Safeguarding Adults Policy

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Approved by Kevin Vashi, Managing Director

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Person/s responsible: SLT, DSL, all staff

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Contents

INTRODUCTION

Safeguarding is Everybody's Responsibility

Netcom believe that Safeguarding is Everybody's Responsibility, therefore The Safeguarding Policy for Netcom reflects the importance of our responsibility to safeguard and promote the welfare of all our learners and staff by protecting them from physical, sexual, or emotional abuse, neglect, bullying and exploitation.

We are committed to providing a caring, friendly and safe environment for all our learners, so that they can learn in a relaxed and secure atmosphere whilst carrying out their online training.

Statutory Requirements

Netcom have a statutory requirement to follow the guidance referenced in the following:

- The Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- The Equality Act 2010 / Public Sector Equality Duty (PSED)
- Care Act (2014) legislation and the Care and Support guidance (2014
- The Public Sector Equality Duty (PSED)
- Equality Act 2010
- Human Rights Act 1998, the Mental Capacity Act 2005, and Public Interest Disclosure Act 1998
- Data Protection Act 1998
- Freedom of Information Act 2000
- Safeguarding Groups Act 2006
- Deprivation of Liberty Safeguards Code of Practice2008
- The Mental Capacity Act 2005
- The Human Rights Act 1998
- The Public Interest Disclosure Act 1998 (PIDA)

Aim

The main aims of this policy are to ensure that staff are working together and fully engaged in being vigilant about raising awareness, embedding, and monitoring safeguarding; that they overcome professional disbelief that such issues will not happen at Netcom and ensure that we work alongside other professional bodies and agencies to ensure that our learners and staff are safe from harm.

In addition, this policy will also outline the duty and responsibilities of all staff, representatives and directors so they understand that anyone is capable of abuse, and that abuse can be experienced in a variety of forms in relation to safeguarding adults.

The policy will always be available to staff via the website and SharePoint and promoted at induction, training and via other communication channels. Learners will be informed during the induction process, reminded of the policy whilst on-program, and have training throughout the length of their program.

All staff, learners and visitors have the responsibility to be vigilant in adhering to this policy and assessing the risks of their own work and/or activities.

The use of the word '**individual**' within the policy represents adults' learners in addition to adults with vulnerabilities.

The use of the word "**victim**" within the policy refers to the person who has suffered abuse.

The use of the word "**perpetrator**" within the policy represents refers to the person who has initiated and carried out the abuse.

Who is included under the heading 'adult?'

An Adult (a person aged 18 or over) 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 or herself, or unable to protect him or herself against significant harm or exploitation'.

This could include people with learning disabilities, mental health problems, older people and people with a physical disability or impairment. It is important to include people whose condition and subsequent vulnerability fluctuates. It may include an individual who may be because of their role as a carer in relation to any of the above.

It may also include victims of domestic abuse, hate crime and anti-social abuse behavior. The person's need for additional support to protect themselves may be increased when complicated by additional factors,

such as, physical frailty or chronic illness, sensory impairment, challenging behavior, drug, or alcohol problems, social or emotional problems, poverty, or homelessness.

Many adults may not realise that they are being abused. For instance, an elderly person, accepting that they are dependent on their family, may feel that they must tolerate losing control of their finances or their physical environment. They may be reluctant to assert themselves for fear of upsetting their carers or making the situation worse.

It is important to consider the meaning of 'Significant Harm'. The Law Commission, in its consultation document 'Who Decides,' issued in Dec 1997 suggested that; 'harm' must be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also 'the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development'.

SCOPE OF POLICY

This policy details how the safeguarding of everyone will be executed:

Learners
- Provision of a safe online learning environment.
- A clear system to ensure personal safety.
- A commitment by Netcom staff to ensure behaviour and discipline of all is to an acceptable standard and bullying, harassment, or victimisation. Will not be tolerated
- A commitment to identify and monitor pastoral issues that may later develop into safeguarding concerns.
- Provide additional resources
- Provision of a safe environment when attending Netcom events

Staff
- Provision of a safe working environment.
- Regular review of systems and procedures to ensure they're appropriate and effective.
- Training and professional development.
- Wearing Staff ID whilst on-site or at events
- Promoting understanding of Safeguarding, report making and disclosures.
- Having difficult and sensitive conversations

External Agencies
- Actively seek support and advice.
- Collaboration with external bodies/stakeholders.
- Contracting and sub-contracting arrangements.

- Arrangements for the appropriate checks for external guest speakers
- Netcom will actively engage with external agencies in the interests of ensuring the safeguarding of learners. This may include the relevant Local Authority Designated Officer (LADO), NSPCC and Local Adults Safeguarding boards, Adult Social Services and the Police

RESPONSIBILITIES

Netcom 's Managing Director has overall responsibility for our Safeguarding Policy and will ensure that this policy is strictly adhered to by working with the designated safeguarding Lead who will ensure that the DST respond to all adult protection enquiries and concerns. The DSL will take overall responsibility for the Safeguarding policy and procedures.

Netcom Designated Safeguarding Team (DST)

Designated Safeguarding Lead (DSL) – **Ann Cox**

Designated Deputy Safeguarding Lead (DDSL) – **Emma Webb**

Designated Safeguarding Officer (DSO) – **Atran Esho**

Designated Safeguarding Officer (DSO) – **Jack Simms**

In addition, the DST will provide advice and support for other staff, ensuring appropriate staff development, consulting with the authority, and working with other organisations, as necessary.

Role of Line Manager

The role of the line manager is to support the member of staff or volunteer involved with the incident and to ensure the correct procedures are followed.

The line manager could, if agreed with the staff member dealing with the incident, make contact with the Designated Safeguarding Officer in the first instance.

RECRUITMENT

Netcom operates a safer recruitment procedure, including arrangements for appropriate checks (DBS) on new staff, contractors, guest speakers and volunteers where applicable. This includes doing online checks of potential new staff to identify any incidents or issues that may have happened and are publicly available online. Shortlisted candidates should be informed that these checks have taken place as part of due diligence checks. Any new staff will have had 2 references obtained. All staff information is held on a single central record (SCR)

Staff Training

Netcom will ensure that all staff are aware of the following:

Abuse may consist of a single act or repeated acts. It may be physical, verbal, or psychological, it may be an act of neglect or an omission to act, or it may occur when a person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent.

Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it.

The Department of Health in its 'No Secrets' 2000 report suggests the following are the main types of abuse:

- *Physical abuse - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.*
- *Sexual abuse - including rape and sexual assault or sexual acts to which the adult has not consented or could not consent or was pressured into consenting.*
- *Psychological abuse - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.*
- *Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.*
- *Neglect and acts of omission - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.*
- *Discriminatory abuse - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.*
- *Institutional abuse - Institutional abuse although not a separate category of abuse in itself, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially to abuse and exploitation. This can be especially so*

when care standards and practices fall below an acceptable level as detailed in the contract specification.

- *Multiple forms of abuse - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of people, negligence, or ignorance.*

Netcom suggests the following are the types of abuse that as an IT Training organisation we need to be vigilant in:

Sexual Harassment and Online Abuse

Netcom Training recognises its responsibility in taking the appropriate steps to protect learners from sexual harassment and online abuse. It also recognises that Ofsted will apply the same expectations of the company in this respect as an independent training provider as for colleges and further education and training in general. Netcom Training will not tolerate any inappropriate behaviour or derogatory comments within the organisation that may cause harm or have the potential to do so. It will also ensure learners are made aware at induction as to expectations of them and their responsibilities when interacting with peers or company employees. This will apply equally to conduct within the training centre and when accessing online learning and communication.

Netcom Training is vigilant in monitoring any signs of online abuse. While recognising and utilising the many benefits and learning opportunities that the online world provides, there is also an awareness that increased use of social media and the internet in general has increased the scope and potential for online abuse and harm. The company Safeguarding and Anti-Bullying and Harassment policies set out the key procedures and requirements of learner facing employees in particular to protect individuals from harm. In addition, they will be made aware of the following examples of more prevalent types of activities that constitute sexual harassment and online abuse:

Cyber-flashing, including the sending of sexual images or video recordings that are intended to violate the recipient/victim.

Encouragement or glorification of serious self-harm, targeting individuals with intentional encouragement of self-harm or assistance thereof.

Flashing images with intent to induce a seizure, sending images to people with epilepsy.

Knowingly false communications, the posting or sending of communication known to be false with the intent of causing significant emotional, psychological or physical harm.

Threatening communications, threats of serious harm and where the perpetrator intends the victim to fear that they will be carried out. Examples include serious bodily injury, rape/sexual assault and serious financial harm.

Other types of abuse:

Domestic abuse

Home Office Definition 2004

'Any incident of threatening behavior, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.'

Women's Aid Definition

'Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behavior. This can also include forced marriage and so- called "honor crimes". Domestic violence may include a range of abusive behaviors, not all of which are in themselves inherently "violent".

Most research suggests that domestic violence occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class, or educational level.

Both definitions would therefore also include incidents where extended family members may condone or share in the pattern of abuse e.g., forced marriage, female genital mutilation and crimes rationalized as punishing women for bringing 'dishonour' to the family.

It is important to recognise that Adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

As part of Netcom 's Induction programme, all staff will complete the Safeguarding in Further Education and Training course, which also covers digital Safeguarding (online safety). This mandatory training will be revisited on an annual basis.

Additional safeguarding training labouring on sector specific areas such as:

- Cyber Bullying
- Trolling
- Phishing

will take place and this will be managed by the HR dept

All Netcom staff will attend annual additional training on current issues relating to safeguarding, which will be delivered in an imaginative manner.

All staff will receive continuous CPD opportunities and updates from the Safeguarding Team, via the Teams channel to help keep up to date and embed the latest information to support this policy.

Safeguarding procedures

Safeguarding Process

1. If staff become aware that an individual may be at risk or experiencing abuse or neglect, they should promptly discuss this with a member of the Safeguarding Team, who will advise of next steps and the member of staff should complete the Safeguarding Report Form, a copy of which can be found online at Netcom Training and attached to this Policy.

2. All staff will adhere to the following guidelines:
   - Following a disclosure, re-assure the learner that they have done the right thing.
   - Record what the learner said, using their words where possible. Sign and date the record.
   - Inform our DST as soon as possible and pass on the written record. The most efficient way to do this is to complete the online form via the website.
   - Listen without making judgements.
   - Stay calm.
   - Try not to ask questions, unless necessary to safeguard the Learner, and make sure you ask open questions.
   - Do not give an opinion or offer advice.
   - Do not promise confidentiality - explain you may need to talk to a DSO.
   - Do not add details of disclosure onto any other platform

3.Situations that could trigger a safeguarding concern include:

   a. Witnessing harm/neglect.

   b. Disclosure of abuse or neglect, either current or historic.

   c. Reasonable suspicion.

4. Staff should not assume that someone else will take action. Staff should be aware that early sharing of information is often vital to enable an effective intervention that might keep an individual safe.

5.A safeguarding concern may come directly from a learner by the completion of the Safeguarding Report

6. Before taking further action, the safeguarding team will first establish that the person identified as

having a safeguarding concern meets the definition of being an individual at risk (see above). If these definitions are not met but the person identified requires support, they will be referred to the appropriate internal (Learner experience team) or external services.

7. Level of urgency is reviewed by the DSL/DSOs as follows:

- **Urgent**: In an emergency, or if a person is at risk of immediate harm, staff should contact emergency services and/or contact DSL -Ann Cox DSL on 07477080476 and a Safeguarding Report Form completed as soon as reasonably possible thereafter.
- **Important/ Medium**: reach out to victim within two working days, discuss concerns and draw of plan of review
- **Low**: follow up questions with victim within two working days, continue to monitor the situation

Once above is complete, assigned DSL/DSO to update Safeguarding Database. It should be assumed that such records may later be used in formal/legal proceedings, if required.

Reporting an incident

1. Any concerns about the behaviour by a member of staff against an individual should be reported directly to a DSO, if available, and referred to Human Resources.

2. Any concerns about the behaviour by a member of the safeguarding team against an individual of staff should be reported directly to a DSL.

3. Any safeguarding concerns involving the Designated Safeguarding Lead (DSL) should be taken to the Director of Netcom Training kevin.vashi@netcomtraining.co.uk

4. Disclosures may be managed in a variety of ways by the DST:
    - **Managed Internally**: identify support measures to put into place internally
    - **Early Help**: refer to appropriate support, such as NHPCC, Mind.org, local wellbeing services, etc.
    - **Referral to Local Authority Safeguarding Team**: severe and urgent cases should be reported to the Local Authority Safeguarding and Adult Social Services Teams.
    - **Referral to Police:** where the victim or others are in immediate danger, contact the police
    - **Monitor and check in** with victim, continue to listen and provide personalised support and care, as well as signposting to relevant support agencies.

And the following actions may be taken:

- To consult with relevant colleagues to ensure all relevant facts have been gathered.
- Reassure victim and ensure that they understand that they did the right thing, will be listened to non-judgmentally, and that we are working to keep them safe.

- DO NOT PROMISE CONFIDENTIALITY. Victim must be made aware that disclosures may need to be escalated.
- Record updates as facts.
- liaise with appropriate external partners e.g.an employer or external partner
- arrange for the individual to be given appropriate support via internal or external services.
- make a referral to local social services
- Contact the police.

5.It is important that accurate records are kept in relation to all safeguarding concerns that are raised. Where it is necessary to share information with other agencies in order to address the risk of harm, this will normally be done by the safeguarding Team

6.However, in an emergency situation, where risk is imminent, any member of staff can call Netcom or emergency services. All records will be kept securely and retained only as long as necessary, in line with the Netcom's retention schedule

Low level concerns

Low level concerns follow the same procedure for confidentially sharing disclosures with the Designated Safeguarding Team, or they can be discussed with a line manager or HR representative first. The DST should ultimately be informed of all low-level concerns and make the final decision on how to respond. If the concern is deemed low level then it is recorded on the Learner Support Database and the learner is contacted by a Learner Experience Officer

Aftercare

Safeguarding cases will be closed in two instances:

1. Mutually agreed (as a team) that an individual no longer requires safeguarding support. The support provided will be the responsibility of the case handler and will involve:
   - Within one working day of a case being closed, an email communication will be sent to inform the individual that their case has been 'temporarily closed' for a period of a month. Signposting and any further IAG will be provided based on the individual case. They will be informed to get back in contact should they need to.
   - Two weeks later, the case handler will send a 'check-in' email to see if the individual requires any further support.
   - A month from case closure, another email will be sent to the individual to confirm that their case has now been fully closed.

2. The learner reaches the end of their program but still requires further support, a three month close down process will be required. The support provided will be the responsibility of the case

handler and will involve:

- Meetings will continue as normal for the first month following the end of their program
- In month two, DSL will create a next steps plan to work through with the individual ready for when support comes to an end.
- Within one working day of the start of month three, the individual will be informed that their case has been 'temporarily closed'. Followed by email confirmation.
- Two weeks later, the case handler will send a 'check-in' email to see if the individual requires any further support.
- A month from case closure, another email will be sent to the individual to confirm that their case has now been fully closed.

If any further support is required, the case may be re-opened again at the discretion of the case handler.

Netcom employs a blocked word list flagging any searched for banned words to the system administrator. The systems admin escalates banned searches to the DSL if they cover the following topics:

- Explicit or adult content
- Illegal activities
- Hate speech
- Violence/self-harm
- Gambling/online gambling
- Inappropriate or offensive content
- Content relating to radicalisation

Keeping yourself safe

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

- Befriending learners on personal social media sites.
- Sharing personal telephone numbers.
- Visit learners at home or transporting learners to and from locations (this includes travelling in the car with a learner driving.)
- Do not use sarcasm, insults, or belittling comments towards learners.
- Personal relationships with learners.

It is important to be mindful of the following regarding your personal conduct:

- You will naturally build a rapport with learners through contact during the learner journey, and the learners may see you as a confidante and support but be sure to

maintain professional boundaries whenever conducting work on Netcom 's behalf.

- Be respectful of all individuals, and appreciate you are in a position of trust. We can listen to their concerns and support them.
- 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 on information (facts) and guidance (signposting). However, it is good practice to challenge learner's views, not for the purpose of changing it but for consideration.
- If at any point, you feel unsafe in a learner's company inform the site manager, your line manager, the Designated Safeguarding Team and leave the premises.

Whistle Blowing

It is acknowledged that there may be times where the staff 'witness' an incident, action or event that may give them cause for concern.

If any member of staff witnesses a potential safeguarding issue, they must treat it as a matter of urgency and contact one of our Designated Safeguarding Team. Any concern must be documented via the relevant form via the website within 2 hours of the disclosure, unless the learner is in immediate harm, where the relevant authorities will be contacted immediately. In this situation ensure that the learner accompanied and kept safe, pending advice from the relevant authorities.

- We are committed to the safety and security of all learners – ALWAYS. Equally, we are committed to the safety and security of all staff whilst onsite.
- All staff are required to share any concerns regarding any staff practices that compromise the safety of the learners to the Designated Safeguarding Team.
- Failure to notify the Designated Safeguarding Team of any concerns regarding any incidents, events or practice by individual staff will result in referral to the safeguarding team, Ofsted and reviewed by senior management.
- Where external authorities are conducting their own enquiries, our own investigation will run in parallel without jeopardy to any official enquiries.
- Any staff member who discloses a concern will be given assurance of confidentiality as far as possible, without jeopardy to any investigations by external authorities or our own investigation
- Any staff member expressing a concern about their safety following a disclosure will be give all necessary support to enable them to continue in their role with security safely.

Evaluation of impact

To deliver on its commitment to safeguarding, Netcom will demonstrate planning and analysis of impact by evaluating the following operating principles:

- How effectively Netcom is meeting statutory requirements

- How effective is the awareness-raising of safeguarding issues for staff, learners, and partners.
- How effective are the referral arrangements.
- How effective are the consultations with learners and staff on safeguarding issues.
- How effective are the improvements following actions taken, to address safeguarding issues.

Definitions

Safeguard	Protect from harm or damage with an appropriate measure
Individual	Within this policy, 'Individual' represents children (under the age of 18), adults with a safeguarding need and adults with vulnerabilities
Safeguarding	Is the process of protecting vulnerable people, whether from crime or other forms of abuse. Radicalisation and Extremism is addressed within our Prevent Policy
Vulnerability	Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack.

Types of Abuse

Physical abuse	Is defined as the use of physical force that may result in bodily injury, physical pain, or impairment. Physical abuse may include but is not limited to such acts of violence striking, hitting, beating, pushing, shoving, shaking, kicking, pinching and burning.
Emotional/psychological abuse	A person subjecting another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

Financial abuse	Tactic used by abusers to limit and restrict their victims' access to their finances. For example, a young adult having their benefits taken away from them.
Neglect by others	Where a parent, carer or guardian will actively and knowingly fail to care for or address the basic needs of a child or

	vulnerable adult. For example, not feeding a child and/or leaving them in the same clothes and not helping them wash for days on end.
Self-neglect	Is any failure of an adult to take care of themselves? It could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves. In this situation, family and carers would be expected to notice these signs and give or apply for appropriate care.
Discriminatory abuse	Is when you are picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.
Organisational abuse	Is where an institution fails to provide basic care. It is also related to gang culture where an individual is forced into committing crime for the financial gain of gang Officers.

Unfamiliar terms

Online Safety	In simple terms, online safety refers to the act of staying safe online. It is also commonly known as internet safety, e- safety and cyber safety. It encompasses all technological devices which have access to the internet from PCs and laptops to smartphones and tablets.

Mental Health	Mental health refers to cognitive, behavioral, and emotional well-being. It is all about how people think, feel, and behave.
Child-on-child abuse	Child-on-child abuse includes, but is not limited to: • physical and sexual abuse • sexual harassment and violence • emotional harm • on and offline bullying • teenage relationship abuse Staff should understand that even if there are no reports of child-on-child abuse in their establishment, this doesn't mean it is not happening.
Sexual exploitation	Child sexual exploitation (CSE) is a type of sexual abuse. When a child or young person is exploited, they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities.
Modern Slavery	Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. (See relevant policy: Netcom Modern Slavery Policy 22-23.docx)
FGM (Female Genital Mutilation)	FGM is when a female's genitals are deliberately altered or removed for non- medical reasons. It's also known as 'female circumcision' or 'cutting' but has many other names. It is illegal in the UK.

Review

This Policy will be reviewed half yearly or earlier if deemed necessary.