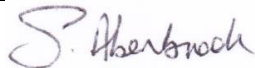


# Safeguarding Policy

## Version 1.4

### Contents

Purpose  
 Scope  
 How we approach safeguarding/ responsibilities  
 Raising Awareness/ Active Promotion  
 What is safeguarding?  
 Definitions & concepts  
 Why is safeguarding necessary for employed learners/ apprentices?  
 Dealing with disclosure of abuse and responding to concerns  
 Confidentiality  
 Recording your concerns  
 Reporting Concerns  
 Notification to external organisations  
 Duty of Confidence  
 Key Contacts  
 Keeping yourself safe  
 Safer Recruitment  
 Disclosure and Barring service (DBS)  
 I.T. and internet safety  
 Cyberbullying  
 Data Protection  
 Whistleblowing and complaints

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### Monitoring and Improvement

This policy will be reviewed annually, or in response to major changes in legislation or significant events. It is the responsibility of the Managing Director (DSL) to review and monitor these procedures and to consult with other agencies as appropriate. Policy review will include consultation with local Safeguarding Adults Agencies whose support and advice is recognised as crucial to the effective implementation of the policy.

## **Purpose**

Interventions Consulting is committed to safeguarding and promoting the welfare of all learners (which includes apprentices), staff, stakeholders and partners and ensuring that action is taken to support them if abuse is suspected. As we support employed learners/apprentices in the workplace this must be done in partnership with employers.

We recognise our statutory and moral duty towards safeguarding the welfare of all children, young people and adults at risk whilst in our care and ensure that everyone has an equal right to protection from abuse or exploitation whatever their race, religion, first language or ethnicity, gender or sexuality, age, health or disability, political or immigration status.

This policy and related procedures have been developed by Interventions Consulting in line with, and taking account of, guidance issued by the Department for Education, Ofsted and other relevant bodies and operates in line with the requirements of the Yorkshire Safeguarding Adults Board as well as The Prevent Strategy.

## **Scope**

This policy applies to all learners including children, young people and adults at risk who may need support, and all staff and partners in the workplace or distance learning.

We expect all staff and partners to endorse and practice their duty towards safeguarding at all times. As a result, Interventions Consulting has a zero tolerance approach to abuse and other harmful behaviour.

Interventions Consulting has implemented outstanding measures to ensure that its safeguarding policy and procedures are fully embedded into the learner journey and works closely with employers and partners to ensure the most effective systems are in place.

Our organisational structure and approach places emphasis on collaborative relationships with our learners and our partners in delivery. This means our response to need and risk is timely and effective. We ensure that we work together to learn the lessons from our practice and use them to inform our safeguarding policies. Our staff are informed in terms of the indicators of possible harm and know what to do when possible abuse or neglect is suspected or disclosed.

Our goal is to enable all learners. This means that we focus on supporting them in finding their own solutions to challenges that pose a risk to their well-being, empowering them to make positive sustainable changes to their lives.

This policy outlines our organisational standards in safeguarding children, young people and adults at risk. We use these standards to measure our performance and achievements in safeguarding learners and staff. We also outline a range of behaviours that we encourage staff to embed in their approach to safeguarding that in turn, we believe, supports effective safeguarding practice and the prevention of harm.

This policy references key legislation and statutory guidance and outlines how we approach safeguarding at local delivery level.

## **How we approach safeguarding/ responsibilities**

Our leadership team sets the strategic direction for safeguarding and has overall responsibility for oversight and management of this policy alongside reviewing and monitoring safeguarding incidents.

The **Designated Safeguarding Lead** for Interventions Consulting is our Managing Director who is an experienced and qualified practitioner. The DSL ensures that safeguarding matters are central to the strategic management of Interventions Consulting and holds ultimate accountability for ensuring safeguarding arrangements for learners, including apprentices, staff and associates.

The DSL is supported by a Deputy Safeguarding Officer, Head of Operations, and together they form the Safeguarding team for Interventions Consulting and are responsible for disseminating safeguarding information and ensuring effective communication on safeguarding issues is maintained by:

- providing up to date knowledge on safeguarding matters
- ensuring access to appropriate safeguarding training

The Safeguarding team also ensure that personnel delivering and supporting learners develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the children, young people and adults at risk that Interventions Consulting works with. Every member of staff has a responsibility for ensuring that learners are safeguarded while they are using our services.

Interventions Consulting's organisational safeguarding standards recognise that we safeguard in a wide range of contexts with a diverse group of learners. Therefore, managing the risk to learners in these contexts can require different sets of knowledge and skills, and different responses, some of which are driven by statute and legislation.

Our safeguarding standards and behaviours seek to underpin safeguarding in all of our practice and are derived from section 11 of the Children Act (2004), The Care Act (2014), Safeguarding Vulnerable Groups Act (2006), Protection of Freedoms Act (2012) Part 5 and Working Together to Safeguard Children (2018).

Our approach to safeguarding is measured against our organisational standards. We demonstrate that we meet these standards through the evidence we draw together in our performance framework.

## **Raising Awareness/ Active Promotion**

This policy, safeguarding and The Prevent Agenda are constantly promoted through:

- Training
- Contract reviews
- Individual performance reviews
- Intranet

We have a commitment to ensuring that during all staff and learner inductions; Health and Safety, Safeguarding, Prevent, Whistleblowing and Complaints procedures are covered and understood.

We also ensure that all staff complete mandatory training on Safeguarding and Prevent annually, as a minimum, to ensure we keep our learners and staff safe.

We expect all staff to:

- Take up the development opportunities that Interventions Consulting offers
- Familiarise themselves with local opportunities for multi-agency safeguarding training and other opportunities in developing safeguarding practice (mentoring, shadowing)
- Through performance review and other opportunities, consider and examine what additional knowledge and skills they may need to carry out their role effectively
- Seek out and reflect upon any feedback from colleagues, peers and learners about what they do in practice and ensure they role model appropriate behaviours

## **What is Safeguarding?**

Safeguarding is a term used to describe the measures put in place to ensure the protection of health, wellbeing and human rights of any individuals who may be at risk.

Safeguarding legislation provides definitions of children and adults at risk and sets out the legislative framework of measures to protect them from harm. These include:

- Promotion of health and development
- Ensuring their safety and care
- Ensuring they are offered the best life chances
- Protection from abuse and neglect
- Prevention of bullying and harassment

## **Definitions & concepts**

### **Child**

Any reference in the policy to a “child” or “young person” is defined as anyone under the age of 18 in accordance with the Children Act 1989 & Education Act 2002.

Due to the fact that our business specialises in Leadership training with employed personnel across manufacturing and distribution sectors, it is unlikely that we will have learners under the age of 18, however, it is important that staff are aware of their duties and practices in such an event.

### **Adult at Risk**

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) Interventions Consulting uses the following indicators to identify an adult who is, or may become “at risk”:-

The individual:

- i. is or may be in need of community care services by reason of mental or other disability, age or illness;
- ii. is or may be unable to take care of himself or herself;
- iii. is unable to protect himself or herself against significant harm or serious exploitation

Whilst not definitive, the main categories of people covered by the definition of “adult at risk” include those who:

- i. have a learning disability
- ii. have a physical or sensory impairment
- iii. have a mental illness including dementia

- iv. are old and frail
- v. are detained in custody or under a probation order
- vi. 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)

## **Abuse**

“Abuse” relates to the mistreatment of an individual’s human and civil rights by any other person or persons, and may consist of single or repeated acts. Incidents of abuse can be either to one person or more than one person at a time. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm.

Within the context of this policy abuse and harmful behaviours are defined through these main categories:

- **Physical:** this may involve hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inflicting inappropriate physical sanctions, or otherwise causing physical harm to a child, young person or adult at risk including fabricating the symptoms of, or deliberately causing the individual ill health (DfE 2014, DoH 2000)
- **Emotional/Psychological:** this is the persistent emotional ill-treatment of a child, young person or adult at risk such as to cause severe and persistent adverse effects on their emotional development. This may involve the imposition of age or developmentally inappropriate expectations resulting in fear, exploitation or corruption. This may also include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Threats of harm or abandonment; humiliation; blaming; intimidation; coercion; harassment; verbal abuse, bullying (including cyberbullying) and being prevented from receiving services or support are all forms of emotional abuse (DoH 2000). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual:** such as rape, sexual assault or sexual acts occurring through force or enticement and which a child, young person or vulnerable adult could not have consented to, or to which they were pressurised into consenting. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities such as involving the child, young person or adult at risk in looking at, or in the production of, pornographic material, watching sexual activities or encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (DoH 2000).
- **Neglect or Acts of Omission:** this includes the persistent failure to meet a child, young person or adult at risk’s basic physical and/or psycho-social needs, and which are likely to result in a serious impairment of the individual’s health or development. This may include failing to provide adequate food, shelter and clothing, or educational services and/or neglect of, or unresponsiveness to, a child, young person or adult at risk’s basic emotional needs (DoH 2000).

- **Financial or Material:** this may include theft, fraud, and exploitation, pressure in connection with money or material possessions. This may also include loss of jewellery or personal property, loss of money from a wallet or purse (DoH 2000).
- **Discriminatory:** this may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or sexual orientation (DoH 2000).
- **Specific Issues and Further Information:** specific advice should also be sought in relation to specific situations including forced marriage, the effects of domestic violence on young people, female genital mutilation, children and young people who sexually abuse or who are exploited and those affected by drug and alcohol abuse in families.
- **Abuse of Trust:** under the Sexual Offenders Act 2003 it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments.
- **Radicalisation:** The process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy.Gov.uk)
- **Online Abuse:** any type of abuse that happens on the web, whether through social networks, playing games online or using mobile phones (NSPCC 2015)
- **Child Sexual exploitation:** Is a type of abuse where children are sexually exploited for money, power or status. (NSPCC 2015)
- **Female Genital Mutilation:** FGM is the total or partial removal of the external female genitalia for non-medical reasons (NSPCC 2015).
- **Domestic abuse:** witnessing domestic abuse is child abuse, Teenagers can suffer domestic abuse in their relationships. (NSPCC 2015)
- **Child trafficking:** Is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold. (NSPCC 2015)
- **Harmful sexual behaviour:** Children or young people develop sexual behaviours that harm themselves or other. (NSPCC 2015)
- **County Lines** Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. (KCSIE 2019)
- **Peer on peer abuse** Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. (KCSIE 2019)

- **Homelessness** Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. (KCSIE 2019)
- **Up skirting** Up skirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals to obtain sexual gratification, or cause the victim humiliation, distress or alarm. (KCSIE 2019)

### **Consent - The basic principles**

Borrowing from the "Mental Health Act (1983): Code of Practice" – The term "informed consent" can be defined as:

The voluntary and continuing permission of the adult to agree to a course of action or inaction, based on adequate knowledge of the purpose, nature, likely effects and risks of the "proposed action/inaction" including the likelihood of its success and any alternatives to it. Permission given under any unfair or undue pressure is not consent. The above definition refers to "undue pressure or influence" which has received increasing attention in preventing the abuse of vulnerable adults. "Undue influence" exists when an individual who is stronger or more powerful gets a weaker individual to do something that the weaker person would not have done otherwise. The stronger person uses various techniques or manipulations over time to gain power and compliance. They may isolate the weaker person, promote dependency or induce fear and distrust of others.

### **Radicalisation and Acts of Terrorism**

#### **The Counter Terrorism & Security Act (2015) & The Prevent Duty**

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Offices uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- funding a specialist police unit which works to remove online content that breaches terrorist legislation

- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on specified authorities including Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

Interventions Consulting is committed to supporting vulnerable students through its safeguarding policies and procedures and recognises that this can support the organisation's contribution to the Prevent duty.

### **Why is safeguarding necessary for employed learners/ apprentices?**

Providers of government funded training have a duty to safeguard their learners and to take such steps that try to ensure the safety of its learners (children under 18 and adults at risk) at all times. As part of that duty, we ensure employers and other stakeholders are aware of their commitment in safeguarding their staff and to ensure that learners are not exposed to threats or dangers.

It is our role to ensure that all staff:

- understand what is meant by safeguarding
- Know and recognise all types of abuse
- Are alert to and aware of signs of abuse at all times
- Know the procedures for reporting concerns
- Use the whistleblowing procedure

### **Dealing with disclosure of abuse and responding to concerns**

Action that should be taken if you have concerns, suspicions, witness abuse or someone discloses abuse:

- Take whatever action is required to ensure the immediate safety or medical welfare of the individual
- Speak to them in a private and safe place
- Obtain their views on what has happened and what they want to be done about it
- Use active listening skills and remain calm, sensitive and non-judgmental
- Provide information about the safeguarding process and how it could help to make them feel safer
- Emphasise that they are not to blame and are right to tell someone
- Clarify main facts, summarise what has been said to you
- Ensure that they understand the parameters of confidentiality (see below)
- Explain how they will be kept informed, particularly if they have communication needs, and that their allegations will be taken very seriously



## Confidentiality

The views of the individual making the allegation should always be taken into account, however, if the individual:

- does not wish action to be taken, or
- does not wish to be involved with any investigation, or
- does not want any information shared with other individuals or agencies

In the first instance it should be explained that you have a duty to discuss the disclosure with the DSL of Interventions Consulting in order to make sure that necessary action is taken. Stress that this is part of your job to keep learners safe.

There will be a need to share information with the relevant authorities and support agencies and generally permission would be asked before doing so. However, in exceptional circumstances e.g. if it is considered that a learner is at serious risk of abuse then information may be disclosed without consent.

## Recording your concerns

- Make a complete and accurate record of events immediately. The following information, if available, should be recorded:
  - Name and address
  - Age and date of birth
  - Ethnic origin
  - Religion, if any
  - Disability, if any
  - Preferred communication method and language
  - Name and address of adults involved in the incident/concern/allegation
  - Date and time of the alleged incident
  - Nature of injury, behaviour or concern
  - When the behaviour or injury was first noticed
  - The explanation in his/her own words as verbatim as possible
  - Date and time of the recording
  - Any questions that were asked
  - Signature of the person recording the concern
- Some of this information may not be available to you. It is important that the person freely volunteers whatever information they wish you to have.
- When recording, you need to ensure you separate fact from opinion by setting out facts first. Having an opinion is entirely valid and may be useful but it must not be confused with factual information
- Consider how the abusive experience might impact on the ongoing delivery of services, particularly personal care arrangements and access arrangements
- All written records about the abuse or allegation of abuse must be retained securely and confidentially and marked as sensitive.

## Reporting concerns

- Report your concerns to the Designated Safeguarding Lead (DSL) as soon as possible and always within 24 hours. If the DSL is not available, you must notify the Deputy Safeguarding Lead
- The DSL will, in consultation with the staff member, decide whether a referral is appropriate/ will take place
- **All reported disclosures must be reported through the completion of a 'Safeguarding Incident form' (SIF)**
- - Part 1 outlines the basic details of the referral and part 2 the details of the incident being reported. Both part 1 and 2 must be completed at the same time following the disclosure.
  - The form must then be anonymised by removing the person's personal details and password protected and sent by email to the DSL

## Notification to external organisations

- The DSL must report the matter to Adult Services (or Children's Social Care where appropriate) or the police by phone immediately, followed up by written confirmation or email within 48 hours.
- A written record of the date and time of the report must be logged and the document should include the name and position of the person to whom the matter is reported. The telephone contact must be confirmed in writing using the appropriate Local Authority form within 24 hours.
- The DSL should note down the detail of the discussion about action to be taken.

## Duty of Confidence

Information held by Interventions Consulting is subject to the legal duty of confidence and should not normally be disclosed without the consent of the persons who have provided the information or are subject of the information. However, the public interest in maintaining confidentiality can be overridden by the public interest to protect vulnerable persons. Disclosure without consent must therefore be necessary and justifiable in each case and be the minimum necessary to achieve the aim.

In the event of doubt, legal advice will be obtained by the DSL before a disclosure is made, and the most appropriate ways of dealing with individual incidents from relevant statutory agencies will be agreed.

## Key Contacts

Designated Safeguarding Lead: Sarah Abenbrook    Managing Director  
[Sarah.abenbrook@interventionsconsulting.com](mailto:Sarah.abenbrook@interventionsconsulting.com)    07951 043099/ 0113 4931943

Deputy Safeguarding Officer: Sarah Aspinall    Head of Operations  
[Sarah.aspinall@interventionsconsulting.com](mailto:Sarah.aspinall@interventionsconsulting.com)    07900 375057/ 0113 4931943

Adult Social Care	0113 222 4401	<a href="mailto:leedsadults@leeds.gov.uk">leedsadults@leeds.gov.uk</a>
Emergency Duty Team	0113 378 0644 (out of hours)	<a href="mailto:edt.ss@leeds.gov.uk">edt.ss@leeds.gov.uk</a>
Police	101 for non-emergencies/ 999 for emergencies	
Care Quality Commission	03000 616161	

## **Keeping Yourself Safe**

To maintain yours and the learner's safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home
- Personal relationships with learners

You will naturally build a rapport with learners/ apprentices and they may see you as a confident and support, but be sure to maintain professional boundaries whenever carrying out work on Interventions Consulting's behalf. Be respectful and appreciate you are in a position of trust.

- Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination ensure a member of the site staff is aware where you are and monitors this
- Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting)
- If at any point, you feel unsafe in a learners company inform the site manager, your line manager, the DSL and leave the premises

## **Safer Recruitment**

Interventions Consulting carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children or adults at risk in line with the Disclosure and Barring Service requirements.

## **Disclosure and Barring Service Checks**

The Disclosure and Barring Service (DBS) is designed to protect children and vulnerable groups by preventing those who pose a known risk from gaining access to them through their work. The DBS makes independent barring decisions and maintains two constantly updated lists, one for those barred from working with children, the other for those bared from working with vulnerable groups.

The DBS service allows individuals to keep their criminal record certificate up to date, so that they can take it from role to role. Interventions Consulting requires that all personnel who come into contact with learners hold a current and valid DBS certificate.

## **I.T. and Internet Safety**

The internet is used in Interventions Consulting to support the professional work of staff, delivery online training via our dedicated LMS and promote learner achievement. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our learners with all the necessary I.T skills that they will need in order to enable them to progress confidently in their educational careers and onward towards their working environments when they leave education.

Some of the benefits of using ICT and the internet in education are:

For learners:

- Flexibility over when and where learners can access learning and training
- an enhanced curriculum with interactive learning tools including self-assessment and eLearning
- real time feedback and assessment opportunities
- access to a vast range of resources and reference materials
- access to subject experts, role models, inspirational people and organisations
- the ability to collaborate virtually on a local, regional and global level
- social inclusion, in class and online

For staff:

- the ability to deliver training in a more flexible way; through virtual group sessions with learners in different locations, incorporating a range of interactive support tools/speakers
- having more regular sessions which can flex around learner's work commitments
- the ability to track progress real time and provide feedback in a more timely manner
- the ability to manage diaries, attendance records and assess work through our LMS
- access to a wider network of professional and personal support partners
- professional development through access to national developments, educational materials and examples of effective curriculum practice and delivery strategies

For parents (learners under 18 and those identified as at risk)

- Communication between Interventions Consulting and parents/carers may be through e-mail and telephone messaging. These forms of electronic contact may in some cases enable a more-timely exchange of information and provide a document trail for both parties.

### **Roles and Responsibilities with regards to IT and internet usage**

The Safeguarding Lead:

- has day-to-day responsibility for eSafety issues and plays a leading role in establishing and reviewing policies, systems and documentation
- ensures that all staff are aware of the procedures that need to be followed in the event of an eSafety incident taking place
- provides advice for staff on eSafety and how to keep learners safe
- liaises with the Local Authority through the LADO for incidents that are defined as Safeguarding concerns and appropriate referrals made

Parents/Carers (for under 18s or those defined as vulnerable or 'at risk')

- play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way.
- will be encouraged to support in promoting good eSafety practice and to follow guidelines.

## Cyberbullying

Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs

Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications

Who is most at risk?

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

Definitions of cyberbullying

<b>Flaming</b>	Online fights, usually through emails, instant messaging or chat rooms, where angry and rude comments are exchanged.
<b>Denigration</b>	Sending unkind online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
<b>Exclusion</b>	Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
<b>Outing</b>	Sharing secrets about someone online including private information, pictures, and videos.
<b>Impersonation</b>	Tricking someone into revealing personal information then sharing it with others.
<b>Harassment</b>	Repeatedly sending malicious messages to someone online.
<b>Cyberstalking</b>	Continuously harassing and denigration including threats of physical harm

## Data Protection (please also see Data Protection policy)

All details and actions taken must be recorded against a learner's profile on the LMS or other electronic learner records as appropriate. There may be different recording requirements dependent on the context of your work however, to remind you, here are the key principles:

- Ensure you include the key details of the learner and any required description about them in the account
- Be accurate
- Record only relevant information. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

What happens to the recording of the disclosure and other information gathered?

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences.

Internally, the Safeguarding Incident Form includes the requirement for an update within 7 days of the disclosure

### **Whistleblowing and Complaints (please also see whistleblowing and complaints policies)**

In the event that an allegation is made against a staff member, either employed or associate, the matter must immediately be notified to the Managing Director (DSL). If there is a risk arising to operational delivery, key partners should be informed.

The DSL will then decide whether the incident is a potential safeguarding matter or should be dealt with under our internal Complaints and disciplinary procedures.

If the allegation is of a safeguarding nature and constitutes:

- A concern which may mean the staff member is not suitable to continue delivering training or supporting learners
- A concern which has led to the possible harm to a learner
- A safeguarding concern which may be criminal in its nature or intent

This must be reported in accordance with the procedure detailed in this policy to the DSL and appropriate authorities