



# Safeguarding Policy

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## 1. Introduction

- 1.1 Staff Power Training (SPT) acknowledges that children and adults at risk are amongst the most vulnerable in society. Therefore, adults in positions of trust have a duty to ensure that the rights of children and young people to protection from abuse are taken seriously and effective action is taken in response to any signs or abuse or neglect.
- 1.2 This policy forms part of our Safeguarding framework and is in place to ensure that anybody who has cause to encounter any of our learners who may be at risk knows what is expected of them and can safeguard others.
- 1.3 SPT has a legal duty of care for the health, safety, security and wellbeing of their learners and staff always when in the respective workplaces. This duty of care incorporates the duty to safeguard all learners from subjection to any form of harm, abuse, or nuisance. It is the responsibility of the Senior Management to ensure that this duty is always discharged.
- 1.4 Safeguarding and promoting welfare are defined in Keeping Children Safe in Education (2024) which asks us as an organisation to play a key role in:
- *Providing help and support to meet the needs of children as soon as problems emerge (recognising that college staff are in a position to identify concerns early and help prevent concerns from escalating).*
  - *Protecting children from maltreatment, whether that is within or outside the home, including online.*
  - *Preventing the impairment of children's mental and physical health or development.*
  - *Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.*
  - *Taking action to enable all children to have the best outcomes.*
- 1.5 However, we also recognise that some adults are vulnerable to abuse and exploitation. This policy therefore applies not only to children but also to adults with care and support needs.
- 1.6 The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:
- *Has needs for care and support (whether or not the local authority is meeting any of those needs).*
  - *Is experiencing, or at risk of, abuse or neglect.*
  - *As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.*
- 1.7 Care and support needs are the mixture of practical, financial and emotional support for adults who need extra help to manage their lives and be independent including older people, people with a disability or long-term illness, people with mental health problems, and carers.
- 1.8 This policy will be reviewed annually, be made easily available to all staff and will be placed on the SPT website

## **2. Aims**

2.1 The primary aims of the policy/procedures are to:

- *Enable staff to meet their statutory responsibility to safeguard children (those under 18) and adults with care and support needs whilst engaged with SPT.*
- *Promote the welfare of children, young people and adults with care and support needs.*
- *Provide a safe environment for children, young people and adults with care and support needs.*
- *Identify children, young people and adults with care and support needs who would benefit from early intervention and help or are in need or suffering/ likely to suffer significant harm and take appropriate action to make sure they are safe.*
- *Contribute to effective partnership working between all those involved with providing Services for Children and Young People and Adults with Care and Support Needs.*

## **3. Principles**

The principles underpinning the work of SPT with children and adults with care and support needs are set out below:

3.1 The welfare of the child or adult with care and support needs is of paramount consideration, and in any conflict of interest their well-being must be the focus of each action.

3.2 The safeguarding of children and adults with care and support needs is everyone's responsibility. Everyone who comes in contact with children and their families or adults with care and support needs has a role to play. This involves at all times taking a student-centred approach and acting in a way that is in their best interest. No single practitioner can have a full picture of a student's needs and circumstances. If they are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

3.3 All staff should be aware that a student may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or be being threatened. This should not prevent staff from showing professional curiosity and speaking to a member of the safeguarding team if they have concerns. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

3.4 All staff working with children and adults with care and support needs should have access to and a clear understanding of the procedures set out in this document.

- 3.5 All members of staff will receive guidance on SPT policies and procedures on safeguarding during their induction and will be asked to read Part 1 of Keeping Children Safe in Education (2024).
- 3.6 All staff employed by SPT will be undergo pre-employment checks as stipulated in Keeping Children Safe in Education (2024). For more detail see Safer Recruitment Policy.
- 3.7 SPT is committed to the maintenance of accurate records of any child protection or adult safeguarding matter dealt with under these procedures and these will be recorded following the stipulations set out in Keeping Children Safe in Education (2024).

## 4. Key Terms

### 4.1 What is safeguarding?

Safeguarding is everyone's responsibility, it's about:

- *Protecting children, young people and adults who are at risk of abuse.*
- *Preventing neglect, abuse and exploitation.*
- *Helping you to keep yourself safe or put plans in place to help protect those who cannot protect themselves.*
- *Everybody feeling safe no matter who they are or what their circumstances are.*

### 4.2 What is abuse?

Abuse of an adult includes:

- *Not caring for an adult properly (neglect)*
- *Controlling or pressuring an adult to give away money or property (financial)*
- *Threatening, humiliating or harassing an adult (psychological)*
- *Hurting an adult and causing injury (physical)*
- *Touching or doing things to an adult without consent (sexual)*
- *Treating an adult badly because of disability, religion, ethnicity, sexual orientation, age or gender (discrimination)*
- *An adult who neglects their own health or who self-harms*
- *Sexually exploiting an adult for money, power or status (sexual exploitation)*

Abuse of a child includes:

- *Not caring for a child properly (neglect)*
- *Ongoing emotional maltreatment or emotional neglect of a child (psychological)*
- *Hurting a child and causing injury (physical)*
- *Forcing or persuading a child into sexual activities (sexual)*
- *Cyber bullying, grooming, sexually abusing or exploiting a child online (online)*
- *Sexually exploiting a child for money, power or status (sexual exploitation)*

## **5. Responsibilities**

### **5.1 The Strategic Safeguarding Officer (SSO)**

- *The SSO has governance over safeguarding and Prevent matters across the business, and will ensure that resources, support, and all relevant training are available and in place for staff.*
- *The SSO will support the Safeguarding and Prevent Team in meeting their responsibilities and will ensure that SPT meet these commitments.*
- *The SSO is also responsible for reviewing the Safeguarding and Prevent Policies annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding and Prevent processes and procedures that support the embedding and working practices of this policy.*
- *The SSO will be assisted by other designated members of staff who are suitably qualified and experienced namely the Designated Safeguarding Lead (DSL) & Designated Safeguarding Officer (DSO).*

### **5.2 Designated Safeguarding Lead (DSL)**

- *The DSL is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within SPT and for liaising with health, children's service, adult services, and other agencies about suspected or actual causes of abuse.*
- *Liaise with the SSO to inform them of issues, especially ongoing enquiries, and police investigations.*
- *Have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.*
- *The DSL will be responsible for determining such action as is necessary under the Safeguarding procedures contained within this document.*
- *The DSL team will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a learner.*
- *Be aware of how to make referrals to safeguarding partners, children's social care and adult's social care for statutory assessments via the local authority multi-agency safeguarding units, along with the role they might be expected to play in such assessments.*
- *Will alert the police when a crime may have been committed.*
- *Foster strong links with Safeguarding Partners and Designated Local Authority Person.*
- *Work with the DSOs to ensure that SPT collaborate with employers and other training organisations that provide apprenticeships and or work placements for children or adults at risk, to ensure that appropriate safeguarding's are in place*

### 5.3 Designated Safeguarding Officer (DSO)

- *Will liaise with DSLs to inform them of issues, especially ongoing enquiries, and police investigations.*
- *Will maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral.*
- *Act as a source of advice, support, and expertise to staff on matters of safety and safeguarding.*
- *Liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved.*
- *Will alert the police when a crime may have been committed.*
- *Foster strong links with Safeguarding Partners and Designated Local Authority Person.*
- *Work with the DSLs to ensure that SPT collaborate with employers and other training organisations that provide apprenticeships and or work placements for children or adults at risk, to ensure that appropriate safeguarding's are in place.*

### 5.4 Staff Members and Associates

- *All staff, supply staff and volunteers must have a full and active understanding of KCSIE 2024 Part One and or Annex A and all sections of the SPT Safeguarding and Prevent Policy.*
- *Be familiar with the procedures in place to address and manage any safeguarding concerns, allegations about staff members including low-level concerns and recording of these.*
- *All delivery staff should also read Part Five and Annex A of KCSIE 2024.*
- *Provide a safe environment in which learners at risk of harm, abuse or neglect can learn in a safe environment.*
- *Be prepared to identify learners at risk of harm, abuse, or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.*
- *Report any concerns – whether about a child, young person, family, colleague or another professional with the DSO/DSL.*
- *Assist in the assessment of possible child abuse by sharing information and reporting concerns as outlined in this policy. Staff may have the one key piece of information that will help Children's Services, Safeguarding Partners make the best decision about a child.*
- *Never promise a Learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe.*

## 6. Risk Assessment

6.1 Risk assessment is an intrinsic part of the safeguarding process. It is used to assess and manage potential risk of abuse or neglect that might harm a person's wellbeing, in a similar way to how SPT consider health and safety, so that the specific needs of children and vulnerable groups are considered.

6.2 A Prevent and Safeguarding Risk Assessment will be carried out and an action plan created, which will be managed by the DSL and will be reviewed as a minimum on an annual basis.

6.3 Every member of staff, associate or volunteer has a responsibility for ensuring that they have read and understand the risk assessment.

## **7. Communication**

7.1 SPT staff members are the first line of defence in safeguarding. It's essential that they understand their roles and responsibilities, know how to recognise signs of abuse or neglect and are familiar with the procedures for reporting concerns.

7.2 Communication with staff should be clear, consistent, and ongoing – this can be achieved through:

- *Regular training: Workshops, e-learning, and refresher courses will all be used to ensure that staff are up to date with the latest safeguarding policies and protocols.*
- *Accessible information: SPT will provide easy-to-understand guidance documents, flowcharts, and quick-reference materials.*
- *Using a range of digital communication tools: People have different communication and learning styles, so it's vital that SPT to use multiple channels to communicate. This will be achieved by using emails, websites, a staff intranet, newsletters, noticeboards, and social media to reach as many people in each audience as possible.*
- *Open dialogue: All staff will be involved in creating safeguarding policies and encourage them to ask questions and provide feedback through regular meetings or clear communication channels.*
- *Designated safeguarding representatives: SPT will ensure that all staff and learners know who they should turn to with any questions or concerns about any aspect of safeguarding.*

## **8. Guidance for Reporting Concerns**

8.1 If you are concerned that a child or vulnerable adult within SPT has suffered maltreatment you should follow these guidelines (*Appendix D*). It doesn't matter how insignificant the concerns may seem. A general principle of 'see something, say something' should be followed.

8.2 What to do if you suspect, or are told, that a child or adult with care and support needs is being abused.

- *You should not investigate the concerns; this is the job of the relevant authorities.*
- *Ask open questions using the T.E.D. approach (do not ask any questions that may be regarded as leading or closed):*
  - *Tell me what happened?*
  - *Explain to me what happened next?*
  - *Describe to me anything else that happened?*

- *Listen carefully to what you are being told and don't pass any kind of judgement on any of the information that you are being given.*
- *Carefully record in writing what you have been told, or what has been observed, as soon as possible and pass on to a member of the safeguarding team.*
- *Do not promise confidentiality as this cannot be delivered.*
- *Do not contact the child/ adult's parents or carers.*
- *If there is any need for emergency medical treatment do not delay, contact a First Aider.*
- *Immediately inform a member of the safeguarding team (Appendix A).*

## **9. Reporting Allegations of Abuse against Members of Staff**

9.1 If you have concerns about the behaviour of another SPT colleague, do not dismiss these concerns. Where you have concerns, or a disclosure is made that indicates, that a member of staff poses a risk of harm (may meet the harm threshold) the process for reporting outlined below should be followed without delay.

9.2 An allegation may meet the harm threshold when a member of staff has:

- *Behaved in a way that has harmed a child/adult or may have harmed a child/adult.*
- *Possibly committed a criminal offence against or related to a child/adult.*
- *Behaved towards a child/adult in a way that indicates he or she may pose a risk of harm.*
- *Behaved or may have behaved in a way that indicates they may not be suitable to work with children/adults (this includes behaviour that has occurred outside of college or online: known as transferable risk).*

9.3 If you are concerned that the harm threshold may be met, then follow this process:

- *Listen carefully to what you are being told and don't pass any kind of judgement on any of the information that you are being given.*
- *Carefully record in writing what the child/adult has told you, or what has been observed, as soon as possible.*
- *Do not promise confidentiality as this cannot be delivered.*
- *Immediately inform a member of the safeguarding team (as outlined in Appendix A).*

## 10. Threshold Decision Making Guidance

10.1 This guide seeks to support practitioners, partners and providers, working within the adult sector, to report and respond to concerns at the appropriate level and to have a consistency of approach across agencies. Guidance Threshold decision making can be complex, often an incident may consist of several types of abuse which must be factored into the decision making.

10.2 The safeguarding threshold guidance (*below*) is a model that should be seen as a guide to managing risk for safeguarding concerns, it should be used in conjunction with practitioners own multi-agency procedures and has been produced to:

- *Offer consistency.*
- *Provide a framework that allows multi agency partners to manage risk.*
- *Assist in differentiating between quality issues and safeguarding risk.*

Rating	Action
Green	Non-reportable - Low risk (no impact)
Yellow	Requires consultation - Medium risk (some harm or risk of harm)
Red	Reportable - High risk (significant harm or risk of harm)

10.3 Responses must be proportionate and directed at preventing vulnerability and risk and promoting the wellbeing of adults at risk of abuse. This guidance has been agreed by the Sunderland Safeguarding Adults Board (SSAB) and will be used by all agencies, in the public, private and voluntary sectors that provide adult services.

## 11. External Speakers and Events

11.1 An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with us, or one of its contracted partners, who has been invited to speak to staff/learners.

11.2 The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- *Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events.*
- *Processes or protocols to demonstrate how information about the speaker is used to decide about whether to allow their event to take place or not (risk assessed).*
- *A requirement for speakers to sign up to the organisation's Equality, Diversity, and Inclusion Policy.*
- *Evidence of the final decision made about whether to allow the speaker into the organisation, including the mitigation measures put in place*

## 12. Training for Staff

12.1 All SPT staff (including associates) commencing employment with SPT are required to complete relevant training in relation to their role (*as detailed below*). SPT will ensure that all employees are made aware of the standards expected of them and implement the appropriate support to achieve these standards.

Individual/Group	Training	Frequency
<b>All Staff</b>	Safeguarding & Prevent Policy Risk Assessment review	At induction
	Identified essential reading ( <i>KCSIE part 1</i> )	At induction & upon change
<b>General Office Staff &amp; Delivery Team</b>	Safeguarding Awareness	Every 12 months
	Prevent Awareness	Every 12 months
<b>Recruitment/Departmental Managers</b>	Safer Recruitment	Every 12 months
<b>DSO/DSL/SSO</b>	Prevent Awareness	Every 12 months
	Prevent Referrals	Every 12 months
	Designated Safeguarding Lead Training	Every 2 years

12.2 Furthermore, SPT are committed to train all staff to work within the local safeguarding procedures and operational safeguarding arrangements where possible as set out by Local Safeguarding Children Boards (*LSCBs*) and Safeguarding Adults Boards (*SABs*).

## 13. Confidentiality

13.1 The Data Protection Act 2018 (*DPA 2018*) and General UK Data Protection Regulations (*UKGDPR*) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people, and adults at risk of harm, abuse, or neglect.

13.2 SPT staff should never promise that they will not tell anyone about an allegation or disclosure, as this may not be in the best interests of the child, young person, or adult at risk of harm or abuse.

13.3 All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with legislation following government advice and guidance.

**Appendix A - Safeguarding Team**

Name	Role	Location	Contact details
Martin Waller	Strategic Safeguarding Officer (SSO)	Head Office - Sunderland	07852182894 <a href="mailto:martin@staffpowergroup.com">martin@staffpowergroup.com</a>
Robert Longstaff	Designated Safeguarding Lead (DSL)	Head Office - Sunderland	07943874431 <a href="mailto:rob@staffpowergroup.com">rob@staffpowergroup.com</a>
Lee Johnston	Designated Safeguarding Lead (DSL)	Head Office - Sunderland	07534388829 <a href="mailto:lee@staffpowergroup.com">lee@staffpowergroup.com</a>
Lorna Thompson	Designated Safeguarding Officer (DSO)	Head Office - Sunderland	07985711654 <a href="mailto:lorna@staffpowergroup.com">lorna@staffpowergroup.com</a>
TBC	Designated Safeguarding Officer (DSO)	Head Office - Sunderland	

If you have any concerns, contact a member of the safeguarding team, or use the email below. Learners should also be made aware of this email address.

The Safeguarding e-mail address: [safeguarding@staffpowergroup.com](mailto:safeguarding@staffpowergroup.com)

## Appendix B – Reporting Points of Contact

<p><b>Sunderland Safeguarding Adults Board</b></p> <p>0191 5205552</p> <p><a href="mailto:safeguarding.adults@sunderland.gov.uk">safeguarding.adults@sunderland.gov.uk</a></p> <p>Online referral form:  <a href="https://adultsportal.sunderland.gov.uk/web/portal/pages/safeguarding">https://adultsportal.sunderland.gov.uk/web/portal/pages/safeguarding</a></p>
<p><b>Newcastle Safeguarding Adults Board</b></p> <p>0191 278 8377 (Monday - Friday, 08:00-17:00)          0191 278 7878 (Evenings and Weekends)</p> <p><a href="mailto:ASCPadmin@newcastle.gov.uk">ASCPadmin@newcastle.gov.uk</a></p> <p>Online referral form  <a href="https://mycarenewcastle.org.uk/form/SAIE?latest=true#!/">https://mycarenewcastle.org.uk/form/SAIE?latest=true#!/</a></p>
<p><b>Teeswide Safeguarding Adults Board</b></p> <p>01642 065070 (Monday - Thursday 08:30-17:00, Friday 08:30-16:30)          01642 524 552 (At any other time)</p> <p><a href="mailto:adultaccessteam@middlesbrough.gov.uk">adultaccessteam@middlesbrough.gov.uk</a></p>

**If you are worried about someone:**

- **In an emergency, please call: 999**
- **If there is no immediate risk, call the police on: 101**

**Appendix C - Safeguarding Reporting Form**

# Safeguarding reporting form

This form should be used to record safeguarding concerns relating to Children and/or Vulnerable persons. In an emergency please do not delay in informing the police or social services. All the information must be treated as confidential and reported to the Designated Safeguarding Officer within one working day or the next working day if it's a weekend.

The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken. Please complete the form as fully as possible.

<b>1 Your details – the person completing the form</b>			
Name			
Position			
Telephone		Email	

<b>2 Details of the person affected</b>			
Name			
Address			
Telephone		Email	

<b>3 Details of the incident (please describe in detail using only the facts)</b>

**4** Other present or potential witnesses

Name			
Address			
Telephone number		Email	

**5** Additional relevant information (please detail anything else that you believe to be helpful or important)

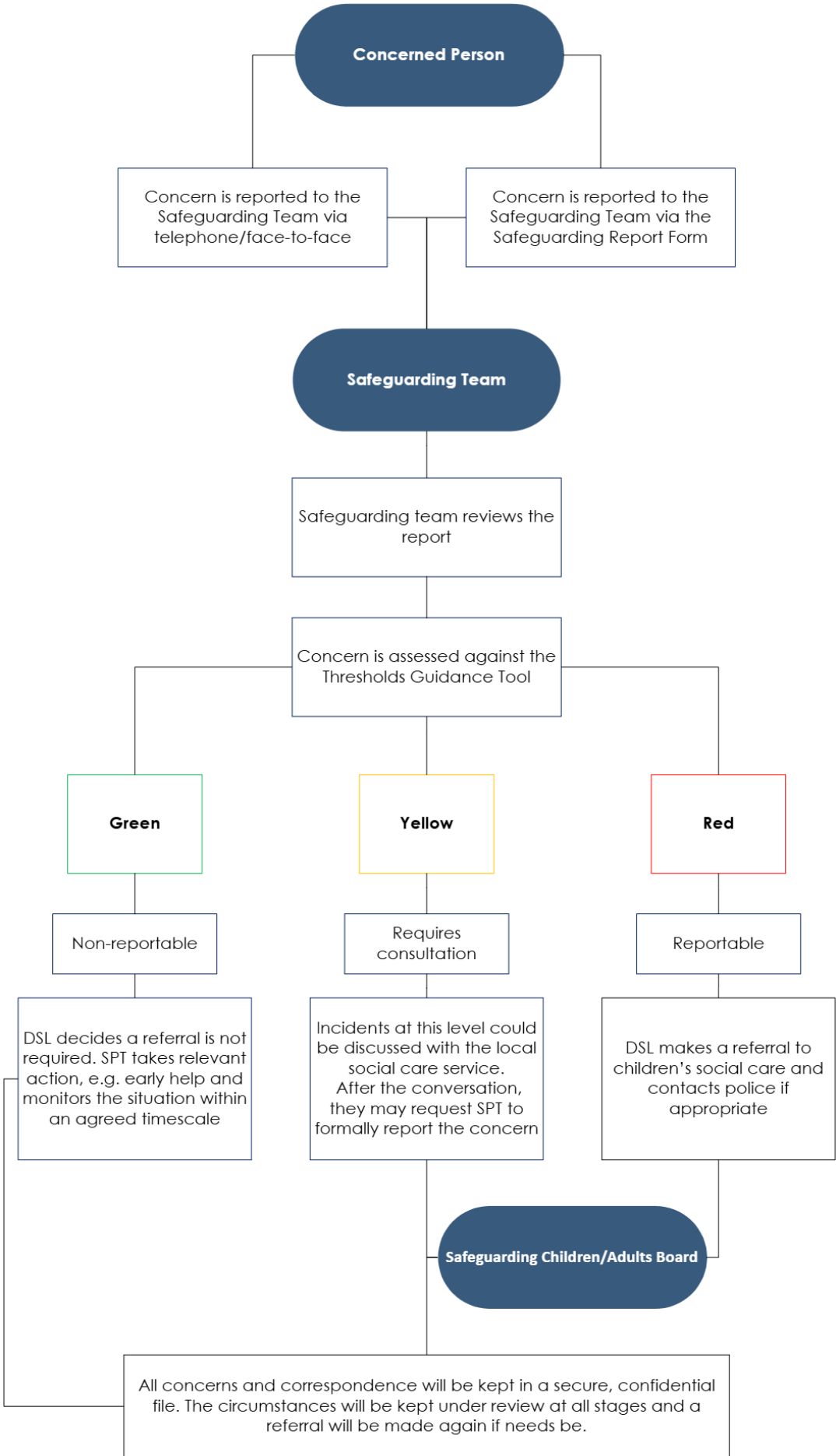
I have completed this form and provided information that is factual and does not contain my own views or opinions on the matter.

Print name

Signature

Date

**Appendix D - SPT Safeguarding Reporting Process**



**Appendix E - Sunderland Safeguarding Adults Board: Thresholds Guidance Tool**

<b>Non-reportable</b>	<b>Requires consultation</b>	<b>Reportable</b>
<b>Low risk</b> <i>No impact</i>	<b>Medium risk</b> <i>Some harm or risk of harm</i>	<b>High risk</b> <i>Significant harm or risk of harm</i>
<p><i>Lower-level concern where threshold of further enquires under safeguarding are unlikely to be met.</i></p> <p><i>However, agencies should keep a written internal record of what happened and what action was taken, following your own internal process.</i></p> <p><i>Where there are a number of low-level concerns consideration should be given as to whether the threshold is met for a safeguarding enquiry due to increased risk.</i></p>	<p><i>Incidents at this level could be discussed with the local adult social care service.</i></p> <p><i>After the conversation, they may request you formally report the concern as a safeguarding.</i></p>	<p><i>Incidents at this level should be reported to your local adult social care service and directed to the safeguarding team.</i></p> <p><i>NB: You may need to contact the police/emergency services.</i></p>