



## **Safeguarding of Children & Vulnerable Adults Protection Policy**

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Any learner under the age of 18 is deemed to be a child in the eyes of the law. The term vulnerable adult refers to any person, over the age of 18, in need of community care or support services because of old age, mental health issues, physical disability, hearing, seeing and/or communication difficulties, learning disabilities or the inability to protect themselves from significant harm or being taken advantage of.

Integer Training Limited is committed to improving and promoting best practice throughout the organisation and ensuring that the wellbeing of learners is safeguarded and that they are protected from harm. This in turn will promote opportunities for them to thrive and benefit from their learning experience and foster a culture where learners are valued and their right to be safe is respected. Safeguarding is everyone's responsibility.

Under this policy abuse and neglect are defined as forms of maltreatment to any learner. This may be by omission or commission, i.e., inflicting harm or failing to prevent harm. We recognise a learner can be abused in a family, institution or community setting by those known to them or, more rarely, by a stranger. Abuse may be by an adult(s) or another child(ren). The main categories of abuse are neglect, physical abuse, sexual abuse, emotional abuse and financial abuse.

The safeguarding of learners also includes protection from harassment (including e-safety), forced marriage or honour-based violence, Female Genital mutilation, breast binding, cuckooing, radicalisation or Child Sexual Exploitation (CSE) will includes sexting.

### **Legislation and guidance**

All Staff must adhere to Integer policies and practices relating to Safeguarding:

- Safeguarding of Children & Vulnerable Adults Policy
- Code of Professional Practice
- Confidentiality Policy & Agreement
- Data Protection Policy
- Preventing Extremism Policy
- Keeping children safe in education (DfE statutory guidance)
- Safer Recruitment

### **Responsibilities - INTEGER TRAINING LTD will:**

1. Promote the health, safety and welfare of children and vulnerable adults by providing opportunities for them to take part in activities safely.
2. Promote the health, safety, and wellbeing of all those who use its services, including learners, staff, volunteers, and visitors. We will exercise our duty of care by working to embed an awareness and response mechanism throughout the whole organisation and train individuals to recognise the signs and symptoms of abuse and how to raise concerns.
3. Respect and promote the rights, wishes and feelings of children and vulnerable adults.
4. Promote and implement appropriate procedures to safeguard the well-being of children and vulnerable adults and protect them from abuse.
5. Recruit staff who are qualified, approved, suitably competent and who have been vetted by our systems and procedures, including renewals of vetting systems and DBS certification

6. Recruit, train, support and supervise staff to adopt best practice to safeguard and protect children and vulnerable adults from abuse and to minimise risk to themselves and to implement this policy approach across all their education and training activity
7. Require members to adopt and abide by this Safeguarding of Children & Vulnerable Adult Protection Policy and these Procedures.
8. Respond to any allegations of misconduct or abuse of children or vulnerable adults in line with this Policy and these Procedures as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
9. Promote and embed the Government's strategy to all stakeholders to stop people becoming involved in violent extremism or supporting terrorism, in all its forms by raising and delivering awareness in 'Prevent'. *(For further information refer to the Preventing Radicalization & Extremism Policy)*
10. Review and evaluate this Policy and these Procedures on a regular basis in accordance with changes in legislation and guidance on the protection of children and vulnerable adults or any changes within Integer Training Limited as a national training provider.

## Safeguarding of e-learners

### Premise

Keeping staff and learners safe is our priority. Staff have a continuing responsibility to promote the welfare of the learners and protect them from harm, including those who are engaged in e-learning.

### Responsibilities in respect of e-learning - INTEGER TRAINING LTD will:

- Require a password and use the waiting room function to prevent strangers from entering a meeting.
- Dress appropriately in smart, presentable, and clean attire.
- Set appropriate boundaries and behavioural expectations and maintain the same professional standards as in the physical classroom.
- Use appropriate language with professional tone and content.
- Contact learners only through the preferred method/s that have been provided at enrolment.
- Discourage lessons from a bedroom or a personal space.
- Conduct lessons in a quiet space, preferably against a neutral background, ensuring that friends and family are not visible during a lesson.
- Conduct lessons within the times identified in the Online learning timetable, within the normal working day.
- Ensure that all live sessions are recorded for safeguarding purposes.
- Reinforce e-safety messages during lessons and when setting tasks that requires access to the Internet.
- Encourage learners to be critically aware of the content they access on-line and be guided to validate the accuracy of information, acknowledge the source of information used, avoid plagiarism and respect copyright.
- Be alert to possible peer-on-peer abuse. This could occur during online collaborative work in online Classroom or on a remote session. Staff must control these sessions and report concerns. No additional unsupervised online collaborative work should be encouraged.
- Check what is visible on screen to the learner, so that nothing inappropriately personal is visible (e.g. personal item, painting, poster)
- Make sure that there is never a possibility of strangers having access to the screen.
- Check thoroughly any pictures or video-clips that you want to share with learners.

### Learner Attendance

- Learners must attend online lessons according to the given timetable/planned session.
- A register will be taken for all online teaching sessions, recording the start and end times, the name of the tutor, the learners present and authorised/unauthorised absences

Staff should be aware of the UK Safer Internet Centre's professional online safety helpline, which provides support with any online safety issues which they may face:

Staff can also signpost learners to age-appropriate practical support from:

UK Safer Internet Centre - to report and remove harmful online content  
CEOP - for advice on making a report about online abuse

#### *Mental health*

Staff should consider the mental health of learners who are working remotely and raise concern if they suspect, from learner's behaviour or emotional state during online lessons, that there may be underlying issues.

#### *Data protection*

Under GDPR all online content from a learner is personal data and subject to the provisions under the Data Protection Act.

- All staff should maintain the security of computerised databases of information on individual learners.
- The names, email addresses and phone numbers of learners are personal data; therefore, only relevant people should have access, and the information should only be kept for as long as it is required.
- Learner data should not be kept on the private devices of staff.
- An audit trail should be retained of all emails sent out

#### *Monitoring*

- Integer will check to ensure that lessons are taking place at the appropriate times.
- Integer will 'drop in' to online lessons randomly and in response to any concerns raised.
- Integer will audit the email trail.
- Integer will assess feedback from questionnaires regarding types of distance learning and adjust provision accordingly.

## **Safeguarding of Children and Vulnerable Adults - Procedures for reporting suspected abuse, radicalisation and concerns**

Cause for concerns may include:

- Signs of physical abuse, e.g., bruising
- Signs of sexual abuse or concerns with regards to CSE (Child Sex Exploitation)
- Signs of emotional abuse or concerns with regards to mental health/self-harm/suicidal thoughts
- Suspicions of abuse or radicalisation due to changes in behaviour
- Disclosure by learners where a member of staff believes the learner to be at risk of harm or radicalisation
- Any obvious signs of neglect
- Use of inappropriate language
- Possession of inappropriate literature including online access
- Expression of extremist views or association with known extremists or seeking to recruit others to extremist ideology
- Cuckooing (when drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing)
- FGM (Female Genital Mutilation)

- “Incel” behaviour: a shortening of the term “involuntarily celibate”, referring to a growing group of predominantly white males who share misogynistic and violent views about women.
- Modern Slavery & Human Trafficking (the illegal exploitation of people for personal or commercial gain)
- Fabricated or induced Illness (FII); this is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

In the event of a concern, staff must:

- Record brief, dated notes of information received and observations made
- Contact the Designated Safeguarding Officer, Jacky Maynard on 01288 357350 or one of the designated deputies, as follows:  
  
Sandeep Dawar (Midlands) on 0121 340 2307  
Saima Rashid (London) on 0208 625 3636
- Maintain confidentiality and guard against publicity while an allegation is being considered or investigated and follow local information sharing protocols
- Stop any other activity and focus on what you are being told or have just seen. Responding to suspicion of abuse takes immediate priority

**Staff must not:**

- Attempt to deal with the situation themselves
- Do not promise confidentiality or agree to ‘keep it a secret’. Explain clearly what you expect will happen next; you can assure them that you will only tell those you have to tell to try to get the matter dealt with. You can and should express support and reassurance to the person giving you the information particularly if it is a child or young person, that the matter will be dealt with quickly and appropriately.
- It is absolutely vital that you avoid any action that could jeopardise subsequent investigations, including legal proceedings. In particular avoid asking leading questions.

The Designated Safeguard Office (DSO) and safeguarding deputies can be contacted on the above numbers between the hours to 9am and 5pm Monday to Friday.

In the event of an incident occurring outside of these hours or in the unusual event that no safeguarding officers are available contact the local safeguarding board for the area in which the incident has occurred.

In an emergency or if a crime has been committed:  
Call 999 in an emergency or if someone is in immediate danger.

Otherwise, call 101 to report crime and other concerns that do not require an emergency response

To report adult abuse in **BIRMINGHAM** call 0121 303 1234 (Birmingham City Council)  
To report adult abuse in **ILFORD** call 020 8708 7333 (Redbridge Council)  
To report adult abuse in **COVENTRY** call 024 7683 3003 (Coventry City Council)

Serious threats to national security, such as terrorism and espionage, should be reported to the Security Service on 0800 789 321

All incidents reported in this way will still need to be recorded on Integer’s paperwork/systems for legal purposes by the staff member; the DSO must also be informed.

Information will be maintained in a confidential password protected area accessed only by designated officers and will be shared on a need-to-know basis to support learners and training teams.

## **Action that will be taken by the Designated Safeguarding Officer (DSO)**

When a report is made to the DSO it will be clear in some cases that an immediate referral must be made to the Local Area Safeguarding Board within one working day of receiving the report of an allegation. In the event of concerns not being appropriate for referral then the learner will be monitored through an appropriate member of staff in liaison with the Safeguarding Officer. Safeguarding issues will be raised at Governance, Senior Management Team and Health & Safety meetings, as appropriate.

Staff will receive support as required.

## **Allegations made against staff, volunteers or governors**

All staff and volunteers are recruited in accordance with Integer's Safer Recruitment Policy and within the DBS/Vetting and Safeguarding guidelines.

All learners need to be protected from grooming, forming inappropriate relationships, exploitation (particularly through the internet), physical abuse, violence, bullying, harassment, victimisation, recruiting or being enticed into extremist organisation/activities, etc. This protection covers all full-time, part-time and work-based learners in all settings.

When an allegation is made against a member of staff, that action should be reported immediately to the DSO or the Managing Director of Integer Training who will inform the relevant Local Authority Designated Officer (LADO) if it is found that the allegation requires escalation.

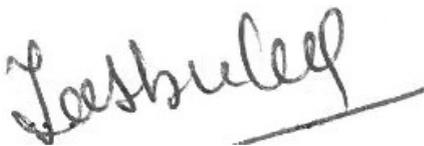
If an allegation is made against the DSO or Managing Director then it should be reported immediately to the Governor of Integer Training who will inform the relevant Local Authority Designated Officer (LADO) if it is found that the allegation requires escalations.

If no further action is appropriate in relation to the allegation i.e., the case is concluded, Integer Training will ensure that this is recorded and kept on the accused persons confidential personnel file and a copy will be given to the person concerned.

Integer Training is committed to working with other agencies to ensure that people are safeguarded. People who use the services of Integer Training have a right to live and work in environments free from abuse, neglect and discrimination.

Integer Training will bring to the attention of the social services and police any concerns or allegations identified through any part of its work.

**Declaration:** I will review and revise this policy as necessary and at regular intervals:

A handwritten signature in black ink, appearing to read 'Jasbir Behal', written over a horizontal line.

Signature of Jasbir Behal, Managing Director, Integer Training Ltd

Date: 13 January 2023

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