

Safeguarding – Child and Vulnerable Adult Protection Policy

1. Introduction

1.1. Every year Teaching Personnel place thousands of educators into educational settings to provide a quality education for children and vulnerable adults. In addition to this, internal staff at Teaching Personnel regularly visit educational settings and complete volunteer school placements as part of our service to clients.

1.2. Teaching Personnel are thoroughly committed to safeguarding and protecting children and vulnerable adults from abuse and harm. We follow all national guidelines to ensure that the highest levels of safeguarding and child and vulnerable adult protection are maintained by all staff.

1.3. We do this by:

- Following [Keeping Children Safe in Education](#) guidance issued by the Department for Education.
- Following [Keeping Learners Safe](#) guidance issued by the Welsh Government.
- Ensuring that educators confirm they have read Part 1 of KCSIE and will keep up to date with any changes. It is imperative that all educators registered and working with Teaching Personnel understand their duties and responsibilities to keep children safe.
- Ensuring educators are up to date regarding any relevant changes to legislation and guidance.
- Ensuring all staff are aware of Teaching Personnel's 'Safeguarding – Child and Vulnerable Adult Protection' policy, and that staff are trained in line with this policy.
- Following DfE guidelines on managing concerns/allegations regarding educators.
- Making Teaching Personnel's policies on 'Safeguarding – Child and Vulnerable Adult Protection', and 'Procedure for Managing Concerns, Allegations, and Unsuitability', accessible to all clients and educators.
- Ensuring all educators work in line with Teaching Personnel's 'Educator Behaviour' policy.
- Ensuring all educators complete Safeguarding Children Level 2 on an annual basis.

1.4. This policy should be read alongside Teaching Personnel's other policies, procedures, guidance and other related documents:

- Educator Behaviour policy
- Procedure for Managing Concerns, Allegations, and Unsuitability policy
- Safer Recruitment Policy
- Lone Working Policy and Procedures
- Online Tutoring Policy and Guidance

2. Application of this Policy

2.1. 'Educators' are referred to in this policy as supply staff placed into educational settings (the hirer) by Teaching Personnel. Educators will be working directly in contact with children and/or vulnerable adults.

2.2. 'Internal Teaching Personnel staff' are employees of Teaching Personnel who in most cases will place the educator into the educational settings (the hirer) and be the main point of contact for both the educator and the hirer.

2.3. Teaching Personnel expects all educators and internal Teaching Personnel staff to adhere to this policy at all times.

2.4. This policy works in conjunction with the hirer's 'Safeguarding and Child Protection' policy which should be given to educators at the beginning of an assignment. Educators, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college and should adhere to their policies and procedures at all times.

3. Purpose of this Policy

3.1. This policy is intended to protect children and vulnerable adults who are in the care of educators and hirers working with Teaching Personnel.

3.2. This policy is intended to provide guidance and overarching principles to those who represent Teaching Personnel and guide our approach to child and vulnerable adult protection and safeguarding.

4. Policy Review

4.1. The Safeguarding Manager will keep Teaching Personnel's 'Safeguarding – Child and Vulnerable Adult Protection' policy up to date in line with any legislative changes. A review of this policy will take place annually.

5. Designated Safeguarding Lead

5.1. Teaching Personnel's Designated Safeguarding Lead is Emma Mounsey and can be contacted on emma.mounsey@supportingeducation.com.

5.2. **The purpose of the Designated Safeguarding Lead is to:**

- Champion this policy across Teaching Personnel.

- Ensure regular update training is provided to internal Teaching Personnel staff.
- Oversee and take responsibility for any child protection issues which may be raised.

5.3. The role of the Designated Safeguarding Lead is to:

- Operate with the best interest of children at heart.
- Raise awareness of safeguarding across the business and contribute to a culture of vigilance.
- Ensure internal Teaching Personnel staff are given training as to what constitutes a safeguarding concern and how to deal with them.
- Keep up to date their own knowledge and skills by undertaking training annually and ensure any Deputy Designated Safeguarding Leads also renew this training.
- Recording keeping of all safeguarding concerns.

6. What do we mean by a child, young person or vulnerable adult?

6.1. Anyone under the age of 18 should be considered as a child or young person for the purposes of this document.

6.2. A vulnerable adult is defined by the [Safeguarding Vulnerable Groups Act 2006](#) as a person who is 18 years or over and who may need community care services for reasons of mental or other disability, age or illness. It is a person who is unable to take care of themselves or to protect themselves.

6.3. A vulnerable adult may be a person who:

- Has a learning or physical disability
- Is physically frail or has a chronic illness
- Has a mental illness or dementia
- Misuses drugs and/or alcohol
- Has a reduction in physical or mental capacity
- Is in the receipt of any form of healthcare Is old and frail
- Is detained in custody
- Living in sheltered housing or residential care home
- Is receiving community services because of age, health, or disability

- Exhibits challenging behaviour - unable, for any other reason, to protect himself/herself against significant harm or exploitation.

7. Indicators of Abuse and Neglect

7.1. [Keeping Children Safe in Education](#) defines abuse and neglect as the following.

7.2. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

7.3. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

7.4. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

7.5. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other

children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

7.6. Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

7.7. Child sexual and child criminal exploitation are forms of child abuse.

8. Safeguarding Principles

8.1. Safeguarding children and vulnerable adults from harm and abuse is an important responsibility. Teaching Personnel are committed to ensuring any child or vulnerable adult who comes into contact with our services is properly safeguarded. Every person under this policy must ensure they play an active role in ensuring that children and vulnerable adults are properly safeguarded.

8.2. Every person under this policy holds responsibility for:

- Remaining alert and aware of possible safeguarding risks to children.
- Identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges.
- Guarding children and vulnerable adults against harmful environments with appropriate actions.
- Taking positive steps to maintain the safety and wellbeing of children and vulnerable adults.
- Recognising and reporting concerns appropriately and without delay.
- Recognising and reporting any concerns of inappropriate or harmful behaviour of another adult engaging with children and vulnerable adults.
- Acting appropriately, and in line with Teaching Personnel's 'Educator Behaviour' policy.
- Having professional curiosity. Children and vulnerable adults may not feel ready to know how to tell someone that they are being abused, exploited, or neglected. Equally, they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened which could be due to their vulnerability, disability, and/or sexual orientation or language barriers. This should not prevent educators from having a professional curiosity and speaking to the Designated Safeguarding Lead if they have concerns about a child.
- Determining how best to build trusted relationships with children and young people which facilitate communication.

8.4. If any person believes a child is in immediate danger, they must call 999.

9. Safeguarding Issues

9.1. Educators should have an awareness of safeguarding issues that can put children at risk of harm.

9.2. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos put children in danger.

9.3. Educators must be aware that children can abuse each other (also known as **child-on-child abuse**). It can happen both inside and outside of school or college and online.

9.4. Educators should be clear as to the educational setting's policy and procedures with regards to child-on-child abuse and the role they have to play in preventing it and responding to it where they believe a child may be at risk.

9.5. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

9.6. Both **child criminal exploitation** and **child sexual exploitation** are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or

increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

9.7. Children can be victims of **domestic abuse**. It can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to psychological, physical, sexual, financial or emotional. Children may see, hear, or experience effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relations abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

9.8. . Whilst all educators should speak to the Designated Safeguarding Lead (or a deputy) with regard to any concerns about **female genital mutilation** (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. More information can be found in the Home Office's '[Female genital mutilation: resource pack](#)'.

9.9. Educators should be aware that **mental health** problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Educators, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. More information can be found in the Department for Education's '[Mental health and behaviour in schools](#)' guidance.

9.10. Educators should be aware of the indicators which may signal children are at risk from or are involved with **serious violent crime**. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

9.11. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

9.12. Any reports of abuse involving children with SEND will require close liaison with the Designated Safeguarding Lead and the hirer's Special Educational Needs Coordinator (SENCO) or the named person with oversight for SEND in a college.

9.13. Children may be susceptible to **radicalisation** into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

9.14. **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

9.15. **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

9.16. **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

9.17. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. More information can be found in the Department for Education's guidance on '[Managing risk of radicalisation](#)'.

9.18. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, educators should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Educators should use their judgement in identifying children or vulnerable adults who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or a deputy) [making a Prevent referral](#).

9.19. It is essential that children and vulnerable adults are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within **online safety** is considerable and ever evolving, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

9.20. Educators should ensure that they establish safe and responsible online behaviours, working to local and national guidelines.

9.21. All expected online behaviours are detailed in Teaching Personnel's 'Educator Behaviour' policy and should be adhered to.

9.22. Children being **absent from education** for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Educators have a responsibility to report any concerns around student absences but educational settings should also have measures in place to identify this and support identifying such abuse to prevent the risk of the child missing education in the future.

9.23. The Department for Education's guidance on ['What to do if you're worried a child is being abused: advice for practitioners'](#) provides more information on understanding and identifying abuse and neglect. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

10. Disclosures of Abuse and Identifying Concerns

10.1. It can be very hard for children and vulnerable adults to speak out about abuse. Often, they fear there may be negative consequences if they tell anyone what's happening to them.

10.2. Some may delay telling someone about abuse for a long time, while others never tell anyone, even if they want to.

10.3. It's vital that children and vulnerable adults are able to speak out and that whoever they tell takes them seriously and acts on what they've been told.

10.4. Even if a child or vulnerable adult doesn't tell someone verbally about what's happened to them, there may be other indicators that something is wrong. It is imperative that educators are able to recognise the signs and know how to respond appropriately.

10.5. Children and vulnerable adults may disclose directly or indirectly and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order.

10.6. It's vital that educators are able to provide children and vulnerable adults with the support they need.

10.7. Children and vulnerable adults may disclose abuse in a variety of ways, including:

- Directly– making specific verbal statements about what’s happened to them
- Indirectly – making ambiguous verbal statements which suggest something is wrong
- Behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
- Non-verbally – writing letters, drawing pictures or trying to communicate in other ways.

10.8. Educators need to be able to notice the signs that a child or vulnerable adult might be distressed and ask them appropriate questions about what might have caused this.

10.9. Educators should never wait until a child or vulnerable adult tells them directly that they are being abused before taking action. Instead, they should report it immediately to the hirer’s and Teaching Personnel’s Designated Safeguarding Lead.

10.10. Waiting for a child or vulnerable adult to be ready to speak about their experiences could mean that the abuse carries on and they, or another child, are put at further risk of significant harm.

10.11. Not taking appropriate action quickly can also affect the child or vulnerable adult’s mental health. They may feel despairing and hopeless and wonder why no-one is helping them. This may discourage them from seeking help in the future and make them distrust adults.

10.12. This guidance is based on NSPCC’s [‘Recognising and Reporting Concerns’](#) – more information can be found on this website to support educators manage concerns and disclosures of abuse.

11. Helping children and vulnerable adults disclose abuse

11.1. Educators must create an environment where children and vulnerable adults are comfortable about speaking out if anything is worrying them. They should be able to recognise abuse and know it is wrong and know who they can talk to about it.

11.2. The people that children and vulnerable adults choose to disclose to need to listen, understand and respond appropriately so the child or vulnerable adult gets the help, support and protection they need.

12. Responding to Safeguarding Concerns, Allegations, and Disclosures

12.1. This section of the policy outlines the guidance that **must** be followed when any safeguarding concern, allegation, or disclosure is reported by a child or vulnerable adult to an educator.

12.2. Care must be shown to help a child or vulnerable adult open up. Full attention should be given to the child or vulnerable adult and body language should be kept open and encouraging. Reassurance must be given to help the child or vulnerable adult understand that their feelings are important, and they've done the right thing in disclosing it.

12.3. A child or vulnerable adult must not be interrupted when making a disclosure, they should be encouraged to go at their own pace.

12.4. Interest must be shown in what the child or vulnerable adult is disclosing. An educator must reflect back on what the disclosure is to check their understanding.

12.5. The alleged perpetrator should never be spoken to about the child or vulnerable adult's disclosure as it could make things worse for them.

12.6. An unbiased approach should be taken at all times when responding to disclosures and this policy should be followed every time to ensure each case is treated in a fair and transparent manner and that the child or vulnerable adult gets the protection and support that they need.

12.7. It is important that detailed notes are taken on any concerns about a child or vulnerable adult. These need to be shared with Teaching Personnel and the hirer's Designated Safeguarding Lead.

12.8. The notes should include: the child or vulnerable adult's details (name, age, address), what they said or did that give cause for concern (if the child made a verbal disclosure, write down their exact words), any information they have given about the alleged abuser.

13. Reporting Safeguarding Concerns, Allegations, and Disclosures

13.1. When a child makes a disclosure to an educator, the educator must immediately report this to the hirer's Designated Safeguarding Lead and get in touch with their point of contact at Teaching Personnel.

13.2. The point of contact who is an internal employee of Teaching Personnel will ensure this report is shared with Teaching Personnel's Designated Safeguarding Lead.

13.3. Teaching Personnel's Designated Safeguarding Lead will ensure that information has been shared with the hirer's Designated Safeguarding Lead (in case it hasn't already by The educator) and that the report has been taken seriously.

13.4. Where Teaching Personnel's Designated Safeguarding Lead does not have direct contact with children and vulnerable adults, the hirer's Designated Safeguarding Lead should manage disclosures from a child or vulnerable adult in their organisation in line with their own policies and procedures. Teaching Personnel will support with all lines of enquiry and investigation where appropriate.

13.5. Where an educator is the alleged perpetrator, this will be dealt with in line with Teaching Personnel's 'Procedure for Managing Concerns, Allegations, and Unsuitability' policy.

13.5. If Teaching Personnel do not feel their report has been taken seriously by the hirer's Designated Safeguarding Lead, a referral will be made to the Local Authority Designated Officer and Children's Social Services.

14. Information Sharing

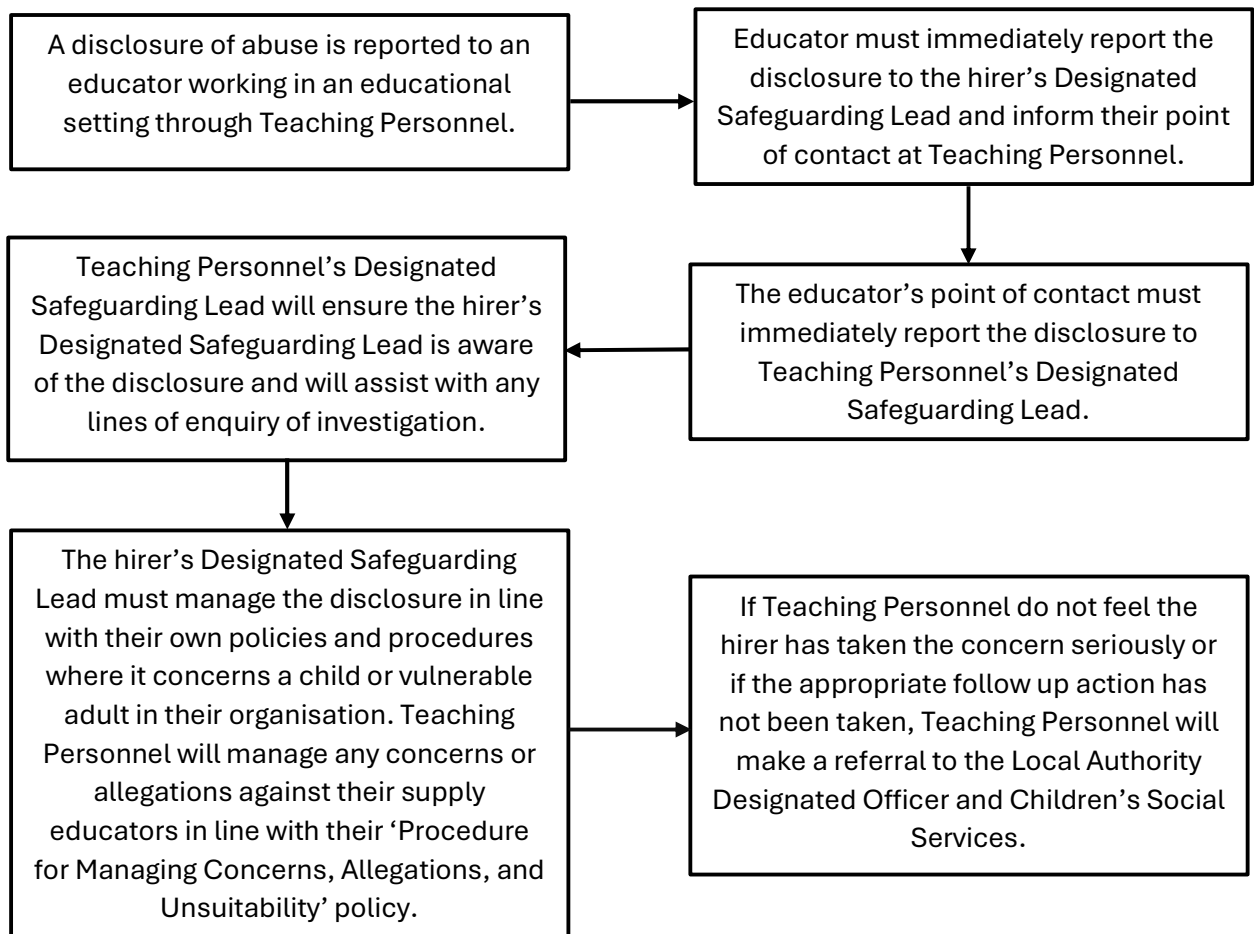
14.1. Timely information sharing is key to safeguarding and promoting the welfare of children and vulnerable adults. Safeguarding a child or vulnerable adult is a clear and legitimate reason for sharing information and data protection law does not prevent you from doing this.

14.2. Educators and internal Teaching Personnel staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children and vulnerable adults safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child or vulnerable adult is already known to local authority social care (such as a child in need or a child with a protection plan).

14.3. [The Data Protection Act and UK GDPR](#) do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, educators and internal Teaching Personnel staff should speak to the hirer and Teaching Personnel's Designated Safeguarding Lead. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children and vulnerable adults.

14.4. More information can be found in the Department for Education's '[Information sharing for advice for safeguarding practitioners](#)'.

15. Flow chart of the process



16. Guidance given to all internal Teaching Personnel staff

Recognising and Reporting Concerns

It is not your responsibility to professionally investigate whether abuse has taken place, or if a person is at risk of significant harm. However, it IS your responsibility to report any concerns have been brought to your attention.

RECORD IT



Reassure the person that they have done the right thing in telling you. Ask them to record in writing what they have been told/witnessed as soon as possible and sign and date it. Explain you will need to share with the hirer's DSL.

REFER TO DSL

Immediately contact the hirer's DSL and inform them of the situation using the record the person has provided. The DSL should contact any child protection agency, the police, or simply provide further advice. If the DSL is unavailable, speak to another member of SLT.



LOG IT



Once you have taken the steps above and are happy that the information has been shared appropriately, if your branch has an internal concerns log, ensure it has been entered on there. If your branch does not, send the information to the Safeguarding Team.

IF YOU HAVE FURTHER CONCERNS

Each individual has the right to make a referral to Children's Social Care, particularly if they feel their concerns are not being taken seriously. Speak to our Safeguarding Manager if this is the case.

