

# SAFEGUARDING POLICY

*Written: November 2020. Last reviewed: January 2025*

## **Contents**

Policy Statement

Reasons for the Policy

Policy Objectives

Definitions

Responsibility for this Policy

Human Resources (HR) Policy and Procedures

Staff Training and Development

Review and Monitoring of the Procedures

Distribution and Promotion of This Policy

Staff Conduct

Safeguarding Young People, Children and our Students

Children and Adults with Special Educational Needs

Behaviour Management

Establishing a Safe Teaching Environment

Dealing with Disclosures (Children)

Dealing with Disclosures and Recognising Concerns (Adults)

Responding and Reporting Concerns

Monitoring and Record Keeping

How Venture Training & Education Ltd will respond to a report/concern

The Mental Capacity Act

Equal Opportunities

Staff Social Media Policy

Contact Numbers

Safeguarding and protecting Apprentices

Preventing abuse towards Apprentices

Monitoring IT Usage

## **Policy Statement**

Venture Training & Education Ltd is committed to a whole organisation approach to providing a safe and supportive learning environment that promotes the wellbeing and security of all students and staff. The Company recognises that all staff members have a role in safeguarding the welfare of children, young people and adults at risk and preventing them coming to any harm or suffering abuse.

Young people and adults learn best when they feel safe, supported and free from fear, worry and concern. Venture Training & Education Ltd recognises that Safeguarding is about the protection from harm and abuse, but also prevention and supporting students to achieve their full potential.

Venture Training & Education Ltd will always respond to disclosure in a proportionate and appropriate way.

The following principles underpin this policy:

- The welfare of young people (defined by the Children Act 1989 as under 18 years of age) and adults at risk is the primary concern
- All young people and adults at risk regardless of their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse and harm
- Everyone has a responsibility to report concerns, but it is the responsibility of child and adult protection professionals to decide whether or not abuse has taken place.
- All incidents and allegations of suspicious/poor practice and indications of abuse should be taken seriously and responded to swiftly and appropriately.
- Confidentiality will be upheld in line with the Data Protection Act 1998.

## **Reason for the Policy**

To ensure that Venture Training & Education Ltd adheres to its legal obligations and social responsibilities in relation to safeguarding children, young people and adults at risk.

Relevant legislation and government guidance:

- Children Act (1989) s. 44 & 47 and s. 17
- Children Act (2004) s.11
- Working Together to Safeguard Children (2013)
- Keeping Children Safe in Education (2016)
- Safeguarding Vulnerable Groups Act (2006)
- Education Act (2002) s.175
- Protection of Children Act (1999)
- Care Act (2014)

To ensure that Venture Training & Education Ltd complies with:

- Kent Inter-Agency Safeguarding Procedures (for children)  
<https://www.proceduresonline.com/kentandmedway/chapters/contents.html>

- Kent Multi-Agency Safeguarding Adults Policy and Procedures (Care Act 2014)  
<https://www.kent.gov.uk/social-care-and-health/information-for-professionals/adult-safeguarding/adult-protection-forms-and-policies/national-adult-protection-legislation>

### **Policy Objectives**

- To raise awareness of all staff of the need to safeguard children, young people and adults at risk, and their responsibilities in identifying and reporting possible cases of abuse,
- To ensure all staff are familiar with the safeguarding procedure.
- To contribute to assessments of young people and adults at risk conducted by external agencies,
- To maintain effective working relationships with external partners in regard to safeguarding.
- To provide opportunities for all students to learn about safeguarding as part of the curriculum.
- To ensure all staff are informed of the most recent and up to date developments in safeguarding.
- To ensure that Venture Training & Education Ltd complies with safeguarding requirements in Human Resources.

### **Policy**

- This policy covers all aspects of the Company activities, including the apprenticeships, work placements and leisure courses.
- Safeguarding will be considered primarily as the protection from harm and abuse but also preventing abuse by creating an environment of trust and confidence where students are aware of their rights and responsibilities. The Company recognises that students can be the cause of abuse and harm to other students.
- The Company recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The Company will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also

continue to promote the development of spaces for free debate where shared values can be reinforced.

- Venture Training & Education Ltd will utilise the tutorial programme, the Company website and social media to deliver positive messages about safeguarding including; healthy relationships, personal safety, e-Safety and healthy living.
- The procedures for safeguarding should be followed in every case
- A “child” and “adult at risk” are defined below. (5. Definitions)
- A concern with definition in regard to adults should not interfere with an objective assessment of an individual’s needs and therefore a student ‘at risk’ may include those who do not fall within the definition in 5.0.
- Children, young people and adults, who are vulnerable shall be identified and their educational progress monitored and reviewed. Resources shall be prioritised to ensure that vulnerability and disadvantage are not reasons for lack of educational achievement.
- Students will be provided with intimate personal care when it is planned appropriately in advance and staff have received appropriate training.
- Children under the age of 16 who are not engaged in Company activities are NOT permitted access to the learning areas of the Company. Parents and/or carers of young children are to be advised that they should not bring their children into Company unless as part of a special event or activity where children are invited.

### **Definitions**

A Child is defined as

***Anyone who has not reached their 18<sup>th</sup> birthday (Children Act 1989)***

An **Adult at Risk** is defined as:

*“someone age 18 years 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”. (No Secrets, Department of Health 2000)”*

However a concern with definition should not interfere with an objective assessment of an individual’s needs and ‘at risk’ in this policy therefore will also include those adult students who fall within one of the following categories and are considered to be **vulnerable**:

- Looked After Child/Care Leaver
- Refugee/Asylum Seeker
- Over 18 Carer
- Pregnant
- Young Parent
- Socio-economic deprivation

- Transient family background
- Homeless
- Offender
- Substance Misuse
- Mental Health
- Disability/Chronic Illness

### ***Abuse of Trust***

In all cases and within the definition of a child or adult at risk, the Company shall consider the abuse of trust as significant harm. A relationship of trust is one in which one person is in a position of *power or influence* over the other person because of their work or the nature of their activity.

The abuse of trust shall be considered gross misconduct.

### ***Harm***

Harm is defined as:

*“a violation of an individual’s human or civil rights by any other person or persons which results in significant harm” (DoH 2000)*

### ***Radicalisation***

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues or external partners if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If the Company has any significant concerns about a student beginning to support terrorism and/or violent extremism, they will discuss them with the nominated local police officer so that appropriate action can be taken.

### **Policy Owner**

Operations Director

### **Who Will Need To Know About This Policy**

This policy will be disseminated as widely as possible and will be made known to the following as appropriate:

- All Senior Leadership Team
- All staff (inc. agency/temporary)
- All Parents/Carers and students (current and potential)
- All volunteers (current and potential)
- All Employers participating in work-based learning, work experience opportunities or guest speakers for students at the Company.
- External contractors who will be asked to provide evidence that their staff are aware of our policy, its implications and where necessary have been subject to appropriate vetting procedures and are aware of their legal responsibilities
- Visitors – who will need to have an understanding of safeguarding arrangements and should wear appropriate identification, i.e. a visitor's badge.

The Company accepts full legal liability for meeting the duty and will take all reasonable action to ensure that all individuals who have contact with the Company meet the requirements of the duty.

### **Responsibility**

- The Company is committed to working together with the Kent Safeguarding Children and Kent Safeguarding Adults Teams and complying with their procedures. We recognise that we have a responsibility towards all children, young people and adults attending or visiting the Company, to safeguard their welfare and to take appropriate steps to ensure this can be achieved.
- It is not the responsibility of the Company to investigate abuse. However, it has a duty to act if there is suspicion that a child/adult has suffered or is likely to suffer significant harm and to notify the appropriate agencies so that they can intervene, investigate and take appropriate action
- Venture Training & Education Ltd Directors will be responsible for overseeing that the Company management team implements the safeguarding strategy, policies and procedures effectively. It will receive and review reports at appropriate intervals to be re-assured of the Company safeguarding compliance. It will ensure that one individual on the Senior Leadership Team and designated Safeguarding link, will liaise monthly with the Designated Safeguarding Lead regarding all safeguarding matters.
- The Company Safeguarding Committee will have delegated responsibility for delivery of the safeguarding strategy, policies and procedures.
- Safeguarding officer will normally be responsible for attending local safeguarding conferences, reviews and Looked after Children reviews.
- Venture Training & Education Ltd will ensure all Safeguarding policies and procedures are communicated to all Company. Staff, Students, visitors and stakeholders as appropriate.
- The Company will ensure there is a Designated Teacher for Looked after Children/Care Leavers. This person will be appropriately trained and liaise with the Designated Safeguarding lead to ensure that all relevant information is shared, including the name of the young person's social worker.

### **Human Resources (HR) Policy and Procedures**

- The Company is committed to ensuring a safe and secure environment for all its students, staff, volunteers and visitors. A fundamental part of this is the provision of the highest quality HR policy and procedures.
- The Company HR department adheres to the guidance given in 'Keeping Children Safe in Education' (2016) and the responsibilities under the Protection of Children Act (1999). This means that there are a number of policies, procedures and processes that it manages or maintains to ensure compliance.
- In summary these are: Recruitment and selection documentation makes reference to and highlights the Company commitment to safeguarding
- Vetting procedures are carried out on all new staff, agency staff, contractors, volunteers and governors. All staff will be DBS checked to an enhanced level as all employment is considered to be in 'regulated activity'. All staff will also be subject to a Barred List check, where appropriate.
- All Staff will be subject to updated DBS vetting every three years.
- A single central record of all information is maintained that identifies the evidence collected to ensure vetting procedures have been carried out
- Appropriate safeguarding induction and training is carried out on an on-going basis and updated regularly
- Specialist safeguarding training will be provided for the nominated members of staff with child protection and adult at risk responsibilities, including the Designated Safeguarding Lead and a Designated Governor for Safeguarding
- Safeguarding Officers will be required to update training every 2 years or when significant changes to requirements and legislation occur, whichever is earlier
- Policy, procedures and processes are monitored and audited on a regular basis to ensure they meet current requirements and legislation
- All information and records are maintained, stored and updated confidentially in line with appropriate legislation
- Contractors who are likely to have any direct contact with children, young people and adults at risk, for any extended period, are subject to appropriate vetting and required to provide evidence of same

### **Staff Training and Development**

All designated safeguarding officers will be required to attend specialist training to maintain up to date knowledge of local referral and assessment processes.

All staff will be required to complete safeguarding training on their induction.

There will be ongoing safeguarding training provided to all staff.

### **Review and Monitoring of the Procedures**

It will be the responsibility of the Designated Safeguarding lead to review and monitor the procedures and to review relevant legislation changes when they occur in order to keep this policy and associated procedures up to date. When required the advice of the Safeguarding Boards and local social care will be sought.

### **Distribution and Promotion of This Policy**

- Staff will be made aware of this policy at induction, through the Company handbook, continuous staff training, posters and site notices.
- Employer, parents/carers and students will be made aware of this policy through Company marketing information, website briefing documents and information sessions.
- All contractors will be made aware of this policy prior to any works being undertaken on Company premises.
- The full policy will be available on the Company intranet (staff) and website.
- This policy will be made available in other formats as appropriate.

### **Staff Conduct**

The promotion of this policy is the responsibility of all senior management and staff at Venture Training & Education Ltd. This is achieved further by the following actions of staff and members of our team:

- Respect the rights, dignity and worth of each and every student or child and treat each equally.
- Place the well-being and safety of each student or child above all other considerations, including their development of performance in their learning pathway.
- Be positive and encouraging to all students and children, using language that inspires and promotes the values of our company's mission.
- Not favour or hold resentment towards any student, but to maintain that all are equal and should not be prejudice against in any way, relating to gender, race or previous behaviour.
- Not exert undue influence to obtain personal benefit or reward.
- Encourage and guide children to accept responsibility for their own behaviour and performance.
- Ensure that the activities they direct or advocate are appropriate for the age, maturity, experience and ability of players.
- At the outset, clarify with the student (and where appropriate, parents) exactly what is expected of them and also what they are entitled to expect from their tutors and assessors (faculty). Co-operate fully with other specialists, appointed responsible persons (e.g. teachers, child protection officers) in the best interests of the student and their wellbeing and education.
- Consistently display high standards of behaviour and appearance.
- Not use or tolerate inappropriate language.
- Identify signs of abuse and act accordingly (see further on for what actions to take).

### **Additional Roles of Venture Training and Education Staff**

- Teach with enthusiasm, charisma and an uplifting spirit.
- Provide a safe environment for all teaching environments.
- Be reasonable in demands of the students in their chosen activity.
- Avoid being over-familiar and friendly or becoming too involved in the activity.



- Stress safety always.
- Develop team respect.
- Develop skill levels and ensure appropriate behaviour.
- Be reliable and punctual.
- Encourage teamwork, sportsmanship and be a positive role model with a positive attitude.
- Teach fair play.
- Never humiliate any student. Never criticise any student in the presence of other learners.
- Not to show any favouritism to any students.
- Avoid joining in any inappropriate activity, which will involve bodily contact and potential injury.
- Notify Venture immediately of any change in circumstances that may affect your right to work with young people, adults or children.
- Any evidence of drinking alcohol or the consumption of drugs would result in the immediate dismissal of that member of staff.
- Ensure all communication with students is done via company pathways of email or telephone. Any messaging should be done over email and not via instant messaging services with personal phones.

### **Safeguarding Young People, Children and our Students**

At Venture Training & Education Ltd we believe that the safeguarding and welfare of young people, children and adults is everyone's responsibility particularly when it comes to protecting from abuse. Everyone staff member is responsible for identifying signs of abuse and acting accordingly.

Abuse can occur anywhere there are children or young people - at home, at school, in the park, at a club. Sadly, there are some people who will seek to be where children are, simply in order to abuse them. We believe that everyone in Venture Training & Education Ltd has a part to play in looking after the children with whom they are working. The Children Act 1989 and Working Together to Safeguard Children (DOH 1999) highlight the shared responsibility of organisations to promote children's well-being and safeguard them from harm. They stress the importance of effective information sharing, collaboration, and understanding.

Venture Training & Education Ltd has a moral and legal obligation to both identify and appropriately deal with concerns raised regarding the well-being of children involved in our teaching activities.

#### **These safeguarding procedures stem from the following principles:**

- The child's/student's welfare is the first consideration.
- All children and young people regardless of age, gender, racial origin, religious belief, sexual identity and any disability have a right to enjoy sport free from all forms of abuse or sexual exploitation.
- Venture Training & Education Ltd has a responsibility for the welfare of children and young people who take part in our sport.
- Venture Training & Education Ltd has a responsibility to maintain confidentiality in all cases involving safeguarding of children and young people in line with current legislation.
- Venture Training & Education Ltd will not tolerate, within its teaching environments, poor practice in dealing with the safeguarding of children and young people.

We know that if the procedures are to help to protect children and young people, everyone involved in 'Venture Training & Education Ltd' and activities needs to be familiar with and discuss them. The procedures are revised on a regular basis each year and discussed personally with any new staff member.

Venture Training & Education Ltd will support anyone who reports his or her concerns that a child/person is at risk of, or may actually be, being abused.

This policy on safeguarding is mandatory and the Child Protection Co-ordinator (CPC) will oversee the procedure is followed appropriately at all times.

A child is defined as any young person under the age of 18.

## **OUR AIMS**

We aim to provide:

- An ethos in which children/students feel safe, secure, valued and respected.
- A place where children and young people can feel confident to talk openly and be sure of being listened to.
- A culture which promotes self-esteem and gives people the knowledge and skills to make positive choices.
- Support for children, parents and staff in difficult situations relating to child protection and to help guide them to the appropriate body (KCC and Child Protection Services).

## **IDENTIFYING ABUSE**

In order to recognise abuse, we need to be open to the possibility that it is happening. This means being aware that abuse can affect children of all ages, of both sexes, different races, cultures and that it can occur in all social classes.

Listed below are some of the signs and types of behaviour which may indicate a child or young person is being abused. In themselves they are not evidence of abuse, but may suggest abuse, particularly if a child exhibits several of them or if a pattern emerges of exhibiting such signs or behaviour. There may be a pattern of minor injuries over time, or inadequate, muddled and inconsistent explanations which alert you to the possibility of abuse. Be aware that even for 'experts' abuse is not easy to diagnose. Sharing your concerns with the Child Protection Co-ordinator (CPC) is vital and the most important first step to take.

There are four main categories of abuse: physical, emotional, neglect and sexual.

- repeated minor physical injuries (e.g. bruising, cuts etc.)
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to
- deterioration or significant changes in behaviour without explanation
- aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour, 'watchful' attitude
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age)
- aggressive and inappropriate sex play

- the child/young person who is reluctant to go home with a parent for no apparent reason
- does not join in social activities, has few friends
- tummy pains with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bedwetting, constantly tired
- running away from home, self-inflicted wounds
- reverting to younger behaviour, depression, withdrawal
- relationships between the child and adults which are secretive and exclude others

Many forms of abuse, such as emotional and sexual abuse, may not show physical signs at all. We should look for a series of signs and symptoms rather than isolated instances, although some signs on their own can be significant.

PHYSICAL ABUSE may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm or deliberate ill health to a child. It might also occur if a child is forced to train beyond his/her capabilities.

SEXUAL ABUSE involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It may involve physical contact, including penetrative or non-penetrative acts, involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.

EMOTIONAL ABUSE is the persistent emotional ill treatment of a child that adversely effects their development. It may involve conveying to a child that they are worthless, unloved, and inadequate, or where inappropriate expectations are put upon them. In a sporting context this may include severe parental or coaching pressure to succeed. Racially and sexually abusive remarks constitute emotional abuse and it can be a feature of bullying.

NEGLECT is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development, such as failing to provide shelter, food, clothing, or unresponsiveness to a child's basic emotional needs. In a sporting context it could also mean failing to ensure they are safe or exposing them to harm.

IN ADDITION BULLYING can often account for a high proportion of referrals. The guidance in this document should be followed in any case where bullying has been reported or observed within the club setting.

### **Children and Young People with Specific Needs**

Some children may require specialised care and clubs who work with children with physical and learning problems should ensure that:

- The guidelines of Disability Sport England "Protecting Disabled Children and Adults in Sport and Recreation" are followed by clubs, teachers and coaches who work with children with particular needs.
- The views of the child and parent/ carer are always obtained prior to any activity, specifically those requiring any physical handling or of a physical nature, to gain both consent and agreement of all concerned.
- No child or young person is discriminated against by the Venture Training & Education Ltd staff or any peers from taking part in an activity, which it is safe and proper for them to undertake.

Some children will suffer with an illness but show no outward appearance of being a child with specific needs, such as those diagnosed with epilepsy or diabetes. It is essential the Venture Camps co-operate with parents on their child's needs should they develop an attack during the sports activities. Such children should not be excluded or prevented from taking part in any sporting activity in which all other peers are entitled to take part, as this would be discriminatory. With the correct knowledge and information, and the required parental support, children with such illnesses can train and compete as any other player.

## PROCEDURES

Staff should always remember that they should never withhold or keep private information heard concerning a child or young person who is being abused. The welfare of the child is paramount and this information should be passed on to the CPC for Venture Camps immediately.

Please remember it is not your responsibility to decide whether a child/young person or adult is being abused, but to act in line with this policy regarding concerns. It is your responsibility to ensure the concerns raised are passed on appropriately.

Venture Training & Education Ltd has a Child Protection Co-ordinator (Meagan Cheek). This person will have the knowledge of the safeguarding policy and procedure to advise anyone with a child welfare concern. They should always be informed of any concern raised within the teaching activities, unless they are in some way implicated in the concern.

Following this the designated CPC will act accordingly:

- If the child or young person is in immediate danger or has been physically injured, ensure they are safe and contact CCPAS (Venture Training & Education Ltd advising body) or social services or the police.
- The concern will also be made known to **Kent Central Duty Team: 03000 411111**
- If the child is not in immediate danger the CPC will pass the concern on to the Kent Central Duty Team and seek advice from here.
- A Child Protection record must be made using the forms provided by Venture Training & Education.

PLEASE REMEMBER - it's not your responsibility to decide whether a child or young person is being abused but we are asking you to act on your concerns.

If your concern involves a member of Venture Training & Education Staff who is the CPC or may have relationship with the CPC that would in some way interfere with this process, and you do not feel it appropriate to speak to the CPC as they may be involved in the allegation then you must contact the Kent Central Duty Team yourself directly.

## **Children and Adults with Special Educational Needs**

**Definition of SEN:** A child or Adult has special educational needs if he or she has a learning difficulty, which calls for special educational provision to be made for her or him.

Here at Venture Training & Education Ltd, we operate an inclusive programme that aims to include all people throughout their learning. No person is discriminated against by the Venture Training & Education staff or any peers from taking part in an activity, which it is safe and proper for them to undertake.

Our staff always work to ensure activities and programmes are written and undertaken to include all children and we are committed to working with parents to develop the best strategies to help students take part, learn and thrive throughout our training programmes, leaving with the same feeling of

excitement, self-satisfaction and achievement that we hope all students experience when training with us.

When possible, Venture Training & Education will allocate trained and experienced staff to support students who might be finding it hard to take part in our activities within a group setting. This designated person will be there to support, communicate with parents (if under the age of 18) to let them know how their child is coping throughout the day and also to offer support to them without distracting the other members of the group.

We ask students or parents of students to share as much detail regarding any pastoral care needed for their child to help us as a team provide the very best support for them throughout the day.

Venture Training & Education Ltd are committed to working with Ofsted, The Out of School Alliance and Kent County Council to ensure we continue to promote an inclusive environment across all our learning experiences and with all our staff.

### **Behaviour Management**

Students will be required to ensure that their behaviour is compatible with the orderly conduct of activities and that minimal disturbance to other visitors is caused and are required at all times to follow the verbal and/or written instructions of our staff.

Behaviour deemed inappropriate may include but is not limited to:-

- Threatening behaviour including offensive or insulting language to other visitors or our staff
- Suspected involvement with illegal drugs
- Fostering an inappropriate relationship with another visitor
- Wilfully leaving allocated areas without good reason;
- Inappropriate use of mobile phones, cameras or video equipment
- Theft, vandalism or illegal activities
- Inappropriate behaviour
- Bullying (in any form) which adversely affects the enjoyment of other visitors.
- Injury to staff

All students are expected to abide by these rules and conditions. Failure to do so will result in them being asked to leave their training and possible removal from their course. Any additional costs so incurred shall be entirely your responsibility and you shall reimburse any costs reasonably incurred by us in connection with the exclusion of the student.

### **Establishing a Safe Teaching Environment**

In order to help Venture Training & Education establish an environment where everyone feels safe and respected, you should remember that safeguarding is paramount throughout all of your work and follow the guidance in the Safeguarding Policy and this procedure.

Any allegations made to staff should be taken seriously and everyone should know what to do and who to speak to when allegations are made or concerns arise.

It is the responsibility of all staff to challenge any poor or unsafe practice or behaviours that pose a safeguarding risk – which may escalate further if not acted upon.

All staff should behave professionally at all times, maintaining a high standard of practice.

## **MOBILE PHONES**

Staff are not to have mobile phones on show during on-site teaching activities.

Phones should only be used for emergency reasons or to contact appointed persons of Venture Training & Education. Staff should not login or be engaged on social media or forms of instant messaging during time with students.

## **SUMMARY OF DEALING WITH DISCLOSURES (CHILDREN)**

Make sure that you stress the following points during discussion:

- It is vital to offer the child time to talk. If this is impossible immediately, then agree on some specified time later.
- It is important for a coach to alert another member of staff if they need support while they hear a disclosure.
- It is crucial to listen to the child without being judgmental or expressing feelings of anger or horror too strongly. The child may well feel shame and guilt at what has happened and may have feelings of love for the abuser.
- It is important to limit any questioning and to be 'open ended' in any questions you may ask. Any probing or leading questions could contaminate evidence which may be needed in the future. Our role is to receive the child's story.
- Do not promise confidentiality which you cannot honour. If a child discloses that they have been abused, you will need to talk to the CPC, and eventually other agencies may need to be contacted. A false promise of confidentiality will betray the trust placed in you. Explain to the child that in order to safeguard her/him you may need to talk to someone else. Make it clear that the child will know in advance that you are going to do this. Tell the child who you will talk to.
- Make a note as soon as you can of the content of the conversation, with details of date, place, etc. Separate out your verbatim report from any subjective views you may have.
- You are not expected to be an expert in counselling, but to use your listening skills and respond sensitively.
- We should not over react to a situation or to information given to us.

## **THE CHILD PROTECTION REGISTER**

The CPC will inform members of staff who have direct pastoral responsibility for any children on the register. These children should obviously be monitored very carefully and the smallest concern noted and passed to the CPC.

## **RECOGNISING A CONCERN (ADULTS)**

A safeguarding concern would include anything which may indicate that there is a concern over the welfare of an adult who may be an adult at risk, or that there is a risk of abuse or harm to that adult.

Suspensions or concerns can be raised in several ways – you must be alert and recognise when you need to act. The most likely ways for a safeguarding concern to be raised are:

- An adult at risk disclosing abuse or risk of harm to themselves – this is called 'making/receiving a disclosure'.

- Another adult or child sharing a concern with you about an adult at risk.
- Noticing some evidence of physical abuse or neglect regarding an adult at risk, or overhearing something which may imply that abuse could be taking place now, in the future or in the past.
- Unusual and concerning behaviour by an adult at risk.
- Someone sharing a concern about a member of Venture Training & Education staff's behaviour towards an adult at risk, or making an allegation of abuse (either current, past or potential).

If you are ever unsure of a safeguarding risk, you should contact the designated Safeguarding officer (Meagan Cheek) for advice and support. You must always take concerns seriously. You are not expected to determine what type of abuse or harm something is, but rather communicate a concern to the DSO.

### **Responding and Reporting Concerns**

**Emergencies:** If anyone is at immediate risk of harm, you should call the appropriate emergency services without delay and without having to seek consent.

Take any immediate steps which are necessary to protect the adult from harm – there may be occasions which do not warrant an immediate referral to emergency services but do require you to act.

All information should be recorded immediately when a concern is raised. It should be shared immediately with the DSO, except for in the instance where the DSO is involved in some way. In this case it should be either passed to the deputy DSO or directly to adult social care/LADO services in Kent County Council.

In an instance where a member of staff is involved, staff have the necessary contacts and external contacts to share an allegation or concern without that individual knowing.

### **SUMMARY OF DEALING WITH DISCLOSURES (ADULTS)**

If an adult at risk discloses abuse or risk of harm to themselves, or makes an allegation of abuse, many of the steps relating to children still apply. You should:

- Assume what they are saying is true.
- React calmly and supportively.
- Reassure them that they are doing the right thing in sharing the concern with you.
- Listen, and take the concern or allegation seriously.
- Keep questions to the absolute minimum necessary to ensure you understand what is being said and ensure that any question that it is necessary to ask is open and not leading.
- Do not criticise or share an opinion to either the adult at risk or anyone else mentioned. Explain what you will do next and who you will need to tell.
- Do not make promises of secrecy or confidentiality – instead, explain that you have to share this with another staff member, and it may be necessary for that staff member to tell someone else in order to keep them and others safe. However, if the adult concerned does not consent to their name being shared, it is usually possible to make an anonymous report, unless we have a duty to pass the information on (for example to protect others).



- Reassure them that actions will be proportionate.

## **CODE OF PRACTICE**

All staff should take precautions not to place themselves in a vulnerable position with relation to safeguarding. It is always expected for work with individual children to be conducted in view of other adults. Newly appointed staff will be required to complete and submit an Enhanced Disclosure Form for the Criminal Record Bureau (CRB). All staff of Venture Training & Education must have a DBS with no previous convictions that may affect his/her ability to work for the company.

## **SUPERVISION AND SUPPORT**

The CPC is available for all staff and parents to talk to, to give support and is also able to put staff and parents in touch with outside agencies for professional support if they so wish.

All staff should work towards an atmosphere which enables children to feel safe to talk. However staff should never promise a child to keep certain information confidential. It must be explained that you have certain duties to help keep that child safe and that you may need the help of other adults to do this.

## **TRAINING**

Training needs are identified at both an overall staff level and at an individual level through staff development and meetings.

- The designated CPO has relevant experience and receives appropriate training in safeguarding and the Prevent Duty and is aware of the Channel Programme and how to access it
- Designated person training is refreshed every two years.
- Safe recruitment practices are followed for all new staff.
- All staff have a copy of this Safeguarding policy, understand its contents and are vigilant to sign of abuse, neglect, or radicalisation.
- All staff are aware of their statutory duties with regard to the disclosure or discovery of child, and concerns about radicalisation.
- all staff receive basic safeguard training, and safeguarding is a permanent agenda item at all staff meetings
- all staff receive basic training in the Prevent Duty
- Staff are familiar with the Safeguarding file which is kept in a lock cabinet in the Venture Camps office.
- Venture Training & Education procedures are in line with the guidance in 'Working Together to Safeguard Children (2018)' and staff are familiar with 'What To Do If You're Worried A Child Is Being Abused (2015)'.

## **MONITORING AND RECORD KEEPING**

What do we need to consider?

- Ensure the safety and confidentiality of files. Child protection records should be kept securely locked.
- Child protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 1984.



- Encourage/train all staff to record information in factual, non-emotive, non-judgemental terms, with notes of the date, time and content.
- In cases of alleged child abuse which come to court, the court may require the child protection records.
- Any times, dates or other relevant information
- A clear distinction between what is fact, opinion and hearsay
- Records should be signed, timed and dated.
- **DO NOT** delay reporting the matter by trying to obtain more information
- **DO NOT** add your own opinion to the report
- **DO NOT** destroy any handwritten notes made at the time of the incident or at the time of reporting, or any other relevant material (such as photographs), in case they are needed by the Crown Prosecution Service.

Staff and parents share a common responsibility to keep children safe. This is emphasised in the Children Act 1989 which highlights the welfare of the child as paramount.

The person who is the Venture Training & Education Ltd Protection Co-ordinator is Mr Ian P Harris who can be contacted by telephone on 07909814643.

CCPAS (Child Protection Advisory Service) is the umbrella organisation through which Venture Training & Education Ltd receives its advice, disclosures and support for matters relating to Safeguarding.

Kent Central Duty Team - 03000 411111. This number should be called if you do not feel it safe to speak to the CPC regarding your area of concern.

### **How Venture Training & Education Ltd will respond to a report/concern**

Venture Training & Education will look to take a 4 step approach to any concern or allegation. That is to:

- Recognise – and take seriously any concern
- Respond – appropriately and immediately
- Refer – to the appropriate agencies or staff
- Record – all relevant information

Venture Training & Education will take all concerns, disclosures or allegations seriously and will react swiftly and proportionately in line with safeguarding best practice and the Safeguarding policy.

The DSOs (and/or responsible people, as appropriate) will assess whether a concern meets the criteria for referral under safeguarding legislation and what actions need to be taken in order to safeguard the welfare of the adult(s) at risk in question.

Adults have a right to refuse consent to share their information to make a safeguarding referral to external agencies.

Where consent is refused, or not able to be obtained, personal details can still be shared externally in certain circumstances, such as:

- If other people are or may be at risk, including children.
- The risk of harm is very high and/or the adult at risk is being coerced into not giving consent.

- If a crime has been committed or if sharing information would prevent a crime (known as 'sharing in the public interest').
- A Venture Training & Education member of staff is implicated.
- The implicated person is also an adult at risk.
- Where there is sufficient evidence to believe that the adult is at high risk and may lack the capacity to manage that risk without support.
- We have a legal duty to do so, for example to comply with a request from a legal authority.

If consent is refused, the DSO or responsible person will:

- Consult with the adult at risk, if it is safe to do so, and discuss the options and implications of refusing consent. 10.5.2. Assess the situation and will make the decision whether or not to share without consent in consultation the relevant SLT member.
- They may require additional information from any employee reporting their concerns in order to build an accurate picture of the circumstances.
- If it is decided that information will be shared without consent, the adult at risk will be informed of this decision and the reasoning, unless it is unsafe to do so. Any actions taken must be in the person's best interests and should be the least restrictive possible course of action to keep that person safe from harm.

Where consent is refused, the DSO will record all decisions about whether or not to refer details to external organisations, including reasoning and any input from the adult at risk, such as details of discussions around their decision not to give consent. Reports can be made or advice can be sought externally without revealing personal details in order to better determine the next steps.

### **The Mental Capacity Act**

In accordance with the Care Act 2014, we must assume that all adults have the capacity to make decisions for themselves, even if we would not agree or advise the same decision. Assumptions around someone's capacity cannot be made solely on a person's appearance or behaviour.

If there is strong evidence to suggest that an adult at high risk may lack the capacity to manage the risk to themselves without support, the Mental Capacity Act applies. We do not expect Venture Training & Education staff to determine capacity, but if they are the main point of contact for the person in question it is likely that they will be asked to aid communication efforts.

### **Venture Training & Education Ltd EQUAL OPPORTUNITIES POLICY**

"Venture Training & Education Ltd is committed to the principle of equal opportunities in its work with young people, providing a framework for the participation by young people irrespective of ethnic origin, class, age, religion, nationality, sex or disability."

This Policy is written for all those involved with Venture Training & Education Ltd to ensure understanding and fairness towards all young people who take part in our training programmes. It is also clear guidance for all staff on the code of practice that must be followed.

Venture Training & Education Ltd is aware of and complies within the boundaries of the law. Particularly in laws such as : the Sex Discrimination Act, Equal Pay Act, Disabled Persons Act and Race Relations Act. These laws impact the way that we employ all staff and how we behave with the public, young people and other clients. Venture Training & Education Ltd only employs staff who are proven to have: firstly, a high standard of commitment to the young people: secondly, those who have high moral standards; and lastly those who have excellence of character.

We understand that 'the teacher' is always a role model : either a good one or a bad one! The responsibility to ensure a high standard of equal opportunities is monitored by the Directors of Venture Training & Education Ltd. This standard will be maintained with integrity during all activities that Venture Training & Education Ltd are involved in and will be a reflection of our main statement.

### **Staff Social Media Policy**

All staff working for Venture Training & Education agree to set all social media accounts to a private setting, which restricts anyone not connected to them as a friend to see any status update or photo which they may post.

Staff at Venture Training & Education should recognise that their actions, including what they post on social media influence young children who look up to them not only as coaches but as role models and could bring the company into disrepute; if those posts were in anyway offensive.

Therefore all staff agree to be cautious in what they post and agree to not post anything of the following:

- Anything that might be deemed offensive, prejudice or discriminate against another person.
- Images or videos that bring the company and the employee into disrepute.
- Venture staff commit to not commenting or being involved in any conversations or comment streams on social media which are related to offensive or rude material.

Venture staff will not accept friend requests or communicate with parents or carers of children on social media in attempt to build personal unprofessional relationships with them. All communication with Venture Staff must be done through the company by email or by calling the office phone.

Any contact made by children or parents on social media will be rejected and reported to the designated lead safeguarding officer.

### **Contact numbers**

Social Care: 0300 041 1111

Social Care Out of Hours contact: 0300 041 9191

LADO (Local Authority Designated Officer): Peter Lewer 0300 041 5648

LSCB (Local Safeguarding Children Board): 0300 042 1126

Local Authority Prevent Co-ordinator: Nick Wilkinson 0300 041 7201

Police: 101 (non-emergency) or 999 (emergency)

Anti-terrorist hotline: 0800 789 321

NSPCC: 0808 800 500

Ofsted: 0300 123 1231

### **Safeguarding and protecting apprentices**

All learners on apprenticeship programmes will receive an induction, which includes raising awareness of Venture Training & Education's commitment towards Safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the Safeguarding Officers.

The understanding of all aspects of Safeguarding, preventing extremism and radicalisation and safe working practices is checked at each review with their designated course leader and the opportunity to discuss any issues is given.

It is the responsibility of Venture Training & Education Staff to assess that the student's well-being is safeguarded by the workplace trainers.

Prior to work related activities commencing, Venture Training & Education will carry out the following checks:

- Pre-placement Health and Safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of our safeguarding policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

The safeguarding principles and measures apply to all apprentices whilst on work placement or when attending Venture Training & Education training days and seminars.

Where a concern is raised relating to the employer, Venture Training & Education Designated Safeguarding Lead will be notified and will decide on an appropriate course of action.

### **Preventing abuse towards apprentices**

Employers are to sign a work placement understanding saying they have received our relevant policies and information and are aware of their duty under Safeguarding.

Venture Training & Education will ensure communication with lead officers at schools and workplaces whereby our students are training, to help identify any signs of abuse in the behaviour of our apprentices day to day during work.

Regular visits and contact with apprentices – assessing their well-being frequently throughout their training is essential.

### **Raising concerns as an apprentice – recording and investigating**

Apprentices are made aware that they are able to raise a safeguarding concern with us their training provider even when it occurs at their work placement. Concerns raised are dealt with as outlined above and as any other concern that is raised within our organization.

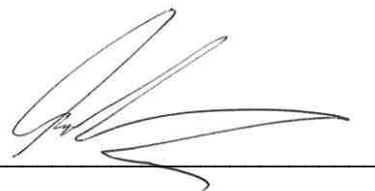
Apprentices should receive the same support and guidance from our organization as any other student or child that attends our courses.

### **Monitoring IT usage**

Use of computers for written assignments in many cases will take place on student's personal laptops or devices. However in the instance that computers and software is shared it is to do so in a safe and secure manner. Computer access should be controlled on an intranet system, limiting internet access in a way that is deemed safe and age appropriate.

Sharing of files and browsing of websites that are not directly related to the student's course of study is prohibited.

Work is to be submitted via the Venture Training & Education Portal or via work email communication. Work should not be shared in any other way. Work should not contain links to external sites which may pose a threat to the organisation in way of cyber threats. Any instances like this will be dealt with accordingly and could result in an apprentice being asked to leave the programme.

Signed: A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a solid horizontal line.

Ian Harris  
Company Director

14/01/2025