunteers, and Subcontract Partners receive training in safeguarding children and vulnerable adults, are aware of procedures for protecting children and adults at risk and that refresher training takes place annually
- The SSO provides information monthly to the Board setting about how we have discharged our duties. The SSO is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity
- If the SSO is absent from the business, the SDSL's will be responsible for undertaking SSO duties

All Employees/Volunteers are Responsible for:

- All staff, supply staff and volunteers must have a full and active understanding of KCSIE 2023 Part One and or Annex A and all sections of the LCG Safeguarding and Prevent Policy - concerning child protection procedures, definitions, impact, indicators of abuse and referrals - to safeguard children at LCG effectively
- All staff, teaching, supply, support staff and volunteers will be required to read the full LCG Safeguarding and Prevent Policy. All staff will be informed of the procedures in place to address and manage any safeguarding concerns, allegations about staff members including low-level concerns and recording of these
- All Senior members and staff who work directly with children (e.g., teachers, teaching assistants, lunchtime supervisors, pastoral support staff) should also read Part Five and Annex A of KCSIE 2023
- Providing a safe environment in which learners at risk of harm, abuse or neglect can learn in a safe environment
- Being prepared to identify learners at risk of harm, abuse, or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required
- Any concerns - whether about a child, young person, family, colleague or another professional, must be shared with the SSO/SDSL
- All staff have a duty to assist in the assessment of possible child abuse by sharing information and reporting concerns as outlined in this policy. Staff may have the one key piece of information that will help Children's Services, Safeguarding Partners make the best decision about a child
- When concerned about the welfare of a child, staff should always act in the 'best interests of the learner'
- Doing nothing is not an option
- In the event of a disclosure being made an immediate verbal referral to relevant Children Service can be made. This will then be followed by a written referral within 24 hours
- Never promise a Learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe
- It may be difficult or upsetting to report a concern and it is sometimes hard to accept that a child is being harmed, particularly if there is an existing relationship with the family or professional concerned. However, the needs of the child must always come first. It is the role of the DSL to support and listen to concerns

If a learner tells you something that causes you concern:

- Listen to the learner
- Never promise learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe
- Encourage the learner to talk, but do not prompt, or put words into their mouths, and do not ask leading questions
- Do not ask the learner to repeat again and again
- Explain what action you must take in a way that is age appropriate

- As soon as you are able, write down what the learner has told you. Use the learner's exact words if possible. Record the date, time and place and any other people present at the time recording on LCG MyConcern
- Report concerns without delay to your DSL and record on MyConcern
- Do not worry you may be mistaken; it is better to discuss your concerns with someone who has the experience and the responsibility to make an assessment
- Do not confront an alleged abuser
- Try to remain calm and not to appear shocked by what they are telling you;
- A learner, parent, caregiver, or member of the public who tells staff their concerns about a child's welfare must never be expected to be asked to make a self-referral to social services or Police

If you have concerns about the behaviour of another colleague, do not dismiss these concerns. Action should be taken in accordance with the appropriate LCG policies. It is particularly important not to ignore or dismiss suspicions about another professional or colleague but approach the SDSL with your concerns:

- Reporting to the SDSL or Director of People any concerns they may have about the conduct of colleagues in relation to Safeguarding and/or Professional Staff Code of Conduct
- If a child discloses a matter of concern to you it can be very upsetting, try not to take these feelings home with you. Talk to the SDSL it is important not to ignore these feelings and to offload

Following the framework described in the Safeguarding referral procedure, know where to go and what to do if they have any safeguarding concerns.

- Attending safeguarding and child protection training and updates as required, on induction and an update at least once every year
- Reading and familiarising themselves with associated LCG Purple People Policies and Procedures for staff and on the website for all external to LCG.
- Reading safeguarding newsletters, hot topics and associated guidance when published
- Promoting awareness of safeguarding issues/support amongst learners, colleagues, and other stakeholders
- Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct, safer working practice and other key safeguarding standards
- Wearing their staff ID badge always when working on or off LCG sites
- Reporting to a DSL any learner welfare concerns that they may have or may need support with
- Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals

Learners

Learners are responsible for:

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers, and others on site
- Reporting any concerns to a member of staff or directly to a DSL with whom they feel comfortable discussing these concerns

- Abiding by the LCG learner code of conduct which is designed to safeguard all those on our sites or using our facilities, including the IT network
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature

Safer Recruitment and Training for Staff

LCG will select and recruit in accordance with the statutory guidance set out in Part 3 of KCSIE (2023), which details Safer Recruitment pay due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedom Act 2012. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in LCG, including staff, volunteers and staff employed by external partners/contractors. The Director of People will ensure that a single central record is maintained of all pre-appointment checks.

DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified, online and including social media checks will be carried out by the recruiting team prior to agreeing any job role and any concerns raised to the Director of HR and the Senior Safeguarding Officer.

Newly appointed staff will have a job role induction in line with our probation policy over a 6- month period. We ensure that all employees are made aware of the standards expected of them and implements the appropriate support, training feedback to achieve these standards. Employees will be made aware of the relevant Safeguarding and Prevent procedures as part of that induction program and will have access to our Safeguarding Policy through our Purple People system.

Individual/Group	Training	Frequency
All new staff and annual updating	<ul style="list-style-type: none"> • Safeguarding Prevent Duty • Policy review (internal and external) • Identified essential reading (KCSIE part 1) • Hot topics, newsletter, videos and CPD • Training events by the DSL team 	At induction and annual updating or at time of changes
Designated Safeguarding Leads (DSL)	<ul style="list-style-type: none"> • Identified essential reading (KCSIE in full) • Specialism divided by the team to ensure full coverage. • Designated Safeguarding Lead Training (2 years) 	Complete and appropriate updating
Board and Senior Managers	<ul style="list-style-type: none"> • Annual training and updating 	Annual and where required (e.g., legislation updates)
Talent Team	<ul style="list-style-type: none"> • Safer recruitment practices • Identified essential reading (KCSIE Part 1 and 3) 	Annual and where required (e.g., legislation updates)

Confidentiality

The Data Protection Act 2018 (DPA 2018) and General UK Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people, and adults at risk of harm, abuse, or neglect.

Colleagues should never promise that they will not tell anyone about an allegation or disclosure, as this may not be in the best interests of the child, young person, or adult at risk of harm or abuse. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with UK GDPR DPA 2018 following government advice and guidance.

- Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately
- Consider safety and wellbeing
 - Base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions
 - Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose

Policy Reviews

All partners' policies and procedures are checked during due diligence and any policies or procedures that do not meet the legislative standards must be revised. We will support partners to revise these documents if they are unsure. All Subcontract Partners' policies are refreshed annually. The partners will follow their own policies and procedures which are checked during the Quality Monitoring (QM) visits to highlight if any safeguarding concerns have been raised, if their policies and procedures have been followed up to ensure action has been taken. All incidents handled by a subcontract partner must be disclosed to the DSL team so that they can identify trends and revise processes and procedures, accordingly, offer support if required to volunteers or Subcontract Partners from the Supply Chain (SC), and, if necessary, report individual/s to the DBS.

Use of Equipment

Our IT equipment (including computers, laptops, mobile phones, PDAs, etc.) must not be used to view, download, create or share (with colleagues or learner) illegal content, including abusive images of children or young people.

Learner Recruitment

When joining a programme, a detailed record of learner needs will be kept, and an Individual Learning Plan (ILP) prepared to ensure all the needs are planned for. All learners receive a learner handbook, detailing our support policies and key contacts. There is also follow up review points to capture their journey and do their needs are being met. Delivery staff will work closely with the designated employer

contact ensuring a triparty support system is in place. The safety of all our learners is paramount and where a learner wishes to join a course from a referral agent or has disclosed behaviours or has Additional Learning Needs (ALN) or an EHCP (Educational Health Care Plan that may be as a concern a risk assessment will be complete to assess course suitability and if the required support plan can be put in place prior to a course offer, this is to ensure that prior to agreeing learners with ALN and or disabilities LCG can support fully with any controls or required additional needs

External Speakers and Events

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with us, or one of its contracted partners, who has been invited to speak to staff/learners.

The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events
- Processes or protocols to demonstrate how information about the speaker is used to decide about whether to allow their event to take place or not (risk assessed)
- A requirement for speakers to sign up to the organisation's Equality, Diversity, and Inclusion Policy
- Evidence of the final decision made about whether to allow the speaker into the organization, including the mitigation measures put in place

For more information on this please refer to 2.7 External Speaker Policy and Procedure.

Anti-Bullying and Harassment

Our policy on bullying and harassment is set out in a separate policy 3.2 Learner Antbullying and Harassment Policy and acknowledges that allowing or condoning bullying or harassment may lead to consideration under safeguarding learners. All incidents of bullying and harassment, including cyber-bullying, racist, homophobic, and gender-related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that Learners at risk with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in our programs. Our policy on bullying and harassment is explained at the induction process for new learners and their parents and carers.

Communications

- When communicating with learners online, observe the same rules of behaviour as if speaking with them in person by being professional: polite, respectful, not swearing or saying anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination
- Ask yourself whether the content of any online communication has a clear work purpose.
- Do not use any text speak abbreviations or symbols / emoticons, even if you ordinarily use these in your personal life
- Never disclose non-public and confidential information about us, our staff, associates, volunteers, or the young people with whom we are working

- Do not say anything or re tweet any posts that could be deemed offensive, controversial, or socially inappropriate in any way
- Contact with young people or adults at risk online should only be a recognized element of your work and done strictly for business purposes
- Do not send any illegal or inappropriate content (written, images or icons), including sexting via mobile phones

Openness and Scrutiny

- Always communicate with learners in a way that is open for others to see
- Do not use private messaging facilities on social networks or apps; if it needs to be private, then do this email exchange or phone and note the conversation afterwards
- Ensure there is always a record of such communication that would be open for others to check, if necessary
- It should always be clear who the communication is from when we are communicating with a learner
- There should be no use of anonymous apps, where the sender can remain anonymous

DEFINITIONS

Children - Any person up to the age of 18 years

Adult at Risk - Those aged 18 years and over who: are unable to safeguard their own wellbeing, property, rights, or other interests

SSO - Strategic Safeguarding Officer

SDSL - Senior Designated Safeguarding Lead

DSL - Designated Safeguarding Lead

Harm - Harm includes ill treatment (including sexual abuse, exploitation and forms of ill treatment which are not physical); the impairment of health (physical or mental) or development (physical, intellectual, emotional, social, or behavioural); self-harm and neglect; unlawful conduct which adversely affects a person's property, rights, or interests (for example, financial abuse)

Radicalisation - The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups

Extremism - Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs

Exploitation - Exploitative situations, contexts, and relationships where a person or persons receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) because of them completing a task on behalf of another individual or groups of individuals

Victimisation - The action of singling someone out for cruel or unjust treatment

Welfare - The health and happiness of a person or group

Abuse - The violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act

Data Protection - Legal control over access to and use of stored data

APPENDIX 1

Strategic Safeguarding Officer and Senior Designated Safeguarding Leads

Name	Role	Location	Contact Details	Lead
Louise Clough	Exec Director	HO	07870 517335	Executive
Steve Williams	Strategic Safeguarding Officer and Safeguarding Board Chair	HO/Group	07485 310 549	Strategic Safeguarding & Wrap Prevent Communications & Training
Neil McCluskey	Senior DSL /Safeguarding Board Member	Military Academies	07785 629 409	Prevent Duty, Online Safety, and Bullying
Natalie Watson	Senior DSL /Safeguarding Board Member	Apprenticeships	07485 368 373	Adult and Online Safeguarding
Zena Bain	Senior DSL/Safeguarding Board Member	HO	07485 310 507	Online Safeguarding Cyber Security
Emma Woodhall	Senior DSL/Safeguarding Board Member	Director of Academies - Hair & Beauty	074585 310 527	Work placement Safeguarding and Domestic Abuse
Michael Arnold	Senior DSL/Safeguarding Board Member	Tutor Delivery Manager Employability (Boot Camp)	07485 368 271	General Safeguarding and Mental Health
Michael Hopkinson	Senior DSL/Safeguarding Board Member	Tutor Performance Manager Flexible Learning	0188436202	Online safeguarding and adult safeguarding
Stephen O'Brien	Senior DSL Safeguarding Board Member	Head of Schools	07852 323 516	School Safeguarding, ACE's (Adverse Childhood Experiences) Security & Threats

Designated Safeguarding Leads

Name	Role	Location	Contact Details	Specialisms
Lauren Cheesmond	DSL	Employability	01388 777 129	Online safety
Amy Fowkes	DSL	Employability	01388 777 129	Adult Safeguarding
Williams Burns	DSL	Skills M&S	07485368261	General – Mental Health
Kimberley Rennie	DSL	Access to HE	07967338478	General – Domestic Abuse-Online learning
Lesley Austin	DSL	Head Office Flexible Learning	01388 777 129	General – Adult Safeguarding
Rebecca Pattinson	DSL	Flexible Learning Tutor	01388 777129	General – Adult Safeguarding Online
Andrea Bartlett	DSL	Flexible Learning Tutor	07458087554	General
Elaine Crompton	DSL	Flexible Learning Tutor	01388 777129	General -Adult Safeguarding
Sam Dudding	DSL	Apprenticeships Skills	07485368272	General
Stacey Stone	DSL	Apprenticeships	07485 310 529	Social Care Adult Safeguarding
Stephen Dean	DSL	Apprenticeships	07458 126 760	General & Adult Health & Social Care
Sonia Hothi	DSL	Field Based	07484 909 424	General & Additional Learning Needs EHCP, SEND
Natasha Meyer-Kennedy	DSL	Middlesborough Construction Academy	01642 061067	General -Domestic Abuse
Rebecca Sheppard	DSL	Pathways Manager	07485 310 496	General & Domestic Abuse
Luke Slater	DSL	Liverpool Marketing	07715 661 791	County lines, gangs, cyber safety, and knife crime
Carolyn Hall-Hughes	DSL	Field Based Academies - Skills	07485 368 190	Safeguarding General
David Mainwaring	DSL	Field Based -Skills	01388 777129	General
Lucy Wright	DSL	Hartlepool Academy	07485 368 129	General & Relationships
Oliver Stephenson	DSL	H&B Head	01388 777129	General
Emily Singh	DSL	Leeds Academy	0113 2461966	General

Name	Role	Location	Contact Details	Specialisms
Caroline Bove	DSL	Huddersfield Academy	01484 510 625	General- Relationship abuse
Elizabeth Stephenson	DSL	Huddersfield Academy	01484 510 625	General
Jess Oates	DSL	Manchester Academy	0161 236 7181	General & Relationship Abuse
Vikki Swarbrick	DSL	H&B Quality	01388 777129	General
Helen Jones	DSL	Chesterfield Academy	01246 588 773	General & Domestic Abuse
Nina Elvin	DSL	Sheffield Academy	01142 750 201	General & Domestic Violence
Jillian Holland	DSL	Derby Academy	01332 368 333	General
Michelle Parkin	DSL	Doncaster Academy	01302 367 464	General
Naomi Cotter	DSL	London Region H&B	07442 534 063	Modern slavery/human trafficking
Tanya Gower	DSL	Loughton Academy	0208 508 2150	Online safety
Remi Samuel	DSL	Camden Academy	07442 491 572	Honour based abuse, forced marriage and FGM (Female Genital Mutilation)
Matthew Taylor	DSL	Ham Academy	07483 061 656	Self-harm and suicidal thoughts
Julie Edwards	DSL	Ham Academy	07483 083 277	Peer on Peer Abuse, harassment, consent and sexual violence in young people, sexual assault
Karen O'Shea	DSL	Chiswick Academy	0207 2675798	General & Domestic Abuse
Katie Simpson	DSL	Croydon Academy	07741 909 140	General
Leigh Wootten	DSL	Field Based -Skills	07458 112 920	Safeguarding General
Warren Miller	DSL	Head Office	01388 777 129	Safeguarding General
Emma Donnelly	DSL	Military Academies	07817 135 925	Child Abuse
Mark Isherwood	DSL	Military - Sheffield	07458005105	General & Bullying, Behaviour
Laurence Corbett	DSL	MPCT Northeast	07825 284 542	Designated Safeguarding Lead

Name	Role	Location	Contact Details	Specialisms
Pete Leak	DSL	MPCT Northwest	07341 812 149	Designated Safeguarding Lead Prevent and Security, Protect.
Matthew Thacker	DSL	MPCT South/Central	07488 260 820	Designated Safeguarding Lead
Lee Winders	DSL	MPCT Greater London	07485 905 420	Designated Safeguarding Lead.
Justin Edwards	DSL	MPCT South Wales	07977 165 084	Designated Safeguarding Lead
Amber Eckford	DSL	MPCT South	0330 111 3939	General Safeguarding
Christopher Couling	DSL	Croydon Military	08442 438438	General
Dean Martin	DSL	Colchester Military	08442 438438	General
Gareth Bradford	DSL	Bradford Military	01138 267806	General
Adam Priddle	DSL	Field Based -Schools YLP	0330 111 3939	Safeguarding – Schools
Sarah Hulme	DSL	Field Based - Regional Operations Manager Schools	07825 669 002	Safeguarding – Schools, Domestic Abuse, and youth violence
James Martin	DSL	Field Based	0330 111 3939	Safeguarding – Schools Teenage Safeguarding

If you have any concerns, contact the safeguarding leads, or use the email below. Learners should also be made aware of this email address.

The Safeguarding e-mail address: safeguarding@learningcurvegroup.co.uk or use our Safeguarding app, which can be found by searching Learning Curve Group in both the Apple and Google store.