



Safeguarding and Child Protection Policy

Date established:	December 2008
Updated:	April 2020
Reviewed:	Annually
Purpose:	This policy aims to set out MIT’s position regarding the safeguarding of children and vulnerable adults according to the Children Act 2004 This Policy must be read joint with the Prevent Policy This has been Update for the period of the Covid-19 Restrictions

Introduction

MITSkills is a privately-owned government funded organisation that undertakes centre and work-based learning programmes both on site and in remote working locations.

This policy applies to all staff including senior managers, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of MITSkills. It shows a commitment to protecting and safeguarding children against potential harm or actual harm. It fully accepts and promotes the principle enshrined in the Children Act 1989 that the welfare of the child is paramount.

The policy also demonstrates a commitment to working with statutory bodies, voluntary agencies and other faith communities to promote the safety and welfare of children and acting promptly whenever a concern is raised about a child or about the behaviour of an adult. MITSkills will work with the appropriate statutory bodies when an investigation into child abuse is necessary.

We will endeavour to safeguard children and young people by:

- Valuing them, listening to and respecting them.
- Adopting child protection guidelines through procedures and a code of conduct for staff and volunteers.
- Recruiting staff and volunteers safely ensuring all necessary checks are made.
- Sharing information about child protection and good practice with children, parents, staff and volunteers.
- Sharing information about concerns with agencies who need to know and involving parents and children appropriately.
- Providing effective management for staff and volunteers through supervision, support and training.
- Providing awareness of this policy through the learner induction and access to wider safeguarding support.
- Reviewing our policy and good practice annually.

MITSkills will endeavour to safeguard the children who are learners or who attend activities we organise or facilitate by following the recognised procedure if a concern is raised about a child’s welfare



It is important that everyone in the organisation is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. That is a task for the professional child protection agencies following a referral to them of concern about a child.

MITSkills (MIT) fully accepts its legal (The Children Act 2004) and moral obligation to provide a duty of care, to protect all children and (vulnerable adults) and safeguard their welfare irrespective of age, any disability they have, gender, racial origin, religious belief and sexual identity.

Legal framework

The Children Act 1989 sets out that the child's welfare is paramount and that safeguarding and promoting it is the priority.

The Children Act 2004 set out a duty on Local Authorities to work closely with those providing services to children and young people.

Safer Recruitment and Safeguarding Children in Education (2007)

Working Together to Safeguard Children 2013 sets out how organisations and individuals should work together to safeguard and promote the welfare of children and how practitioners should conduct the assessment of children:

'Safeguarding children - the action we take to promote the welfare of children and protect them from harm - is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.'

The UN Convention on the Rights of the Child sets out key principles which are enshrined within these acts and the statutory guidance. From 15 January 1992, when the treaty came into force, every child in the UK has been entitled to over 40 specific rights. These include:

- the right to life, survival and development
- the right to have their views respected, and to have their best interests considered at all times
- the right to a name and nationality, freedom of expression, and access to information concerning them
- the right to live in a family environment or alternative care, and to have contact with both parents wherever possible
- health and welfare rights, including rights for disabled children, the right to health and health care, and social security
- the right to education, leisure, culture and the arts
- special protection for refugee children, children in the juvenile justice system, children deprived of their liberty and children suffering economic, sexual or other forms of exploitation

The rights included in the convention apply to all children and young people, with no exceptions.



Definitions in this document

A child is legally defined as *'any person who is under the age of 18 years.*

The broad definition of a vulnerable adult is *'a person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation'.*

The main categories of people covered by this definition of vulnerable adult include people:

- a) who have a learning disability
- b) who have physical or sensory impairments
- c) who have a mental illness including dementia
- d) who are old and frail
- e) detained in custody or under a probation order
- f) who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).

Employee's are subject to DBS checks upon joining the company these checks will be renewed every 3 years.

Policy Statement

It is imperative that those working on behalf of MITSkills are equipped with the knowledge and awareness enabling them to detect any abuse or ill treatment of children or vulnerable adults. This policy document therefore aims to be a reference for all members of staff and volunteers involved

In implementing this child protection/safeguarding policy MITSkills will

- Ensure that all workers understand their legal and moral responsibility to protect children and young people from harm, abuse and exploitation by including training on Child Protection in their induction and in subsequent training that is undertaken.
- Ensure that all workers understand their responsibility to work to the standards that are detailed in the organisation's Child Protection Procedures and Guidance working at all times towards maintaining high standards of practice.
- Ensure that all workers are aware of child protection and safeguarding children procedures enabling within these guidelines by ensuring their attendance at annual training and subsequent refresher training organised by MITSkills or an approved training provider.
- Ensure that all workers understand their duty to report concerns that arise about a child or young person, or a worker's conduct towards a child/young person, to the organisation's named designated person for safeguarding and or child protection.
- Ensure that a named designated person responsible for safeguarding and child protection is appointed and that they have appropriate training and support for their role. Ensure the designated person understands their responsibility to refer any child protection concerns to the statutory child protection agencies (i.e. Police and/or Children's Services (CS)).
- Ensure that any procedures relating to the conduct of workers are implemented in a consistent and equitable manner.
- Ensure that all workers understand their obligations and responsibilities under Prevent as part of Safeguarding and have appropriate training to support them in their responsibilities.



- Provide opportunities for all workers to develop their skills and knowledge, particularly in relation to the welfare and protection of children and young people.
- Ensure that children, young people and vulnerable adults are enabled to express their ideas and views on a wide range of issues and will have access to the organisation's Complaints Procedure.
- Ensure that parents/carers are encouraged to be involved in the work of the organisation and, when requested, have access to all guidelines and procedures.
- Endeavour to keep up to date with national developments relating to the welfare and protection of children and young people.
- Ensure that appropriate background checks are undertaken when anyone joins the organisation and before they start working directly with children and young people.
- Ensure that all people working directly with children and young people have at least a basic understanding of child protection (based on MITSkills, policy, procedures and guidelines.) They will as part of their training have completed a child protection course. (as a minimum an online course)
- Ensure that effective Safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures and guidelines will be published on SharePoint.
- Ensure that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters.
- Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Ensure all records are stored securely and in accordance with the Data Protection Act and the GDPR.

Due to the wide nature of our work MITSkills may be in the frontline of work with some children, young learners, vulnerable learners and vulnerable adults. This means that we may be the first to identify that a child, young or vulnerable learner or adult is being or has been abused or that we are concerned about a person's well-being. Everyone has an equal responsibility to ensure that the individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests with the Directors, Senior Management and Designated Persons for Safeguarding but also with every individual member of staff employed or volunteering within our organisation whilst at work, at an employer's premises or at home.

We will ensure that our Safeguarding Policy and Procedures are reviewed at least annually to ensure that they are still relevant and effective.

Policy Aims

The aims of MITSkills are to promote good practice as follows: -

- a. To provide children and vulnerable adults with a safe and healthy environment.
- b. To ensure they are encouraged to enjoy learning and to achieve.
- c. Allowing them to make a positive contribution to their training and their goals.
- d. To ensure learners feel safe and secure so they can concentrate on learning.
- e. To help them achieve economic well being.



Safer Recruitment

MITSkills will take all possible steps to prevent unsuitable persons working with young or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007) and the Safer Practice, Safer Learning document produced by NIACE. (National Institute of Adult Continuing Education).

When interviewing potential staff, we will ensure that:

- a). There is an open recruitment process
- b). There is a rigorous interview with specific questions relating to safeguarding
- c). Applicants identity and claims to academic or vocational qualifications will be verified
- d). References will be taken up by direct contact with referees
- e). Evidence of the date of birth and address of the applicant will be obtained
- f). Where appropriate, an Enhanced Disclosure and Barring Service Check will be conducted, where a position requires an Enhanced DBS check this will be made clear on the job advert and application form and a statement explaining MITSkill's commitment to safeguarding will be documented. All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

During interviews the panel will explore:

- a). The applicant's attitude and demeanour towards young or vulnerable learners
- b). The applicant's ability to support our commitment to safeguarding and promoting the welfare of young or vulnerable learners
- c). Any gaps in the applicant's employment history
- d). Any concerns or discrepancies arising from the information obtained
- e). A Single Central Record (SCR) will be held for all staff employed by MITSkills and this will be updated on an ongoing basis.

Post Appointment

All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this will be to:

- a). Provide awareness and explanations of relevant policies and procedures. Provide support for the role in which they have been engaged
- b). Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities
- c). Enable individual line managers and colleagues to recognise any concerns about the persons ability or suitability from the outset and address them if deemed appropriate.
- d). Ensure that individuals are aware of reporting concerns and who the Designated Persons for safeguarding are.
- e). Ensure that individuals are aware of other relevant policies and procedures; i.e. disciplinary procedure, E&D Policy.

Training:

MITSkills will ensure that job descriptions are accurate to the post and frequently reviewed and updated where appropriate.



All staff are regularly evaluated to identify any additional training needs including those related to Prevent and Safeguarding.

All staff will be required to read 'Keeping Children Safe in Education 2019 (Part 1)', MITSkills recognise that learners and potential learners under 18 are a particularly vulnerable cohort and reading this document raises awareness of staff of issues relating to this group.

MITSkills will encourage staff to apply for training and employment opportunities within the company.

Where a need is identified, to recruit competent staff to deliver, suitable training and support will be provided, including on Safeguarding and Prevent.

Staff are required to comply with our Prevent Policy, Safeguarding Policy and Equality and Diversity policy which we see as integral ensuring learners develop, and are kept safe within MITSkills.

Safeguarding Code of conduct

The code of conduct should guide all actions taken by staff and anyone else working on behalf of MITSkills. If it is necessary to act contrary to it (for example visiting a learner in their home) you should only do so after discussion and approval with your line manager.

- a). Place the safety and well-being of learners first – before any organisational or personal goals and before any loyalty to colleagues and friends
- b). Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is or may have been inappropriate.
- c). Be committed to actively preventing the exploitation and abuse of young or vulnerable learners.
- d). Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), or ability and treat each individual learner with respect and dignity.
- e). Respect each learners' boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem. The focus of your relationship with a learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners on occasions where it does not constitute part of your normal duties. Avoid establishing relationships through the use of social media such as Facebook or Twitter
- f). Do not take illegal drugs whilst at work, do not drink alcohol prior to or during contact with learners and do not smoke with or in front of vulnerable learners.
- g). Do not give learners alcohol, tobacco products or any form of drug or medication. You should not assist learners in anyway, in obtaining these items.
- h). Do not engage in or tolerate the bullying or harassment of any person.
- i). Never engage in or tolerate inappropriate physical activity such as 'horse play'.
- j). Ensure all lone working with young or vulnerable learners is undertaken with caution and awareness in mind.
- k). Report where learners may be at risk of radicalisation, or extremism and challenge where learners are accessing or encouraging others to or sharing material and views with extremist or radicalisation content to the Safeguarding Officer.

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general



good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

- a). Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners
- b). Do not make sexual or discriminatory comments of any kind
- c). Do not engage in rough or sexually provocative games
- d). Do not make sexual comments/innuendos
- e). Do not become involved with lending or borrowing money or property
- f). Do not form exclusive or secretive relationships
- g). Do not invite young or vulnerable learners into your home
- h). Do not allow or use inappropriate reading materials/or internet materials/or sites
- i). Do not use unacceptable forms of restraint

All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or vulnerable learners.

If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or vulnerable learner who is upset and administering first-aid are examples of necessary and acceptable behaviour. Employees should, however, endeavour to minimise any possible misunderstanding of their actions.

- a) Always ensure the working environment is safe and healthy.
- b) Respect the rights, dignity of all learners and treat everyone with equality;
- c) Ensure the welfare of each child in the context of achieving their goals;
- d) Ensure that if any manual/physical support is required, it should be provided openly. Children should always be consulted, and their agreement gained.

Staff are expected to keep up to date date with Safeguarding and Child protection and Prevent guidelines on SharePoint.

MIT Staff and Associates should never;

- a) Engage in rough, physical or sexually provocative games;
- b) Allow or engage in any form of inappropriate touching;
- c) Allow children to use inappropriate, racist or abusive language to go unchallenged;
- d) Make sexually suggestive comments to a child.

Note: It may sometimes be necessary for adults to do things of a personal nature for children if they are young or disabled. These tasks should only be carried out with the full understanding of the parents/carers. If a person is fully dependant on you, talk with him/her about what you are doing and give choices where possible.

If any of the following occurs, you should report this immediately to another colleague and record the incident. You should ensure you inform the Safeguarding Officer so that the parents of the child or the school are informed (Schools have specialised staff ready and prepared to assist when needed). You should not attempt to do so yourself.

- a. If you accidentally hurt a child or young person;
- b. If he/she seems distressed in any way;
- c. If a child misunderstands or misinterprets something you have done.
- d. You are concerned that the child or vulnerable adult is being abused.

For all incidents or concerns involving a vulnerable adult or child follow the current safeguarding procedures and guidelines including where a learner raises concerns or accusations, record the



facts reported and or observed, and report them to the MITSkill's Safeguarding and Prevent Officer.

It is the Safeguarding Officer's responsibility to investigate and report any Safeguarding issue to appropriate external organisations.

This Policy is to be read in conjunction with our Prevent Policy.

Covid-19 Appendix 2020

The Department of Education has issued guidance on Safeguarding during the Covid-19 restrictions – staff are asked to keep up to date with these. This can be found here:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers#online-safety-in-schools-and-colleges>

MITSkills has put in place the following during the Covid-19 restriction, the italics are the outline requirements from the Department of Education.

What staff and volunteers should do if they have any concerns about a safeguarding of prevent concern.

MIT Staff should continue to report their concerns to the Safeguarding & Prevent Lead who will investigate, please do not investigate yourself. We ask that you contact the numbers below, making sure you are safe to do so first.

If the learner is in immediate danger or injured, please contact the appropriate emergency service 999 as learner safety is priority but report the incident as soon as possible. (Preferably the same day but within 24 hours).

We would encourage all staff to report it on the appropriate incident form available on SharePoint, (and at the end of this document) as this will help structure the report. Again, we ask you to report by phone or email as soon as possible, and then complete the form within 24 hours.

The incident form is available on SharePoint and at the bottom of this document.

Reporting Safeguarding and Prevent Concerns

MITSkills has a reduced office staff and as a precaution the Company Secretary is acting as an initial point of contact and back up to our Safeguarding Lead. In the event of a Safeguarding issue please complete the following steps:

1. Contact Hani Zubeidi on the following mobile number 07785 103001.
2. If the phone number is in use, leave a voicemail stating clearly your name, contact number, and that you are aiming to report safeguarding issue. This should be backed up with a text with the words "Safeguarding Issue" to the same number. We will ring you back.
3. Progress your report using the incident form which is available on SharePoint and below. Email this to Hani Zubeidi at **Hani.Zubeidi@mitskills.com** and also our Designated Safeguarding Lead Stuart Francis at **Stuart.Francis@mitskills.com**.



Designated Safeguarding and Prevent Staff to which staff should report concerns in the first instance. Stuart Francis – Stuart.Francis@mitskills.com

Deputy Safeguarding Officer is Claire Clark - Claire.Clark@mitskills.com.

MITSkills emphasize the continued importance of all staff acting immediately on any safeguarding concerns.

DSL (and deputy) arrangements during Covid 19 are different in that our Main Office at West Byfleet has reduced staffing and due to this we would ask that you use the following additional steps above.

There is continued importance for staff to work with and support local social workers for looked-after and previously looked-after children (Relevant to those on Study programme of 16 to 19 Traineeships). Where there is a known social work contact please ensure that this is flagged in the incident report.

Peer on peer abuse and what staff should do if they have concerns about a staff member who may pose a safeguarding risk to children.

During the Covid 19 restriction peer on peer abuse continues to be a risk including online abuse, and staff are encouraged to discuss wider learner needs and experiences as part of regular reviews and to encourage learners towards safe online use.

As part of our commitment to learners we provide Learning Curve online modules to support learners online with Internet safety, Safeguarding and Prevent. If you have a learner and they have not had access to these training modules, or they have lost their access to these please contact Hugh Hebborn - Hugh.Hebborn@mitskills.com

The Government has provided free online courses online to support learner safety, and these resources can be found via the Education and Training foundation called "Side by Side" Please follow the link below

<https://www.etflearners.org.uk/>

Available courses

SIDE BY SIDE

A Prevent resource with modules on

- Radicalisation and Extremism
- Staying Safe Online
- What Can You Trust?
- British Values

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The Government as part of the Covid-19 support has also provided the following link to a free course which is an Introductory Level 1 course in Cybersecurity and Staying Safe Online to support those in learning.

https://www.open.edu/openlearn/science-maths-technology/introduction-cyber-security-stay-safe-online/content-section-overview?utm_source=ncs&utm_campaign=ol&utm_medium=cybersecurity

- Staff should also try to be aware of changes in participation in online classroom or online activity that could be suggestive of a safeguarding issue e.g. becoming aware of learners accessing radical materials or using inappropriate use of chat sites, texts and emails between peers. (Please refer to Keeping Children Safe in Education).
- If a member of staff becomes concerned that another member of staff may be using online or having personal contact with a learner in a manner that is inappropriate, manipulative or abusive they should report this as a safeguarding concern. (see reporting above).
- It is of continuing importance for staff to work with and support local social workers for looked-after and previously looked-after children (Relevant to those on Study programme of 16 to 19 Traineeships) where there is a known Social work contact please ensure that this is flagged in any incident report. In the event staff are contacted by a Social Workers over a Safeguarding concern they must report this to the Company Secretary, and Designated Safeguarding Lead. (see reporting above).

Arrangements to support children the school or college are concerned about who do not meet the 'vulnerable' definition.

MITSkills expects that delivery staff will continue to support learners on furlough and/or Breaks in Learning. Provision of evidence of learning and reviews, as well as contact is a continuing requirement. Where a tutor or delivery staff become aware that a learner is failing to participate in learning they should attempt to communicate this with the learner to understand why. This should be flagged to their lead tutor and the contacts below given within 3 working days of becoming aware of the failure to engage.

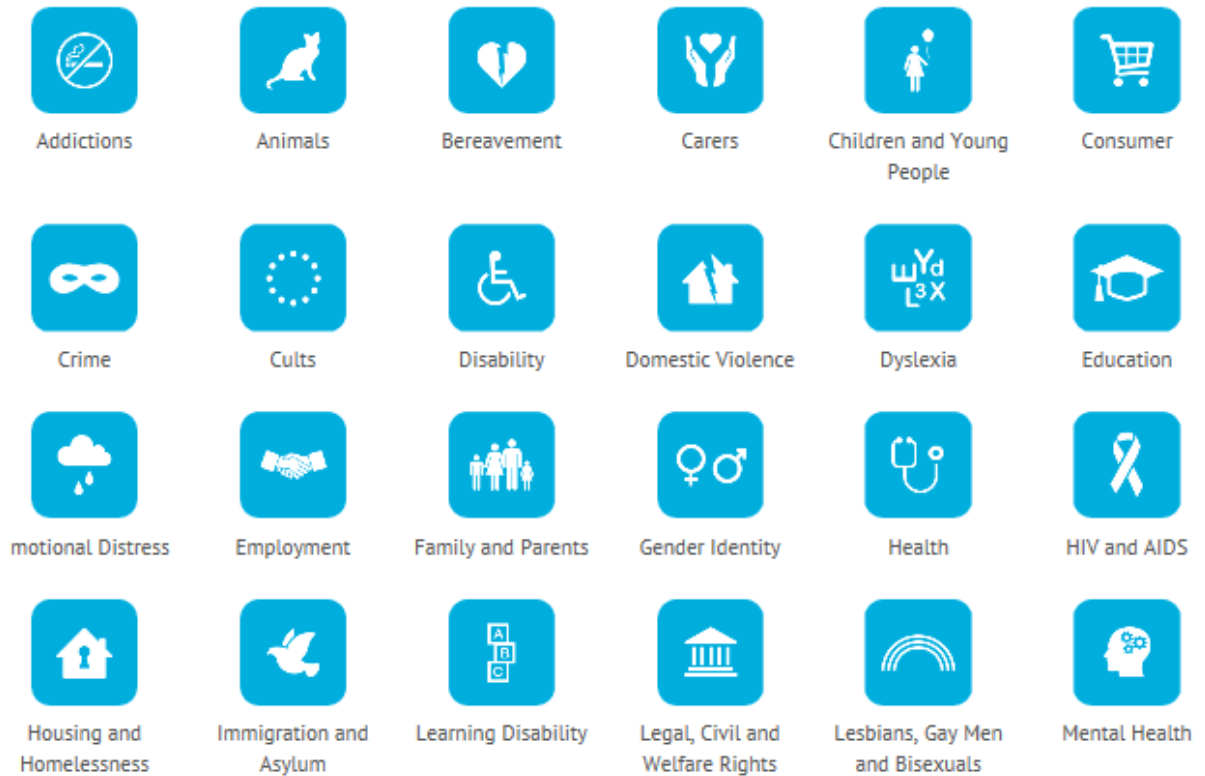
Learners who are not considered vulnerable may have additional support needs during this period and MITSkills can offer a variety of support advice and guidance.

We also offer sign posting to a wide range of support via our website and our IAG trained team can be contacted on the online form or using 0845 430 9009.

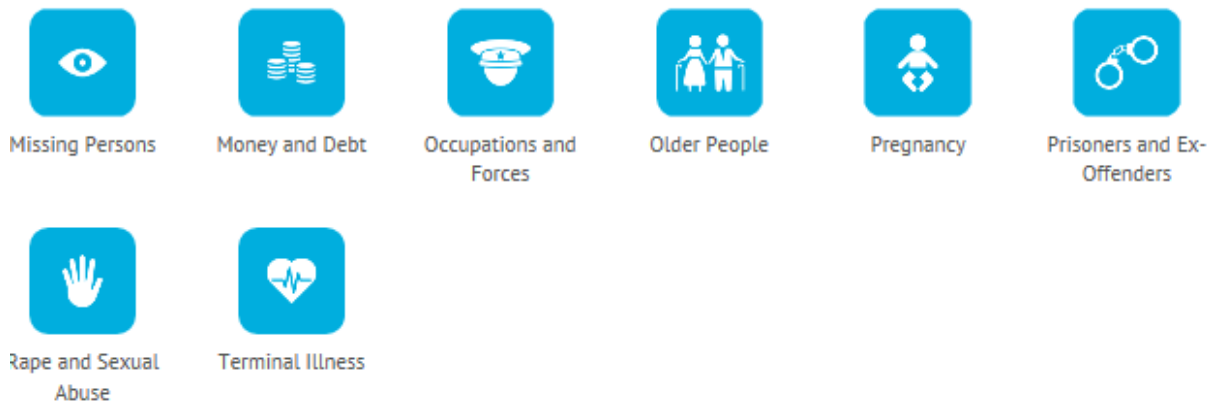
<https://mitskills.com/learner-support-iag-links/>

Within our website we offer links to the National Helpline Service which offer 24/7 support on a variety of areas of support for learners, staff and their families.

Please see the website link on next page



<https://helplines.org/helplines/>



For those going on a break in learning or being made redundant there is additional support available. Delivery staff and tutors should report when a learner is on a break in learning or made redundant on the specific form available on SharePoint. This should be sent by email to MITSkills as soon as possible and no later than 3 working days of being informed, as the learner may be impacted by a variety of issues for example, loss of employment or loss of income and may need additional support.

Those within 6 months of completion are entitled by ESFA rules to complete their Apprenticeship. This should be discussed as a matter of urgency and the learner and tutor must agree how this will be achieved and provide a signed plan. Tutors should consider what support the learner may need and agree this with the learner (and employer where appropriate).



For MITSkills to support learners on a Break in Learning or in Redundancy tutors must ensure they check learner's contact details, and detail on a change of circumstance form the most recent email and telephone number on which the learner can be contacted. (If the learner is not to be contacted this must be clearly stated on the form). This should be emailed within 24 hours to admin@mitskills.com and the following emails Hani.Zubeid@mitskills.com and Sam.Hamner@mitskills.com

Support including help with job search for those made redundant or other support for employment, including employability skills or sign posting to careers advice should be evidenced either via review and or change of circumstance, (confirmation of this can be by learner email) for those unable to continue in learning and employment, showing the agreed support.

Again, please see our website for signposting to high quality careers advice.

Break in learning learners – it must be clear the reason for the break in learning – the employer and/or learner should state clearly why the break of learning is required and that they intend to return. These learners should be offered support to wider skills outside the Apprenticeship to support their return to learning. The government has offered the following which may help support wider employability learning.

<https://nationalcareers.service.gov.uk/find-a-course/where-to-find-free-online-learning>.

A broad plan for return and follow up plan should be agreed including employer and learner's commitment to restart learning within 6 months. Agreed contact reviews should be included in this plan. Please confirm to the learner that MITSkills will continue to offer support as part of this plan, and ensure they are aware of how to contact our learner support team.

In addition, groups furloughed, redundant or on breaks will receive contact by text, phone or email as part of our commitment to our duty of care offering learner support. Tutors remain the first point of contact for those in learning and we are asking for evidence of support for the learners in learning every 4 weeks during this period, tutors must follow up an agreed return from break review with the employer to ensure plans for return to the Apprenticeships are updated.

If a learner is failing to continue learning (including off the job hours of 20%) the tutor should ensure that they evidence calls and emails to learners and/or employers and inform MITSkills. (If tutors become aware the issue falls into a safeguarding concern please see Reporting Safeguarding and Prevent above).

The safety of young learners aged 16 to 19 including those on EHC aged 19 to 25 and care leavers that are not physically at college remains a focus in this period.

Concerns over learner safety issues for this group should be reported under Safeguarding and Prevent.

We ask all tutors and assessors to report where any learners are not engaging in learning (including online) for all age groups to Hani Zubeidi and Sam Hamner at the following email addresses.

Hani.Zubeidi@mitskills.com

Sam.Hamner@mitskills.com



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