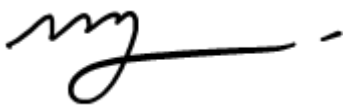
Safeguarding Adults Policy

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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 of our learners and employees 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 of our learners and employees. We ensure that learners can learn in a relaxed and secure atmosphere whilst carrying out their training and employees are supported and feel safe whilst carrying out their roles.

Statutory Requirements

Netcom has 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 2018
- Freedom of Information Act 2000
- Safeguarding Groups Act 2006
- Deprivation of Liberty Safeguards Code of Practice 2008
- The Mental Capacity Act 2005
- The Human Rights Act 1998
- The Public Interest Disclosure Act 1998 (PIDA)
- The Keeping Children Safe In Education Guidance (KCSIE)
- Working Together to Safeguard Children

Purpose of this policy

The main purpose of this policy is to ensure that employees 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 employees are safe from harm.

In addition, this policy will also outline the duty and responsibilities of all employees, representatives, directors and learners, 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 employees 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 employees, 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.

Terminology

- The use of the word '**individual**' within the policy represents adult 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 refers to the person who has initiated and carried out the abuse.
- The use of the words ''**vulnerable adult**'' relates to 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 vulnerable 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.

- The use of the words **'Significant Harm'** refers to 'harm' that may 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'
- The use of the word **'child'** within this policy refers to any person who has not yet reached their 18th birthday. Although Netcom's learners are aged 19 and over, this policy applies where employees become aware of safeguarding information relating to a child.

Scope

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 (DSL) who will ensure that the Designated Safeguarding Team (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) – Chloe Schemanoff
- Designated Deputy Safeguarding Lead (DDSL) – Bly Garrett
- Designated Safeguarding Officer (DSO) – Lauren Demetriou
- In addition, the DST will provide advice and support for other employees, ensuring appropriate employee development, consulting with the authority, and working with other organisations, as necessary.

Learner Success Team (LST)

- The role of the Learner Success Coach is to support the learner involved with the incident and to ensure the correct procedures are followed via a triage system. They are involved in health and well-being cases that could be a cause for concern and identify attendance issues that could tip into safeguarding issues.

HR

- The role of the HR Team is to liaise with the safeguarding team in relation to employee safeguarding issues

Learners

- Learners are expected to report any issues that they feel constitute a safeguarding issue via the safeguarding reporting system and uphold the guidelines laid down by Netcom as detailed in the Induction and the Learner Handbook and referred to as Learner Expectations. Our Learner Expectations guidelines are in line with British Values.

Definition

Safeguarding in Further Education is the process of creating an environment for all learners and employees that actively prevents harm, harassment, bullying, abuse, and neglect**.** Understanding the importance of safeguarding is a duty that all funded Further Education organisations must adhere to.

Procedure

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

Learners can expect:

- Provision of a safe learning environment, whether that be online or face to face
- A clear system to ensure personal safety.
- A commitment by Netcom employees 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 and direct learners to Mental Health First Aiders when necessary
- Access to additional resources and signposting
- Provision of a safe environment when attending Netcom events

Employees can expect:

- Provision of a safe working environment.
- Regular review of systems and procedures to ensure they are appropriate and effective.
- Training and professional development.
- To be supplied with Employee ID whilst on-site or at events
- Promoting understanding of Safeguarding, report making and disclosures.
- Opportunities to have difficult and sensitive conversations in a supportive manner and environment
- That there will be a robust provision to support their well-being

External Agencies can expect:

- A robust safeguarding approach is adopted at all times
- Collaboration with external bodies/stakeholders.
- Contracting and sub-contracting arrangements, where appropriate.
- 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 Adult Safeguarding Boards, Adult Services and Adult Social Services, and the Police.

Recruitment

Netcom operates a safer recruitment procedure, including arrangements for appropriate checks (DBS) on new employees, contractors, guest speakers and volunteers where applicable. This includes doing online checks of potential new employees 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 employee will have had 2 references obtained. All employee information is held on a single central record (SCR)

Employee Training

Netcom will ensure that all employees 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 particularly vigilant about:

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-Bullying, sending messages of an intimidating or threatening nature

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 behaviour, 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 behaviour. This can also include forced marriage and so- called "honour crimes". Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently "violent".

Most research suggests that domestic violence occurs in all sections of society irrespective of gender, 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 employees 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

All Netcom employees will attend annual additional training on current issues relating to safeguarding.

All employees will receive continuous CPD opportunities and updates from the Safeguarding Team. This may be via the Teams channel or in the form of monthly newsletters, to help keep up to date and embed the latest information to support this policy.

Safeguarding will be discussed in weekly team meetings around questions posed from the weekly management meetings.

Safeguarding Process

1. Our Digital Programme Advisors (DPAs) will request information from potential learners regarding convictions. We will not accept learners with unspent convictions. Due to a duty of care for our employees and learners we will carry out a risk assessment if a potential learner has a spent conviction which has ongoing restrictions. For learners requesting a face-to-face course, we will conduct a risk assessment if a learner presents with a spent conviction relating to GBH or Mental health issues that are likely to be exacerbated by their environment (e.g. PTSD).

2. If an employee becomes aware that an individual (employee or learner) 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. Contacting the safeguarding team is done via the safeguarding e-mail address or telephone number.

3. If an employee feels that the cause for concern may not be constituted as a safeguarding concern, they can opt to complete a health and well-being referral, which will be triaged by the relevant Learner Success Coach, who may escalate to the safeguarding team if necessary.

4. All employees will adhere to the following guidelines:

- Following a disclosure, re-assure the learner that they have done the right thing.
- Listen without making judgements.
- Stay calm.
- Try not to ask leading 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 to any other platform
- Record what the learner said, using their words where possible in an e-mail to the safeguarding team

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.

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

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 Learner Support Officer.

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, employee should contact emergency services and/or contact the DSL.
- **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.

Internal Reporting of 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 employee should be reported directly to a DSL.

3. Any safeguarding concerns involving the Designated Safeguarding Lead (DSL) should be taken to the Head of Operations kenneth.dunn@netcomtraining.co.uk.

4. Any incidents regarding employees will be recorded in the monthly safeguarding meeting and HR will keep a record.

Aftercare

If it is deemed that an individual no longer requires safeguarding support the member of the DST dealing with the issue will close the case on the database and record the outcome. An email will be sent to the individual to inform them that their case has been closed. They will be informed to get back in contact should they need to.

If the learner reaches the end of their program but still requires further support, a three-month close-down process will be offered.

Keeping safe

To maintain employee and learner safety, the following are prohibited:

- Befriending learners on personal social media sites.
- Sharing personal telephone numbers.
- Visiting learners at home or transporting learners to and from locations (this includes travelling in the car with a learner driving.)
- Initiating personal relationships with learners.

Employees are made aware to be mindful of the following regarding personal conduct:

- Maintain professional boundaries whenever conducting work on Netcom's behalf due to the nature of naturally building a rapport with learners, which could be construed inappropriately by learners.
- 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 employee 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, an employee feels unsafe in a learner's company they should inform their manager and a member of the Designated Safeguarding Team and leave the situation. An employee can request support from their manager or a member of the safeguarding team to work with a learner at any time.

Whistle Blowing

It is acknowledged that there may be times when employee 'witness' an incident, action or event that may give them cause for concern. They should process the safeguarding concern as shown above but also refer to the whistleblowing policy

Concerns Involving Children

Although Netcom learners are aged 19 and over, employees may become aware of information through their work which indicates that a child under the age of 18 may be experiencing, or be at risk of, abuse, neglect, exploitation or other harm.

A child does not need to be a Netcom learner for a safeguarding concern to be raised. Safeguarding and promoting the welfare of children is everyone's responsibility, and employees should act where information becomes known to them which may indicate that a child is at risk.

Where an employee knows, suspects or has concerns that a child may be at risk, they must:

- Report the concern to the Designated Safeguarding Team (DST) as soon as possible.
- Record what they have been told or observed accurately.
- Not attempt to investigate the concern themselves or ask unnecessary probing questions.
- Not promise confidentiality where safeguarding information is disclosed.
- Contact the emergency services on 999 where there is an immediate risk of serious harm.

Employees are not expected to determine whether abuse has taken place or to have proof before raising a concern. Where an employee is unsure, the concern should still be reported to the DST so that it can be assessed and appropriate action determined.

The DSL or DDSL will assess the information available and, where appropriate, make a referral to the relevant Local Authority Children's Social Care service, Police or other appropriate safeguarding agency.

Where information needs to be shared to safeguard a child, consent from an adult learner is not an absolute requirement. Information will be shared where it is necessary and proportionate to protect a child from harm, in accordance with relevant safeguarding and data protection requirements. The rationale for decisions made, information shared, advice received and any subsequent action will be recorded appropriately.

Netcom will have regard to Working Together to Safeguard Children, the Children Act 1989, the Children Act 2004, Keeping Children Safe in Education, and applicable data protection legislation when responding to concerns involving children.

Evaluation of Impact

To deliver on its commitment to safeguarding, Netcom will demonstrate planning and analysis of impact by the Quality Team carrying out a range of evaluation activities to include: surveys to employees and learners, the undertaking of huddles with learners every month, and carrying out observations on all employees. This will ensure that the following operating principles are adhered to:

- Statutory requirements are adhered to
- Safeguarding issues for employee, learners, and partners are managed effectively
- Referral arrangements are in place
- Learners and employee are adequately trained on safeguarding issues.
- There are effective improvement plans in place

Review

This Policy will be reviewed annually, or earlier if deemed necessary.