

## Safeguarding Children and Vulnerable Group's Policy

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## **Safeguarding Children and Vulnerable Group's Policy**

### **Specialist Trade Courses Group Safeguarding Statement**

Specialist Trade Courses Group (STC Group) is fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for its stakeholders including children and vulnerable groups.

The company recognises its responsibility and acknowledges that it is the duty of STC Group's workforce in its entirety to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation. Therefore employees, volunteers, delivery partners and contractors will always show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

It is STC Group's intention to:

- Ensure that all stakeholders are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership
- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel is at risk
- Ensure that appropriate supervision is given where required
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Regularly review and monitor STC Group's policies and procedures to ensure our legal, moral, and social responsibilities are met
- Take all suspicions and allegations of abuse including risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration
- Work in partnership with and in accordance with organisations' procedures where required, including Designated Person in Local Authority, Safeguarding Children's Boards, Safeguarding Adults Boards, and the Channel multi-agency panel
- Comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance to any amendments to such
- Have Designated Safeguarding Officers (DSO's) in place to advise on and manage any concerns and referrals made
- Ensure that relevant employment and security checks are undertaken, as required
- Ensure that all personal data will be processed in accordance with the requirements of the Data Protection Act 1998
- Ensure that personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the disclosure of

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confidential information is necessary in order to protect a child or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or vulnerable adult and on a strict "need to know" basis

The following policies demonstrate and support STC Group's shared commitment to safeguarding and promoting the welfare of its stakeholders:

[Bullying & Harassment](#)

[Code of Conduct](#)

[Public Interest Disclosure \(Whistleblowing\)](#)

[Data Protection](#)

[Safeguarding Children and Vulnerable Groups](#)

[Disciplinary](#)

[Criminal Records Policy](#)

[Grievance](#)

[Equality and Diversity Policy](#)

[Internet Policy](#)

[Health and Safety Policy Statement and Handbook](#)

[Lone Worker](#)

[Recruitment & Selection Policy](#)

[Probation Policy](#)

[Complaints Procedure](#)

### Policy

This policy has been agreed and is sponsored by the STC Group Managing Director and Senior Management Team as of April 2017 and LADO (Local Authority Designated Officer)

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence.
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.

Managing and overseeing individual cases from all partner agencies.

Ensuring the child's voice is heard and that they are safeguarded.

Ensuring there is a consistent, fair, and thorough process for all adults working with children and young people against whom an allegation is made.

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Monitoring the progress of cases to ensure they are dealt with as quickly as possible.

Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist you in deciding whether you need to make a referral and/or take any immediate management action to protect a child.

### STCG Lead Designated Safeguarding Lead

Katy O'Donnell	Head of Apprenticeships	Clacton	07581 487784
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### STCG Designated Safeguarding Officers:

Name	Role	Location	Contact Details
(Deputy Safeguarding Officer) Maria Darbin	Group Performance Manager	Harold Wood	07849 805 282
Sarah Tipple	Lead IQA	Colchester	07866 121 121
Sharon Mena	Quality Manager	Harold Wood	07719 019 618
Jason Gabriel	Tutor/Assessor	Harold Wood	07413 168 419
Luke Reinbach	Lead Learner Recruiter	Romford	07849 806033
Connie Johnson	Tutor/Assessor	Clacton	07514 496 694

STC Groups Safeguarding E-mail Address- [safeguarding@thestcgroup.co.uk](mailto:safeguarding@thestcgroup.co.uk)

The links below have been taken from the Working Together to Safeguard Children 2016 guidance document.

### For children and young people

Childline	Tel: 0800 1111
Child Exploitation and Online Protection Centre (CEOP)	<a href="http://www.thinkuknow.co.uk/">http://www.thinkuknow.co.uk/</a> TEL: 0870 000 3344
Child and Family Consultation Service	<a href="http://www.there4u.info/index.html">http://www.there4u.info/index.html</a>
NSPCC Helpline	Tel: 0808 800 5000 <a href="https://www.nspcc.org.uk/">https://www.nspcc.org.uk/</a>

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NSPCC Whistleblowing helpline	Tel: 0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Internet Watch Foundation	<a href="https://www.iwf.org.uk/">https://www.iwf.org.uk/</a>
Social Care link for Safeguarding concerns	<a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>
Forced Marriage Unit	<a href="https://www.gov.uk/guidance/forced-marriage">https://www.gov.uk/guidance/forced-marriage</a>

The need to refer allegations or concerns about possible risk posed by staff, volunteers, delivery partners or contractors to the Designated Local Authority Person (formerly LADO) is a requirement as detailed in the government guidance *Working Together to Safeguard Children (2016)*.

Essex Safeguarding Adult Board:	<a href="https://www.essexsab.org.uk/">https://www.essexsab.org.uk/</a>
Concerned about an adult? Essex social care direct:	0345 603 7630
Essex Safeguarding Children Board:	<a href="https://www.escb.co.uk/">https://www.escb.co.uk/</a>
Emergency Duty Team:	<a href="mailto:escb@essex.gov.uk">escb@essex.gov.uk</a>

### Introduction

STC Group believes that it is always unacceptable for a child or vulnerable adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and vulnerable adults by a commitment to practice which protects them. STC Group have a commitment that no child or vulnerable adult will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy and social inclusion strategies.

This policy has been developed to describe the responsibilities of Employees, Volunteers, Delivery Partners and Contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that STC Group fulfils its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

STC Group will endeavour to safeguard children and vulnerable groups by:

- Valuing, listening to and respecting them
- Adopting Policies, guidelines and a Code of Conduct and behaviour for Employees, Volunteers Delivery Partners and Contractors
- Sharing information about concerns with agencies which need to know, and involving parents and children and vulnerable adults appropriately

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- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers and delivery partners with responsibilities for children and or vulnerable groups
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Making all new staff, volunteers, delivery partners and contractors aware of our safeguarding policy and procedures
- Providing all staff, volunteers, and delivery partners with safeguarding training
- Ensuring that all children, vulnerable groups their parents and carers are aware of our safeguarding policy and procedures
- Ensuring all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding

STC Group is committed to reviewing its policies and good practice annually unless there is a change to legislation including EU Directives with immediate effect or there has been a significant change within the organisation. The Lead DSO is responsible for updating the policy with support from the strategic management team.

STC Group operates a culture of openness and transparency and embeds the Principles of the 4R's across all our services and ensure all staff, volunteers, delivery partners and contractors understand their responsibilities with regard to Safeguarding.

### The 4 R's:

Recognise	the signs and indications of abuse
Respond	as soon as possible
Record	everything you have heard, was said or any actions seen
Refer	to the Designated Safeguarding Officer (DSO)

### Definition

To this policy and procedures, children are any persons up to the age of 18 years.

### Adult at risk

An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]). An adult at risk may be a person who.

- has a physical or sensory disability
- is physically frail or has a chronic illness
- has a mental illness or dementia
- has a learning difficulty
- misuses drugs and or alcohol
- has social and or emotional issues
- exhibits challenging behaviours

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Statutory guidance and legislation differ in relation to working with these two groups e.g., children and vulnerable groups. Practitioners are familiar with the differences if they are working across the age groups and take advice from the DSO when appropriate.

### Legislation & Guidance

- The Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1991
- Data Protection Act 1998
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Statutory guidance Working Together to Safeguard Children 2016 (previous versions; 1999, 2006, 2010, 2013 and 2015)
- Keeping Children Safe in Education 2015 (this replaces previous version of 2014 and the Safeguarding Children and Safer Recruitment in Education 2006)
- Advice for practitioners providing safeguarding services to children, young people, parents, and carers 2015
- The Care Act 2014
- The Mental Capacity Act 2005
- The "No Secrets" guidance which sets out a code of practice for the protection of vulnerable adults
- Equality Act 2010
- Prevent Duty 2015
- Education and Training (Welfare of Children) Act 2021

### Definitions and Indications of Abuse

Abuse, including neglect, is a form of maltreatment of a child or adult at risk (often called a vulnerable adult). In relation to adults the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm' which is a term from the Children Act 1989. Someone may abuse a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2016 defines four types of abuse: physical, emotional, sexual and neglect. Vulnerable groups may also be subjected to these forms of abuse therefore the wording from Working Together to Safeguard Children 2016 has been slightly altered to reflect this fact. Adults may also be subjected to financial, discriminatory, and institutional abuse and staff should be familiar with indicators for all forms of abuse.

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### Physical Abuse

Physical Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>• Hitting</li> <li>• Shaking</li> <li>• Throwing</li> <li>• Poisoning</li> <li>• Burning or Scalding</li> <li>• Drowning</li> <li>• Suffocating or otherwise causing Physical Harm</li> </ul> <p><b>Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates illness in a child, young person, or vulnerable adult</b></p>	<ul style="list-style-type: none"> <li>• Unexplained bruises, marks, or injuries on any part of the body</li> <li>• Frequent visits to the GP or A&amp;E</li> <li>• An injury consistent with the explanation offered</li> <li>• Fear of parents or carers being approached for an explanation</li> <li>• Aggressive behaviour or severe temper outbursts</li> <li>• Flinching when approached</li> <li>• Reluctance to get changed or wearing long sleeves in hot weather</li> <li>• Depression</li> <li>• Withdrawal behaviour or other behaviour change</li> <li>• Running away from home/residential care</li> <li>• Distrust of adults, particularly those with whom a close relationship would normally be expected</li> </ul>

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### Emotional Abuse

Emotional abuse is the persistent maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's or vulnerable adult's emotional development.

Emotional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>• Conveying to the child or vulnerable adult that they are worthless and unloved,</li> <li>• That they are inadequate, or valued only insofar as they meet the needs of another person</li> <li>• Not giving the child or vulnerable adult opportunities to express their views</li> <li>• Deliberately silencing them</li> <li>• Making fun of what they say or how they communicate</li> <li>• Age or developmentally inappropriate expectations being imposed on the child or vulnerable adult</li> <li>• Interactions that are beyond the developmental capability</li> <li>• Overprotection and limitation of exploration and learning</li> <li>• Preventing the child or vulnerable adult participating in normal social interaction</li> <li>• Seeing or hearing the ill-treatment of another child or vulnerable adult</li> <li>• Serious bullying (including cyber bullying)</li> <li>• Causing children or vulnerable adults frequently to feel frightened or in danger</li> <li>• Exploitation or corruption of children or vulnerable adults</li> </ul> <p><b>Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult though it may occur alone.</b></p>	<ul style="list-style-type: none"> <li>• A failure to thrive or grow</li> <li>• Sudden speech disorders</li> <li>• Developmental delay, either in terms of physical or emotional progresses</li> <li>• Behavioural change</li> <li>• Being unable to play or socialise with others</li> <li>• Fear of making mistakes</li> <li>• Self-harm</li> <li>• Fear of parent or carer being approached regarding their behaviour</li> <li>• Confusion</li> <li>• Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others</li> </ul>

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### Sexual Abuse

Sexual Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>• Forcing or enticing a child/ren or vulnerable adult/s to take part in sexual activities, not necessarily involving a high level of violence, whether the child or vulnerable adult is aware of what is happening</li> <li>• Physical contact including assault by penetration (for example rape or oral sex)</li> <li>• Non-penetrative acts such as masturbation</li> <li>• Kissing</li> <li>• Rubbing and touching outside of clothing</li> <li>• They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities</li> <li>• Encouraging children to behave in sexually inappropriate ways</li> <li>• Grooming a child in preparation for abuse (Including via the internet)</li> </ul> <p><b>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</b></p>	<ul style="list-style-type: none"> <li>• Pain or itching in the genital/anal areas</li> <li>• Bruising or bleeding near genital/anal areas</li> <li>• Sexually transmitted diseases</li> <li>• Vaginal discharge or infection</li> <li>• Stomach pains</li> <li>• Discomfort when walking or sitting down</li> <li>• Pregnancy</li> <li>• Sudden or unexplained changes in behaviour e.g., becoming aggressive or withdrawn</li> <li>• Fear of being left with a specific person or group of people</li> <li>• Nightmares</li> <li>• Leaving home</li> <li>• Sexual knowledge which is beyond their age or developmental age</li> <li>• Sexual drawings or language</li> <li>• Bedwetting</li> <li>• Saying they have secrets they cannot tell anyone about</li> <li>• Self-harm or mutilation, sometimes leading to suicide attempts</li> <li>• Eating problems such as overeating or anorexia</li> </ul>

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### Neglect

This is the persistent failure to meet a child's or vulnerable adults basic physical and or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development.

Abuse by Neglect: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>• Neglect may occur during pregnancy because of material substance abuse</li> <li>• A parent or carer failing to provide adequate food, clothing, and shelter</li> <li>• Exclusion from home or abandonment</li> <li>• Failure to protect a child or vulnerable adult from physical harm or danger failure</li> <li>• To ensure adequate supervision</li> <li>• Failure to use adequate care takers</li> <li>• Failure to ensure access to appropriate medical care or treatment</li> <li>• Neglect of, or unresponsiveness to a child's or vulnerable adults basic emotional needs</li> </ul>	<ul style="list-style-type: none"> <li>• A constant hunger, sometimes stealing food from others</li> <li>• Dirty or smelly</li> <li>• Loss of weight, or being constantly underweight</li> <li>• Inappropriate dress for the weather</li> <li>• Complaining of being tired all the time</li> <li>• Not requesting medical assistance and</li> <li>• failing to attend appointments</li> <li>• Having few friends</li> <li>• Worsening health conditions</li> <li>• Pressure sores</li> <li>• Mentioning their being left alone or unsupervised</li> <li>• Sore or extreme nappy rash</li> <li>• Skin infections</li> <li>• Mentioning their being left alone or unsupervised</li> <li>• Sore or extreme nappy rash</li> <li>• Lack of response to stimuli or contact</li> <li>• Poor skin condition(s)</li> <li>• Frozen watchfulness</li> <li>• Anxiety</li> <li>• Distressed</li> </ul>

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	<ul style="list-style-type: none"> <li>• Child moves away from parent under stress</li> <li>• Little or no distress when separated from primary carer</li> <li>• Inappropriate emotional responses</li> <li>• Language delay</li> </ul>
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### Financial Abuse

Financial Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>• Being overcharged for services</li> <li>• Being tricked into receiving goods or services that they do not want or need</li> <li>• Inappropriate use, exploitation, or misappropriation of property and or utilities</li> <li>• Theft</li> <li>• Deception</li> <li>• Fraud</li> <li>• Explanation or pressure in connection with wills</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of basic requirements e.g., food, clothes, or shelter</li> <li>• Inability to pay bills</li> <li>• Unexplained withdrawals from accounts</li> <li>• Inconsistency between standard of living and income</li> <li>• Reluctance to take up assistance which is needed</li> <li>• Unusual interest by family or other people in the persons assets</li> <li>• Recent changes in deeds</li> <li>• Power of Attorney obtained when person lacks capacity to make the decision</li> </ul>

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### Institutional Abuse

Institutional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>• Service users required to fit in excessively to the routine of the service</li> <li>• More than one individual is being neglected</li> <li>• Everyone is treated in the same way</li> <li>• Other forms of abuse on an institutional scale</li> </ul>	<ul style="list-style-type: none"> <li>• Inflexible daily routines, e.g., set bedtimes and or deliberate waking</li> <li>• Dirty clothing and bed linen</li> <li>• Lack of personal clothing and possessions</li> <li>• Inappropriate use of nursing and medical procedures</li> <li>• Lack of individualised care plans and failure to comply with care plans</li> <li>• Inappropriate use of power, control, restriction, and confinement</li> <li>• Failure to access health care, dentistry services, etc.</li> <li>• Inappropriate use of medication</li> <li>• Misuse of resident's finances or communal finances</li> <li>• Dangerous moving or handling practices</li> <li>• Failure to record incidents or concerns</li> </ul>

### Domestic Violence and Abuse

Domestic violence and abuse are any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 years or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse; psychological, physical, sexual, financial and or emotional.

**Discriminatory abuse** – verbal abuse, unequal treatment, inappropriate use of language, slurs, treating a person in a way that is inappropriate to their age and /or culture background, deliberate exclusion.

**Organisational abuse** – neglect and poor care practice.

**Neglect and acts of omission** – failure to provide access to appropriate needs, care and support or educational services, ignoring medical, emotional, or physical care needs.

**Self-neglect** – either unable or unwilling to provide adequate care for themselves, or obtain necessary care to meet their needs, declining essential support.

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Any or all these types of abuse may be perpetrated because of deliberate intent, negligence, or ignorance. More often adults with care and support needs and children are abused by someone who is known to them. An abuser may be a volunteer, a partner, relative, friend or child, a trainer or other member of staff or delivery partner.

### **Peer on Peer Abuse**

Children and young people can abuse their peers. Alertness to the risk of peer-on-peer abuse is paramount to preventing, identifying, and responding to it. Staff must never dismiss abusive behaviours as a normal part of growing up, or “banter”, and develop high thresholds before acting. A significant proportion of sex offences are committed by teenagers, and, on occasions, committed by younger people. Peer on peer abuse must be taken as seriously as abuse by adults.

### **Child Sexual Exploitation**

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts, and relationships where young people (or a third person or persons) receive ‘something’ (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur using technology without the child’s immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability (National Working Group for Sexually Exploited Children and Young People (NWG) 2008).

Sexual exploitation results in children and young people suffering harm and may be supported to recover whilst others may suffer serious life-long impairments which may, on occasion, lead to their death, for example through suicide or murder.

### **Modern Slavery / Trafficking**

Modern Slavery includes exploitation in the sex industry, forced labour, domestic servitude in the home and forced criminal activity. These types of crimes are often called human trafficking. It can be perpetrated against men, women, and children, and include victims that have been brought from overseas, and vulnerable people in the UK and Ireland, being forced to work illegally against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. Threats, use of force or other forms of coercion, abduction, abuse of power or position of vulnerability are just some of the ways perpetrators will force their victims to concede.

### **Honour Based Violence**

‘Honour’ based violence is a crime committed when family members or acquaintances feel that dishonour (shame) has been brought to their family or community by doing something that is not in keeping with traditional beliefs of their culture. For example, having a relationship with someone from a different culture or religion, wearing clothes or taking part in activities that might not be considered traditional within their culture or wanting to leave an arranged marriage or forced marriage.

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### Cyber Abuse / Sexting

Cyber bullying is facilitated through electronic technology which includes devices and equipment such as cell phones, computers, and tablets. Communication tools are also utilised such as social media sites, chat and websites. Examples of cyber bullying are rumours sent via e-mail or posted on social networking sites and embarrassing pictures, videos, and fake profiles.

Children, young persons, and adults who are being bullied in this way have difficulty removing themselves from this behaviour as cyber bullying can take place 24 hours a day, 7 days a week and can reach a person when he or she is alone. Messages and images can be posted anonymously and distributed quickly to a very wide audience. It can be difficult or in some cases, impossible to trace the source. It is also extremely difficult to delete inappropriate or harassing messages, texts, or pictures once they have been posted or sent.

### Identifying cases of Female Genital Mutilation (FGM) and Forced Marriage

There are many different types of abuse but there are some that staff may be less aware about. Female Genital Mutilation and Forced Marriage fall into this category. Any indications that children or vulnerable adults may be subjected to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision the STC Group will do everything that it can to ensure that:

- The DSOs are aware of the issues surrounding FGM and Forced Marriage
- Advice and signposts are available for accessing additional support e.g., the NSPCC's helpline. ChildLine services, Forced Marriage Unit
- Awareness raising about FGM, and Forced Marriage is incorporated in the STC Group's safeguarding training

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a child or vulnerable adult has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care even if it is against that person's wishes. STC Group's staff must NOT consult or discuss these concerns with the child or vulnerable adult's parents or family or others within the community. If there is an imminent risk e.g., the child or vulnerable adult being taken out of the country, police must be informed (101) and the safety of the child or vulnerable adult whilst awaiting the police response must be the prime consideration.

### Prevent Duty

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The Government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The Prevent Team will, in partnership with other professionals including those involved in Safeguarding investigate further to assess the nature and extent of the risk. The relevant local police prevent teams will complete an initial assessment which will be used to inform the decision as to whether an individual should be referred to Channel.

## **Safeguarding Children and Vulnerable Group's Policy**

### **Extremism and Radicalisation**

Extremism can range from incitement of social, racial, or religious hatred through to advocating and justifying the use of violence to achieve fundamental change in society.

Radicalisation is the context of extremism and refers to the process by which people come to support violent extremism and, in some cases, join terrorist groups. It is important to note however that having radical views is not wrong or illegal. It is when radical views cross over to incitement of hatred and justification of violence that it moves into criminality.

HM Government defines 'extremism' as a vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The HM Government definition also includes calls for death of members of its armed forces, whether in this country or overseas.

### **How does Channel work?**

Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Channel is designed to work with individuals of any age and is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities

Each Channel Panel is chaired by a Local Authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk can work together to provide the best support.

### **What does Channel support look like?**

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment, or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

### **Who can make a referral?**

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police, and social services.

### **What happens with the referral?**

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

## **Safeguarding Children and Vulnerable Group's Policy**

### **Raising a concern**

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSO, who can raise concerns to Channel if appropriate.

### **Abuse of Position of Trust**

The STC Group recognises that our staff, volunteers, delivery partners and contractors are in a position of trust with our learners in our care whether children, young people or vulnerable adults and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital that for all of those in positions of trust to understand the power this can give them over those they care for and the responsibility.

The STC Group acknowledge the principle of equality embedded into 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.

We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years.

STC Group recognises the importance that its staff, volunteers, delivery partners and contractors protect the rights and needs of all children, young people, and vulnerable adults on our programmes and in our care.

### **Anti-Bullying**

The STC Group's policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding children or vulnerable adults' procedures. All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying, will be dealt with in accordance with our anti-bullying policy. STC Group recognise that children and vulnerable adults with special needs and or disabilities are more susceptible to being bullied. STC Group maintain a log of bullying incidents in our programmes. Our policy on bullying is explained at the induction process for new learners and their parents/carers.

### **Online Safety**

All staff, volunteers, delivery partners and contractors if relevant are trained in and receive regular updates in e-safety and recognising and reporting concerns. Our acceptable use policy recognises that internet safety is a whole team/organisation responsibility which includes customers and their parents and carers.

Children, young people, and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some children, young people and vulnerable adults may find themselves involved in activities which are inappropriate or possibly illegal.

The STC Group therefore recognise our 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. These issues are addressed within the learner journey and relevant policies and procedures and with parents and carers.

The STC Group will ensure filters are in place to prevent access to unsuitable sites and we will monitor the use of the network and internet to ensure that any learner, staff, volunteer, delivery partner or contractor attempting to access inappropriate, abusive, or harmful material is appropriately advised and or supported. If inappropriate, harmful, or indecent images are found then the Police will be informed immediately and STC Group will fully support their investigation. If involving a staff member/volunteer, immediate suspension

## Safeguarding Children and Vulnerable Group's Policy

in line with the disciplinary process will immediately take effect and the managing safeguarding allegations procedure may need to be instigated by the Lead DSO. STC Group will take the police advice when this is involving a customer as to whether the relevant commissioner should be informed.

The welfare and protection of our children and vulnerable adults is paramount and consideration should always be given to whether the use of photography will place them at risk. Images may be used to harm children or vulnerable adults for example, as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent is always sought when photographing learners and additional consideration given to photographing vulnerable children (particularly looked after children) or vulnerable adults, those known to be fleeing domestic violence. Consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

We are aware of the LSCB escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

### Online Safety and social media

Online safety also involves being aware of the risks to young people, our staff/volunteers and vulnerable adults when communicating via the internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities, and social networking sites such as Facebook, Twitter, and Instagram.

As an organisation working with young people, it is acknowledged by STC Group the impact and involvement that social networking sites such as Facebook, Twitter and Instagram have on the lives of young people and their role in the ways which they interact with each other. These tools are used by STC Group to encourage young people in their projects and involvement with activities. At the same time, we recognise the dangers and potential risks that these sites can pose to both young people and STC Group staff / volunteers and that they have the potential to be abused as a means of interacting with young people.

There is a wide range of ways to communicate with young people and this is a rapidly changing environment as new technologies, applications, and social media sites merge. No code of conduct for e-safety can cover all these separately. However, there are broad principles that we expect all staff/volunteers to adhere to safeguard young people and themselves in respect of using all these forms of media, devices, apps, and social networking sites.

### Content

- When communicating with young people/vulnerable adult online observe the same rules of behaviour as if speaking with them in person that is by being professional - polite, respectful, not swearing or saying anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Ask yourself whether the content of the message could be misunderstood or misinterpreted by someone else.
- Always ensure the content of any online communication has a clear work purpose.
- Don't use any text speak abbreviations or symbols/emoticons even if you ordinarily use these in your personal life.
- Never disclose non-public and confidential information about STC Group, its staff/volunteers or the young people or vulnerable groups with whom we are working.

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- Do not say anything or re-tweet any posts that could be deemed offensive, controversial, or socially inappropriate in any way.
- Contact with young people or vulnerable adults online should only be a recognised element of your work and done strictly for the business of STC Group only.
- Do not send any illegal or inappropriate content (written, images or icons) including sexting via mobile phones.

### Openness and scrutiny

- Always communicate with young people in a way that is open to others to see if necessary.
- Do not use private messaging facilities on social networks or apps rather if it needs to be private then do this by email exchange or phone and note the conversation afterwards.
- Ensure there is always a record of such conversations that would be open to others to check if necessary.
- It should always be clear who the communication is from when STC Group is communicating with a young person or a vulnerable adult.
- There should be no use of anonymous apps – that is where the sender can remain anonymous.

### Recording

Only use social media and apps where there is a permanent record of what's been said and sent thereby being open to scrutiny e.g., the use of Snapchat is **not** appropriate.

### Use of equipment

STC Group IT equipment (including computers, laptops, mobile phones, notebooks, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content including abusive images of children or young people).

### Role of the Designated Safeguarding Officer

The STC Group has appointed DSLs and a Lead DSL to have overall responsibility for issues related to safeguarding children and vulnerable adults. The DSL is responsible for acting as a source of advice on child and vulnerable adult safeguarding matters, for coordinating action within the organisation and for liaising with health, children's services, adult services, and other agencies about suspected or actual cases of abuse. The lead DSL will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for children and vulnerable adults within STC Group.

Designated members of staff receive training in Safeguarding children and vulnerable adults and interagency working as required by the LSCB and receive refresher training annually as required by STC Group. The team are required to keep up to date with developments in safeguarding children and vulnerable adults as required.

The Lead DSL has governance over safeguarding matters across STC Group and Rob Botten, Managing Director has overall responsibility for safeguarding at Board level. The Managing Director will ensure that resources, support, and all relevant training are available and in place for staff. The Managing Director will

## Safeguarding Children and Vulnerable Group's Policy

support the Safeguarding team in meeting their responsibilities and ensuring that STC Group meets its commitments and takes it seriously.

- There is a clear and robust job description for the DSL role within STC Group which can be accessed on the system. The Lead DSL is responsible for reviewing the child and vulnerable adult safeguarding policy annually along with any policies linked to the safeguarding policy and processes and procedures that support the embedding and working practices of this policy
- The DSL / relevant contract manager is responsible for ensuring the child and vulnerable adult policy is available publicly and to parents and carers and that parents and carers are aware that suspected abuse referrals may be made and STC Group's role in this
- The Lead DSL will alert the DBS where a person has been dismissed or left due to risk to or harm that they presented or may have presented to a child or vulnerable adult
- The DSL will alert the Police – where a crime may have been committed
- DSLs foster strong links with the LSCB and Designated Local Authority Person
- Refer all cases of suspected abuse to the local authority children's social care agency or in the case of a vulnerable adult to the local authority adult's social care
- Liaise with senior management to inform them of issues especially on-going enquiries and police investigations
- DSLs will maintain a proper record of any safeguarding referral, complaint, or concern – even where that concern does not lead to a referral
- DSLs 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 DSLs ensures that STC Group works with employers and other training organisations that provide apprenticeships and or work placements for children or vulnerable adults from STC Group to ensure that appropriate safeguards are in place
- The individual responsible for HR and Training with support from the Managing Director ensures that all staff, volunteers, and delivery partners receive training in safeguarding children and vulnerable adults, are aware of STC Group's procedures for safeguarding children and vulnerable adults and that refresher training takes place annually
- Lead DSL provides information on a quarterly basis to the MD and SMT setting out how STC Group has discharged its duties. The lead DSL is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity
- If the Lead DSL is absent from the business the Deputy DSL will be responsible for undertaking Lead DSL duties

**Under no circumstances should a member of staff, volunteer or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSLs with support from the senior management team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.**

**Delivery partners may make their own referrals but must inform their STC Group supply chain manager immediately.**

## **Safeguarding Children and Vulnerable Group's Policy**

If STC Group staff are working on external sites, then they would need to be aware of the safeguarding process for that external specific site/company. The STC Group DSL would liaise with the corresponding DSO during the process as necessary. For example, if there was a concern about a staff member of the external site then the STC Group DSL would speak with the DSL of the external site. If there was a safeguarding concern about an STC Group child, vulnerable adult, or staff member then the STC Group DSL would deal with this but may, depending on the circumstances, need to inform the DSL on the external site.

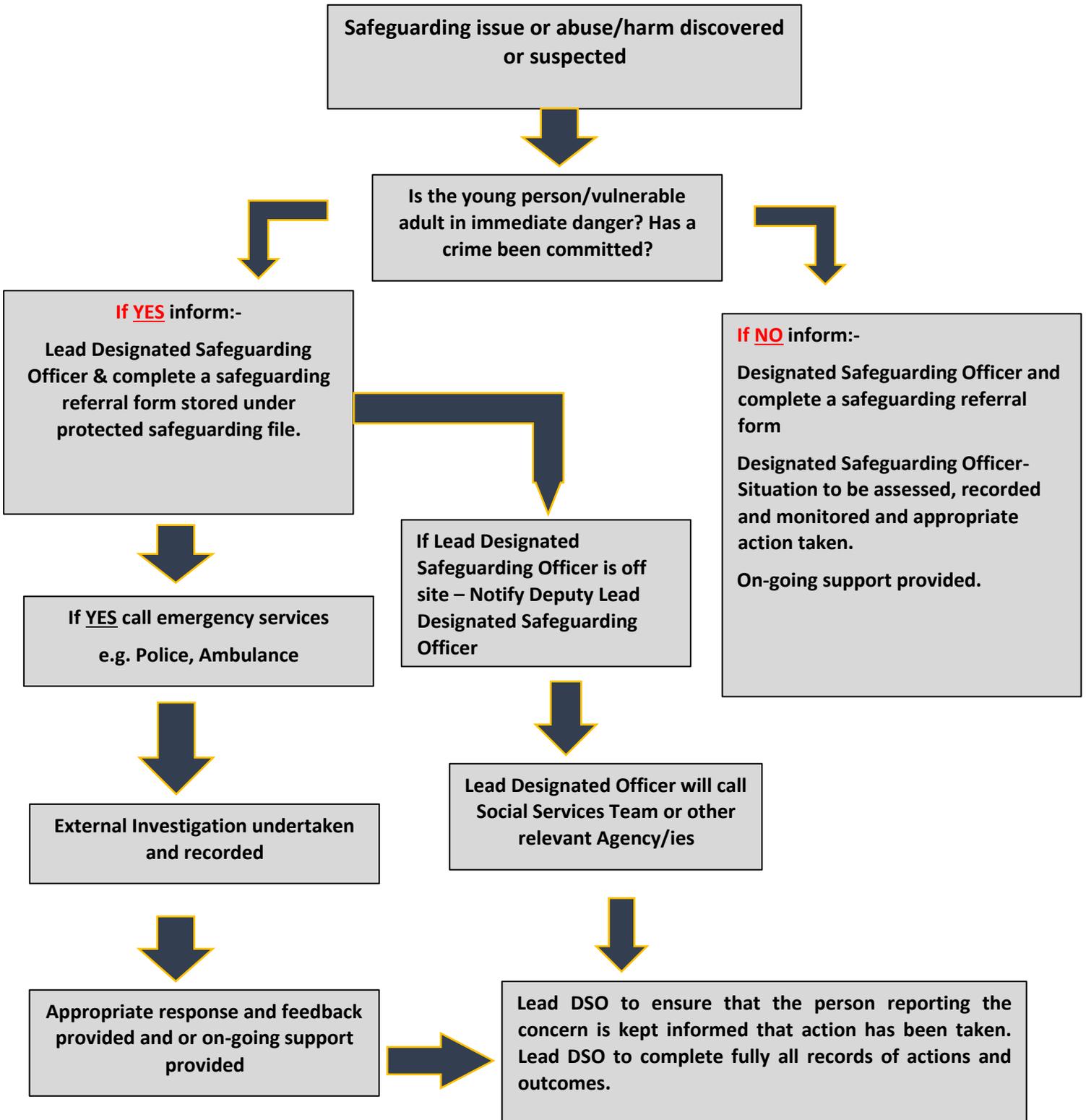
If STC Group is working in schools, then any concerns about pupils or school staff must be reported to the designated safeguarding lead in the school. The STC Group DSL also needs to be informed.

### **Responding to Concerns**

STC Group ensure and emphasise that everyone in the organisation understands and knows how to share any concerns immediately with the lead or deputy for safeguarding and the additional DSL's. The process for responding concerns is set out below:

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### SAFEGUARDING FLOWCHART



## Safeguarding Children and Vulnerable Group's Policy

When an allegation of abuse is made to a member of staff, the member of staff who receives it should.

- Reassure the individual (child or vulnerable adult) alleging that they have done the right thing
- Listen and not interrupt
- Do not promise that the matter will be kept confidential. Explain to him/her that you must report the matter to a member of STC Group's designated safeguarding team as part of your legal duty, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding team members.
- Let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding issue
- Note, this is not an investigation, simply establish the key facts, remember TED – Tell, Explain, Describe
- Only ask simple, open, non-leading questions, e.g., if a child or vulnerable adult tells you they have been hurt ask “Can you describe how that happened” rather than “did someone hit you”
- Accept what the individual is saying and do not offer an alternative interpretation of the alleged events
- Raise the concern with a DSO, do not ask any more questions
- Write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual and you ensure you make clear what is fact and what is opinion or hearsay in any given piece of information
- Not ask the individual to sign anything at this stage
- Note anything about the individual which may be connected e.g., any visible injuries including the position and description
- Report the matter to a DSO immediately within the same working day
- Complete the relevant documentation (the DSO Referral Form located in the SCT Group system) and submit to the designated **safeguarding team** via the safeguarding e-mail address: [safeguarding@thestcgroup.co.uk](mailto:safeguarding@thestcgroup.co.uk)
- Ensure you tell the individual what will happen next

Remember, if a child or vulnerable adult tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, it doesn't make it any less real and distressing for the child or vulnerable adult. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred on to the DSL as per this procedure.

Staff should be mindful that an allegation may involve another child/children/young person(s) and if a child has been involved, and the Lead DSL should be contacted immediately as equally the welfare of the child being accused is paramount at this time.

The DSL will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.

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If a child or vulnerable adult chooses to disclose, you should never:

- Take photographs of injuries
- Examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- Investigate or probe, aiming to prove or disprove possible abuse
- Make promises to the individual about confidentiality or keeping secrets
- Assume that someone else will take the necessary action
- Jump to conclusions or react in any way to what the individual is disclosing
- Speculate or accuse anybody
- Confront another person (adult or child) allegedly involved
- Offer opinions about what is being said or about the persons allegedly involved
- Forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur. **Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED THEN IT IS ASSUMED THAT IT DID NOT HAPPEN**
- Fail to pass the information on to the designated safeguarding team
- Ask the individual to sign a written copy of the disclosure or a statement

Where a child or vulnerable adult has communication difficulties or use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in the same manner as for other children or vulnerable adults.

If a young person or adult has personal needs their requirements would be discussed prior to commencement of programme and an additional support plan implemented. The STC Group will respect personal privacy and dignity, ensuring that young people and adults are supported in meeting their own physical care needs wherever this is possible.

If it is determined by the DSL that the concern is not a safeguarding one but rather the child needs support services, then this should be discussed with the child and with the parents. A referral for child in need services to the local authority requires parental consent.

The DSL is responsible for following up any referrals made to social care to ensure that action has been taken. This should be done within 3 working days of having made the referral if social care has not been back to the DSL to confirm their actions. A record of actions being taken must be made by the DSL.

If there is concern that the action is not sufficient to safeguard the child or adult, then the DSL must discuss with the Lead DSL and escalate, if necessary, with Social Care. The local safeguarding children board will have procedures to follow in this instance.

### Talking to Parents/Carers

In most cases, it is good practice to be open and honest at the outset with parents/carers about concerns and any action that STC Group intends to take. STC Group's Safeguarding Policy will be presented to parents/carers at information sessions held to inform them of our commitments and responsibilities, including the mechanism for communication of this. Where a referral is to be made the STC Group Lead DSL will make all reasonable efforts to ensure parents/carers are informed. However, an inability to inform

## Safeguarding Children and Vulnerable Group's Policy

parents/carers should not prevent a referral being made. Consideration will be given to not informing them when a child or vulnerable adult expresses a wish that their parent/carer are not informed at this stage.

There are cases where it would not be good practice for the lead DSL to discuss concerns with parents/carers before referral.

In these cases, arrangements for discussing concerns with the parents/carers should be agreed in advance with Social Care and or the Police. Concerns must not usually be discussed with parents/carers before referral where:

- Discussion would put a child or vulnerable adult at risk of significant harm
- Discussion would impede a police investigation or social work enquiry e.g., FGM or forced marriage
- Sexual abuse is suspected
- Organised or multiple abuse is suspected
- The fabrication of an illness is suspected
- To contact parents/carers would place you or others at risk
- It is not possible to contact parents/carers without causing undue delay in making the referral

In each case the lead DSL must make a reasoned judgement and record the decision s/he reaches. Where further guidance is needed, contact should be made with the Designated Local Authority Person or relevant social care department or Police.

### Abuse Requiring Immediate Response

If medical attention or police emergency action is required, then:

- The emergency services should be contacted on 999 immediately. The STC Group DSL team should be informed without delay
- The DSL team will contact the relevant Social Care and or police services (contact numbers annex 6)
- If the referral is out of hours, then you will need to inform the duty manager (contact numbers annex 3)
- The DSL must consider if it is safe for the child or vulnerable adult to return home to a potential abusive situation, seeking advice from Social Care or Police as required
- Managers in the Police or Social Care agencies will then advise about how to proceed to ensure immediate wellbeing of the child or vulnerable adult
- If the child or vulnerable adult is in immediate danger or in need of medical attention, they should remain with STC Group staff, volunteers, delivery partner or contractor.

The Duty Manager Rota details the name and contact details of each manager including those out of hours who will be responsible for dealing with any incidents or crisis and can be located on the system. All STC Group staff have been given a copy of the STC Group safeguarding policy and these documents are accessible on the system and will also be displayed at relevant sites where STC Group activities will be undertaken.

Where there is any doubt about the safety of the child or vulnerable adult if they were to return home to a potentially abusive situation, the lead DSL must inform the relevant Social Care agency and or the Police of their concerns. Managers in the Police or Social Care agencies will then advise about how to proceed to ensure the immediate well-being of the child or vulnerable adult.

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If after 48 hours no action has been taken the Lead DSO or DSO Team member should utilise the escalation process with the LSCB.

Staff must also be aware that if they feel the referral has not been dealt with, no action has been taken or that STC Group is trying to disregard the referral they should follow the procedures as set out in the Whistleblowing Policy.

### Allegations against Staff, Volunteers, Delivery Partners or Contractors

All allegations of abuse or harm made against a member or members of staff, volunteers, delivery partners or contractors will be managed in line with STC Group's safeguarding and employment policies and procedures.

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or vulnerable adults in their present position or in any capacity. It is essential that any concerns for the welfare of a child or vulnerable adult arising from abuse or harassment by a member of staff, volunteer, delivery partner or contractor should be reported immediately to the Lead DSO who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures are, therefore, to be followed in respect of allegations that a member of staff, volunteer, delivery partner or contractor has:

- Behaved in a way that has harmed, or may harm a child or vulnerable adult
- Possibly committed a criminal offence against, or related to, a child or vulnerable adult
- Behaved towards a child, children or vulnerable adult in a way that indicates they are unsuitable to work with children or vulnerable adults

Where you have concerns about a colleague, volunteer, delivery partner or contractor, you should report these concerns to the DSOs Team immediately, detailing your concerns on the STC Group safeguarding referral form and who will manage the allegations in line with agreed policy.

The Lead or Deputy Lead DSO will discuss allegations against staff, volunteers, delivery partners or contractors with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action, if any, is necessary, notifying the parents/carers, the person the allegation has been made against will be suspended partly to protect them during any investigation, risks to other children, communication with relevant organisations/bodies, supporting the person the allegation has been made against and ensure they are treated fairly and with impartiality as detailed in STC Group's disciplinary policy and procedures and will include any support from the other agencies involved and managing possible media interest. Disciplinary or Capability procedures will not be initiated until the investigation by police or social care has been concluded. STC Group will take the lead from these bodies at all stages of the process and involve the relevant DSO, Senior Managers and HR personnel.

This may include:

- Child Protection or Vulnerable Adult Safeguarding Investigation – this will assess whether the child/adult needs protection or in need of services – led by Social Care
- Criminal Investigation – led by the relevant Police force
- A Disciplinary Investigation – in line with STC Group's disciplinary procedures

In the first two instances, Social Care and or the Police will lead on investigations.

## Safeguarding Children and Vulnerable Group's Policy

STC Group's Lead DSL will notify the Disclosure and Barring Service (DBS) where:

- STC Group have permanently removed a member of staff, volunteer, delivery partner or contractor from regulated activity
- STC Group thinks that the person has either:
  - Engaged in relevant conduct, or
  - Satisfied the harm test, or
  - Received a caution for, or been convicted of, a relevant offence

For most cases, the DBS only has the power to bar a person who is, has been or might in future engage in regulated activity.

STC Group's Managing Director Mark Eighteen, will act as STC Group's Named Senior Manager to provide high level support to the Lead DSL in handling allegations of abuse made against a member of staff, volunteer, delivery partner or contractor in line with current STC Group policy.

If the concern raised is relating to a DSL, then the Lead DSL in conjunction with the strategic management team will follow the safeguarding process. If concerning the Lead DSL, then the Deputy DSL would be involved with the strategic management team. If concerning the named Senior Manager, then the Lead DSL would be informed in conjunction with any relevant external agency.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken the individual the allegation was made against will be supported back into work and their team environment by the HR Director with an agreed support plan put in place.

### Support for the Referrer

STC Group will fully support and protect staff, volunteers, delivery partners and contractors who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or vulnerable adult and reports his or her concern about a colleague's practice.

This support may take the form of counselling, moving the person reporting the abuse/potential abuse to another workplace temporarily whilst the incident is investigated. STC Group Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately. However, all staff, volunteers, delivery partners and contractors have a duty to safeguard and promote the welfare of children and vulnerable adults. However, to investigate concerns robustly, it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Following a referral, staff, volunteers, delivery partners and contractors may be involved in the assessment and management process led by the relevant Social Care Team and may be invited to take part in any strategy meeting or attend an initial Case Conference, where there is a criminal investigation, they may be required to co-operate with the Police. In all these circumstances, they will be offered sufficient time to prepare and attend meetings with the support of their line manager and STC Group DSO Team.

They will also receive appropriate senior management support and the DSO will continue to provide support and guidance as required/appropriate

Records will be kept of every concern raised and they will be detailed as what actions have been taken, whether an external agency has been involved and is leading on any investigation and what the outcome has been so that the file can be closed and then stored for legal purposes on the secure system.

### Record Keeping and Information Security

Well-kept records are essential in situations where it is suspected or believed that a child or vulnerable adult may be at risk from harm.

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Records should state who was present, time, date, and place. Be factual, state exactly what was said, observed or alleged, be written in ink, and signed by the recorder.

Records must also be stored, retrieved, and destroyed within current Data Protection laws and STC Group's robust Data and Information Security requirements.

The use of a standard Safeguarding Referral Form for all staff irrespective of their role or which delivery contract they currently work with and is available on the system.

Staff, volunteers, delivery partners and contractors are guided in recording, to be mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that they may become evidence in court proceedings. Equally staff, volunteers, delivery partners and contractors must be aware that documents regarding an individual that STC Group hold may be subject to a Freedom of Information request under the Freedom of Information Act. Under the Act individuals have the right to access their own records unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender
- Information held for the purposes of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person

Records are kept for the time required legally and or contractually by the various government Commissioners and there is a robust storage, retrieval and disposal process and system in place.

Details of allegations that are found to be malicious will be removed from personnel files. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, detail of how the allegation was followed up and resolution to the allegation and notes of action/s taken and any decisions reached, is kept on the confidential personnel file of the accused and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the Police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if an allegation re-surfaces at a later date. In respect of safeguarding allegations against an adult the record should be retained at least until the accused has reached normal pension age of for a period of 10 years from the date of the allegation if that is longer. Records in respect of a safeguarding concern about a child should be kept for 7 years unless a minimum time is specified by specific contracts held by STC Group.

Where a request for information sharing is made, the Lead DSO and Managing Director, would make a decision as to whether they are able to share the information and if necessary would seek relevant legal advice and advice from other bodies such as the NPCC and Childline. All decisions taken about information sharing are expected to keep the safety of the young person or vulnerable adult of central and paramount important. Once the decision has been made regardless of whether it is to be shared or not this is still recorded identifying the reasons for the decision. If the request has come from the LSCB, they will provide STC Group with clear rationale as to why the information is needed and the request should be proportionate to the reason. STC Group follow the 7 Golden Rules to Information Sharing as per the guidance document "Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers".

All learners undergo induction relevant to the business or contract area. Part of this process includes consent forms as required and collection of other personal details. This is recorded on electronic customer

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relationship management systems relevant to the business area and other documents directly relating to delivery, all are stored securely.

Learner's and their parents/carers are made aware of the need for STC Group and or delivery partners to hold information relating to them, what will be held, how it will be held, how long it might be held, who might have access to it and how it will be used.

The safeguarding form is sent to the STC Group safeguarding e-mail address and this is then uploaded by a member of the DSO Team to the system within 24 hours and can only be accessed by the DSO Team. Once a copy has been uploaded to the system local records will be destroyed. All concerns and incidents are reported on at senior management level and lessons learnt in how these were dealt with are discussed and where appropriate procedures are revised.

All partner's policies and procedures are checked during due diligence and any policies or procedures that do not meet STC Group's and legislative standards must be revised. STC Group will support partners to revise these documents if they are unsure. Depending upon the contract being delivered, the partners will follow their own policy and procedures which are checked monthly by the STC Group Supply Chain Manager (SCM) during the Monthly Monitoring Reviews (MMR's) and then quarterly during the Quarterly Monitoring Reviews (QMR's) to highlight if any safeguarding concerns have been raised, if their policy and procedures have been followed, if any of the concerns have been referred and to whom and if the referral has been followed up to ensure action has been taken. The SCM reports on delivery partners safeguarding to the DSO Team.

Awareness sessions regarding data and information security are delivered to staff at all levels in the organisation with regular reminders through Intranet news items. All information covering data protection and security are held on our system which all staff, volunteers, delivery partners and where applicable contractors are made aware of through the awareness and induction sessions.

The STC Group's definition of its staff's roles and responsibilities to data security and protection are detailed in several documents on our system. The STC Group and all delivery partners have security plans which are reviewed annually for agreement.

All guidance will be found on our system under Information Security Management - The Company IT security Manager ensures that third party service providers comply and are aware of the Company IT Security Policies and will ensure that a Contract and/or a Service Level Agreement is in place prior to any work commencing.

### Safer Recruitment and Training for Staff

When recruiting new members of staff STC Group follows the government guidance "Safeguarding Children: Safer Recruitment in Education and Safer Recruitment principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. STC Group adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that STC Group uses the DBS checking service to assess applicants' suitability for positions of trust, the Company complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. DBS checks are undertaken in line with Government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance. Applicants will also have to complete a Declaration Form in line with STC Group's recruitment policy (Annex 2)

Newly appointed staff will have a job role induction (JRI) in line with the STC Group Probation policy over a 3-month period. A robust induction into the child and vulnerable groups safeguarding procedures will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for an Employee to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role.

## Safeguarding Children and Vulnerable Group's Policy

Probation allows the manager of the newly appointed Employee to assess objectively whether the recruit is suitable for the role, considering the individual's overall capability, skills, performance and general conduct in relation to the job in question.

The STC Group shall ensure that all Employees are made aware of the standards expected of them and will put in place the appropriate support, training, and feedback to achieve these standards.

For the organisation, Probation allows the assessment of the Employee's contribution, potential and suitability for the role to which they have been appointed.

Furthermore, Probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan.

They will be made aware of the relevant Safeguarding procedures as part of that induction programme, and be given a copy of STC Group's Safeguarding Children and Vulnerable Groups Policy

### Training Interventions

Individual/Group	Training	Frequency
All new staff	Safeguarding induction Prevent Duty and Chanel	During JRI
All staff	Safeguarding refresher Prevent Duty/Chanel	Annually
Lead DSO/DSO	DSO training/refresher for children and vulnerable groups safeguarding	Every 2 years
Recruitment managers	Safer recruitment	Annually
On-call managers	Safeguarding referral guidance as part of On-Call Training	Annually
Board members	Safeguarding awareness and refresher. Training in relation to safeguarding required in their role as a Board member	Annually

## Safeguarding Children and Vulnerable Group's Policy

Delivery Partners staff	Safeguarding refresher Prevent Duty Chanel	Annually
Volunteers	Safeguarding refresher Prevent Duty Chanel	Annually

### STC Group Safeguarding Code of Conduct

All employees are required to abide with the STC Group Code of Conduct (Annex 4) alongside the Safeguarding Code of Conduct below, which applies to behaviour of all staff and volunteers in direct contact with young people and on-line.

This Safeguarding Code of Conduct also details how individuals can also protect themselves against allegations of abuse.

### How to Protect Yourself against Allegations of Abuse:

Avoid personal and social contact with children or vulnerable adults and seek to minimise the risk of any situation arising in which misunderstandings can occur.

#### You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult.
- Issue or threaten any form of physical punishment.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person even where the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment to discipline. Shouting at young people should be avoided whenever possible and only if alternative forms of discipline have failed.
- Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer, or games etc.) that has inappropriate content for young people.
- Invite, or allow a young person or vulnerable adult who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in, or tolerate, any inappropriate physical activity involving young people.
- Allow the use of inappropriate language to go unchallenged.

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- Do things of a personal nature for children or vulnerable adults that they can do for themselves.
- Dismiss an allegation of any sort relating to a customer's welfare or delay the reporting of an allegation.
- Discourage anyone from reporting concerns or ask individuals to keep secrets.
- Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they suspect abuse.
- Spend excessive amounts of time alone with children or vulnerable adults, away from others.
- Make unnecessary physical contact with children or vulnerable adults, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports or similar. In all cases, contact should only take place with consent of the child or vulnerable adult.
- Do not arrange to meet a child or vulnerable adult or their families with whom you work outside of working hours unless it is with consent of the parents/carer and person in charge of the activity.
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a young person or their family.
- Consume alcohol, take illegal drugs or legal highs, during the working day/evening or at events, including during any breaks or when in the presence of young people.
- Smoke/vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.

### You Should:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and vulnerable adults' rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviours they do not like
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
- All staff, volunteers, delivery partners and contractors at organised activities will be expected to act with discretion about their personal relationships. This should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff, volunteers, delivery partners, contractors and or participants of the organised activities must be declared
- Avoid working in isolation with Children and vulnerable adults, follow the recommended adult-to young people ratios for meetings and activities and ensure there is separate sleeping accommodation for young people, adults, and Young Leaders.
- Never give out a personal mobile number or private e-mail address and ensure working hours of contractability are stated
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSOs
- Treat all young people and adults equally and listen to them; avoid favouritism and gossiping.

## Safeguarding Children and Vulnerable Group's Policy

- Ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children or vulnerable adults on social network sites. Always use professional language when writing, phoning, emailing or using the social media to communicate with young people or vulnerable adults.
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned
- If staff, volunteers, delivery partners and contractors have concerns relating to the welfare of a child or vulnerable adult in their care, be it concerns about actions/behaviours of another colleague or concerns based on any conversation with the child or vulnerable adult, particularly where they make an allegation, they should report this immediately
- Act as a role model
- Set and monitor appropriate boundaries and relationships when working with children and vulnerable adults based on openness, honesty and respect for the child or vulnerable adult. Ensure that the focus of your relationship with a young person that you have met through any programmes always remains professional. The aim should never be to develop the relationship into a friendship or intimate relationship.
- Respect a young person's/adult's right to personal privacy but never agree to keep any information relating to the harm of a young person/adult confidential. Provide support to a child, young person or vulnerable adult making a complaint
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSOs without delay and record all the facts
- Ensure that if a young person who has become distressed needs comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a young person before you act. Hugging should be limited and never initiated by staff/volunteers. Any hugging should be done by the side of the young person with an arm placed around the shoulders side by side.
- Ensure that if any kind of physical support is required during any activities, it is provided only, when necessary, in relation to the activity and that this is done in a way that other colleagues can observe you.

Upon induction to the programme the child/ young person or vulnerable adult will be given a copy of the Code of Conduct and the STC Group staff will go through this document with them to ensure they understand their responsibilities.

If a child, young person, or vulnerable adult feels that there has been a breach of the code of conduct they should report this breach by utilising the STC Group complaints process (Annex 5). The complaint will be fully investigated as per the policy/process and actions taken to ensure the individual making the complaint is fully supported. If the complaint is regarding another child, young person, or vulnerable adult there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of code of conduct may need the intervention of the DSO Team and the STC Group safeguarding procedures should be followed.

All complaints are recorded and followed up to a satisfactory conclusion. The SCM for the relevant contract would conduct the investigation with support from the STCG Quality manager, Sharon Mena.

## **Safeguarding Children and Vulnerable Group's Policy**

Staff/volunteers who breach this code of behaviour may be subject to STC Group's disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.

All children, young people and vulnerable adults should be treated with respect and the code of conduct has been written with respect, dignity, and safety for every individual in mind, however staff understand that children/young people can abuse their peers. Peer abuse can take many forms such as sexting, bullying, physical and emotional abuse, and inappropriate banter.

## Safeguarding Children and Vulnerable Group's Policy

### Annex 1: STC Group National Designated Safeguarding Referral Form

<b>Name of Child/Vulnerable Adult:</b>							
If an STC Group learner, please state which programme and location they are allocated to:							
Programme				Location			
Gender:	M/F	DoB:		Ethnicity:			
				Language:			
				Interpreter needed?	Y/N		
Address:							
Postcode:				Phone:			
Service/Organisation:				Date started at Service/Organisation:			
Main Carer/s: (Specify relationship)	Name:		DoB:	Address:		Phone No:	
Is the main carer aware of the referral?				Yes		No	
If No, state reason:							
Does the individual concerned know a referral is being made?				Yes		No	
If No, state reason:							
Other Relevant Information (GP, Health Visitor Name)							

## Safeguarding Children and Vulnerable Group's Policy

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Reason for Concern: (State briefly what the individual concerned said or what you observed that caused concern. Include date, time, and event. Please use an additional sheet if necessary)

--

Category of concern:

Physical		Neglect		Emotional		Sexual		Financial		Extremism	
----------	--	---------	--	-----------	--	--------	--	-----------	--	-----------	--

Who have you spoken to and what was said?

--

State what action taken, and when:

--

Signed:

--

Print Name:

--

Date:

Position:

--

It is important that you complete all sections of the form. Once completed, please forward the form for the attention of the Designated Safeguarding Officers via email ([safeguarding@thestcgroup.co.uk](mailto:safeguarding@thestcgroup.co.uk)) and your form will be dealt with accordingly.

## Safeguarding Children and Vulnerable Group's Policy

### Annex 2: Human Resources Declaration Form

STC Group is steadfast in its commitment to safeguarding and promotes thorough and safe recruitment practices in line with the Company's duty of care in ensuring the safety and wellbeing of its stakeholders.

Surname	
Full Forenames	
Full Permanent Address	
Date of Birth	

#### Safeguarding

United Kingdom legislation and guidance relating to the welfare of children and vulnerable adults has as its core, the principle that the welfare of children and young people must be the paramount consideration. STC Group fully support this principle and therefore, we require that everyone connected with STC Group who will come into contact with children/vulnerable adults or their personal details, complete and sign this declaration. This record is to ensure that children's/vulnerable adults' welfare is safeguarded.

- Has any children's services department, the NSPCC or the police ever conducted an enquiry or investigation about any allegations or concerns that you may pose to an actual or potential risk to young people/children?

Yes		No	
-----	--	----	--

- Have you ever been convicted of any offence relating to children, young people or vulnerable adults?

Yes		No	
-----	--	----	--

- Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behaviour towards a child/vulnerable adult?

Yes		No	
-----	--	----	--

#### Access to Government Assets

Furthermore, STC Group has Government contracts, some or all of which require it to access Government Assets (defined as premises, systems, information or data). The Company has a duty to protect these assets and this obligation extends to its employees and agents. Since you are, or may become, such a person, all sections on this form will need to be completed.

**Note:** If a conditional offer of employment is made to you, you may be required to obtain and produce for inspection, a Disclosure certificate, which is an independent check against the National Collection of Criminal Records to confirm the accuracy of the information provided on this form.

- Have you ever been convicted of or found guilty by a Court of any offence in any country (excluding parking but including all motoring offences even where a spot fine has been administered by the Police) or have you ever

## Safeguarding Children and Vulnerable Group's Policy

- been put on probation (probation orders are now called community rehabilitation orders) or absolutely/conditionally discharged or bound over after being charged with any offence or is there any action pending against you?

You need not declare convictions which are "spent" under the Rehabilitation of Offenders Act (1974). *(If yes, please provide further details in the section provided)*

Yes		No	
-----	--	----	--

- Have you ever been convicted by a Court Martial or sentenced to detention or dismissal whilst serving in The Armed Forces of the UK or any Commonwealth or foreign country? You need not declare convictions which are "spent" under the Rehabilitation of Offenders Act (1974). *(If yes, please provide further details in the section provided)*

Yes		No	
-----	--	----	--

- Do you know of any other matters in your background which might cause your reliability or suitability to have access to Government assets to be called into question?

Yes		No	
-----	--	----	--

**If you answered 'YES' to any of the questions on this form, please give details below.**

This declaration must be signed and returned to Human Resources prior to commencing any work.

I declare that the information I have provided on this form is true and complete to the best of my knowledge and belief. I also consent to my personal data being processed and kept for the purposes described above in accordance with the Data Protection Act 1998. In addition, I understand that any false information or deliberate omission in the information I have given on this form may disqualify me for employment in connection with Government contracts. I undertake to notify any material changes in the information I have given above, including any future criminal convictions, to the HR department.

I understand that a Disclosure check will be undertaken as a condition of my employment, details of which will be held by STC Group. I declare that I am aware of my statutory rights under the Data Protection Act 1998 and hereby give my consent for STC Group to release my name, Disclosure reference number and date of issue to third parties for bid and/or contractual purposes only.

Name	
------	--

## Safeguarding Children and Vulnerable Group's Policy

Job Role	<input type="text"/>
Signature	<input type="text"/>
Date	<input type="text"/>

**Note:** You are advised that under the provision of the Rehabilitation of Offenders Act (NI Order) (1974) (Exceptions) Order 1975 as amended by the rehabilitation of Offenders Act 1974 (Exceptions) (Amendments) Order 1986 you should declare all convictions, including spent convictions. *(applicable where working with children and/or vulnerable groups)*

## Safeguarding Children and Vulnerable Group's Policy

### Annex 3: STC Group's Duty Manager Rota

Duty Managers Name	Contact Number	Hours Covered	Notable Dates
Katy O'Donnell	07581 487784	Out of Hours	
Maria Darbin	07849 805 282	Holiday cover only	

Notable dates may be Christmas or if a DSO has hospital appointments.

Hours covered will be due to Katy O'Donnell being off ill or on holiday and will be confirmed during weekly team meetings as necessary.

## Safeguarding Children and Vulnerable Group's Policy

### Annex 4: STC Group Code of Conduct

STC Group's Code of Conduct is set out below. It covers the main standards of behaviour STC Group requires from employees. The Code includes the Company Rules, which employees need to follow, and examples of misconduct which STC Group normally regards as gross misconduct. A breach of the Company Rules may result in disciplinary action. A single instance of gross misconduct may result in dismissal without notice.

STC Group Rules and the examples of misconduct are not exhaustive. All employees are under a duty to comply with the standards of behaviour and performance required by STC Group, and to behave in a reasonable manner at all times.

Employees are required to comply with the rules relating to notification of absence set out in STC Group's Absence Policy and Procedure. Employees are required to arrive at work promptly, ready to start work at their contracted starting times. Employees are required to remain at work until their contracted finishing times. Employees must obtain management authorisation if for any reason they wish to arrive later or leave earlier than their agreed normal start and finish times. STC Group reserves the right not to pay employees in respect of working time lost because of poor timekeeping. Persistent poor timekeeping will result in disciplinary action.

Employees will actively promote the service supplied by the organisation where appropriate. Employees are required to maintain satisfactory standards of performance at work. Employees will strive to deliver the highest quality service to service users. Employees will actively review and improve their performance when necessary. Employees are required to dress in a smart professional manner. Employees are required to comply with all reasonable management instructions. Employees are required to co-operate fully with their colleagues and with management, and to ensure the maintenance of acceptable standards of politeness. Employees are required to take all necessary steps to safeguard the Company's public image and preserve positive relationships with its customers, clients, or members of the public.

Employees are required to ensure that they behave in a way that does not constitute unlawful discrimination. Employees are required to comply with STC Group's Operating Policies and Procedures. Employees will respect individuals, their rights, and responsibilities

Any queries received from the media must be referred immediately to management. Employees must not attempt to deal with queries themselves.

Employees may be required to work additional hours at short notice, in accordance with the needs of the business. Employees may be required from time to time to undertake duties outside their normal job remit.

Employees may be required from time to time to work at locations other than their normal place of work.

Employees must not discuss company matters outside the organisation without the prior consent of the partners. Employees are required to keep confidential, both during their employment and at any time after its termination, all information gained in the course of their employment about STC Group's business, and that of STC Group's clients or customers, except as required by law or in the proper course of their duties. Employees are not permitted to engage in any activity outside their employment with STC Group which could reasonably be interpreted as competing with the Company. Employees are required to seek permission from management before taking on any other employment while employed by STC Group.

Employees are required to gain an understanding of company's health and safety procedures, observe them, and ensure that safety equipment and clothing are always used. Employees must report all accidents, however small, as soon as possible, making an entry in the Accident Book.

Except for use on authorised Company or client business, employees are not permitted to make use of STC Group's or its clients, telephone, fax, postal or other services. Employees must not remove Company or site property or equipment from Company or site premises unless for use on authorised Company business or with the permission of management.

Where an employee damages property belonging to STC Group, either through misuse or carelessness, STC Group reserves the right to make a deduction from the employee's pay in respect of the damaged property. On termination of their employment employees must return all Company property, such as keys, laptops,

## Safeguarding Children and Vulnerable Group's Policy

mobile telephones, Company vehicles, documents or any other items belonging to STC Group. This list is not exhaustive.

STC Group may reasonably request to search employees' clothing, personal baggage or vehicles. An authorised member of management in the presence of an independent witness must conduct any such search. Should an employee refuse such a request, STC Group will require the appropriate authorities to conduct the search on behalf of STC Group. An employee's failure to cooperate with STC Group in this respect may be treated as gross misconduct.

Employees are solely responsible for the safety of their personal possessions on Company premises and should ensure that their personal possessions are kept in a safe place at all times. Should an employee find an item of personal property on the premises he or she is required to inform management immediately.

STC Group will normally reimburse employees in respect of any expenses wholly, necessarily and proportionately incurred in the course of their work against the relevant receipts. STC Group reserves the right to refuse to pay an expense claim where the expenditure is unreasonable, disproportionate or unnecessary.

In order to provide a cost effective service, employees are requested to use the Company's equipment, materials and services wisely.

Employees should try to reduce wastage and the subsequent impact on the environment by ensuring that they close windows, avoid using unnecessary lighting or heating or leaving taps running, switch off equipment when it is not in use, handle all materials with care and where possible recycle any necessary items accordingly.

In order to provide a working environment which is pleasant and healthy, smoking is not permitted anywhere on Company premises. For the avoidance of doubt, failure to comply with STC Group's policy on smoking may result in disciplinary action, up and including dismissal.

Employees must notify STC Group of any change in personal details, including change of name, address, telephone number or next of kin. This will help STC Group to maintain accurate personal details in compliance with the Data Protection Act 1998, and ensure it is able to contact the employee or another designated person in case of an emergency.

Set out below are examples of behaviour which STC Group treats as gross misconduct. Such behaviour may result in dismissal without notice. This list is not exhaustive.

- theft, dishonesty or fraud
- deliberate recording of incorrect working hours
- smoking on Company premises
- assault, acts of violence or aggression
- unacceptable use of obscene or abusive language
- possession or use of or being under the influence of non-prescribed drugs or alcohol on Company premises or during working hours
- wilful damage to Company, employee or customer property
- serious insubordination
- serious or gross negligence
- bringing STC Group into disrepute
- falsification of records or other Company documents, including those relating to obtaining employment
- unlawful discrimination, including acts of indecency or sexual harassment
- refusal to carry out reasonable management instructions
- gambling, bribery or corruption
- serious breach of the Health and Safety policies and procedures
- breach of confidentiality, including the unauthorised disclosure of Company business to the media or any other party
- unauthorised accessing or use of computer data
- unauthorised copying of computer software

## **Safeguarding Children and Vulnerable Group's Policy**

Employees have the right to appeal against any disciplinary action taken against them. All appeals must be made in writing no later than the end of the fifth working day after the disciplinary decision was notified in writing to the employee. The first of these five working days is the day on which the employee received written confirmation of the disciplinary decision. The employee should submit the written appeal to the CEO.

STC Group will arrange and hold an appeal hearing as quickly as possible, and, in any event, within seven working days of the date on which the appeal was submitted. The employee will be entitled to attend the appeal hearing and will be given an opportunity to state his or her case. The findings of the appeal hearing will be notified to the employee within three working days of the hearing. The decision at this stage will be final. Employees are entitled to be accompanied by a fellow employee or a trade union official at all stages of the procedure.

## Safeguarding Children and Vulnerable Group's Policy

### Annex 5: STC Group's Complaints Process and Form

1. Any member of staff who receives a verbal complaint should attempt to resolve the problem immediately and having done so must inform their line manager, Quality Manager or the MD of the nature of the complaint and action taken.
2. A **Complaints Log Form** should be completed for each complaint received and stored in the Complaints Folder.
3. If the member of staff is unable to resolve the complaint, they should ask the complainant to put their complaint in writing and bring the matter to the immediate attention of their line manager or the Director who should respond to the complaint within 2 working days.
4. If the person making the complaint needs help in putting their complaint in writing this should be provided by someone who the complainant is happy to be supported by.
5. Where the complaint involves either a member of staff or a learner, the line manager or Director should discuss the matter with the parties concerned.
6. All written complaints must be given to the Director on the day of receipt and an acknowledgment made on the same day. A full response must be given within 5 working days.
7. The Director is responsible in conjunction with the quality manager for maintaining a Complaints Folder of all verbal and written complaints which contains copies of complaints and STC Group responses.
8. Where a complaint requires disciplinary action to be taken against either a member of staff or a learner, the appropriate Disciplinary Procedure must be followed.

**Safeguarding Children and Vulnerable Group's Policy**

**Complaints Log**

Complaint Source: Learner , Employer , Member of Staff , Other

Date:	
Name and Address (if applicable) of Complainant:	
Reported to:	
Details of Complaint	
Person Responsible for Dealing with Complaint	
Action Taken:	
Date:	

Copies of relevant documentation attached (Please Tick):-

	Attached	Not Applicable
Written Complaint		
Supporting Evidence		
Written Response		
Other		

## Safeguarding Children and Vulnerable Group's Policy

### Annex 6: List of relevant Agencies and Contact Details

Website: [www.samaritans.org](http://www.samaritans.org) Telephone: 020 8394 8300 Email: [jo@samaritans.org](mailto:jo@samaritans.org)

UK Helpline: 08457 90 90 90

Local GP Finder: [www.nhs.uk/ServiceDirectories/pages/serviceSearch.aspx](http://www.nhs.uk/ServiceDirectories/pages/serviceSearch.aspx)

Website: [www.bacp.co.uk](http://www.bacp.co.uk) Email: [bacp@bacp.co.uk](mailto:bacp@bacp.co.uk)

Website: [www.aest.org.uk](http://www.aest.org.uk)

Website: [www.nspcc.org.uk](http://www.nspcc.org.uk) Telephone: 0808 800 5000

TEXTPHONE: 0800 056 0566

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Website: [www.kidscape.org.uk](http://www.kidscape.org.uk) Helpline: 08451 205 204

Website: [www.ChildLine.org.uk](http://www.ChildLine.org.uk) ChildLine: 0800 1111

Website: [www.voiceuk.org.uk](http://www.voiceuk.org.uk) Telephone: 0845 122 8695

Website: [www.bullying.co.uk/](http://www.bullying.co.uk/) Email: [help@bullying.co.uk](mailto:help@bullying.co.uk)

Website: [www.direct.gov.uk/en/EducationAndLearning/AdultLearning/index.htm](http://www.direct.gov.uk/en/EducationAndLearning/AdultLearning/index.htm)

Website: [www.mind.org.uk](http://www.mind.org.uk) Telephone: 020 8519 2122

or 0845 766 0163

Email: [contact@mind.org.uk](mailto:contact@mind.org.uk)

Website: [www.elderabuse.org.uk](http://www.elderabuse.org.uk)

Website: [www.cruse.org.uk](http://www.cruse.org.uk) Telephone: 0844 477 9400 (helpline) Email:

[info@cruse.org.uk](mailto:info@cruse.org.uk) or [helpline@cruse.org.uk](mailto:helpline@cruse.org.uk)

Young Person's Free Helpline: 0808 808 1677

Website: [www.suzylamplugh.org](http://www.suzylamplugh.org) Telephone: 020 7091 0014

Email: [info@suzylamplugh.org](mailto:info@suzylamplugh.org)

Website: [www.ncdv.org.uk/](http://www.ncdv.org.uk/) Telephone: 0800 970 2070

Email: [office@ncdv.org.uk](mailto:office@ncdv.org.uk)

Website: [www.respond.org.uk/easy\\_read.html](http://www.respond.org.uk/easy_read.html) Helpline: 0808 808 0700

Website: [www.relate.org.uk](http://www.relate.org.uk) Telephone: 0845 456 1310 or 01788 573241

Email: [enquiries@relate.org.uk](mailto:enquiries@relate.org.uk)

Website: [www.thesite.org](http://www.thesite.org)

Website: [www.talktofrank.com](http://www.talktofrank.com)

Tel: 0800 77 66 00

(in 120 languages)

TEXTPHONE: 0800 917 8765

Website: [www.stonewall.org.uk](http://www.stonewall.org.uk)

Website: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk) Telephone: +44 (0)870 000 3344 Email

[enquiries@ceop.gov.uk](mailto:enquiries@ceop.gov.uk)

Website: [www.carers.org](http://www.carers.org)

Email: [info@carers.org](mailto:info@carers.org)

Website: [www.youngminds.org.uk/](http://www.youngminds.org.uk/)

## Safeguarding Children and Vulnerable Group's Policy

Telephone: 0808 802 5544 or  
0207 089 5050

Email: [ymenquiries@youngminds.org.uk](mailto:ymenquiries@youngminds.org.uk)

Website: [www.dyslexiaaction.org.uk/](http://www.dyslexiaaction.org.uk/)

Telephone: 0300 303 8840

Email: [supportus@dyslexiaaction.org.uk](mailto:supportus@dyslexiaaction.org.uk)

Website: [www.asmentoring.co.uk/](http://www.asmentoring.co.uk/)

Email: [enquiries@asmentoring.co.uk](mailto:enquiries@asmentoring.co.uk)

Website: [www.gov.uk/access-to-work/overview](http://www.gov.uk/access-to-work/overview)

Telephone: 0345 268 8489

Email: [atwosu.london@dpw.gsi.gov.uk](mailto:atwosu.london@dpw.gsi.gov.uk)

Website: [www.autism.org.uk/](http://www.autism.org.uk/)

Telephone: 0207 833 2299 or

0808 800 4104

Email: [nas@nas.org.uk](mailto:nas@nas.org.uk)

Website: [www.patoss-dyslexia.org/](http://www.patoss-dyslexia.org/)

Telephone: 01386 712 650

Website: [/www.renardassociates.co.uk](http://www.renardassociates.co.uk)

Telephone: 07825686851

Website: [www.nationaldomesticviolencehelpline.org.uk/](http://www.nationaldomesticviolencehelpline.org.uk/)

Telephone: 0808 200 0247

Website: [//rapecrisis.org.uk/](http://rapecrisis.org.uk/)

Email: [rcewinfo@rapecrisis.org.uk](mailto:rcewinfo@rapecrisis.org.uk) Website: [//rapecrisis.org.uk/](http://rapecrisis.org.uk/)

Email: [rcewinfo@rapecrisis.org.uk](mailto:rcewinfo@rapecrisis.org.uk)

Website: [//staysafeonline.org/](http://staysafeonline.org/)

Website: [www.crisis.org.uk/](http://www.crisis.org.uk/)

Telephone: 0300 636 1967

Email: [enquiries@crisis.org.uk](mailto:enquiries@crisis.org.uk)

Website: [//england.shelter.org.uk/](http://england.shelter.org.uk/)

Telephone: 0808 800 4444

Email: [info@shelter.org.uk](mailto:info@shelter.org.uk)

Website: [www.citizensadvice.org.uk/](http://www.citizensadvice.org.uk/)

Website: [www.stepchange.org/](http://www.stepchange.org/)

Telephone: 08001381000

Website: [www.moneyadviceservice.org.uk](http://www.moneyadviceservice.org.uk)

Telephone: 0300 500 5000

Website: [//ceop.police.uk/safety-centre/](http://ceop.police.uk/safety-centre/)

Telephone: 0870 000 3344

Website: [www.bpas.org/](http://www.bpas.org/)

Telephone: 03457 304030

Email: [clientservices@bpas.org](mailto:clientservices@bpas.org)

Website: [www.themix.org.uk/](http://www.themix.org.uk/)

## Safeguarding Children and Vulnerable Group's Policy

Telephone: 0808 8084994

Website: [www.dressforsuccessgl.org](http://www.dressforsuccessgl.org)

Telephone: 0203 773 7279

Email: [info@dressforsuccessgl.org](mailto:info@dressforsuccessgl.org)

Website: [www.smartworks.org.uk/](http://www.smartworks.org.uk/)

Telephone: 0208 962 6586 or 0207 288 1770

Email: [london@smartworks.org.uk](mailto:london@smartworks.org.uk)

Website: [www.suitedbootedcentre.org.uk/](http://www.suitedbootedcentre.org.uk/)

Telephone: 07808 531654

Email: [info@suitedbootedcentre.org.uk](mailto:info@suitedbootedcentre.org.uk)

Website: [www.drinkaware.co.uk/](http://www.drinkaware.co.uk/)

Telephone: 0207 766 9900

Email: [contact@drinkaware.co.uk](mailto:contact@drinkaware.co.uk)

Website: [www.actiononaddiction.org.uk](http://www.actiononaddiction.org.uk)

Telephone: 0300 330 0659

## Safeguarding Children and Vulnerable Group's Policy

### Annex 7: STC Group's Information Security Management

In accordance with STCG's Information Security Management System (ISMS) documents are reviewed on an annual basis, Risk is managed continually through a controlled Risk management process and full annual analysis. The Risk Register records all risks which are reported to SMT and Directors.

All information security incidents will be reported to STCG's Information Security Manager immediately who is responsible for ensuring the incident is correctly raised and evaluated for risk, The IT Security Manager will work with the identified asset owner responsible to resolve such incidents and take any further actions required for future mitigation. Where deemed appropriate, part of the process would be to inform the Managing Director for the resolution of any such incidents.

All delivery partners and STC Group direct delivery sites are subject to STC Group's scheduled audits against relevant security controls in STC Group's IT Policy. Any non conformities are recorded in the corrective action log to be dealt with according to our ISMS. Where a security incident is identified, this is followed up in accordance with STC Group's ISM process by the IT Security Manager.

STC Group ensure encryption is in place, computers are locked down so no one can use USB data sticks. We have clear desk policies and this is checked during audits at delivery partner's premises and all policies are checked annually with our delivery partner's.

All assets relating to STC Group's information systems are controlled and maintained in accordance with the IT Security Policy.

All customer data has been classified as Corporate Sensitive and is protected under the Corporate Sensitive protection method as set out in the IT Security Policy. Aggregation of data must be considered and is covered under the classification that has been attributed.

All physical storage media is marked with physical asset tags and recorded in the IT asset management system. All protectively marked classifications will be dealt with as set out in the IT Security Policy under Corporate Sensitive data.

All delivery partners are subject to STC Group scheduled audits against relevant security controls. Any non conformities are recorded in the corrective action log to be dealt with according to our corrective action procedures. Where a security incident is identified, this is followed up in accordance with STC Group's ISM process by the IT Security Manager.

Under STC Groups Information Security Management System the ISM states all learner related data is to be treated as Corporate Sensitive. STC Group's agreed delivery partner's sign agreements stating they will work in complete compliance to STC Groups Document set – Disclaimer detail is also included in all communication via email.

All employees are issued with a Job Description for the job role they are employed for. The Roles and Responsibilities are defined within the Job Description. Job Descriptions clearly state individual responsibility for IT security, Safeguarding and other operational areas.

All STC Group staff sign a confidentiality agreement under STC Group's standard terms of employment. Data security/protection awareness is maintained by regular communications, inductions and visits by internal auditors. STC Group carry out scheduled internal audits in accordance with our ISMS.

System records are maintained so that the Company Network and systems can be adequately monitored and audited for signs of actual, or possible, security breaches and attacks. 24 x 7 monitoring is in place through STC Group's Hosted Contract and in accordance with the IT Security Policy and IT Service Delivery Document.

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Delivery partners are required to undertake the security training before they are given access to the systems. Where we collect such items as learner CVs and / or training certificates these are all handled in the same way as any paper record in that they are stored electronically on encrypted storage drives or where a paper copy is maintained it would be stored with the particular customer file and stored in secure locked cabinets, all learner data is classified within our ISM systems as corporate sensitive.

STC Group has classified all data as Corporate Sensitive in order for a full compliant backup and restore service to be applied in line with its contractual agreements.

STC Group maintain a corporate classification system to ensure that all Corporate Sensitive data is held on archive for the life time of the contract in addition to the agreed retention period for audit purposes, this is fully documented within our ISM.

All hard copy data once archived is securely stored. We shred all paperwork not required to be kept for audit purposes on site.

Access to the Internet is via a fully managed firewall with access to web sites being restricted by Internet filtering software. No laptop or other device can access customer data away from a secure site unless the contract is delivered on secure premises.

Access to sensitive data will be provided only through the uses of a company PC or Laptop (asset) which must be a domain member unit which will be regulated through End Point analysis. All devices will be encrypted. 2 factor authentications will be configured to ensure the staff would connect using a username and password. Role level Active Directory security will then ensure the system direct the member to the dedicated systems file.