

Xyrius Training Limited

Safeguarding Policy

Purpose Statement:

Xyrius Training Limited strives to adopt the highest possible standards to ensure the safety and welfare of all learners and staff. It is the responsibility of everyone within Xyrius Training Limited to record and report any concerns they have immediately. Whatever your role, if you see, hear, or know something that concerns you, and suspect that anyone is at risk of being harmed or abused, you must immediately report what you have seen, heard or know. Doing nothing is not an option. While it is not possible to ensure that learners would never come to harm, the adoption of this policy, associated guidelines and code of conduct aims to facilitate the management of risk associated with the duty to protect staff and learners.

Responsibilities:

Xyrius Training Limited understands that to fulfil its responsibility to safeguard children/young people and vulnerable adults, all staff are required to undertake mandatory training and appropriately share any concerns that are identified or disclosed. We will immediately refer a person, if there are concerns about his/her welfare, possible abuse, or neglect to the appropriate agency where he/she resides. A Safeguarding Investigation Form (Appendix 1) will also be completed and sent to our Designated Safeguarding Officer (DSO) immediately. A written record of the referral will be forwarded to the relevant external agencies (where appropriate) within 48 hours of the disclosure.

Our DSO has overall responsibility for safeguarding in our organisation and will ensure that:

- Concerns are logged and stored securely. Written records about a child/young person or adult at risk are retained securely on record.
- All such records will be stored confidentially and securely. This will be monitored and managed by the DSO.
- All staff receive regular updates on child protection, vulnerable adults, and safeguarding, and that they receive refresher training as required.
- They are the first point of contact for all staff to go to for advice if they are concerned about children, young persons and/or vulnerable adults.
- They have a higher level of safeguarding training and knowledge than the other staff within the organisation.
- Safeguarding policy and procedures are kept up to date and regularly reviewed.
- Adherence to safe recruitment procedures for new staff members and support their induction.
- Assess information from staff regarding concerns about children, young people and/or vulnerable adults, make decisions about whether staff concerns are sufficient to notify First Contact, or whether other courses of action are more appropriate.

- Promote a safe environment for children, young people, and/or vulnerable adults by ensuring our safeguarding policy is embedded into IAG, enrolment, learning sessions, and review processes.
- They know the contact details of relevant statutory agencies e.g., Local Authority Safeguarding Children Partnership and the Local Authority Designated Officer (LADO) for allegations against staff
- Staff are aware of this policy and the associated procedures, identifying any appropriate training that staff may require
- Adequate staff training is provided and taken up and compliance is monitored and accurately recorded on an ongoing basis.
- A report is prepared for the quarterly management meeting for senior management to review any safeguarding issues.

It is not the responsibility of the Designated Safeguarding Team to decide whether children, young people and/or vulnerable adults have been abused or not, that is the responsibility of investigative statutory agencies such as DCSP, SAB, or the police.

However, keeping children, young people and/or vulnerable adults safe is everybody's business. Staff must ensure they have the knowledge to identify Safeguarding Issues, who to go to, and how to report any concerns they may have about children, young people and/or vulnerable adults being harmed or at risk of being harmed.

Definition:

A child is defined as being under the age of 18 years by the Children Act 1989. A young person or vulnerable adult may be defined as any person aged 18 or over who is, or may be, unable to care for themselves by reason of mental, physical, or learning disability, age, or illness, who is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or serious exploitation.

In relation to children and young people, safeguarding and promoting their welfare is defined in 'working together to safeguard children' as:

1. Protecting children from maltreatment.
2. Preventing impairment of children's health or development.
3. Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
4. Taking action to enable all children to have the best outcomes. A vulnerable adult is an adult at risk or vulnerable adult is defined as a person *"that has needs for care and support (whether or not the LA is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect; AND as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect"* (The Care Act, Department of Health, 2015).

Safeguarding action may be needed to protect children, young people, and adults from:

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- the impact of new technologies on sexual behaviour, for example sexting
- teenage relationship abuse
- substance misuse
- issues that may be specific to a local area or population e.g., gang activity and youth violence
- domestic violence
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting, particularly in relation to babies and young children

Safeguarding is not just about protecting children, young people, and/or vulnerable adults from deliberate harm, neglect, and failure to act. It relates to broader aspects of care and education, including:

- children's and learners' health, safety, and wellbeing
- risk assessments of individuals, activities, resources, and facilities
- the use of reasonable force
- meeting the needs of children and learners with medical conditions
- providing first aid
- educational visits (including the necessary considerations for the type of trips and visits, in terms of staffing ratios, overnight stays etc.)
- intimate care and emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure children's and learners' security, considering the local context.

It is important that we understand that safeguarding is not implicit to children only, the need to ensure effective safeguarding also extends to any adult at risk, who may be vulnerable through a variety of actions, inadequate policies and procedures, and failures to act. Safeguarding of both children and vulnerable adults is of paramount importance and Xyrius Training Limited seeks to ensure that a safe learning environment is available to all learners.

We understand our responsibilities towards the Prevent Duty. We have a legal responsibility to fulfil the prevent duty statement and protect children and adults from the risks of extremism and radicalisation, a role which is underpinned by the Counter- Terrorism and Security Act (2015) “*to have due regard to the need to prevent people from being drawn into terrorism.*” We will protect Learners and employees from radicalising influences by:

- Promoting our Safeguarding and Prevent Policies to all staff, learners, employers, and suppliers.
- Implementing our comprehensive approach to raising, recording, and investigating concerns.
- Providing information, advice, guidance, and support regarding both safeguarding- and Prevent-related matters.
- Monitoring the implementation of our Safeguarding and Prevent policies through desk-based audits of teaching and learning, conducting observations of teaching and learning, and regular Learner surveys that ask learners questions relating to safeguarding.

We will ensure Learners and employees are resilient to extreme narratives by making sure they understand what extreme is and how this compares to normal actions and narratives. To achieve this, all of our staff will receive basic Prevent training every 3 years. Our Learners are educated on Prevent and what extremism and radicalisation are during their inductions. Our DSO will identify any changes in the behaviour of our Learners and employees through regular observations of teaching and learning and progress reviews, in addition to reviewing Prevent-related feedback through staff/learner surveys. We will deal with any issues raised by Learners or employees through our referral process, which is detailed further below.

Promoting Our Safeguarding Policy:

We promote our safeguarding policy by providing all employees a copy upon induction, we keep an updated copy on the company website for learners to access, we provide yearly eLearning training for all staff and through 1-2-1 reviews and Performance and Development reviews.

Getting Commitment To Our Safeguarding Policy:

We get commitment from our staff, employers, suppliers, and Learners to our safeguarding policy via:

1. Mandatory eLearning
2. CPD
3. Inductions
4. Enrolment
5. 1-2-1 reviews
6. Performance and development reviews
7. Staff meeting or standardisation

Training Our Employees To Implement Our Safeguarding Policy:

All our employees are trained to implement our safeguarding policy by undertaking mandatory safeguarding training. All staff will receive basic child protection/safeguarding training every 3 years and the DSO will receive the appropriate level of training which is also renewable every two years. Training activities will be recorded for staff will be monitored. Where a staff member has not met the training requirements, managers will be responsible for ascertaining the reason why, ensuring compliance is met at the earliest opportunity.

New members of staff receive a thorough safeguarding induction and safeguarding training, or where they can demonstrate they have completed the same standard of training recently, then they would be exempt though they would still need to be trained in the reporting methodology and expectations of Xyrius Training Limited. Induction training will cover preventative action, roles, and responsibilities as well as reporting mechanisms. Regular safeguarding updates are available to ensure that any updates or developments are disseminated to staff, so they remain current.

Staff training will include but not be restricted to:

- Abuse
- Basic Child Protection Procedures and Vulnerable Adults
- Bullying
- Grooming
- E-Safety
- Prevent, Radicalisation & British Values
- Risk Assessment
- Confidential Reporting Code (Whistle Blowing)
- Staff Code of Conduct

Training will be updated at least every three years for all staff.

Protecting Learners:

We protect Learners in our care with regards to safeguarding by:

1. Covering our safeguarding policy during IAG and enrolment.
2. Completing safeguarding checks at all learning sessions and reviews, which cover safeguarding in addition to other areas such as equality and diversity, health and safety, Prevent, and British Values.
3. Completing observations of teaching and learning to ensure trainers are embedding safeguarding into their learning sessions.
4. Issuing feedback surveys every 12 weeks to learners and employers.

Raising, Recording, And Investigating Concerns:

We enable concerns to be raised, recorded, and investigated through our referral process, which is detailed below.

Our Referral Process:

The following '5 R' process must be followed by all staff:

- Recognise the signs of abuse
- Respond and react accordingly
- Record the facts of the disclosure
- Report the disclosure to the DSO immediately. All Safeguarding Investigation Forms must be forwarded to the DSO within 24 hours
- Refer (to the emergency services or Social Services or through the Channel process) in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the DSO (or Deputy/Safeguarding Officers) immediately.

Recognise:

Signs of abuse can be recognised as differences to the individual's usual behaviour or observed from a change in their physical appearance as mentioned below:

- Physical – this could include a lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, development of a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.
- Behavioural – this could include sudden changes in a person's character, including lack of confidence, low self-esteem, becoming withdrawn, aggressive, or angry for no reason, becoming anxious or tearful. The information above is by no means exhaustive, and an individual may not wish to disclose something that they perceive as 'normal'.

Respond:

People are often reluctant to talk about abuse. Many perpetrators may tell people to keep the abuse a secret and frighten them with unpleasant consequences. Listed below are some ways to respond to issues or concerns:

- Stay calm and listen carefully to what is being said
- Reassure the person that they have done the right thing by telling you, but not that everything will be okay; sometimes things get worse before they get better
- Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a need-to-know basis
- Allow the person to continue at his/her own pace – asking questions for clarification only; try to ask, 'Tell me', 'Explain to me', 'Describe to me', and avoid leading questions
- Explain what you will do next and with whom the information will be shared

- Do not delay in discussing your concerns with the appropriate staff. If you feel that anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example:
- Call an ambulance or a GP if someone needs medical attention
- Call the emergency services/police if a crime is taking place or has taken place
- Inform the DSO immediately
- Separate the alleged perpetrator and victim – but only if it is safe to do so. Any violence by a learner or member of staff (including employer staff) must be reported through ALSS's Internal Notification Process.

If you are suspicious but no disclosure has taken place, discuss your concerns with the DSO.

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact your Line Manager and DSO
- Do not question the person making the allegation or investigate the matter yourself.

Information Sharing:

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. When sharing information, remember:

- The Data Protection Act (2018) is not a barrier to sharing information
- Be open and honest
- Seek advice
- Share with informed consent where appropriate (There may be some circumstances where seeking consent, including parental consent, is not required)
- Consider safety and well-being
- Ensure that information sharing is appropriate and secure
- Keep a record.

Record:

A Safeguarding Investigation Form (appendix 1) **MUST** be completed. Where a Safeguarding Form is not readily available, please ensure that the following information is noted:

- Your details
- Name of those involved
- Date of incident(s)/disclosure/suspicion
- Details of incident(s)/disclosure/suspicion
- Background information
- Actions taken.

Whilst you can record observations, do not interpret, or give opinions as this may bias the information provided and jeopardise any future investigation into the allegation. The Safeguarding Investigation form should be kept secure and forwarded to your DSO.

Report:

Any issues, concerns, allegations, or suspicions relating to safeguarding must be taken seriously and reported to the DSO.

Refer:

Where required, the DSO will deal with the relevant referrals and liaising with the relevant external agency.

This will include the following:

- Any referrals to first contact - 03000 267 979 (children / adult services) or through the Channel process (first contact - 03000 267 979)
- Where there is disagreement between members of staff about the need to make a referral
- Concerns about a young person subject to a Child Protection Order should be relayed to the keyworker immediately, in the absence of a key worker, the procedure below should be followed.

Learners aged 18 Years or Over:

There is no requirement to report abuse to any external agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk, in which case Xyrius Training Limited safeguarding procedures should be followed. The learner may wish to involve the police. The role of staff is to support them through this process. Alternatively, if this is past abuse, then the learner may require directing towards a counselling agency, such as NSPCC, Victim Support, Support line or other abuse survivor support agencies.

Support And Guidance For Learners:

We provide our Learners with support and guidance through:

- Information, advice and guidance packs and leaflets
- Enrolment and induction training for Learners
- Making DSO contact details available in varying locations
- Policy and forms being available on the website for learners

Monitoring Our It Usage:

We monitor our IT usage via Microsoft 365 (Azure) analytics. Anything that is flagged during these checks would be fed up the line by our IT team to our senior management team as part of the quarterly management review. Any incident deemed to be an emergency would be dealt with immediately. All incidents highlighted would be entered into the NCCI system and form part of our annual Quality Improvement Plan (QIP) review.

We provide our learners with information which enables them to use our IT systems safely, in accordance with relevant legislation, regulations, and Xyrius Training Limited policies.

What dangers may learners be exposed to online?

- inappropriate material
- cyber bullying via websites, social media, mobile phones or other technologies
- identity theft or invasion of privacy
- breaking copyright law
- inappropriate advertising online gambling and financial scams
- safeguarding issues such as grooming or radicalisation
- other illegal activities

Xyrius Training Limited has a duty to safeguard learners to keep them both safe and within the law and commits to:

- Providing an internet filtering system.
- Educating all learners to safely use the internet as part of their class.
- Providing training and information for all staff.
- Embedding this aspect of safeguarding in all policies and, where appropriate, curriculum plans.

The responsibilities of our staff and providers includes:

- Undertaking corporate training on online safety.
- Being aware of when it is appropriate to refer concerns about learners or colleagues to their line manager or the DSO.
- Reporting concerns where they arise.
- Refraining from making negative comments about learners on blogs or social networking sites. This could be considered gross misconduct.
- Educating learners in keeping safe online.
- Educating learners on keeping within the law online (copyright, libel).
- Acting as a good role model in their own use of IT.
- Being aware of the potential for cyber-bullying in their sessions via malicious messages e.g., through the use of forums and social networking sites, or via internal class emails or text messages on mobile phones, which can cause hurt or distress.

Learners are encouraged to access various technologies in sessions, private study, and in the completion of assignments and independent research. Therefore, they are expected to follow the information, advice, and guidance given.

Risk Assessments:

For all other risks, staff are responsible for making the learners aware that what they are doing is inappropriate and unacceptable. It is important that Safeguarding Designated Team are informed about any incident immediately. It is extremely important that all information is received and acted upon immediately. All incidents and complaints received relating to the health, safety and wellbeing of learners and staff will be acted upon, recorded, and stored for future reference. Incidents should be recorded on an Incident Report Form as soon as reasonably practicable.

Risk assessments should cover:

- Where it is known that a learner has a difficulty or disability that might impact on their learning a Risk Assessment should be completed on the venue, activity, and the learners. Such Risk Assessments will be held with the course/class register or penned portrait.
- Staff engaged in Off Site and Lone Working arrangements must be familiar with the Lone Working Policy and adhere to its requirements.
- The Lone Working Policy is based on a thorough appraisal of the risks and how to mitigate them.
- Delivery occurs in many venues. It should not be assumed that fire evacuation and first aid policies are the same in every venue. All staff should always make themselves and the learners aware at the beginning of every session.
 1. First Aid - who is first aid qualified and where the first aid box is located.
 2. The Fire evacuation procedures - What to do in the event of a fire, including the need to leave by the nearest available fire exit and location of assembly point and inform learners if there is likely to be a practice fire alarm.

Violence At Work:

Xyrius Training Limited is a responsible employer and we take our duties seriously therefore this policy has been drawn up to help us comply with our legal responsibilities, which include the provision of a safe place and a safe system of work for our staff and others who may be affected by our business activities. The DSO will review these procedures regularly to ensure they are relevant to working practices and that they are being implemented. Violence at work has been defined as when the person is abused, threatened, or assaulted in relation to their work. This includes verbal as well as physical abuse. Physical abuse is obviously dangerous, but verbal is more common and can also be very serious. Whilst this definition applies to all staff, there are some groups who may be more at risk than others; the following have been identified as being most at risk.

- Employees who provide a service
- Lone workers
- Employees who represent an authority
- Staff who work outside normal working hours
- Training Staff dealing with the general public

The following are guidelines on action Xyrius Training Limited will take to reduce the risk of violence to staff, assessors, and visitors. They are not exhaustive but are a set of principles to be followed if a risk is perceived. Our aim is to establish a culture of openness, so employees are comfortable reporting any incidents.

1. As part of the risk assessment process, we will talk to staff across the business in order to assess what, if any, further measures are required.
2. Staff are actively encouraged to discuss with either their line manager or HR any concerns they may have, and all approaches will be treated sympathetically.
3. Any incidents, including verbal threats or abuse, must be reported. If necessary, these will be reported under RIDDOR.

The safety of Xyrius Training Limited staff is paramount. If anyone finds themselves dealing with rude or aggressive individuals at work, they must never return aggression as this is how anger can escalate into violence. Try to adopt a calm and reassuring attitude and speak slowly and gently. In the unlikely event that a situation escalates, staff should always withdraw from it. Xyrius Training Limited recognises that in the event of an employee being a victim of violence, some counselling or other specialist help may be required. It is our intention to deal with cases constructively and sympathetically. HR will give you advice and guidance on how to obtain help and assistance with any workplace related violence issue. All requests for help will be dealt with in the strictest confidence.

Designated Safeguarding Officer:

Designated Safeguarding Officer
Margaret Brewer margaret@xyrius.co.uk

In non-severe cases, please email the safeguarding email on the following:

Email Address
Monica.roadknight@xyrius.co.uk

Links to relevant documents and websites for relevant definitions:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550499/Keeping_children_safe_in_education_Part_1.pdf

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

<https://www.gov.uk/government/publications/working-together-to-safeguard-children>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

Appendix 1 - Safeguarding Investigation Form

Date and time of incident/disclosure		Date and time of report to DSO	
1. Details of person reporting the safeguarding issue or alleged Incident			
Name:			
Tel Number (preferably mobile No):			
Relationship to subject: i.e., tutor, friend			
Has the learner given consent to refer?	Yes		No
2. Details of the person/s who have been affected by a safeguarding incident			
How many people have been affected?			
Name		D.O.B	
Address, including postcode		Contact number	
What qualification are they enrolled on?		Tutor name: (if different from above)	
Does the individual have a disability?	Yes		No
If yes, please give details:			
Email address			
Is the above person under 18 or an adult at risk? If yes, please complete the parent carer details below.			
Parent/Carer Name		Carer/Parent been informed	
Parent/Carer Address including Postcode		Contact number Home	
Parent/Carer email address		Relationship to Subject	
Are you aware of any other Professionals/Agencies that are involved with supporting the person?			
Agency	Tel No	Contact Name	Role
3. Is this an issue that involves?			
Immediate Danger		Aged 19+ Vulnerable Person Protection issue	e-Safety Issue

Illegal Activity		Prevent – anti Radicalisation		Issue Behaviour Management	
Aged 0-18 Child Protection issue		Bullying & Harassment		Other	

If other, please give further details:

4. Relevant Witnesses

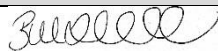
Full Names	Tel. no.	Address	Relationship to person

5. Details of incident, disclosure, or issue

Give an account of the issue, disclosure, or incident in as much detail as possible. Please include details of when the incident took place (if applicable) where the incident took place (if applicable)

Signature of person reporting incident

Document Control

Document Title	Document Owner	Signature	Version	Review Date
Safeguarding Policy	Bethan Rhodes		May22 v.1	

This document should be a reviewed a minimum of annually.