



2 Counties Training

SAFEGUARDING Including Child Protection

POLICY DOCUMENT

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INTRODUCTION

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications the Teachers' Standards 2012 and 'Working Together to Safeguard Children' 2018 and **'Keeping Children Safe in Education' 2020**. KCSIE is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015. All sub-contractors must have regard to it when carrying out their duties to safeguard and promote the welfare of children

2 Counties Training (Worcestershire County Council) fully recognises its responsibilities for safeguarding children against: physical abuse; emotional abuse; discrimination; sexual abuse; institutional abuse; financial abuse; radicalisation/extremism; internet exploitation and Female Genital Mutilation.

This Policy has been developed for the purpose of delivering the 2 Counties Training Programme within Herefordshire & Worcestershire. The policy should be read in conjunction with Worcestershire County Council's Safeguarding Policy. This policy applies to all staff, governors and volunteers working on the programme. It is expected that all sub-contractors will adhere to Worcestershire County Council's policy and practice and that there is a designated named member of staff who has responsibility for all safeguarding matters.

EQUALITY STATEMENT

Worcestershire County Council are committed to ensuring equality of education and opportunity for all learners, staff, parents and carers and other stakeholders. Worcestershire County Council will not tolerate any form of unlawful discrimination, harassment or victimisation on the grounds of race, sex, gender reassignment, sexual orientation, marital status, pregnancy and maternity, disability, age, religion or belief; or for any other unjustifiable reason We aim to develop a culture of inclusion and diversity in which all those connected to the service feel proud of their identity and able to participate fully. The achievement of learners will be monitored by race, gender and disability and we will utilise this data to support learners, raise standards and ensure inclusive teaching. We will tackle discrimination by the positive promotion of equality, challenging bullying and stereotypes and creating an environment which champions respect for all. At Worcestershire County Council we believe that diversity is a strength, which should be respected and celebrated by all those who learn, teach and visit.

RESPONSIBILITIES

There are five main elements to our policy:

1. Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children and young people;
2. Raising awareness of child protection issues and equipping children and young people with the skills needed to keep them safe;
3. Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
4. Supporting learners who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan;
5. Establishing a safe environment in which children can learn and develop.

We recognise that because of the day to day contact with children and young people, sub-contractor consortium staff are well placed to identify concerns early and to observe the outward signs of abuse. The sub-contractor consortium will therefore:

- Establish and maintain an environment where children and young people feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to;
- Ensure children and young people know that there are adults in the sub-contractor consortium whom they can approach if they are worried;
- Include opportunities in the curriculum, specifically through PSHE and ICT, for children and young people to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children and young people from harm. To this end we will:

- Ensure there are systems in place for children and young people to express their views and give feedback e.g. through sub-contractor consortium/class councils, safety questionnaires, participation in anti-bullying and e-safety events;
- Ensure that the child's thoughts/wishes and feelings are recorded on all referrals.

PROCEDURES

We will follow the procedures set out by the Worcestershire Safeguarding Children Board (WSCB) and take account of guidance issued by the Department for Education (DfE). This applies to the 2 Counties Training central team together with all staff within the sub-contractor consortium delivering Training Programmes

For Young People Aged 16-18yrs (Upto 24yrs With Educational Health Care Plan) who are, or are At Risk Of, NEET (Not In Education, Employment Or Training) in Worcestershire and/or Herefordshire

The sub-contractor will:

- Ensure it has a senior leader nominated as Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role;
- Ensure it has a member of staff who will act in the absence of the DSL (deputy DSL);
- Ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and understands their role;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect and maintain an attitude of 'it could happen here';
- Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL or Sub-contractor Manager and are aware that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon.
- Ensure that parents have an understanding of the responsibility placed on the sub-contractor and staff for child protection by setting out its obligations in the sub-contractor documentation and publishing its policy on the sub-contractor website; Ensure the DSL implements the Equality Plan supported by the Centre Manager/deputy;
- Ensure the designated person ensures that all appointments panels give due regard to this plan, so that no-one is discriminated against when it comes to employment or training opportunities;
- Ensure the DSL promotes the principle of equal opportunity when developing the curriculum, and promotes respect for other people and equal opportunities to participate in all aspects of the programme;
- Ensure the DSL treats all incidents of unfair treatment and any incidents of bullying or discrimination, including racist incidents, with due seriousness.;
- Ensure the DSL ensures all staff are appropriately trained in safeguarding and Prevent and refresher sessions are undertaken in a timely way.

The Role of all Staff - Teaching and Non-Teaching

All staff will:

- Strive to provide material that gives positive images based on race, gender and disability, and challenges stereotypical images;
- Challenge any incidents of prejudice, racism or homophobia, and record any serious incidents, drawing them to the attention of the Centre Manager and DSL;
- Support the work of associate staff and encourage them to intervene in a positive way against any discriminatory incidents.

- Ensure that the duty of care towards its learners and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
- Be aware of and follow procedures set out by the DFE and the WSCB where an allegation is made against a member of staff or volunteer, including making a referral to the DBS and/or National College for Teaching and Leadership if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned;
- Operate safer recruitment practice; ensuring that at least one member on every recruitment panel has completed safer recruitment training.

Training

When staff join our sub-contractor consortium they will be informed of the safeguarding children and young people arrangements in place. They will be given a copy of this policy, the sub-contractor consortium's code of conduct and the leaflet 'Safer Working Practice for Staff in Education Settings' and told who the DSL is and who acts in their absence.

All staff will receive induction in safeguarding children and young people. The induction programme will include basic child protection information relating to signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice.

All volunteers, supply staff and regular visitors to our sub-contractor consortium will be told where our policy is kept, given the name of the DSL and informed of the sub-contractor consortium's procedures in reporting concerns.

All staff will receive training in child protection and safe working practice, updated every three years, in line with LSCB guidance.

Staff with specific responsibility for safeguarding children and young people will undertake both single and inter-agency training at a level suitable to their role and responsibilities, updated every two years.

Responsibilities

Sub-contractors with a Governing Body will nominate a member to be responsible for safeguarding children and young people and liaise with the DSL and or Principal in matters relating to safeguarding. It will ensure that:

- safeguarding policies and procedures are in place, available to parents on the sub-contractor consortium website or by other means and reviewed annually;
- an annual report on the effectiveness of the sub-contractor consortium's safeguarding procedures is presented to the governing body and returned to the Local Authority;
- any weaknesses brought to its attention relating to safeguarding are remedied without delay.

The Sub-contractor Manager will ensure that the Safeguarding policies and procedures are fully implemented and followed by all staff and that sufficient resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection.

The DSL will co-ordinate action on safeguarding and promoting the welfare of children and young people within the sub-contractor setting. The DSL is responsible for:

- Organising child protection induction training for all newly appointed staff and whole staff training, refreshed every 3 years;
- Undertaking, in conjunction with the Sub-contractor Manager and Safeguarding Governor, an annual audit of safeguarding procedures, using the County safeguarding checklist.
- Referring a child to Children's Social Care as appropriate, when there are concerns about possible abuse and neglect.
- Keeping written records of concerns about children and young people, including the use of body maps, even where there is no need to refer the matter immediately;
- Ensuring all child protection records are kept securely, separate from the main pupil file, and in locked locations;
- Ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county;
- Notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan;
- Monitoring unauthorised absence, particularly where children and young people go missing on repeated occasions, reporting concerns in line with 'missing children' procedures;
- Developing effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings;
- Contributing to assessments and providing a report to initial and review conferences which has been shared with parents first.

MANAGING A DISCLOSURE (Child Protection)

Teachers and other staff in the sub-contractor consortium are in a unique position to observe children and young people's behaviour over time and often develop close and trusting relationships with pupils. If a young person discloses directly to a member of staff, the following procedures will be followed:

- Listen carefully to what is said;
- Ask only open questions such as: 'Tell me what happened.'
- 'Please explain what you mean when you say
- 'Can you describe the person?' or 'Can you describe the place?'
- Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?'
- Do not force the young person to repeat what he/she said in front of another person;
- Do not begin an investigation – for example by asking the young person to record what happened in writing or taking a photograph of any injuries;
- Report immediately to the DSL and complete a hand-written record as soon after the disclosure as possible and in any case within 24 hours, using the young person's words as far as possible. Use body maps to record any observed injuries

Where a young person discloses safeguarding allegations against another pupil in the same setting, the DSL should refer to the local procedures on the WSCB website/Keeping Children Safe in Education and seek advice from the Access Centre before commencing its own investigation or contacting parents.

Information Sharing & Confidentiality

- The Sub-contractor consortium recognise that all matters relating to child protection are confidential
- The Sub-contractor Manager or DSL will disclose any information about a pupil to other members of staff on a need to know basis only
- All sub-contractor staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and young people
- All sub-contractor staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

Communication with Parents

Sub-contractors recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children and young people effectively.

Sub-contractors will always undertake appropriate discussion with parents prior to involvement of another agency **unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation.**

Sub-contractors will ensure that parents have an understanding of the responsibilities placed on the sub-contractor consortium and staff to safeguard children and young people and their duty to co-operate with other agencies in this respect.

Record Keeping

- Any member of staff within the Sub-contractor consortium receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Concerns will be recorded using the sub-contractor consortium's safeguarding children and young people recording system.
- All records of a child protection nature will be passed to the DSL including case conference or core group minutes and written records of any concerns. Child protection records are kept securely and transferred in a safe and timely manner when a child moves sub-contractor consortium.
- The DSL maintain and regularly audit the sub-contractor consortium's child protection records and ensure that each stand-alone file includes a chronology of significant events.
- The Sub-contractor Manager will report all safeguarding incidents to the Manager:2 Counties Training

SUPPORTING CHILDREN AND YOUNG PEOPLE

- The Sub-contractor recognises that children and young people who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.
- The Sub-contractor acknowledges that the sub-contractor provision may be the only stable, secure and predictable element in the lives of children and young people who have been abused or who are at risk of harm.
- The sub-contractor is aware that research shows that at sub-contractor provision level abused learners' behaviour may be challenging and defiant or they may be withdrawn.

The sub-contractor will endeavour to support all learners by:

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;
- Promoting a positive, supportive and secure environment giving pupils a sense of being valued;
- A consistently applied sub-contractor Behaviour Policy which is aimed at supporting vulnerable learners. The sub-contractor will ensure that the learner knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;
- Liaising with other agencies that support the pupil such as Children's Social Care Services, Child and Adult Mental Health Service (CAMHS) and those agencies involved in the safeguarding of children and young people;
- Notifying Children's Social Care Services immediately there is a significant concern;
- Providing continuing support to a learner about whom there have been concerns who leaves the sub-contractor consortium by ensuring that appropriate information is forwarded under confidential cover to the learner's new setting.

SUPPORTING AND SUPERVISION OF STAFF

The sub-contractor recognises that staff working in the sub-contractor consortium who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

The sub-contractor will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

2 Counties Training will enable supervision for the DSL through network meetings, direct consultation with the 2 Counties Training Lead Officer and/or the Worcestershire County County's Senior Adviser or advanced social work practitioners in order to promote best practice and challenge unsatisfactory or poor practice.

In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children and young people, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

SAFER RECRUITMENT AND SELECTION OF STAFF

The sub-contractor has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the sub-contractor's measures to safeguard children and young people and to identify, deter or reject people who might pose a risk of harm to children and young people or are otherwise unsuited to work with them.

All staff working within our sub-contractor consortium who have access to children and young people have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK.

Sub-contractors with a Governing Body ensure governors are subject to an enhanced DBS check without barred list check, in line with Worcestershire recommendation. The sub-contractor maintains a single central record of recruitment checks for audit purposes.

Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment. Volunteers who are not working in regulated activity, will be supervised at all times.

Allegations against staff

Sub-contractors acknowledge that a pupil may make an allegation against a member of staff.

If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the DSL and the sub-contractor manager, unless the allegation concerns the sub-contractor manager, in which case the Manager: 2 Counties Training will be informed immediately.

The sub-contractor manager (or Manager: 2 Counties Training) on all such occasions will discuss the content of the allegation with the LA's Senior Adviser for Safeguarding Children in Education or the Local Authority Designated Officer (LADO), prior to undertaking any investigation.

The sub-contractor consortium will follow the DFE and LA procedures for managing allegations against staff, a copy of which is readily available in the sub-contractor consortium.

The case manager will be guided by the Senior Adviser and/or LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.

WHISTLEBLOWING

Whistleblowing is 'making a disclosure in the public interest' and occurs when a concern is raised (i.e. someone 'blows the whistle'), about a certain type of wrongdoing, danger or illegality that affects others, for example members of the public. The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party. Typically, the whistleblower is not directly, personally affected by the danger or illegality.

The Council is committed to the highest standards of openness, probity and accountability. This section to be read in conjunction with Worcestershire County Council Whistleblowing policy and procedure. The aim is to encourage employees and others who have serious concerns about any aspect of the Council's work to come forward and voice those concerns. All staff, including sub-contractor staff should feel they are able to raise an allegation in good faith and without recourse, or being victimised, and recognise that learners cannot be expected to raise concerns in an environment where staff fail to do so.

The Employment Rights Acts 1996 and the Public Interest Disclosure Act 1998 gives legal protection to staff (including employment agency supplied workers and those on work experience) against being dismissed or penalised by employers as a result of disclosing information on malpractice, wrongdoing or dangers (a 'qualifying disclosure'). Protection is given to a 'protected disclosure' which is a 'qualifying disclosure' given to particular persons as defined by the legislation,

All employees and managers to be made aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of. Managers should:

- ensure that any concerns raised are taken seriously
- investigate thoroughly and make an objective assessment of the concern
- keep the individual advised of progress
- ensure action is taken to resolve a concern

Concerns can be raised by telephone, in person or in writing but preferably in writing with the employees' line manager. The earlier the concern is expressed, the easier it is to take action. There will be a need to provide the following information:

- the nature of the concern and it is believed it to be true
- the background and history of the concern (giving relevant dates)

Within ten working days of a concern being raised, the person investigating a concern will write to the whistleblower

Whistleblowing concerns about the sub-contractor manager/owner should be raised with the Manager 2 Counties Training.

Complaints or Concerns expressed by Learners, Parents, Staff or Volunteers

Sub-contractors recognise that listening to learners is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

Sub-contractors will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the sub-contractor will take but also the length of time that will be required to resolve the complaint. The sub-contractor will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The sub-contractor's complaints procedures are readily available.

Positive Physical Intervention

Sub-contractor policy on positive handling is set out in their Behaviour Policy/a separate policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.

Sub-contractors understand that physical intervention of a nature that causes injury or distress to a learner may be considered under management of allegations or disciplinary procedures.

Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique, or equivalent. All incidences of physical intervention will be recorded in accordance with the Team Teach recommended procedures. We recognise that touch is appropriate in the context of working with children and young people and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries.

Abuse of Position of Trust

Sub-contractors recognise that as adults working in the sub-contractor consortium, we are in a relationship of trust with the pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.

Sub-contractors acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.

Sub-contractors recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

RADICALISATION/EXTREMISM

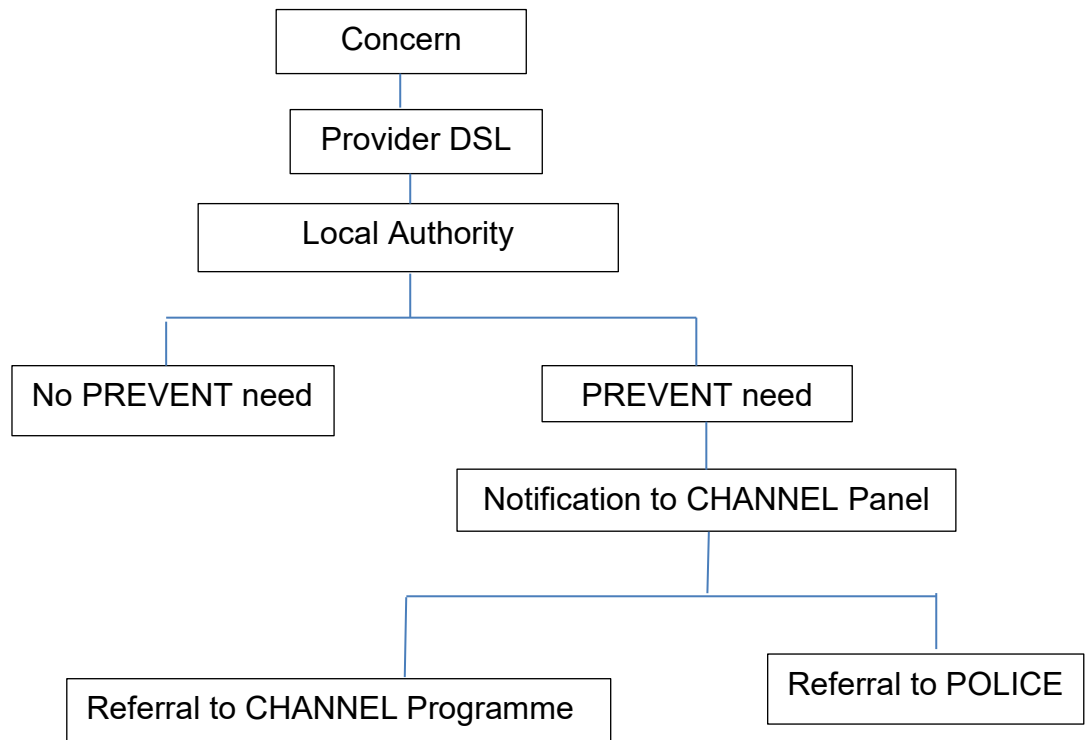
FE Skills providers are defined as “specified authorities” & therefore subject to the statutory requirements of Section 26 of Counter-Terrorism & Security Act 2015 (the Prevent Statutory Duty).

Sub-contractors will ensure a senior member of staff is appointed as PREVENT Lead who is suitably trained to guarantee all staff are aware of their Prevent duty under the Counter-Terrorism and Security Act 2015. Learners, particularly vulnerable young people, are to understand how to keep themselves and their peers safe from the risks associated with radicalisation or extremism. The Lead to:

- Work in partnership with 2 Counties Training Prevent Lead and the Worcestershire Strategic Prevent Board
- Raise awareness of the CTLP and regular updates
- Provide training for all staff to ensure awareness and knowledge is raised on how to identify and report issues relating to safeguarding and PREVENT
- Actively promote to learner’s issues as relevant on safeguarding / PREVENT and knowledge on how to keep themselves and their peers safe
- Have clear strategies, and tutor confidence, in place to deal with extremist views voiced in the classroom

Sub-contractors encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. Sub-contractors ensure that partisan political views are not promoted in the teaching of any subject in the sub-contractor consortium and where political issues are brought to the attention of the pupils, reasonable practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

Escalation:



- Referral to LA Channel Panel
- Contact your local police force or dial 101 (the non-emergency number)
- The Department for Education has dedicated a telephone helpline (020 7340 7264) to raise concerns relating to extremism directly by email to counter.extremism@education.gsi.gov.uk.

ANTI-BULLYING

Sub-contractor’s policy on anti-bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, racist, homophobic and gender related bullying will be dealt with in accordance with our anti-bullying policy.

Sub-contractors recognise that children and young people with special needs and/or disabilities are more susceptible to being bullied. Sub-contractors maintain a log of bullying incidents.

E-SAFETY

- Sub-contractor consortium members of staff are trained in and receive regular updates in e-safety and recognising and reporting concerns.
- Sub-contractor Acceptable Use policy recognises that internet safety is a whole sub-contractor consortium responsibility (staff, pupils, parents).
- Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.
- Sub-contractors therefore recognise their responsibility to educate our learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

SAFEGUARDING AND REMOTE EDUCATION

- Sub-contractors to comply with the statutory duty from the Department of Education Keeping Children Safe in Education when delivering remote learning:
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf
- And [teaching online safety in schools](#) that provides information to help training providers to ensure their learners understand how to stay safe and behave online. The main principles of keeping young people safe online:
 - Focus on the underpinning knowledge and behaviours that can help pupils to navigate the online world safely and confidently regardless of the device, platform or app. This teaching should be built into existing lessons across the curriculum and covered within specific online safety lessons
 - Young people should be able to make judgements about what they see online and not automatically assume that what they see is true, valid or acceptable including Fake News. Schools can help pupils consider questions including:
 - is this website/URL/email fake? How can I tell?
 - what does this cookie do and what information am I sharing?
 - is this person who they say they are?

- why does someone want me to see this?
 - why does someone want me to send this?
 - why would someone want me to believe this?
 - why does this person want my personal information?
 - what's behind this post?
 - is this too good to be true?
 - is this fact or opinion?
- Young people should be able to recognise the techniques that are often used to persuade or manipulate others and the underlying principles of online radicalisation
- Contact with parents/carers can also be used to reinforce the importance of young people staying safe online. It's especially important for parents and/carers are made aware of what their young people are being asked to do, including:
 - sites they will be asked to use
 - school staff their child will interact with
- Sub-contractors should emphasise the importance of a safe online environment and encourage parents/carers to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites. These are usually free, but often need to be turned on.

Reporting concerns

- It is essential to have and communicate clear reporting routes so that young people, tutors and parents/carers can raise any safeguarding concerns.
- Sub-contractors should consider signposting to the practical support that's available for reporting harmful or upsetting content as well as bullying and online abuse. Get support by:
 - reporting harmful online content to the [UK Safer Internet Centre](#)
 - getting government advice and trusted resources from [Educate Against Hate](#) on safeguarding from radicalisation, building resilience to extremism, and promoting shared values
 - get advice on reporting online abuse from the National Crime Agency's [Child Exploitation and Online Protection command](#)
 - get advice and support from [Anti-Bullying Alliance](#) for children who are being bullied
- Sub-contractors should the free [Professionals Online Safety Helpline](#) which supports the online safeguarding of both children and professionals. Call 0344 381 4772 or email helpline@saferinternet.org.uk. The helpline is open from Monday to Friday from 10am to 4pm.

Virtual lessons and live streaming

- Sub-contractors who choose to provide remote education using live streaming or pre-recorded videos, guidance from the National Cyber Security Centre (NCSC) on [which video conference service is right for your school](#) and [using video conferencing services securely](#) you to set up video conferencing safely.
- In addition, [guidance from the UK Safer Internet Centre on safe remote learning](#) includes detailed advice on live, online teaching, and the [safeguarding guidance from London grid for learning \(LGfL\)](#) includes platform-specific advice.
- Teaching from home is different to teaching in the classroom. Tutors should try to find a quiet or private room or area to talk to pupils, parents/carers. When broadcasting a lesson or making a recording, consider what will be in the background.

Personal data and GDPR

- Sub-contractors should continue to follow the guidance outlined in the [data protection: toolkit for schools](#) when managing personal data and may need to consider:
 - ♦ taking care not to share contact details when emailing multiple people
 - ♦ being careful when sharing usernames and other personal data for access to online resources
 - ♦ providing access to school data systems safely

PHOTOGRAPHY AND USE OF IMAGES

The welfare and protection of learners is paramount and consideration should always be given to whether the use of photography will place learners at risk. Images may be used to harm children and young people, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

Sub-contractors ensure consent is always sought when photographing learners and additional consideration given to photographing vulnerable children and young people, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

HEALTH & SAFETY

Sub-contractors' Health & Safety policies, set out in a separate document, reflect the consideration given to the safeguarding of learners both within the sub-contractor environment and when away from the sub-contractor premises, for example when undertaking sub-contractor trips and visits or work experience.

Safe Environment

- The sub-contractor undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- The sub-contractor has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of sub-contractor consortium hours.

Challenge and Escalation

The sub-contractor consortium recognises that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard learners.

As part of our responsibility for safeguarding children and young people, the sub-contractor consortium acknowledges that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

The sub-contractor consortium is aware of the WSCB escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children and young people.

MONITORING AND EVALUATION

Sub-contractor Safeguarding Children policy and procedures will be monitored and evaluated by:

- Completion of an annual safeguarding audit;
- Completion and return to the LA of the annual safeguarding report;

- Learner surveys and questionnaires;
- Discussions with learners and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the sub-contractor consortium's single central record of recruitment checks;
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records;
- Supervision of staff involved in child protection;
- Case file audits undertaken by the DSL.

CONTACTS

2 Counties Training:

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07568116972
swalters@worcestershire.gov.uk

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Deputy Designated Safeguarding Lead
07702620415
kbirch@worcestershire.gov.uk

External

WCC Family Front Door
01905 822666
[www.worcestershire.gov.uk/are you worried about a child](http://www.worcestershire.gov.uk/are_you_worried_about_a_child)

Out of Hours Emergency Duty Team	01905 768020
Police Public Protection Unit:	101 - 24hrs non-emergency
Immediate Risk of Danger:	999 - Emergency
NSPCC Helpline	0808 800 5000
Local Authority Senior Adviser for Safeguarding Children in Education - Denise Hannibal	01905 728902
Local Authority Designated Officer (LADO) – Jon Hancock / James Ballard	01905 766090 / 763763
Local Authority Prevent Lead – Paul Kinsella	01905 846550

pkinsella@worcestershire.gov.uk