

Cellar Tapes UK LTD (CT Recruitment & Training)

Safeguarding Policy/Strategy

We all have a statutory duty to safeguard and promote the welfare of our learners and staff to maintain a professional attitude of *it could happen here* where safeguarding is concerned.

Cellar Tapes UK Ltd is committed to safeguarding learners and promoting children's welfare and expects all staff, governors, volunteers, and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to **act without delay** to protect learners by reporting anything that might suggest a child (or adult) is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. Cellar Tapes UK Ltd seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

***'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.'* (Keeping Children Safe in Education 2023)**

All staff are encouraged to report any concerns that they have and **not see these as insignificant**. On occasions, a referral is justified by a **single incident** such as an injury or disclosure of abuse. More often however, **concerns accumulate over a period of time** and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, **it is crucial that staff record and pass on concerns** in accordance with this policy to allow the Designated Safeguarding Lead (Chris Lewington) to build up a picture and access support for the child at the earliest opportunity.

We maintain a professional attitude of 'it could happen here' where safeguarding is concerned. When there are concerns about the welfare of a learner, staff members will always act in the best interests of the learner. This policy has been developed in-conjunction with our culture of prevention, protection and support and will be linked with all our policies e.g. anti-bullying, online safety, health and safety, anti-radicalisation. We will continue to maintain an ethos where learners feel secure, are encouraged to talk, are listened to and feel safe. Learners at Cellar Tapes UK Ltd are encouraged to talk freely with any staff member at Cellar Tapes UK Ltd if they are worried or concerned about something. This includes any learners we are responsible for under sub-contracting arrangements.

Introduction

The aim of our policy is to clarify Cellar Tapes UK Ltd role in the safeguarding and protection of children and young people and adults at risk and to promote their welfare. The purpose is to bring about better outcomes for all learners by facilitating open communication channels and clear accountability in interagency working arrangements. By implementing the strategy & policy it will help all learners achieve the below outcomes:

- Are committed – developing a robust culture of vigilance
- Build resilience – raising awareness of safeguarding and child protection issues, and equipping children & young people (and adults) with the language and skills to keep themselves safe
- Establish a safe environment – in which children & young people (and adults) can work and learn and develop within an ethos of openness and are taught to treat each other with respect, to feel safe, to have a voice and are listened to
- Support vulnerable learners – supporting learners who have been abused, have witnessed violence towards others or may be vulnerable to abuse
- Prevent unsuitable people – from working with children & young people by ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with our children. And to maintain an active vigilance thereafter
- Make a positive contribution – know and understand how to ensure those around our learners and in their care are safeguarded and how to report if there are concerns

This policy applies to the entire Cellar Tapes UK Ltd caseload including all young people aged 13-18 and vulnerable adults, who form part of our statutory responsibilities, specifically those young people who have a physical, sensory or learning disability. Throughout this document the generic phrase learners will be used where possible. Where the phrase “Child” or “Child Protection Procedure” applies these will also apply to Adults at risk. We recognise that any learner could potentially be a victim of abuse.

- Knowing that safeguarding and promoting the welfare of learners is everyone’s responsibility, and the voice of the learner is evident
- Protecting our learners from maltreatment
- Establishing a safe environment in which our learners can learn and develop within an ethos of openness
- Preventing impairment of our learner’s health or development
- Ensuring young people at Cellar Tapes UK grow up in circumstances consistent with the provisions of safe and effective care.
- Offering learners a balanced curriculum including PHSE, healthy relationship education, online safety, sexting
- Offering learners a balanced curriculum through online activities, enabling them to enhance their safeguarding skills and knowledge whilst understanding the risks.

- Understanding that no single professional can have the full picture of a learner’s needs and circumstances. Everyone who comes into contact with children and their family has a role to play in identifying concerns, sharing information and taking prompt action.
- Undertaking the role so as to enable learners at Cellar Tapes UK to have best outcomes.
- Ensuring as a provider we have a clear understanding of our staff’s knowledge and understanding and embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our provision.

This policy provides guidance to all adults working within the business, whether paid or voluntary or directly employed by Cellar Tapes UK or a third party.

- This policy is available on our website & within the resources section on our eportfolio and is available on request from Cellar Tapes UK Ltd
- We also inform learners about this policy when they enroll in learning.
- This policy will be reviewed in full by the Board on an annual basis or sooner should legislation/guidance change.
- This policy sets out how Cellar Tapes UK Ltd discharges its statutory responsibilities relating to safeguarding and promoting the welfare of learners. Our policy applies to all staff; paid and unpaid
- The policy is provided to all staff (including freelance, temporary staff and volunteers) at induction, alongside our Staff code of conduct. In addition, all staff are provided with Part One & Annex A of Keeping Children Safe in Education 2018.
- All new staff receive a safeguarding induction with the Safeguarding Lead and all staff have to complete the necessary mandatory training

The revised interagency guidance is based on:

Keeping Children Safe in Education – updated 01/09/2023

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf

Prevent Duty Guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182780/14.258_HO_Prevent_Duty_Guidance_v5c.pdf

Work-based learning National Guidance – DfE – Prevent

CONTEST Strategy (Prevent)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1180064/CONTEST_2023.pdf

Equality Act 2010

<https://www.gov.uk/guidance/equality-act-2010-guidance>

Protection of Freedoms Act 2012

<https://www.gov.uk/government/publications/protection-of-freedoms-bill/protection-of-freedoms-bill>

Vetting and Barring Scheme (VBS) revised guidance 2012

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Education Act 2011

<https://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>

Every Child Matters 2004 updated 2007

<https://www.gov.uk/government/publications/every-child-matters>

Children Act 2004

<https://www.legislation.gov.uk/ukpga/2004/31/contents>

Working Together to Safeguard Children 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Human Rights Act 2010

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

Data Protection Act 2018

<https://www.gov.uk/data-protection>

The Care Act

<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

Modern Slavery

<https://www.england.nhs.uk/ourwork/safeguarding/our-work/modern-slavery/>

All staff working with learners must be able to identify when someone may be likely to suffer significant harm through abuse or neglect and how to act upon concerns by referring them to Children's or adults Social Care. In addition all staff must ensure that learners are supported with e- safety and are aware of threats surrounding this.

For children or young people only:

We will work closely with Cellar Tapes UK local safeguarding children's boards who will help and support us in instances relating to abuse. For anyone wanting to contact the local safeguarding children's board, the contact details are: Cellar Tapes UK, this is the Cellar Tapes UK Safeguarding board, it is worth noting that all regions will have their own local numbers.

<https://www.bristol.gov.uk/council-and-mayor/policies-plans-and-strategies/social-care-and-health/keeping-children-safe>

All agencies and their staff should be aware of internal arrangements consistent with the child and vulnerable adult's protection procedures (Section B), and the roles of key staff within the organisation.

Roles, Responsibilities and Structure

All staff delivering services in children and young people have a responsibility under the Keeping Children Safe in Education – updated 01/09/2023 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf to safeguard and promote the welfare of children.

We also have an ethical and moral duty to protect those adults that could become vulnerable or who are vulnerable to abuse due to the nature of the sectors we deliver education within.

<u>No.</u>	<u>Prevent Vulnerability/Risk Area</u>	<u>Risk Y/N</u>	<u>Action taken/already in place to mitigate/address risk</u>	<u>Owner</u>	<u>When</u>	<u>RAG</u>
1	<p><u>LEADERSHIP/Awareness</u> Do the following people, if applicable, have a good understanding of their own and institutional responsibilities in relation to "Safeguarding"?</p> <ul style="list-style-type: none"> • Board • Staff • Safeguarding team 	Y	<p>Board are fully aware of their obligations and have undertook appropriate annual training, including safer recruitment for those involved.</p> <p>Safeguarding lead is a member of SLT and our Safeguarding Governor sits on the board, other members are aware and again have undertaken relevant training.</p> <p>All staff undertake annual training on Prevent/Safeguarding/Channel/E&D. New staff complete this in the first 2 weeks of employment.</p> <p>Safeguarding lead meets with all new employees during induction</p> <p>All staff are aware of the policy and is held on the company intranet (yammer), the policy is ratified at board level.</p> <p>Partner meetings are held throughout the year where Safeguarding is a standard agenda item.</p> <p>TLA observers feedback and action organisations who have missed opportunities to promote safeguarding.</p>	JV/CL	Ongoing	Low

			<p>Governors meets quarterly & Safeguarding is standard agenda item at Governing Board meetings.</p> <p>Geographical sharing of information.</p>			
2	<p><u>Partnership</u></p> <p>1) Is there active engagement from the organisation's board, SMT, managers and leaders?</p> <p>2) Does the organisation have an identified single point of contact (SPOC) in relation to Safeguarding?</p>	Y	<p>1) Yes, all managers aware of policy. Prevent/SG etc is mandatory governing meeting agenda item (held bi-weekly). CEO/SG/Prevent lead is present at all meetings.</p> <p>2) Yes, the safeguarding lead</p>	JV/CL	Achieved	Low
3	<p><u>Staff Training</u></p> <p>Do all staff have sufficient knowledge and confidence to:</p> <p>1) exemplify British Values in their management, teaching and through general behaviours in the institution</p> <p>2) understand the factors that make people vulnerable</p> <p>3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response</p>	Y	<p>1) Staff receive annual training both online and face to face by a variety of experts in relevant areas (cyber-security, safeguarding etc). BV is reinforced throughout the year at relevant team meetings, sharing of information from Safeguarding lead. ATL has relevant policies/procedures/COP in place to ensure staff exemplify BV in their general behaviour. TLA strategy includes measuring of BV/SG/Prevent etc and is monitored via observation with relevant actions put in place.</p>	CL	Achieved, ongoing	Med

			<p>2) Staff understand via the training of factors that make people vulnerable and how/who to report to. This is reinforced on a regular basis at team meetings, updates from Safeguarding Lead.</p> <p>3) Staff are fully aware of who to report to and what action to take. This is enforced at induction and reinforced throughout the year at meetings, through yammer and email.</p>			
5	<p><u>Speakers and Events</u></p> <p>1) Is there an effective policy/framework for managing speaker requests?</p> <p>2) Is it well communicated to staff/students and complied with?</p> <p>3) Is there a policy/framework for managing on site events i.e. charity events?</p> <p>4) Are off site events which are supported, endorsed, funded or organised through the organisation (including Students' Union if applicable) subject to policy/framework?</p>	N/A	<p>Not applicable for our provider as we do not hold such events, however a policy is in place should we do so in the future.</p> <p>Staff have training on procedures. Our provider as we do not hold such events, however a policy is in place should we do so in the future.</p> <p>All managers are aware of the policies for Freedom of Speech, including guest speakers should the need arise. All managers are aware that a risk assessment has to be undertaken and authorised by the Safeguarding Lead.</p>	N/A	N/A	N/A
6	<p><u>Safety Online & ICT Systems</u></p> <p>1) Does the institution have a policy relating to the use of IT and does it contain a specific reference and inclusion of Safeguarding?</p>	Yes	<p>1) Yes, there is a clear policy in relation to ICT that includes Safeguarding</p>	CL/JV	Ongoing	Low

	<p>2) Does the institution employ filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material?</p> <p>3) Does this also include the use of using their own devices via Wi-Fi?</p> <p>4) Does the system alert to serious and/or repeated breaches or attempted breaches of the policy?</p>		<p>2) Yes. We have an external provider, Fifteen Group, that manages all of our IT systems. Our firewall prevents access to sites and extremist material.</p> <p>3) Visitors to the premises would have to log into our system to use the wi-fi and are therefore covered by the above firewall.</p> <p>4) We use software called “mimecast” which identifies emails which would breach the policy and informs the Data & Systems Manager. Sonicwall prevents access to websites that breach the policy, including social media – this can be accessed but only with approval.</p> <p>5) Learners can only access ICT equipment on any of our sites with supervision of a staff member.</p> <p>6) We are cyber essentials accredited</p>			
7	<p><u>Prayer and Faith Facilities</u></p> <p>1) Does the institution have prayer facilities?</p> <p>2) Are they good governance and management procedures in place in respect of activities and space in these facilities?</p>	N/A	Not applicable for our provider as we deliver in the workplace. However, if facilities were needed we would be able to accommodate an area for prayer.	N/A	N/A	N/A

8	<p><u>Site Security</u></p> <ol style="list-style-type: none"> 1) Are there effective arrangements in place to manage access to the site by visitors and non-students/staff? 2) Is there a policy regarding the wearing of ID on site? Is it enforced? 3) Are dangerous substances kept and stored on site? 4) Is there a policy in place to manage the storage, transport, handling and audit of such substances? 5) Is there a policy covering the distribution (including electronic) of leaflets or other publicising material? 6) Does the institution intervene where off site activities are identified or are likely to impact upon staff and/or students i.e. leafleting, protest etc? 	Yes	<ol style="list-style-type: none"> 1) There is a visitor's book and all visitors are seen entering or leaving the building. Staff are all trained to be vigilant with regards to visitors. 2) No as the only people who have access to the centre is our staff. We currently considering bring this in to place. 3) No – only standard cleaning products which are stored in a locked cupboard in the kitchen in small quantities. 4) N/A 5) Yes, all material has to be approved by the relevant manager and/or CEO 6) This has not occurred, but yes we would intervene 	CL/JV	Being reviewed	Low
9	<p><u>Safeguarding Referrals</u></p> <ol style="list-style-type: none"> 1) Is there a Safeguarding Policy? 2) Do Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals? 	Yes	<ol style="list-style-type: none"> 1) Yes there is safeguarding policy in place and this links with other key policies (E&D, Prevent, Modern Slavery, Complaints, ICT) 2) Yes, annually as a minimum supported by wider face to face training. 3) Yes, we have links with our Prevent lead who is Cellar Tapes UK Board member. We also have links with the local Safeguarding 	CL/JV	On Going	Low

	<p>3) Does the institution utilise Channel as a support mechanism in cases of radicalisation and extremism?</p> <p>4) Does the institution have a policy regarding referral to Channel identifying a recognised pathway and threshold for referral?</p>		<p>boards who provide clear information on their website in relation to Prevent leads in their area. The CEO holds a list of all the FE Prevent Leads and local safeguarding Boards relevant to the learners.</p> <p>4) No , all referrals are assessed by SLT and referred via the DSL. This is clearly communicated to staff and they understand that they should not refer directly to external agencies themselves so as not to delay investigations as each case is treated individually.</p>			
10	<p><u>Communications</u></p> <p>1) Is the institution Safeguarding Lead and their role widely known across the institution?</p> <p>2) Are staff and students made aware of Safeguarding, current risks and appropriate activities in this area?</p> <p>3) Are there information sharing protocols in place to facilitate information sharing with Safeguarding partners?</p>	Yes	<p>1) Yes, has been communicated to all staff and is regularly communicated. New staff meet the Safeguarding Lead during the first 2 weeks of their induction to ensure that they are clear on the processes and procedures.</p> <p>2) Yes. Policies are communicated to learners and Safeguarding is promoted throughout the teaching/learning with a clear focus on naturally occurring opportunities to discuss prevent alongside the embedded curriculum activities.</p> <p>3) Yes, we work with partners and share information via APTEM (on which there is</p>	CL	Achieved	Low

			an account set up for each learner and employer), email and regular partner meetings.			
11	<p><u>Staff and Volunteers</u></p> <p>1) Does awareness training extend to sub-contracted staff and volunteers?</p> <p>2) Is the institution vigilant to the radicalisation of staff by sub-contracted staff and volunteers?</p>	N/A	<p>1) No as we do not have sub-contracted staff, however if we did volunteers and associates are expected to undertake the same training, policies and procedures as ATL. Safeguarding is embedded throughout the organisation and all training is provided free of charge.</p> <p>2) Yes. Due diligence of all sub-contracted staff and volunteers takes place, they are checked to ensure they maintain their training and relevant updates.</p>	CL/JV		
12	<p><u>Freedom of Expression</u></p> <p>1) Does the institution have a Freedom of Speech/Expression policy?</p> <p>2) Does this policy recognise and incorporate the risks associated with radicalisation and extremism?</p> <p>3) Is the need to protect vulnerable individuals covered within this policy?</p>	Yes	<p>1) Yes there is a freedom of speech policy in place with a guest speaker risk assessment.</p> <p>2) Yes, the policy explicitly highlights the risks.</p> <p>3) Yes the need to protect vulnerable people is included in the policy.</p>	JV	Ongoing	Low
14	<p><u>Safe place to discuss safeguarding</u></p>	Yes	<p>1) As part of TLA staff are trained on how to engage discussion in relation to safeguarding and how to handle discussions</p>	CL	Achieved	Low

	<ol style="list-style-type: none"> 1) Are staff trained to facilitate discussions on safeguarding? 2) Are there opportunities available to do this i.e. do you run a programme of seminars? 3) Can external speakers be invited to discuss safeguarding? 		<p>should they cause debate of a negative nature. Managers are all fully aware on how to address discussions in relation to safeguarding.</p> <ol style="list-style-type: none"> 2) We run standardisation meetings throughout the year where staff can discuss prevent. Any external speakers to discuss Safeguarding, are subject to authorisation from the Safeguarding lead prior to any invitation. 			
15	<p><u>Policies and Procedures</u></p> <ol style="list-style-type: none"> 1) What policies need to change to incorporate Safeguarding (prevent, security & estate management, disciplinary, behaviour, room booking, external speakers) 	Yes	<ol style="list-style-type: none"> 1) All relevant policies are being updated where necessary to include Safeguarding, this are reviewed annually or on a needs basis should updates be required in-between times. 	JV	On Going	Low
16	<p><u>Information Sharing</u></p> <ol style="list-style-type: none"> 1) Are there information sharing protocols in place with the Police and the council? 2) Do the Police know who to contact for any issues? 3) Does the provider know who to contact at the Police? 4) Do other staff members know who the Prevent lead is at the provider? 	Yes	<ol style="list-style-type: none"> 1) Yes there is an Information Sharing policy and procedure in place, this can be found our sharepoint. 2) The police are aware that they would need to contact the Safeguarding Lead at Cellar Tapes UK who is also the General Manager. 3) Yes, we have links with our local safeguarding boards at the local authorities 	JV	Achieved	Low

			<p>who have the information in relation to who to contact within the police.</p> <p>4) Yes all staff know who the Prevent Lead is, how to contact them, who to contact in their absence and this is reinforced on a regular basis as reminders are sent out, posters are around the building.</p>			
17	<p><u>Safeguarding Messaging</u></p> <p>1) How can Safeguarding be communicated better?</p> <p>i.e. posters, newsletters, dropbox, student and staff handbooks, staff induction, internal literature</p>	Yes	<p>1) More communication with learners through newsletters via email. Regular reviews and monthly meeting that are being delivered through Aptem empathising on safeguarding.</p>	CL	Ongoing	High