



## OUR POLICY FOR SAFEGUARDING AND PROMOTING STUDENT WELFARE

NB: if you have a concern about the welfare of a student please speak to Maria Grimsley (Key Account Manager and Designated Lead For Safeguarding), Robin Lindsay (Commercial Partnerships Director, Deputy Designated Lead for Safeguarding and Equality and Diversity Lead) or Jonathan Bourne (Managing Director) immediately – contact details inside

**Policy owner:** Maria Grimsley

**Next review due:** July 2022

**Version date:** July 2021

### DAMAR TRAINING

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## **1. Policy for Safeguarding and Promoting Student Welfare**

Further education colleges and providers of adult, community and work-based learning in England are required under statutory guidance for schools and colleges, 'Keeping children safe in education' and by the Safeguarding Vulnerable Groups Act 2006 to secure the safety of children, young people and vulnerable adults who are their students.

Damar is committed to safeguarding and promoting the welfare of all our students, placing specific emphasis on children and vulnerable adults during their learning journey. For the purposes of this document, 'children' includes everyone under the age of 18. As a training provider we recognise our responsibility to promote the right of every individual to:

- Be healthy (both physically and mentally)
- Stay safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well being

This policy is regularly reviewed and updated as necessary and as part of our annual self-assessment. It forms part of our wider quality system and is embedded in our other core quality and procedural documents. A copy of the policy is given to every member of Damar staff, it is on our staff intranet and it is available for download from our website.

This policy contains sets out, amongst other things, how Damar:

- promotes the policy
- gets commitment to the policy
- trains our colleagues in implementing the policy
- protects our apprentices
- prevents abuse towards our apprentices
- has a way of raising, recording and investigating concerns
- has a way of apprentices getting support or guidance
- monitors its IT usage
- reviews the policy and how often (include the last review date)

This policy is closely linked to our Prevent Policy and the two policies should be read together as, together, they set out Damar's responsibilities towards the Prevent duty, including our:

- have a legal responsibility to fulfill the prevent duty statement
- how we protect apprentices and employees from radicalising influences
- how we ensure apprentices and employees are resilient to extreme narratives
- how we identify changes in behaviour of apprentices and employees
- how we deal with any issues raised by apprentices or employees

## 2. Organisational responsibilities

Our Directors accept overall responsibility for safeguarding and promoting the welfare of our students and delegate specific responsibilities to individual members of staff as appropriate.

All staff with delegated responsibilities receive the necessary information, training and support to carry out their roles.

Our Recruitment Co-ordinators carry out initial screening on all candidates, which includes questions relating to general health, medical conditions, disability and additional learning needs/support requirements.

Business Development Team colleagues complete a review (ITP, Standard 10 refers) of every new student during the enrolment process, which also covers general health, medical conditions, disability and additional learning needs/support requirements, together with questions relating to the workplace environment and arrangements.

## 3. Individuals with specific responsibilities

Key Account Manager and Designated Lead for Safeguarding: Maria Grimsley (tel: 07960 88814)  
Commercial Partnerships Director, Deputy Designated Lead for Safeguarding and Equality and Diversity Lead: Robin Lindsay (tel: 07960 815300)

Staff inductions planning: Director of People and Performance, Diane Flynn

Compulsory online training and testing: Content for Safeguarding, Prevent, Health and Safety and Equality and Diversity – Maria Grimsley, Key Account Manager and Designated Lead for Safeguarding

Design and construction of online training and testing - Digital Content Team

Management of the Single Central Record: Business Support Unit Manager

Workplace training environment and student reviews: Business Development (Account Managers) and Coaching Team

Raising student awareness and initial reporting: all staff, specific emphasis on the coaching team.

## 4. Promoting Student Welfare

The primary duty for promoting and embedding the concept of safeguarding across the organisation sits with:

Damar's Managing Director: Jonathan Bourne (tel: 07768 056712)

Key Account Manager and Designated Lead for Safeguarding: Maria Grimsley (tel: 07960 888149)

Commercial Partnerships Director, Deputy Designated Lead for Safeguarding and Equality and Diversity lead: Robin Lindsay (tel: 07960 815300)

All Damar staff are expected to promote, exemplify and embed the importance of safeguarding, with colleagues, employer partners and, crucially, with our students.

Damar puts safeguarding at the heart of its provision. Our commitment is demonstrated and achieved:

- by ensuring that the Designated Lead(s) receive safeguarding training that is suitable to fulfil their roles and that this is updated, at least, annually
- in our staff and student online induction training and testing programme
- through ongoing staff training and in our team-wide training days
- through its inclusion in all job descriptions
- at regular team meetings, where safeguarding is included as a discussion point on agendas in our compulsory schemes of work for students which includes activity focusing on Safeguarding, Prevent, Equality and Diversity and British Values
- through our student/supervisor review process
- through the delivery of supervisor briefings
- by conducting employer health and safety reviews
- through the completion of student risk assessment (Standard 10)
- through guidance in our staff handbook
- through the inclusion of safeguarding in our documentation: Health and Safety Review Forms, Individual Training Plans (which incorporate the Standard 10), Contract for Services, Supervisor Guide
- by its inclusion on our website
- through the display of signs and notices
- with the support of our policies for Health and Safety, Prevent, Whistleblowing and Equality and Diversity

As part of our wider commitment to wellbeing, Damar has committed to fund raising on behalf of two charities each year, where funds raised will have a positive impact on issues relating to safeguarding themes.

## 5. Environment

Through our embedded health and safety policies and procedures, we ensure a workplace and training environment that is as healthy, safe and supportive as is reasonably practicable.

In addition, we promote a 'culture' of safety and wellbeing by ensuring that:

- health and safety and safeguarding are a primary focus for all student recruitment, including thorough screening of all candidates to identify individuals' needs
- the Designated Lead(s) for Safeguarding is/are clearly identified and staff understand the process for raising concerns
- through training that is regularly refreshed, staff are alert to the signs and indicators that may suggest a safeguarding concern
- safeguarding is a discussion point at all team meetings across the organisation
- specialist training is provided for the Designated Safeguarding Lead(s)

- relevant information is cascaded throughout the company using a wide range of methods
- safeguarding concerns and actions are recorded in a timely, appropriate and secure way and, where necessary, are shared with the relevant local authority/partner agency(ies)
- from time to time training resources (particularly in our legal programmes) may contain material that some students might find upsetting. We take care to ensure that suitable warnings are in place

## 6. IT Security

A risk assessment of our IT usage has been conducted at Director level.

This concludes that our students are largely supervised whilst using Damar devices and therefore, the likelihood of student access to, or influence by malicious material whilst on site is very limited.

However, the use of technology has become a significant part of many safeguarding issues, child sexual exploitation radicalisation, sexual predation and often provides the platform that facilitates harm.

Increasingly, students are required to learn online, often in their home environment, and Damar ensures that staff are fully aware of the breadth of risks that exist, which can be categorised into three areas:

- content: being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users, for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, or online bullying

and commits to educating its students to be able to recognise them and to escalate their concerns where appropriate.

Our IT, internet and e-mail usage policies help us to manage the risks relating to our staff and our access to specialist technical support enables us to monitor and review usage where there are concerns.

Staff must only access and use IT equipment, systems and data where they are authorised to do so and only for the purpose of fulfilling their duties.

Misuse will be investigated at Director level and, with the support of our specialist IT partner, appropriate action taken. Unacceptable use or behaviour, with specific relevance to safeguarding may include, but is not limited to:

- using the internet to send offensive or harassing material to other users
- using the internet to engage with predatory individuals/groups where there is any intent to harm
- distributing, disseminating or storing images, text or materials that might be considered indecent, pornographic, obscene or illegal, save for legitimate teaching purposes
- distributing, disseminating or storing images, text or materials that might be considered discriminatory, offensive, abusive, sexist, racist, or might be considered as harassment, save for legitimate teaching purposes

- broadcasting unsolicited personal views on social, political, religious or other non-business-related matters

A full list of all unacceptable use and behaviours can be found in our Email and Internet Use Policy and in our IT Policy.

## 7. Recognising Concerns

Damar colleagues work together to ensure the welfare of every student. All staff must complete compulsory training and development to understand and recognise the indicators that may suggest a risk of abuse, neglect or harm.

They are made aware of issues where Safeguarding action may be needed, which includes, but is not limited to:

- neglect
- physical abuse
- emotional abuse
- bullying including online bullying and prejudice-based bullying
- racist, disability, homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- peer-on-peer abuse, such as sexual violence and harassment
- radicalisation and/or extremist behaviour (our policy for Prevent covers this in detail). Prevent referrals must be robust, informed and with good intention
- child sexual exploitation and trafficking
- child criminal exploitation, including county lines
- risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example 'sexting'
- teenage relationship abuse
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic abuse
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting
- homelessness

- so-called honour-based abuse – NB formerly ‘violence’. This change recognises that there are non-violent forms of abuse
- upskirting (where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge
- other issues not listed here but that pose a risk to children (our under 18s), students and vulnerable adults

Staff are made aware that mental health issues can, in some cases, be an indicator that a child or vulnerable adult has suffered, or is at risk of suffering abuse.

Staff are taught that safeguarding is not just about protecting vulnerable individuals from deliberate harm, neglect and failure to act. It includes, but is not limited to, the following wider aspects relating to well-being:

- health and safety and well-being, including mental health
- recognising and meeting the needs of those individuals who have special educational needs and/or disabilities
- meeting the needs of individuals with medical conditions
- first aid provision
- emotional well-being
- online safety

## **8. The 5 Rs: Recognition, Response, Reporting, Recording and Referral**

All staff are supported towards being able to recognise behaviour that may indicate abuse or a lack of well-being. Primarily they will focus on the learning and workplace environment, but they should be sensitive to any signs for concern outside of this environment.

As soon as they have a concern, all staff are expected to pass their information to their Designated Lead(s) in the first instance. The Designated Lead(s) will then decide on the most appropriate next steps. In some cases, issues may need to be discussed at Director level, before taking further action.

Damar is committed to taking appropriate, proportionate and timely action. No report of a concern about possible abuse or lack of well-being will ever be ignored. To determine the most appropriate response, Damar colleagues will aim to establish clarity on any potential concern and refer internally to the Designated Lead(s). It is not the intention that colleagues ‘lead’ or ‘probe’ with questions, rather that they ‘listen well’. Staff are required to record their concerns and pass to the Designated Lead(s) at the very earliest opportunity.

It is the responsibility of the Designated Lead(s) and the Directors, once concerns have been reported, to make further decisions and any resulting actions will reside with them.

The Designated Lead(s) and the Directors are responsible for making decisions to refer a complaint or allegation, having first gathered and examined all relevant information.

Once a concern(s) has been raised it is the responsibility of the Designated Lead(s) and the Directors, to carry out investigations into suspicions, allegations or complaints and to work with local safeguarding partners/agencies to safeguard and promote the welfare of its students, in line with statutory guidance.

In the most serious situations where:

- There is a danger to life or
- Risk of serious injury, or
- A serious crime is in progress or about to happen.

The Police will be contacted in line with NPCC guidance on 'When to call the Police'.

## 9. Safer Recruitment

Damar is fully committed to safer recruitment procedures and practice.

We aim to prevent people who pose a risk of harm from working within our organisation. This applies to all roles, whether, full-time, part-time or sub-contracted partners.

Our recruitment process is designed to deter unsuitable candidates from applying and to identify and reject them if they do.

Damar:

- ensures that all interview panels will include at least one member of staff who has been suitably trained in our Safer Recruitment process
- ensures all application forms, job adverts and recruitment briefs contain reference to our commitment to safeguarding and, for those positions where a DBS check is required, the aforementioned will contain a statement to that effect
- ensures all candidates are treated fairly and consistently and that we are compliant with all relevant legislation
- makes proportionate decisions, based on risk assessment relating to individual roles, regarding the level of checks that are required
- requests an enhanced DBS check for all roles identified through our risk assessment
- requires all DBS checks to be renewed yearly and, wherever possible, via the automatic DBS Update Service (Damar commits to funding these renewals)
- ensure that where an individual starts employment in a role which requires a DBS check, before the DBS certificate is available, they are suitably supervised until such time as all checks are complete
- conducts additional pre-appointment checks, including eligibility to work in the UK, reference and identity checks

## 10. Allegations Management

We aim, through our safer recruitment process, to ensure that the likelihood of potential allegations being made against staff is at the lowest possible level. However, should an allegation be made, we recognise it is essential that we have a management strategy.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including temporary staff, sub-contractors or volunteers), posing a risk of harm to children (all students who are under 18 years old), or vulnerable adults, then:

On receipt of an allegation we will:

- inform the Designated Safeguarding Lead(s), our Directors and the member of staff against whom the allegation has been made
- refer to and work with (as appropriate) suitable partners to remove the risk and ensure the safety of our students. This is a legal duty and failure to refer when the criteria are met is a criminal offence
- ensure that our investigation complies with our policies and that it is compliant with statutory guidance

With specific reference to children and vulnerable adults, allegations may relate (but are not limited) to:

- behaviour that has harmed, or may have harmed\*
- a criminal offence(s) against or related to a child/vulnerable adult
- behaviour that indicates he or she may pose a risk to these individuals\*
- behaviour that indicates he or she may be unsuitable to work with these individuals\*

\* Such behaviours may have occurred within, or outside of the workplace environment. Inappropriate behaviours outside of the workplace may indicate a 'transferable risk'.

## 11. Additional Support and Guidance

Damar commits to working with other agencies and professional bodies to ensure the safety and well-being of our students.

Where necessary and appropriate for the specific nature of a safeguarding concern, we will actively engage in a timely manner with partners such as:

- The Police
- The local area MASH Team (Multi-Agency Safeguarding Hub) - for concerns regarding children and families
- The local Adult Social Care Team - in Stockport this is the Stockport Safeguarding Adults Board (SSAB)
- The LADO (Local Area Designated Officer) – regarding concerns/allegations about employees
- The local area Channel Panel
- The local area Prevent Lead
- The Disclosure and Barring Service (DBS)

## 12. Safeguarding and Equality

In order to provide an overall safe learning environment, Damar is committed to the principles of Equality and Diversity, in line with legislation and through our Policy for Equality and Diversity. Damar will look to the law and to its own policy to reinforce the safeguarding of Student welfare in areas such as access to work, bullying and harassment. Our Equality and Diversity Policy details this.

### 13. Documents Supporting the Policy

Other documents supporting this policy are:

- Safer Recruitment Policy
- Self-assessment report
- Damar Staff Handbook
- Health and Safety Policy
- Prevent Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Keeping Children Safe in Education – Part One must be read by all staff