

Safeguarding Policy and Procedures

Chameleon Vocational Training Limited

1. Introduction	<p>Chameleon Vocational Training Limited makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.</p> <p>Chameleon Vocational Training Limited meets learners, apprentices, children and / or vulnerable adults through the following activities:</p> <p>Delivery of learning services, including Full/Part time Programmes. Work Based Learning through Apprenticeship Programmes, Work Experience and Automotive workshops and the delivery of Levy Apprenticeship programmes</p> <p>The types of contact with learners, apprentices, children and / or vulnerable adults will be through a controlled frequent weekly contact with Senior management team, Lecturers and Administration staff.</p> <p>This policy seeks to ensure that Chameleon Vocational Training Limited undertakes its responsibilities about protection of learners, children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff, directly and indirectly (Supply) employed staff in their practices and clarifies the organisation's expectations. CVT follow the process of Recognising/Responding appropriately/Reporting and Recording all concerns and issues.</p> <p>It is extremely important to establish the age of the learner and the mental capacity and vulnerabilities, as this information will determine which legislation and processes CVT will follow.</p>
2. Confirmation of reading	<p>I confirm that I have been made fully aware of, and understand the contents of, the Safeguarding Policy and Procedures for Chameleon Vocational Training Limited.</p> <p>Please complete the details below and return this completed form to Michelle Quinn</p> <p>Employee Name:</p> <p>Employee Signature:</p>

	Date:
3. Legislation (Different Acts apply to different age groups)	<p>The main documents of legislation governing this policy are:</p> <ul style="list-style-type: none"> ○ Working Together to Safeguard Children 2018 ○ The Care Act 2014 (learners' over 18) ○ Keeping Children Safe in Education (updated Autumn 2022) ○ Equality Act 2010 and Human Rights Act ○ Public Sector Equality Duty (PSED) ○ The Mental Capacity Act (MCA) 2005 ○ The Adoption and Children Act 2002: ○ The Children Act 2014/18 ○ The Single Assessment Process ○ Universal Services ○ Safeguarding Vulnerable Groups Act 2006 ○ Care Standards Act 2000 ○ Public Interest Disclosure Act 1998 ○ The Police Act – CRB 1997 ○ Mental Health Act 1983 ○ NHS and Community Care Act 1990 ○ Rehabilitation of Offenders Act 1974 ○ Prevent strategy and Anti radicalisation. ○ Safer Recruitment <p>Additional Support and Guidance can be found:</p> <ul style="list-style-type: none"> ○ Local Authorities Partnership Working Programme (SSCP, South Tyneside Works) ○ Sexual violence and sexual harassment between children in schools and colleges (Gov.uk) ○ NPCC – When to call the Police Guidance ○ GDPR and Information sharing and withholding ○ Data Protection, new toolkit and ICO ○ How to keep Children Safe Online and Parent focus with keeping their children safe online ○ Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which was made compulsory in September 2020. ○ Ofsted Guidance

	<ul style="list-style-type: none"> ○ Prevent and the Channel Programme ○ CVT IAG (Information, Advice and Guidance) Policy and Principles ○ LGBTQ+ pupils and support and guidance
4. Definitions	<p>Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.</p> <p>Abuse is a selfish act of oppression and injustice, exploitation, and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.</p> <p>It can take many forms, including the following:</p> <ul style="list-style-type: none"> ○ Physical abuse <ul style="list-style-type: none"> ○ Mental Health ○ Sexual abuse ○ Emotional abuse ○ Bullying ○ Neglect ○ Financial (or material) abuse ○ Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) ○ Domestic Abuse <p>Definition of a child A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).</p> <p>Definition of Vulnerable Adults A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.</p> <p>This may include a person who:</p> <ul style="list-style-type: none"> ○ Is elderly and frail ○ Has a mental illness including dementia ○ Has a physical or sensory disability ○ Has a learning disability ○ Has a severe physical illness ○ Is a substance misuser

	<ul style="list-style-type: none"> ○ Is homeless
5. Responsibilities	<p>All staff (paid or unpaid, direct, or indirectly employed) have a responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.</p> <p>Additional specific responsibilities of the Senior Management Team and the Designated Safeguarding Manager:</p> <ul style="list-style-type: none"> ○ The policy is in place and appropriate ○ The policy is accessible ○ The policy is implemented ○ The policy is monitored and reviewed ○ Enough resources (time and money) are allocated to ensure that the policy can be effectively implemented ○ Promoting the welfare of children and vulnerable adults. ○ Ensure staff (paid and unpaid) have access to appropriate training/information, advice and guidance (IAG) ○ Receive staff concerns about safeguarding and respond to all seriously, swiftly and appropriately ○ Keep up to date with local arrangements for safeguarding and DBS ○ Develop and maintain effective links with relevant agencies ○ Take forward concerns about responses. <p>The Designated Safeguarding Manager (Lead) DSL is Michelle Quinn contact details:07487 390 436 The Designated Safeguarding Deputy/Officer DSO is Shaun Welch contact details:0191 3406060</p>
6. Implementation Stages	<p>The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the company. These include:</p> <ul style="list-style-type: none"> ○ Whistleblowing –ability to inform on other staff/ practices within the company ○ Grievance and disciplinary procedures – to address breaches of procedures/ policies ○ Health and Safety policy, including lone working procedures, mitigating risk to staff and clients ○ Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory ○ Data protection (how records are stored and access to those records) ○ Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose ○ Staff induction ○ Staff training

	<ul style="list-style-type: none"> ○ SEND ○ Safer Recruitment ○ Chameleon Vocational Training Limited ensures safe recruitment through the following processes: ○ Providing the following safeguarding statement in recruitment adverts or application details – ‘recruitment is done in line with safe recruitment practices.’ ○ Job or role descriptions for all roles involving contact with learners, children and / or vulnerable adults will contain reference to safeguarding responsibilities. ○ There are person specifications for roles which contain a statement on core competency regarding learner, child/ vulnerable adult protection/ safeguarding ○ Shortlisting is based on formal application processes/forms and not just on provision of CVs ○ Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification ○ DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Portable/ carry over DBS checks from another employer will not be deemed to be enough(and a risk assessment will be put in place until a satisfactory DBS can be viewed). It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts. ○ No formal job offers are made until after checks for suitability are completed (including DBS and 2 references). ○ CVT may consider online searches as part of our due diligence on short listed candidates <p>Disclosure Barring Service Records Gap Management</p> <p>The company commits resources to providing Disclosure Barring Services check on staff (paid or unpaid) whose roles involve contact with children and /or vulnerable adults.</p> <p>To avoid DBS gaps, the Chameleon Vocational Training Limited will ‘maintain and review a list of roles across the company which involve contact with learners’ children/ vulnerable adults’/apprentices and will be monitored periodically by Michelle Quinn.</p> <p>This information will be found in the Single Central Record File.</p> <p>Chameleon Vocational Training Limited will ensure that their established staff and roles are regularly reviewed through</p> <ul style="list-style-type: none"> ○ A 3-year rolling programme of re-checking DBS’s is in place for holders of all identified posts. ○ Existing staff (paid or unpaid) who transfer from a role which does not require a DBS check to one which involves contact with children / vulnerable adults will be subject to a DBS check. ○ Service delivery contracting and sub-contracting
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	<ul style="list-style-type: none"> ○ There will be systematic checking of safeguarding arrangements of partner organisations ○ Safeguarding will be a fixed agenda item at any partnership reporting meetings. ○ Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures.
7. Apprenticeships	<p>Whilst our apprentices are on site, staff and employees will apply CVT policies and procedures for Safeguarding. We expect the same level of diligence and awareness with all our apprentice employers and the expectations are clearly set at the induction/recruitment stage. Induction packs are given to employer's, mentors and the apprentice in relation to the process to follow if any party has any concerns or issues.</p> <p>Apprentices and employers will have direct and signposted access to IAG relating to matters of wellbeing and personal safety. Focus areas will include H&S offsite and in the workplace, apprentices should feel safe at our centre and work. All apprentices are confident that bullying and harassment would not be tolerated at the centres or work. The relationships and attitudes that apprentices experience in these environments should be positive and supportive. Apprentices will have a good understanding of local safeguarding risks, such as county lines and drink spiking, and know how to protect themselves from risk.</p>
8. Online Safety	<p>Processes and procedures for reporting concerns will be the same as reporting Safeguarding concerns, and as previously mentioned all CVT staff have a responsibility towards keeping all CVT learners and apprentices safe from online harm and abuse. Safety online will also be a large focus including topics covering, the basics, friendships and social media, online manners, data protection, sharing personal information, cyberbullying, spending money, online reputation, mental health, sexting and pornography, harmful adults and grooming/exploitation and gambling. Management will monitor how to deliver these topics over the duration of the full time study programmes and apprenticeships.</p> <p>IAG will be made available through the centre, including information boards, social media/safety online books and leaflets, PD/embed sessions.</p> <p>CVT will also look at introducing sessions that will cover topics including fake news, harmful online challenges and hoaxes, body image and digital detox techniques and commit to challenging ALL inappropriate behaviour.</p> <p>DSL will complete relevant specific online safety and harm CPD.</p>
9. Communication Training and support for staff	<p>Chameleon Vocational Training Limited commits resources for induction, training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding</p> <p>Induction</p> <ul style="list-style-type: none"> ○ Discussion of the Safeguarding/Prevent Policy (and confirmation of understanding) ○ Discussion of other relevant policies, IAG and procedures for Partner working ○ Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence) References for learners who are registered directly with the ESFA (Levy apprentices

	<p>and learning) and indirect (through South Tyneside Works and Sunderland Council) and the separate reporting procedures.</p> <ul style="list-style-type: none"> ○ Initial training on safeguarding including safe working practices, safe recruitment, online safety, understanding child protection and Prevent <p>Training</p> <ul style="list-style-type: none"> ○ All staff who, through their role, are in contact with learners, children and /or vulnerable adults will have access to safeguarding training at an appropriate level, specifically refresher CP/Safeguarding courses every 3 years for all staff, 2 years for Designated and Deputy Safeguarding leads training and regular updates as requested but at least annually for all staff and volunteers. CVT management team will ensure that all staff have allocated time to complete these responsibilities. <p>Communications and discussion of safeguarding issues:</p> <ul style="list-style-type: none"> ○ Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice: ○ Team meetings/workshops ○ SMT meetings ○ One to one meeting (formal or informal), ○ External Partnerships/Prime Partners and Local Authorities <p>Support</p> <ul style="list-style-type: none"> ○ We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include: ○ Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with. ○ Seeking further support /IAG as appropriate e.g. access to counselling. ○ Staff who have initiated protection concerns will be contacted by Michelle Quinn.
10. Professional boundaries and Staff Behaviour	<p>Professional boundaries are what define the limits of a relationship between an employee and a learner/client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.</p> <p>Chameleon Vocational Training Limited expects staff (directly or indirectly employed) to protect the professional integrity of themselves and the company.</p> <p>The following professional boundaries must be adhered to in relation to:</p> <ul style="list-style-type: none"> ○ Use of abusive language ○ Response to inappropriate behaviour / language/ sexual misconduct ○ Use of punishment or chastisement

	<ul style="list-style-type: none"> ○ Passing on service users' personal contact details ○ Degree of accessibility to learners/apprentices/employers (e.g. not providing personal contact details) ○ Accepting responsibility for any valuables on behalf of a learner/apprentice/employers ○ Accepting money as a gift/ Borrowing money from or lending money to learner/apprentice/employers ○ Accepting gifts/ rewards or hospitality from companies as an inducement for either doing/ not doing something in their official capacity ○ Cautious or avoidance of personal contact with learners/apprentices/employers ○ The use of social media sites to discredit the company or learner/apprentices/employers ○ Inappropriate use of mobile phones and text messages with learners /apprentices/employers ○ Inappropriate use of the Internet/websites <p>Please refer to Chameleon Vocational Training Limited policies with regards to e.g. Code of Conduct (Behaviour Policy) E-safety, Computer Misuse, all can be found in the Employee Handbook.</p> <p>If the professional boundaries and/or policies are breached this could result in disciplinary procedures or enactment of the allegation management procedures</p>
11. Reporting	<p>The process outlined below details the stages involved in raising and reporting safeguarding/Prevent concerns and must be passed to Michelle Quinn at Chameleon Vocational Training Limited.</p> <p style="text-align: center;">Communicate your concerns with your immediate manager</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Seek medical attention for the vulnerable person if needed</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Discuss with parents of child/Employer Or with vulnerable person.</p> <p style="text-align: center;">Obtain permission to make referral if safe and appropriate</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">If needed seek advice from the External Bodies, Sunderland Safeguarding Designated Person Danielle Rose 0191 5613901, local City Council Sunderland Safeguarding Children Partnership 0191 5205560 (OOH 0191 5205552) South Tyneside Children's Team 0191 4245010(OOH 0191 456 2093)</p> <p style="text-align: center;">↓</p>

	<p>Ensure that feedback from the Local Authority/relevant body is received and their response recorded</p> <p>If the immediate manager is implicated, then refer to their line manager or peer. (Shaun Welch)</p> <p>What if consent is refused?</p> <p>If the concern is from a young person classified as an adult, and the consent is not explicitly given, the individual wishes must be carried out unless:</p> <ul style="list-style-type: none"> ○ Public interest to intervene, by not reporting others are put at risk or harm ○ Public duty of care to intervene, a crime has been or may be committed ● If someone is in imminent danger the Police or emergency services MUST be called.
12. Allegations Management	<p>Chameleon Vocational Training Limited recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the company or by a professional from another organisation.</p> <p>The process for raising and dealing with allegations is as follows:</p> <p>First step: Any member of staff (paid or unpaid) from Chameleon Vocational Training Limited is required to report any concerns in the first instance to their line manager</p> <p>Second step- Line manager will then discuss the situation with the designated safeguarding manager.</p> <p>Chameleon Vocational Training Limited recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA). Specific concerns will be reported to our partners.</p> <p>Learning lessons apply to all cases, not just those which are concluded and found to be substantiated and CVT have now implemented a Low level concern policy and safeguarding /behaviour trend analysis report.</p>
13. Monitoring	<p>Chameleon Vocational Training Limited will monitor the following Safeguarding aspects:</p> <ul style="list-style-type: none"> ○ Safer recruitment practices ○ DBS checks undertaken ○ References applied for new staff ○ Records made and kept of supervision sessions ○ Training – register/ record of staff training on child/ vulnerable adult protection ○ Monitoring whether concerns are being reported and actioned ○ Checking that policies are up to date and relevant ○ Reviewing the current reporting procedure in place ○ Presence and action of Designated manager responsible for Safeguarding is in post ○ Keeping of individual student chronologies or contact sheets ○ Current and up to date issues for IAG and the appropriate delivery of that IAG (e.g. KCSIE/Prevent etc.)

	<ul style="list-style-type: none"> ○ Current and up to date issues/risks/audits from CVT IT systems.
12.Managing Information	<p>Information will be gathered, recorded and stored in accordance with the following policies, GDPR, Data Protection Policy, Confidentiality Policy. Chameleon Vocational Training Limited is a registered member of the ICO.</p> <p>All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Safeguarding Manager.All staff must be aware that they cannot promise learners/apprentices or their families/carers that they will keep secrets.</p>
14. Conflict resolution and Complaints Policy	<p>Chameleon Vocational Training Limited is aware of the need to have a conflict/complaint and grievance process, please refer to the Employee handbook/ Health and Safety Policy/Complaints policy and procedure and our website WWW.cvt-uk.com.</p> <p>For further information or speak to the company Director: Michelle Quinn, 07487 390436 or email enquiries@cvt-uk.com</p>
15. Communicating and reviewing the policy	<p>Chameleon Vocational Training Limited will make learners/apprentices and their employers aware of the Safeguarding Policy at Induction meetings, review sessions, tutorials and on request. This policy will be reviewed by Michelle Quinn, every year and when there are changes in legislation or IAG</p>
16. Multi Agency Working, Partnerships and Support	<p>New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.</p> <p>The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.</p> <p>The three safeguarding partners should make arrangements to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way</p>

	<p>As this is a new arrangement CVT will monitor and review this process and make itself aware of any updates and named contacts within the Local Authority. As we work across authorities the Designated Lead will take this matter up with CVT Prime partners.</p>
<p>17. Current Updates and CVT amendments</p>	<p>Sexual abuse in schools: helpline and Ofsted review</p> <p>Source: Gov.uk Department for Education. NSPCC Learning Date: 31 March, 01 April 2021, September 2021, September 2022/2023</p> <p>The Department for Education (DfE) has announced a new helpline to support potential victims of sexual harassment and abuse in education settings. The helpline, run by the NSPCC, provides children and adults who are victims of sexual abuse in schools with support and advice including how to contact the police and report crimes. The helpline will also provide support to parents and professionals. The dedicated NSPCC helpline number is 0800 136 663. The government has also asked Ofsted to undertake an immediate review of safeguarding policies in state and independent schools in England looking at the extent and the severity of the issue and ensuring schools have appropriate processes in place to allow pupils to report concerns freely, knowing these will be taken seriously.</p> <p>Read the news story: Government launches review into sexual abuse in schools Helpline for people who have experienced sexual abuse in education settings launched</p> <p>See also on NSPCC Learning > Protecting children from peer-on-peer sexual abuse</p> <p>CVT have continued its focus on highlighted Peer on peer abuse in education, staff code of conduct and introduced a new low level concern policy</p> <p>CASPAR Briefing September 2022</p> <p>The DfE's advice on Sexual violence and sexual harassment between children in schools and colleges (DfE, 2021) has been merged into Keeping children safe in education 2022. As part of this merger, the term "child-on-child abuse" rather than "peer-on-peer abuse" is used throughout the updated guidance</p> <p><u>Actions to be taken by CVT</u></p> <ul style="list-style-type: none"> • Safeguarding documents/presentations to be amended to reflect contact details • CDP for all staff, NSPCC 16–25-Year-Olds and NSPCC Online safeguarding • Risk assessments updated

	<ul style="list-style-type: none">• All staff to read and sign Part 1 of KCSIE 2023(annually or when an update is released)
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Reviewed by :.....Michelle Quinn.....

Date:.....05/09/2023.....

Next Review Date:.....05/09/2024.....