



Safeguarding Policy and Procedures 2019-2020

Incorporating:

Appendix A: Mentoring Guidelines

Appendix B: Confidentiality Policy

MISSION STATEMENT

Central Training is an innovative and high quality-learning provider, committed to the continued improvements of learner and employee skills. We aim to:

- Provide learners with the best possible level of teaching, assessment, information, advice and guidance to enable them to progress well and achieve their learning goals through strong leadership and management.
- Ensure that all learners and employees improve their English and Maths through rigorous training and curriculum development.
- To review the service that we provide to our learners and employers by continually encouraging an open and self-critical environment.
- Encourage creativity and innovation from staff.
- Promote lifelong learning with learners, staff and employers.

OUR VISION

We aim to be recognised as one of the leading Learning Providers in the UK for youth and adult education programmes by delivering an 'Outstanding' service to our learners and employers and striving to continually improve our learners' progress and successes.

'BREAK THE BARRIERS – LIVE THE DREAM'

OUR VALUES

Team Work

Support, listen and respect one another, whilst working together towards achieving company objectives and by making Central a fun and enjoyable place to work.

Safeguarding

Ensure that the health, safety and well-being of our learners and staff is at the heart of the company.

British Values

Rigorously promote and encourage learner and staff awareness of British Values, avoiding radicalisation of any kind and ensure an in-depth awareness of their rights relating to Equality and Opportunity.

Customer Satisfaction

Uphold the highest integrity with openness and honesty at all times, by doing what we say we will, without compromising on quality whilst meeting customers' needs.

Business Success

Employees that use initiative take ownership for the company, its customers and colleagues, have the passion, and drive to achieve effective results.

Personal Development

We value learning and take responsibility to gain the required development in meeting our learners' needs. Therefore, personal development, feedback, coaching and mentoring are core principles at Central.

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General Policy Statement

This policy is issued to all members of staff and learners and is available on the Central Training Group website, www.centraltraininggroup.com. The policy is displayed on noticeboards within all centres/subcontractors and issued to all employers (within the Employer's Handbook).

Central Training Group and its partners (CTG) has a statutory and moral duty to ensure that all sites function with a view to safeguarding, health & safety, and promoting the welfare of children, young people and vulnerable adults receiving education and training at CTG or who are visiting CTG. CTG accepts that safeguarding is a shared responsibility and has, in line with guidance such as Working Together, a strong commitment to co-operate in a multi-agency arena and to actively promote and safeguard the welfare of young people as part of the Working Together to Safeguard Children (DfES 2015).

Throughout these policies and procedures, reference is made to 'children and young people'. This term is used in reference 'those under 18 years of age' (The Children Act 2004).

CTG recognise that some adults are also vulnerable to abuse; accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. The term 'vulnerable' adult refers to any person aged 18 years and over who is or may be in need of support and community care services by reason of mental impairment, disability or illness and who is or may be unable to fully take care of him/herself or unable to protect him/herself against significant harm or exploitation.

CTG is committed to ensuring that:

- all staff, subcontractor staff and employers abide by Safeguarding rules;
- it provides a safe environment for all learners;
- it identifies children, young people and vulnerable adults who are suffering or likely to suffer significant harm from the initial interview stage;
- it takes appropriate action to see that such children, young people and vulnerable adults are kept safe, at home, at CTG, and at all other activities relating to educational placement;
- confidentiality is applied to any information of a personal and/or sensitive nature and that staff will receive guidance on the management and disclosure of confidential information where appropriate.

In pursuit of these aims CTG will approve and annually review policies and procedures with the aim of:

- raising awareness of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of a safe environment for all those within CTG and CTG subcontractors;
- aiding the identification of children, young people and vulnerable adults at risk of significant harm, and providing procedures for reporting concerns;
- establishing the procedures for reporting and dealing with allegations of abuse, including those against members of staff;
- ensuring the safe recruitment of staff;
- supporting staff to manage vulnerable learners;

- ensuring that any sensitive matters are dealt with in a confidential manner.

In developing the policies and procedures CTG will consult with, and take account of, guidance issued by the Department of Education and Skills and other relevant bodies and groups. The procedures have been developed in co-operation with the Local Safeguarding Children Boards in the areas around the Essex and London CTG sites. The policy and procedures comply with the guidance entitled Keeping Children Safe in Education (2016). In relation to vulnerable adults: Safer Practice, Safer Learning 2007, Southend on Sea Adult Protection Procedures (2015).

CTG will immediately refer concerns that a child, young person or vulnerable adult might be at risk of significant harm, to the relevant Department of Social Care/Police and other agencies.

All staff working with children, young people and vulnerable adults will complete the Level 1 Child Protection on-line awareness course to familiarise them with child protection legislation and procedures. CTG will provide refresher training at least every three years. There are two senior members of CTG management team with special responsibility for child protection/safeguarding vulnerable adults and they have completed Safeguarding Awards at Level 3.

CTG will receive an annual report from the designated person, which reviews how these duties have been discharged. CTG recognises the following as definitions of abuse: -

An abuse is a violation of an individual's human and civil rights by another person or persons and we recognise that for young people high self-esteem, confidence, supportive friends and clear lines of communication with trusted adults can help to prevent abuse.

Confidentiality

Safeguarding raises difficult issues of confidentiality. Staff have a professional responsibility to share information regarding abuse with one of the Designated Child Protection Officers (Sue Irons or Elaine Moreline).

If a member of staff thinks that a learner might be about to disclose abuse they must gently point out to the learner that they are willing to listen but that they will have to inform someone else.

CTG staff cannot offer absolute confidentiality to learners. There are clear situations when it is essential that staff share information with their colleagues. In the case of abuse, it is essential that staff share information with the Designated Child Protection Officers (DCPO).

CTG staff must contact the DCPO if:

- There is information or evidence that a learner under the age of 18 is being abused or radicalised.
- They suspect that abuse or radicalisation has taken place
- They are unsure if abuse or radicalisation has taken place
- In their judgement there is, or could be, a risk of harm or radicalisation
- They suspect that a crime has been, or is about to be, committed.
- There is a clear breach of college rules
- It is simply outside your experience to deal with the situation.

It is good practice to be as open and honest as possible with parents/carers about any concerns, however you **must not** discuss concerns with parents/carers in the following circumstances:

- Where sexual abuse or sexual exploitation is suspected
- Where organised or multiple abuse is suspected
- Where fabricated or induced illness (previously known as Munchausen Syndrome by proxy) is suspected.

- Where female genital mutilation is the concern
- In cases of suspected forced marriage
- Where contacting parents/carers would place a young person, yourself or others at immediate risk

What is Abuse?

The Children Act defines a child as a person under the age of 18 years.

Safeguarding responsibilities also extend beyond the age of 18 to a group of vulnerable adults. A vulnerable adult is defined as a person aged eighteen or over, who has either a dependency upon others or a requirement for assistance in the performance of basic functions. This can be as a result of a learning or physical disability, a physical or mental illness or an addiction to alcohol.

Abuse is when a child or young person is hurt or harmed in a way that causes **significant harm** to that child and which may have an effect upon the young person's health, development or wellbeing

Significant harm

Significant harm is ill-treatment that has **severe effects** on the young person's health and development. This could be a single traumatic event e.g. a violent assault, suffocation or poisoning. More often significant harm is a combination of significant events, both acute and longstanding, which damage the young person's health and development. Where it is believed that a child/young person is suffering from, or is at risk of significant harm or radicalisation, we will follow the procedures set out in this policy.

The following specific issues require a safeguarding response and staff will be provided with guidance on how to recognise the signs and respond in an appropriate way:

Physical Abuse

Physical abuse is causing harm to a person. It may involve hitting, shaking, throwing, poisoning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of deliberate failure to prevent injury occurring.

Neglect

Neglect is the persistent or severe failure to meet a person's basic physical and/or psychological needs. It will result in serious impairment of health or development. This may include ignoring medical or physical care needs.

Sexual Abuse

Sexual abuse involves a person being forced or coerced into participating in or watching sexual activity. It is not necessary for the person to be aware that the activity is sexual and the apparent consent of the person is irrelevant. Sexual abuse includes grooming and child sexual exploitation.

A child of 13 or under is deemed by the Sexual Offences Act to be unable to give consent.

Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people under 18 involves 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 performing, and/or other performing on them, sexual activities. CSE can occur through the use of technology without the young person's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no 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. **Both girls and boys can be exploited.**

Psychological Abuse

Psychological abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's, young person's or vulnerable adult's behaviour and emotional development/health, which may result in low self-worth. Some level of emotional abuse is present in all forms of abuse. Psychological abuse may also include threats of harm or abandonment, humiliation, blaming, controlling, intimidation, coercion, verbal abuse, isolation or withdrawal from services or support networks.

Financial or Material Abuse

This may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance, or the misappropriation of property, possessions or benefits (DOH 2000/2009).

Discriminatory Abuse

This may include abuse, bullying and harassment based on individuals' Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex or Sexual Orientation (DOH 2000/2009).

Loss of Rights as a Citizen

This happens when a person's individual rights as a citizen are refused or prevented (for example, not being able to vote at elections).

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons. FGM has been categorised into four types, ranging from a symbolic prick to the clitoris or prepuce, to the fairly extensive removal and narrowing of the vaginal opening. All these forms of FGM have been found in the UK. FGM is sometimes known as 'female genital cutting' or female circumcision. FGM is considered a grave violation of the rights of girls and women.

Prevent (under the Counter Terrorism and Security Act) Under Prevent, the following apply but are not limited to:

- Gun and Knife Crime
- Radicalisation
- Violent Extremism
- Discriminatory Abuse

In respect of safeguarding individuals from radicalisation, CTG works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially grooming by others.

Increased Vulnerability

CTG recognises that in certain circumstances young people/vulnerable adults may be at an increased risk of harm and may require additional safeguarding interventions, such circumstances include but are not limited to:

- Under age sexual activity involving 13-15-year olds • Self-harm
Forced Marriage
- Disabled Children
- Migrant Children
- Parental disability
- Domestic Violence
- Living away from home
- Begging

1. Designated Staff with Responsibility for Child and Vulnerable Adult Protection

Lead Designated Child Protection Officer (LDCPO)

The designated members of staff with lead responsibilities for child protection/vulnerable adult issues are Sue Irons, Director of Learner Recruitment, Progress and Compliance (Safeguarding the Health and Safety Champion) and Elaine Moreline, Managing Director (Quality). These people are senior members of CTG Management Team. They have a key duty to take lead responsibility for raising awareness to the staff of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of an environment, which is safe and free from abuse and harm for all those learning within and visiting CTG. They have received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children Board, and will receive refresher training at least every two years. They should keep up to date with developments in child protection/vulnerable adult issues.

The lead designated senior members of staff are responsible for:

- Overseeing referrals to any agencies, of cases of suspected abuse or allegations to the Department of Social Care.
- Providing advice and support to other staff on issues related to child protection/vulnerable adults.
- Maintaining detailed records of any child protection/vulnerable adult referral, complaint or concern (even when the concern does not lead to a referral).
- Ensuring that parents/carers of young people and children within CTG are aware of CTG Child Protection/Vulnerable Adults Policy and related documents.
- Carers of vulnerable adults will be made aware of CTG Child Protection/Vulnerable Adults Policy.
- Liaising with the Local Safeguarding Children Board (LSCB) and other appropriate agencies.
- Liaising with secondary schools, and other agencies, which send pupils to CTG to ensure appropriate arrangements are made.
- Liaising with employers and training organisations that receive children, young people or vulnerable adults from CTG on long term placements to ensure that appropriate safeguards are put in place.
- Ensuring that all staff receive Level 1 Awareness training in child protection/vulnerable adult issues and are aware of CTG child protection/vulnerable adult procedures.
- Ensuring that all mentors, health and safety officers and centre managers have completed training at Level 2 in Safeguarding and undertaken training in Prevent (Channel).
- Ensuring that IT systems are protected from abuse by annually updating protection software via the company employed to maintain IT/internet.

The lead designated members of staff will provide an annual report to CTG Board of Directors setting out how CTG has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the LSCB (or others) to the Board at the earliest opportunity.

Designated Child Protection Officer (DCPO)

Additional members of teaching/teaching support staff will assist the lead designated members of staff with child protection/vulnerable adult/prevent issues, as appropriate.

Other designated members of staff who can undertake the child protection/vulnerable adult/prevent procedures and deal with child protection issues are: -

Louise Bell – Recruitment Manager
Prim Campbell – Director of Funding and Data

These designated staff members:

- Report to the appropriate member of staff with lead responsibility.
- Know how to make an appropriate referral.
- Are available to provide advice and support to other staff on issues relating to child protection/vulnerable adults/prevent.
- Have particular responsibility to be available to listen to children, young people and vulnerable adults studying at CTG.
- Deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in child protection/vulnerable adult/prevent issues and inter agency working as required by the LSCB and will receive refresher training at least every two years.

2. Dealing with Suspicions or Allegations of Child Abuse/Abuse of Vulnerable Adults

What to do if a young person tells you about abuse or radicalisation

It is important that children, young people and vulnerable adults are protected from abuse. Learners need to know that they will be listened to and their concerns will be taken seriously. Young people will talk about their concerns and problems to people they feel they can trust. The person a child talks to will not necessarily be a senior member of staff. When a member of staff becomes aware of an allegation or alleged incident, they should immediately go to the appropriate DCPO (refer to Section 1). This should take priority over your usual duties and notifying your Manager in the first instance.

Where complaints, allegations or suspicions are against the nominated members of staff these should be referred to another member of the Senior Management Team.

CTG aims to ensure the learning environments are supportive and safe, where individuals are treated with courtesy and respect and their contribution to learning is valued. CTG will not tolerate harassment or bullying in any form and will take firm action to protect its learners whenever incidents are identified. In rare incidences staff may be made aware of abuse of learners by other learners. Staff should make themselves familiar with the Bullying and Harassment Policy and Procedure. In such circumstances, it may also be necessary to instigate Vulnerable Adult/Child Protection procedures. and the procedure for dealing with such incidents is outlined below. Designated staff will consider whether the incident requires a referral to the Police or Department of Social Care. The Mentoring Team are able to provide a confidential 'listening ear' to victims of abuse/assault and any Learner involved will be offered access to the facility. If the victims of abuse/assault or any Learner involved need more in-depth specialist help they will be referred to the appropriate support agency.

Reporting Allegations or Suspicions of Abuse or Radicalisation

Staff should not investigate concerns or allegations themselves, but should report immediately to the Child/Vulnerable Adult designated person(s). Referrals to Department of Social Care or Channel should only be made by the designated person or the named nominees.

If a child, young person or vulnerable adult tells a member of staff about possible **abuse or radicalisation** the member of staff should:

- Listen carefully to the young person giving them time and your full attention. Allow the young person to give a spontaneous account. Do not stop a young person who is freely recalling significant events. Rather than directly questioning the Learner, just listen and be supportive, and stay calm.
Explain that you cannot promise not to speak to others about the information they have shared – do not offer false confidentiality. Inform them that you will have to pass this on to a member of staff responsible for safeguarding.
- Arrange for the person making allegation and person accused of allegation to remain on site.
- Reassure the young person or vulnerable adult that by telling you they have done the right thing.
- Avoid interviewing the young person or vulnerable adult but should clarify without resorting to leading questions and without exerting pressure, what the child, young person or vulnerable adult is saying.
- Not put words into the young person's or vulnerable adult's mouth.
- Inform the young person or vulnerable adult that you must pass information on, but only those who need to know about it will be told. Inform them of to whom you will be reporting the matter.
- Note the points carefully using the young person or vulnerable adult's own words
- Make a detailed note of the date, time, place, what the young person said, did, questions asked and their body language.
- Report the concerns immediately to the appropriate DCPO and then complete a referral form, attaching a copy of any other notes taken.

Once details of a concern have been received by the appropriate DCPO, the following procedures/working practices will be undertaken:

- DCPO will request the fully completed Cause for Concern form and that the young person for whom concerns exist be requested to remain in CTG until notified by DCPO.
- Case accepted by DCPO.
- DCPO meets with staff/child/vulnerable adult as applicable – record of meetings taken using record sheets as applicable.
- In the event of an emergency DCPO may contact Police, and inform the Board of Directors that this has taken place, other less immediate referrals to the Police should be discussed with a Director prior to any action
- A range of additional interventions are considered by the appropriate DCPO. When applicable DCPO discusses case with another DCPO or refers to LDCPO. This could include:
 - Primary carer informed of concerns/ action being taken (where appropriate as determined by the appropriate DCPO).
 - Contact made with relevant First Contact Team or appropriate team for Vulnerable Adults.
 - Follow up referral made to relevant First Contact Team/appropriate team where deemed appropriate and where agreed with Social Care Team.

- Other referrals to be made and advice provided to young person (logged).
- Log updated to reflect action taken and appropriate `traffic light` is to be set on CTG mentoring tracking system.
- File to be made up and stored securely with the appropriate DCPO until such times that all required actions are completed.
- File to be transferred to permanent and secure storage area at the Head office in Southend.
- Where no Child Protection/Prevent issues are present but additional needs are identified and, according to the judgement of practitioners the young person requires extra support to ensure they meet the 5 Every Child matters outcomes.
- Where the appropriate DCPO considers additional complexities apply, they may request attendance by a second DCPO whose primary role will be to share in decision making, record the incident, and clarify understanding of all involved.

It is important to remember that adult protection guidelines are intrinsically different to those applying to children. Adults have the right to make their own decisions unless there are clear grounds to override this because of their lack of capacity or if a wider public interest is involved.

3. Reporting and Dealing with Allegations of Abuse/Radicalisation against Members of Staff

Procedure

Introduction

In rare instances, staff of educational institutions have been found responsible for abuse. Due to their frequent contact with children, young people and vulnerable adults, staff may have allegations of abuse made against them. CTG recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that the investigation is thorough and not subject to delay.

CTG recognises that the Children Act 2006 and No Secrets (Department of Health 2000/2009) states that the welfare of the child, young person or vulnerable adult is of paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within CTG will do so with sensitivity and will act in a careful, measured way.

Safe Care Practices in CTG

In CTG there are times when learners will be seen individually by staff. Safe care practices have several key objectives:

- To keep learners safe from abuse.
- To ensure CTG is a safe environment in which to study and work.
- To minimise the risk of staff receiving false allegations of abuse, strategies for safe caring need to be adopted by all staff employed at CTG to achieve the above objectives
- Maintain good communication with other staff, e.g. if you are about to interview a learner alone, inform other staff.
- Whilst it may be appropriate to verbally reassure a learner, physical affection should be avoided.
- Staff should communicate to their line manager if they feel uncomfortable in the presence of a learner, e.g. male Learner who makes sexualised remarks to a female member of staff. The line manager should raise the issues with the appropriate lead designated person.
- Staff should avoid intimate care, e.g. helping learners' toileting, which should be the responsibility of the learners' carer at all times.
- Staff must be familiar with the learner code of conduct and reiterate this to learners.

It is an offence for a person over 18 (teaching/teaching support staff) to have a sexual relationship with a child/young person under 18 where the person is in a position of trust in respect of that child/young person, even if the relationship is consensual. This applies where the child/young person is in full time education and the person works in the same establishment as the child/young person, even if s/he does not teach the child/young person.

Whistle Blowing

CTG's Whistle Blowing Policy and Procedure is intended to provide safeguards to enable concerns to be raised and to maintain public confidence in the reputation of CTG and should be followed by staff when relevant, in instances related to child/vulnerable adult protection.

Receiving an Allegation from a Child/Young Person/Vulnerable Adult

A member of staff who receives an allegation about another member of staff from a child/young person/vulnerable adult should follow the guidelines in Section 3 for dealing with disclosure.

The allegation must be reported immediately to the Managing Director of Quality who will confer with the Group Managing Director.

The Managing Director (Quality) will:

- Obtain written details of the allegation from the member of staff who received it which will be signed and dated. The written details should be countersigned and dated by the Managing Director (Quality).
- Record information about times, dates, locations and names of potential witnesses.

Initial Assessment by the Managing Director (Quality)

The Managing Director (Quality) should make an initial assessment of the allegation consulting with the Department of Social Care or Police, as appropriate.

Where the allegation is considered to be either a potential criminal act or indicates that the child/young person/vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter will be reported immediately via the Local Authority Designated Officer (LADO) to the Department of Social Care.

In instances where there is no cause to suspect that 'significant harm' is an issue, but a criminal offence may have been committed, the Police must also be consulted.

The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child/young person/vulnerable adult. This matter will be assessed in accordance with CTG Staff disciplinary procedures.
- The allegation can be shown to be false because the fact alleged could not possibly be true. Even in this event the Local Authority Designated Officer should be consulted.

Enquiries and Investigations

Child/Vulnerable Adult protection enquiries by Department of Social Care or the Police are not to be confused with internal disciplinary enquiries by CTG. CTG may be able to use the outcome of an external agency enquiry as part of its own procedures. The Child/Vulnerable Adult Protection agencies, including the Police, have no power to direct CTG to act in a particular way; however, CTG should assist agencies with their enquiries.

CTG shall normally hold in abeyance its own internal enquiries while the formal Police or Department of Social Care investigations proceed, to do so otherwise may prejudice the investigation. However, in certain circumstances, where the joint evaluation process may deem that there is sufficient evidence for matters to be taken forward in a disciplinary process parallel with the criminal process, without jeopardising the criminal investigation, all relevant parties may reach an agreement about the way forward with regard to these parallel investigations. Any internal investigations shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency (e.g. Police) the Managing Director (Quality) and the Group Managing Director should normally be involved in it, and contribute to, the inter-agency strategy discussions. The Managing Director (Quality) and the Group Managing Director are responsible for ensuring CTG gives assistance to the agencies enquiries. They will ensure that appropriate confidentiality is maintained in connection to the enquiries, in the interests of the member of staff about whom the allegation is made. Subject to no objections from the Police or investigating agency, the Managing Director (Quality) and the Group Managing Director shall:

- Inform the child/young person/vulnerable adult or parent/carer making the allegations that the investigation is taking place and what the likely process will involve.
- Ensure the parents/carers of the child/young person making the allegations have been informed that the allegation has been made and what the likely process will involve.
- Where a vulnerable adult is concerned, consent is required from the adult.

The Managing Director (Quality) will:

- Inform the member of staff against whom the allegation has been made of the fact that the investigation is taking place and what the likely process will involve.
- Keep a written record of the action taken in connection with the allegation.

The Managing Director (Quality) shall inform the Board of Directors of the allegation and the investigation.

Suspension of Staff

Suspension is not automatic. In respect of staff other than the Group Managing Director, suspension can only be carried out by the Group Managing Director, or another member of the Board of Directors.

In respect of the Group Managing Director, suspension can only be carried out by the Board of Directors.

Suspension may be considered at any stage in the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives, e.g. paid leave of absence, agreement to refrain from attending work, change of or withdrawal of specific duties.

Suspension will only occur for a good reason. For example:

- Where a young person/vulnerable adult is assessed to be at risk.

Where the allegations are potentially sufficiently serious that, if proven, would justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff will be encouraged to seek advice. CTG's Suspension procedure will apply. If the group Managing Director (or a member of the Board of Directors) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with the reasons, shall be despatched within three working days.

Where a member of staff is suspended, the Group Managing Director (or member of the Board of Directors) should address the following issues:

- The Board of Directors are informed of the suspension in writing.
- The Board of Directors will receive a report that a member of staff has been suspended pending investigation; the detail given to the Board should be minimal.
- Where the Group Managing Director has been suspended, the Chairman of the Board will need to take action to address the management of CTG.
- The parents/carers of the young person/vulnerable adult making the allegation will be informed of the suspension. They will be asked to treat the information as strictly confidential. In the case of a vulnerable adult, the adult's consent is required.
- Consideration will be given to informing the young person/vulnerable adult making the allegation of the suspension.
- Relevant senior staff that need to know of the reason for the suspension will be informed by the appropriate Managing Director.
- Depending on the nature of the allegation, the Group Managing Director will consider whether a statement to the Learner of CTG and or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

The Group Managing Director and the Board of Directors shall consider carefully and review the decisions as to who is informed of the suspension. Department of Social Care/Police and external investigation authorities will be consulted. The suspended member of staff will be given appropriate support during the period of suspension. He/she will also be provided with information on progress and developments in the case at regular intervals. The suspension will remain under review in accordance with CTG disciplinary procedures.

The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the existing disciplinary procedures.

The member of staff will be informed of:

- The allegations against him/her.
- His/her entitlement to be accompanied by a work colleague.

Where a member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately and arrangements made for the member of staff to return to work. It may, in certain cases, be appropriate to offer extra support of source counselling. The young person/vulnerable adult making the allegations and their parents should be informed of the outcome of the investigation and proceedings in writing. This should occur prior to the return to CTG of the member of staff (if suspended). In the case of a vulnerable adult, consent is required from the adult.

Action on conclusion of a case

The Group Managing Director will give consideration to what information should be made available to the general population of CTG. If the allegation is substantiated and the person is dismissed or CTG ceases to use the person's services, or the person resigns or otherwise ceases to provide his/her services, CTG will consider whether a referral to DCSF for consideration of List 99 action or by the GTC is required, or advisable, and the form and content of a referral. In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, CTG will carefully consider how best to facilitate and support that return to work.

Allegations without Foundation

False allegations, by the young person/vulnerable adult, may be indicative of problems of abuse elsewhere. The following steps should be taken in such cases:

- A record will be kept and consideration given to a referral to Department of Social Care in order that other agencies may act upon the information.
- In consultation with the Group Managing Director, the appropriate Managing Director shall inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or young person/vulnerable adult protection action will be taken.
- Consideration will be given to offering counselling/support.
- The appropriate Managing Director will inform the parents/carers of the alleged victim that the allegation has been made and the outcome. In the case of vulnerable adult, the adult's consent is required.
- Where the allegation was made by a young person/vulnerable adult other than the alleged victim, consideration to be given to informing the parents/carers of that young person.
- The Appropriate Managing Director will prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming the above action has been taken.

Malicious/Vexatious Allegations

When an allegation is unfounded and there is evidence through the investigation that the allegations could potentially be malicious, the Learner Disciplinary Policy will apply if such a malicious/vexatious allegation was from a learner or the Staff Disciplinary Procedure if such an allegation was from a member of staff.

Records

Documents relating to an investigation are retained in a secure place, together with a written record of the outcomes and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she are informed about CTG's statutory duty to inform the Secretary of State for Education.

Monitoring Effectiveness

When an allegation has been made against a member of staff the appropriate Managing Director and the Board of Directors will, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to improvement of CTG's procedures and/or policies which should be drawn to the attention of the Local Safeguarding Children Board and/or Department of Social Care. Considerations are also given to the training needs of staff.

4. Recruitment and Selection Procedures

CTG has a range of checking procedures in place as part of its recruitment and selection process such as:

- They apply to staff and volunteers who may work with young people/vulnerable adults.
- The post or role is clearly defined.
- The key selection criteria for the post or role is identified.
- Vacancies are advertised widely in order to ensure a diversity of applicants.
- Documentary evidence of academic/vocational qualifications is required.
- Professional references are required.
- Previous employment history is verified.

- Disclosure and Barring Service checks are undertaken.
- A variety of selection techniques are used (e.g. qualifications, previous experience, interview, reference checking, etc.).

CTG ensure this process is reviewed regularly to ensure they continue to comply with legislative requirements.

Related Documents

- Policy against harassment
- Learner Disciplinary (Learner Code of Conduct / Learner Handbook)
- Staff Disciplinary (Staff Handbook)
- Equality & Diversity
- Restraint Policy
- Standard Code of Practice for Mentors 2017-2018
- Mentoring Guidelines
- Learning Support Procedures
- Prevent Policy
- Drug and Alcohol Abuse Policy



CENTRAL TRAINING GROUP

Safeguarding

Annex A – Guidance Handbook for Mentoring Staff 2019-2020

General Information

The purpose of the mentoring scheme is to provide valuable support and development for new learners of all ages within the college environment. The scheme promotes understanding of the learning process both formal and informal, and helps learners to adjust to their new employment and the course.

It is important to note that mentoring is separate from the review process, which is provided by the individual tutors.

Statement

Central Training Group has undertaken to:

- Support and encourage all prospective learners during the transition between school and college and school and employment.
- Give learners the confidence to make informed decisions about their career path and encourage learners during completion of their qualification.
- To be available for on-going support and advice as and when required.

Objective

- To improve the retention and achievement of learners.
- To provide all learners access to a mentor throughout their training
- To provide one-to-one appointments with a mentor to all learners who request one at any time in their training.
- To give learners a 'good' learning experience.

Process

All prospective learners attend an information, advice and guidance day (IAG) that includes initial assessment where their academic ability and personal circumstances are reviewed. If required a learner will be assigned a mentor at the information day to guide the applicant through the interview and induction process.

All staff completing mentoring are DBS checked prior to commencing employment. Suitable work experience/qualifications are mandatory for mentors.

Mentors conduct individual 1-2-1 sessions on an appointment basis. Mentors are also available for contact by telephone during the working week as required.

Mentors are given the background information gained from the course interview process about their mentees prior to meeting them. All learner background information is kept in a confidential file that is held in the relevant mentor's office.

All recruitment/mentoring staff will be given this guidance and procedures to assist them in their mentoring duties. Support agency contact sheets and information will be distributed and for further support a Co-ordinator/Recruitment Mentoring Officer has been appointed in each area:

Louise Bell Recruitment Co-ordinator/Mentor (Essex)

Sue Irons Operational Director of Recruitment and Safeguarding (London)

All mentors are required to keep accurate confidential records detailing learner contact. Records from each 1-2-1 session should be recorded on the appropriate paperwork available on the Z drive. Mentees are encouraged to create personal action plans with small achievable goals or actions to take that will enable them to take ownership of their own problems. These action plans are reviewed at each session and any solutions or problems arising discussed.

Mentors may be required to investigate non-attendance at college and/or employment and take appropriate action as requested by the tutors.

At the end of the mentoring period the mentor will ask their mentees to complete an evaluation and offer continued support if required. Feedback from mentees is sought on a regular basis to ensure mentoring systems meet the needs of the learners.

Mentoring issues will be reviewed bi-monthly during the Joint Recruitment Team meetings.

Role of the mentor

The mentor role involves providing support and guidance to learners through regular meetings. They are expected to facilitate a supportive and developmental relationship with the mentee. However, they are not expected to be an expert or to be able to solve all problems raised and in some cases, it could be that specialist help is required and the learner is referred to an independent agency.

It is **not** the intention of the scheme for the mentor to work in the same way as a professional counsellor. At times, the mentor may need to refer their mentee to a professional Counselling Service or Social Services Department.

A mentor utilises different skills and approaches depending on the subject and situation. However, some key responsibilities, skills and attributes of mentors are given below.

- Participate in training sessions for the mentoring programme in order to better understand and support it.
- Initiate first mentoring meeting in which the mentor should ensure the mentee understands the purpose of mentoring scheme.
- Provide friendly professional support and guidance relating to problems raised by the mentee.
- Help to clarify the mentees' learning goals and development needs.

- Arrange introductions to useful contacts and agencies inside and outside the college environment to enable the mentee to begin to solve his/her own issues.

Skills and qualities of a mentor:

- Interest in being a mentor and enthusiasm about the scheme.
- Encouraging of others.
- Cares and respects others.
- Trustworthy and trust in others.
- Has appropriate professional knowledge and skills.
- Non-judgemental, friendly and approachable.
- Listens actively and effectively– asks open and appropriate questions, maintains good eye contact, acts as a sounding board.
- Reflects back feelings and opinions to demonstrate listening/understanding.
- Gives constructive and positive feedback – focuses on the behaviour and not the person, explores alternatives and ideas for the future without being prescriptive.
- Able to appreciate his/her differing experience and needs.
- Willing and able to consider issues of ethnicity, gender or disability in the context of the learning environment.

Meeting Learners for the First Time

Mentors will be issued with a group register and arrange a suitable time with the Tutor to meet the group. The Mentor can either casually chat with members of the group while they are completing a practical activity or meet each group member on a one-to-one basis in a private room away from the class environment.

Using the Mentoring Contact Sheet

The mentor should then set up a record for each learner they support together with a short description of the mentees situation i.e. "Rosie is a quiet young lady who lives at home with her mum and step-father and works in The Hair Studio". Some learners may not wish to see the Mentor every week whilst others may need to meet with the Mentor on a regular basis throughout their training. The Mentor should note on the Mentor's Contact Sheet each time they do not meet the learner and each time they do.

Dealing with Learner Problems

Learners often confide in their Mentor about a range of situations that may not be related to either their work or college situation. Mentors should listen sensitively and encourage the learner to think about solutions to their situation themselves rather than telling them what to do and how to do it. As a mentor, you are there to be a support whilst the learner deals with their own situation.

The Mentoring Record Tracker

Mentors that are supporting learners with issues that require specialist support or referral to an appropriate agency should forward the details to Louise or Sue who will record the information on the Mentoring Tracking Sheet and code the issues as follows:

Red	Learner has serious issues that need monitoring. Ensure the learner is contacted each week.
Amber	The Learner has moderate issues that need monitoring. Telephone the learner on a bi-weekly basis.
Green	Learner's issues have been addressed.

Learner stress factors that you may encounter:

- Transition from School to College/Work

The transition from school to college can be a stressful time for a young person. The worry about leaving school where they are settled and know the surroundings well to attend college where they are learning new skills in new surroundings can intimidate even the most confident of young people. Learners beginning an Apprenticeship also have the added stress of starting employment. Mentors will meet young people in the first instance at CTG pre-course events and then again at enrolment. This relationship can then continue following induction for as long as required.

- Academic Skills

The skills required to study a vocational qualification alongside either GCSEs or functional skills can be difficult for some learners. Learners can find the programme worrying and hard. Academic support is always available and all learners have had their maths and English skills assessed prior to the start of the course but need the extra support from their mentor to be able to cope with the challenge of studying. Learners can be referred to the Essential Skills department for more specialist academic support at any time throughout their programme.

- Financial Worries

Young learners are not experienced in managing their own money; they may be living independently and earning the Apprenticeship wage of £3.30 (rising to £3.40 on 1st October 2016) per hour without any support from parents or relations. Some learners may be eligible for help from the benefits agency and can be referred to the nearest office for guidance and support.

- Housing Problems

Learners may become homeless whilst completing an Apprenticeship. The mentor should refer the learner to the Housing and Benefit Departments. The Connexions Service (available in Southend) also has access to emergency housing support.

- Relationship Breakdown

Learners can find it difficult to study and deal with relationship breakdowns. The Learner's family unit may separate and learners may have the added responsibility of coping with their parent's emotions and also their siblings. Learners can be referred to specialist counselling.

- Bereavement

Extra support will be required if Learners experience the death of someone close to them. It is an emotional time and it will be difficult for a young person to cope with their emotions whilst working and also studying. The mentor can support the learner by liaising between the tutor and the employer whilst giving the learner the opportunity to talk about their feelings and how to deal with them.

- Unemployment

Learners may lose their work placement which is an integral part of their apprenticeship programme. Learners should be referred to the Recruitment Department who will assist them in finding new employment.

- Health, Illness or Disability

Learners can find their programme of study difficult if they are also coping with health issues or disability. Learners will have been identified as needing mentoring support at their initial interview but may also need to be referred to a specialist agency by the mentor to ensure they enjoy and achieve their goal.

- Social Isolation – Cultural Differences

All learners will benefit from a network of social contacts for support and companionship; some learners may feel isolated due to their confidence in mixing with new people. Other learners may come from differing cultural backgrounds and find it hard to integrate within a diverse group. The mentor and tutor are vital in both scenarios in ensuring the group dynamics welcome all learners equally. Learners will take part in Equality and Diversity awareness throughout their course

- Language Barriers

Some learners may come from families who may not speak English as their first language, and may feel isolated as a result. In the past learners have had to take holiday from work/college to go home and interpret workmen in the home. The learner can feel stress from being in an interpreter type situation outside of college and therefore need a mentor to guide them in accessing services on behalf of their family.

- Abuse

Learners may be victims of abuse. Mentors should not deal with this situation alone. If a learner discloses that they have been the victim of abuse, you should make a note of the situation using the learner's own words, note their body language and injuries, and immediately contact the Designated Child Protection Officer (Sue Irons, Essex LDCPO - 01702-671216 or Elaine Moreline, London LDCPO - 01702-671223) **DO NOT** promise to keep the information a secret. **YOU MUST** inform the learner that you can listen but you may have to refer them to a specialist agency or the police. Refer to the Child Protection Policy and Procedure at the front of this document.

- Radicalisation

Learners may be victims of radicalisation. Mentors should not deal with this situation alone. If a learner discloses that they have been encouraged to become involved in terrorism, you should make a note of the situation and immediately contact the Designated Child Protection Officer (Sue Irons, Essex LDCPO - 01702-671216 or Elaine Moreline, London LDCPO - 01702-671223) who will review the information and contact the Police for guidance. **DO NOT** promise to keep the information a secret. **YOU MUST** inform the learner that you can listen but you will have to discuss the situation with a senior colleague.

Strategies for:

Dealing with Learner Distress

One situation most people find difficult to handle is when learners become upset and distressed. It can make people feel embarrassed, inadequate and uncertain about how to act towards that person, especially if you don't know them very well.

Learners demonstrate negative or difficult emotions through various behaviours. These can be considered socially acceptable or unacceptable, although this may vary between different people depending on their values and beliefs.

To some extent mentors can be led by the learner for their response for example, crying is a form of emotional release that can help the learner and is unlikely to harm anyone else. The mentor can help by just being there and providing the privacy of the mentoring area. It is better not to discourage people from crying.

Mentors may find these situations difficult as it is always hard to know what to say – often, there is little you can say at that moment. This is not a problem – it is better to keep quiet rather than talk for the sake of it. It is a good time to listen and allow the learner to express their feelings.

When distress is resulting in behaviour which could cause harm to themselves or others, Mentors have the responsibility to protect those at risk. Mentors should take care not to put themselves in danger – they should always seek assistance from a Manager or someone who is experienced or professionally qualified if they are unable to deal with the situation themselves.

Dealing with Complaints

Hear the person out, take the complaint seriously and do not behave defensively, give them information about how to make an official complaint and pass the concerns to the relevant manager. Record the complaint and follow the situation up with the learner at your next meeting.

Dealing with Shouting, Aggressive or Threatening Behaviour

Learners may shout in frustration at a situation, staff should remain calm, keep the volume of their voice down, acknowledge the strength of the learner's feelings but make it clear that we want to help them but we cannot tolerate violence, if necessary gain support from a Senior Manager.

Sometimes Learners may become angry or aggressive. This is upsetting for everyone involved and can become a frightening situation to deal with. The mentor's priorities are to protect everyone's safety and rights and to minimise the disturbance.

The following strategies can be effective in such a situation:

- Remain calm.
- Acknowledge the learner's anger, and do not be drawn into an argument as this can provoke the situation.
- Speak slowly at a low volume – DO NOT SHOUT.
- Be aware of the limits of the role, refer to a manager immediately.
- Never give the impression of laughing or trivialising matters.
- Listen carefully to what the learner is saying, answer any questions and provide information if appropriate.

As soon as the situation has been successfully dealt with write a report of the issue and what has been the outcome and copy to the learner's mentoring file/tutor.

Dealing with quiet and withdrawn learners

Arrange to meet the learner on a 1-2-1 basis and acknowledge that it has been noted that they have become quiet or withdrawn, ask if they have anything on their mind that they would like to discuss and offer to help them to communicate their problem. Learners may not wish to disclose their issue at a first meeting but the situation should be monitored by the tutor and mentor. When the learner has a feeling of trust in the mentor they will be more likely to confide the issue. If a learner does not wish to discuss a problem, it is their right to privacy to keep it to themselves.

Supervision

Dealing with learners' problems/issues can be emotionally draining for mentors. It is important that mentors meet regularly with their Line Manager to discuss the issues that they are dealing with.

Mentors can find themselves upset by a learner's distress, at such times the mentor should ask another staff member to take over. Learners should not have to cope with the mentor's distress as

well as their own. Mentors may need to release their emotions after dealing with the learner and line managers or other members of the mentoring team will be supportive and provide an opportunity to offload.

The Mentoring Code of Conduct

Mentors will:

- Meet all new learners during their first month of training
- Observe confidentiality procedures
- Give work telephone and mobile numbers for learner to contact them during office hours
- Ensure that work mobile phones are switched off at 5.30pm each day and on days off and weekends

- Support and encourage the learners they mentor
- Complete mentoring if requested to by learners on an individual basis
- Maintain detailed mentoring records in a secure cupboard
- Provide advice and support to other staff on issues related to their learners
- Avoid physical affection/contact
- Report any concerns or evidence of possible abuse following the Reporting Allegations or Suspicions in the Child Protection and Vulnerable Adults Policy, Section 2

- Accompany learners to hospital in a taxi if necessary Mentors must not:
 - Meet with learners outside of work hours
 - Leave work mobile phones on after 5.30pm
 - Give out personal mobile numbers or home numbers
 - Carry out investigations of any concerns or allegations themselves
 - Promise confidentiality where suspicion of abuse, radicalisation or a criminal act may have taken place
 - Discuss learner issues with colleagues or family members
 - Give lifts to learners in either private or company cars

Useful Contact Details

<p>DrugScope Tel: 020 7928 1211 (Mon-Fri 9am-5.30pm) E-mail: info@drugscope.org.uk Website: www.drugscope.org.uk</p>	<p>Frank (Drug Support) Helpline: 0800 77 66 00 (24hours) E-mail: frank@talktofrank.com Website: www.talktofrank.com</p>	<p>Narcotics Anonymous Tel: 202 7730 0009 or 08537 33366 Website: www.ukna.org</p>
<p>Drugs & Alcohol Awareness Team – Southend Tel: 01702 534786 Queens Way House Essex Street Southend</p>	<p>Alcoholics Anonymous Tel: 0845 769 755 Website: www.aa.org National alcohol addiction information agency</p>	<p>Alcohol Concern Website: www.alcoholconcern.org.uk National agency on misuse</p>
<p>Drinkline Tel: 0800 917 8282 Drinkline is a national alcohol helpline providing counseling, support, advice and information</p>	<p>Quitting Smoking Tel: 0800 169 0 169 (9am – 11pm daily) Tel: 0800 169 9 169 (noon – 9pm daily) Text Phone: 0800 169 0 171 Website: www.givingupsmoking.co.uk or www.nosmokingday.or.uk</p>	<p>General Health www.nhs.uk</p>
		<p>NHS Direct Tel: 0845 4647 website: www.nhsdirect.nhs.uk</p>
<p>Sexual Health Helpline Tel: 0800 567 123 Text Phone: 0800 521 361 Website: www.playingsafely.co.uk</p>	<p>Care Confidential – For pregnancy and post-abortion support Tel: 0800 028 2228 or 0845 330 8466 (7 days a week from 7pm – 10pm) and (10am – 2pm Mon – Fri)</p>	<p>Colchester Rape Crisis Line P.O. Box 548, Colchester, Essex, CO3 3JX Helpline: 01206 769795 website: www.crcl.org.uk</p>
<p>Self Harm Support Website: www.selfharmuk.org</p>	<p>Childline Tel: 0800 1111 website: www.childline.org.uk</p>	<p>YoungMinds Tel: 0207 336 8445 Parents Information Service: 0800 0 8 2 38 website: www.youngminds.org.uk/selfharm</p>
<p>Samaritans Tel: 08457 90 90 90 Email: jo@samaritans.org website: www.samaritans.org.uk</p>	<p>National Children’s Bureau 8 Wakley Street, London, EC1V 7QE Tel: 020 7843 6000 Email: selfharm@ncb.org.uk website: www.selfharm.org.uk/database</p>	<p>Mental Health Support ‘See Me’ Campaign website: www.justlikeme.org.uk</p>
		<p>Mind Tel: 08457 660 163 website: www.mind.org.uk</p>
<p>SHELTER For urgent advice please call: 0808 800 4444 (8am-8pm, seven days a week) Website: www.england.shelter.org.uk</p>	<p>Southend Women’s aid – The Dove Project Tel: 01702 302333 4 West Road, Westcliff on Sea, Essex, SS0 9DA</p>	<p>YMCA Southend: 01702 301301 or 01702 335711 Romford: 01708 766211 Chelmsford: 01245 354873</p>

<p>Southend on Sea Borough Council <u>Children and Families Dept</u> Southend-on-Sea Borough Council Civic Centre Victoria Avenue Southend-on-Sea Essex SS2 6ER Tel: 01702 215007</p>	<p>Relate Youth Council Service Tel: 01702 433017 or 01702 342901</p>	<p>Integrated Youth Support Service incorporating: Youth Offending Connexions Youth Support Young Person Drug/Alcohol team Teenage Pregnancy Community Engagement Streets Ahead 01702 534300</p>
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Safeguarding

Annex B – Confidentiality Policy 2019-2020

Confidentiality Statement

Central Training Group offer a confidential service for all clients. Any information that a client discloses to a member of staff from one of the individual support teams will remain confidential to that team. Issues may be discussed with other team members if necessary, but with no-one else without the explicit consent of the client concerned, unless we believe that harm has or might occur to the learner or others.

Such rare exceptions might include:

- if a learner is considered to be at risk of harming themselves or others;
- if a learner discloses details about their involvement in child abuse, terrorism, treason or any other criminal offence;
- if a learner requests that we pass on information to a third party and signs that he/she agrees to the release of information.

It should be noted that, by law, consent is still required from under 18s in the same way as for adults with regard to matters of data protection and confidentiality. However, in accordance with statutory requirements, where child protection issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported.

If the need ever arises for confidentiality to be broken, every attempt will be made to discuss this with the learner beforehand, unless to do so may worsen the situation for the client.

If any third party, for example a tutor, parent, friend, partner or employer, contacts us to ask for information about any learner who may have visited or used the mentoring, we will not disclose this information. The enquirer will be advised to ask the learner. In exceptional circumstances, we may disclose information only if, in our professional judgment, exceptional circumstances apply, as noted above. If this is the case, information would only be disclosed on a 'need to know' basis.

All staff, external agencies/visitors working with learners as part of the college programme are made aware of this policy. It sets out guidance for all staff about learner information that they can regard as confidential and that which they cannot. Any external agencies/visitors to the college who are teaching or working with groups of learners should also abide by this policy.

Confidentiality must be applied to any information of a personal/and or sensitive nature that may be offered or otherwise self-disclosed by a learner or member of staff. In the case of learners between the ages of 14-18 the issues raised may sometimes also be ones covered by the Child Protection Policy. Advice and guidance on how to manage such issues may be found in Section 2 of the Child Protection and Vulnerable Adults Policy and Mentoring Guidelines.

Any other general information already held on an enrolled learner in the CTG records and information storage systems may be disclosed to third parties as required, subject to the legislation

Policy Objectives

- To provide consistent messages at CTG about handling information about learners once it has been received.

- To encourage an ethos of trust within CTG where learners and staff feel safe to confide and share problems
- To ensure that staff and learners are aware of the CTG confidentiality policy and procedures
- To reassure learners that their 'best interests' will be at the forefront of any procedures.
- To ensure that learners and parents/carers know that CTG cannot offer unconditional confidentiality
- To ensure that if there are safeguarding issues then the correct procedure is followed working within the guidelines set out within this policy.
- To ensure that confidentiality is a whole college approach
- To ensure that learners have a right of access to any records CTG may hold about them

Confidentiality and Record Keeping

Each member of staff who has contact with learners will keep records of appointments or conversations with them in accordance with their professional judgement. Both paper and computer records are the property of Central Training Group. Central Training Group's obligation to maintain confidentiality and the learner's right to decide who should have access to confidential information must be explained to the learner and made clear to clients on appropriate application and assessment forms.

Scope

Personal information may be held about learners at many stages of the learner journey, including:

- At enrolment, for purposes of funding and fee remission.
- When disclosing information about a disability or learning need.
- During information, advice or guidance sessions or discussions.
- When being referred for additional or specialist information or support.
- When disclosing financial or residency information for Learner Support Fund applications.
- When disclosing financial information regarding application and processing of discretionary funds.
- During assessment and review.
- During completion of Individual Learning Plans.
- When giving feedback.
- During Mentoring sessions.

Learners have rights under the Data Protection Acts 1984 and 1998. These protect personal information from being used inappropriately. Under the Acts, this information must be destroyed when it ceases to be relevant. Everyone also has a right to see information held about them if they ask.

Confidential information may also be disclosed in some classroom situations particularly where learners are discussing personal issues, this Confidentiality Policy applies in these situations.

Procedures for confidentiality within Central Training Group (CTG)

Any information that a learner discloses to a member of staff or visitor should not be passed on to other colleagues indiscriminately but should only be discussed on a 'need to know basis'.

Members of staff must not offer learners, or their parents/guardians, unconditional confidentiality.

Any information concerning a learner's behaviour or conduct that is likely to cause harm to themselves or to others should be passed on to the relevant Designated Child Protection Officer or Recruitment Co-ordinator (Essex) as appropriate.

When starting a lesson that may well touch on sensitive and/or controversial issues such as equality and diversity/dealing with clients, tutors should ensure that learners understand the confidentiality issues.

Tutors and Mentors need to be aware that the mentoring/review systems may bring an understanding of what is not acceptable in a relationship, and can lead to disclosure of a child protection issue where the Child Protection Policy should be referred to. If a personal disclosure is made, the tutor/mentor should explain that such information can, and should, be kept confidential within the classroom, but that it will need to be passed onto the appropriate Designated Child Protection Officer immediately.

Where a learner discloses information about physical or sexual abuse, neglect or emotional abuse, the member of staff must follow the guidelines in Section 2 of The Child Protection and Vulnerable Adults Policy

If a member of staff believes a young person or vulnerable adult may be suffering or at risk of suffering significant harm, then they should always refer these concerns to the appropriate Designated Child Protection Officer immediately.

If such disclosed information is to be passed on the learner should be informed of this and know whom CTG are passing the information onto and who else in the college or externally will have access to the information.

In the case of illegal activity of a non-child protection nature, any action that the college takes will always be in the best interests of the learner, although it will also be referred to the Board of Directors for a final decision about involving the Police.

Tutors should not pass on information about learners to their parents unless it is a child protection or criminal issue, in which case, CTG has a duty of care to inform the parents/guardians of learners under the age of 18 about such issues.

Where the parent/carers are involved in the situation of child protection they should not be contacted unless it has been agreed with First Contact or the Police.

Learners should be informed about where they might seek confidential help – see mentoring guidelines.

Related Documents:

Drug Related Incidents Policy
Health, Safety Policy
Safeguarding Policy
Mentoring Guidelines
Tutors' Handbook
Academic and Disciplinary Procedures Learner
Code of Conduct