



Safeguarding and Child Protection Policy

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Policy Statement:

Safeguarding is everyone's responsibility! Everyone has a role to play in relation to protecting and safeguarding children, apprentices, young people and vulnerable adults, professionals must be prepared to think the unthinkable and adopt the attitude it could happen here.

Total People recognises that **ALL apprentices/learners** including children, young people and vulnerable adults have a fundamental right to be protected from harm and exploitation and that apprentices/learners cannot learn effectively unless they feel and are safe. Therefore, this policy relates to ALL apprentices/learners and potential apprentices/learners embarking on or enrolled onto a programme with Total People.

Total People recognise the particularly important role education providers play in relation to safeguarding & protecting children, young people, and vulnerable adults from harm. The overall responsibility for safeguarding sits with the Board and is developed and embedded into practice by the Managing Director and Senior Leadership Team. Total People also recognise that the Safeguarding Team, Learning Coaches and Tutors at Total People as well as employers are best placed to identify concerns early, report at the earliest opportunity, provide support & guidance and ultimately prevent concerns from escalating.

This policy is concerned with keeping **ALL** apprentices/learners **safe** when they are **at training or work and outside of training and work**, this policy will outline Total People's approach to safeguarding.

This policy is communicated with employers during induction and their responsibilities highlighted to them. The policy is also reinforced for all employees through online learning modules and planned CPD.

Safeguarding as defined by Keeping Children Safe in Education is:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to ensure children have the best possible outcomes

Safeguarding as defined by the Care Act

Safeguarding vulnerable adults is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:

- Protecting the rights of adults to live in safety, **free from abuse and neglect**
- People and organisations **working together** to prevent and stop both the risks and experience of abuse or neglect
People and organisations making sure that the **adult's wellbeing is promoted** including, where appropriate, taking fully into account their **views**, wishes, feelings and beliefs in deciding on any action
- Recognising that adults sometimes **have complex interpersonal relationships** and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

Categories of abuse:

Children (under 18)	Adults (over 18)
Physical abuse	Physical abuse
Emotional abuse	Emotional abuse
Neglect	Neglect
Sexual abuse	Sexual abuse
	Self-neglect
	Domestic abuse
	Financial abuse
	Psychological abuse
	Discriminatory abuse
	Slavery
	Organisational abuse

Total People recognise that additional safeguarding considerations should be given to vulnerable groups of apprentice/learners in every aspect of their training and working life. This includes but is not exclusive to:

- Vulnerabilities associated with age – apprentice/learners up to 18 years of age
- Vulnerabilities associated with Special Educational Needs or Disabilities including those with an EHC plan (up to 25 years)
- Vulnerabilities associated with being in care or being a care leaver
- Vulnerabilities for adults over 25

Total People recognise that any child / young person may require early help, but also recognise that colleagues should be alert to the potential need for early help where young people

- Have a mental health need
- Are a young carer
- Are frequently missing/goes missing from care or from home
- Are at risk of modern slavery, trafficking, sexual or criminal exploitation
- Are at risk of being radicalised or exploited
- Have a family member in prison, or is affected by parental offending
- Have challenging family circumstances such as drug or alcohol misuse, adult mental health and domestic abuse
- Are misusing drugs or alcohol themselves
- Are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Are persistently absent from education, including persistent absences for part of the day

Taken from Keeping Children Safe in Education 2022

Total People recognise the importance of being aware of categories of harm for adults under the Care Act 2014, as listed in the table of definitions above.

Total People's Safeguarding policy relates to ALL apprentices and learners embarking on or enrolled onto a programme with Total People and MOL.

Safeguarding and Equality, Diversity, and Inclusion (EDI)

Total People place inclusivity at the heart of their practice. Keeping Children Safe 2022 identifies the significance of the Equality Act 2010 to school safeguarding, including that schools and colleges:

- Must not unlawfully discriminate against learners because of their protected characteristics.
- Must consider how they are supporting learners with protected characteristics.

- Must take positive action, where proportionate, to deal with the disadvantages these learners face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

Learners and staff should expect an inclusive and supportive learning/working environment whatever their background according to the Equality Act 2010.

There is an acknowledgment that those from different minority communities are more likely to be at risk of suffering from wider mental wellbeing, notably 'People of Colour' communities, LGBTQ+, women, deaf people, those with disabilities, young and older adults, and those with mental ill-health diagnosis (Source: Centre for Mental Health, Mental Health inequalities factsheet, 2020).

Our approach will challenge our biases, assumptions and values when supporting staff and learners from an EDI perspective, promoting equality and equity in support for those with mental wellbeing issues. This will be the case for both learners and staff.

Colleagues will be supported to work to the concept of 'cultural humility' when addressing the mental wellbeing needs of learners and support to colleagues.

Safeguarding – an umbrella term:

Safeguarding is not just about protecting children young people and vulnerable adults from deliberate harm. It also relates to the broader aspects of care and education for all Total People and MOL learners including:

- Apprentice/ learner's health and safety and emotional well-being, and their mental and physical health or development.
- Meeting the needs of apprentices/learner with special educational needs and/or disabilities.
- Meeting the needs of apprentices/learners with medical conditions.
- Providing first aid.
- Educational visits and off- site education.
- Intimate care and emotional wellbeing.
- On-line safety and associated issues.
- Appropriate arrangements to ensure site security, considering the local context.
- Keeping apprentices/learners safe from risks, harm and exploitation.
- Ensuring the best possible outcomes for all apprentices / learners

Safeguarding can involve a range of potential issues such as:

- Physical abuse, emotional abuse, neglect, and sexual abuse (PENS).
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying).
- Domestic abuse
- Peer on peer abuse.
- Racist, disability- based, homophobic, bi-phobic or transphobic abuse.
- Gender based violence/violence against women and girls.
- Extremist behaviour and/or radicalisation.
- Child sexual exploitation, human trafficking, modern slavery or exploitation.
- The impact of new technologies, including 'sexting' and accessing pornography.
- Child on child sexual violence and sexual harassment.
- Issues which may be specific to a local area, for example gang activity, knife crime, youth violence, Criminal Child Exploitation (CCE) and county lines.

- Family circumstances which present challenges for the student, such as drug and alcohol misuse, adult mental health issues.
- Risk from serious violence and violent crime.
- Issues affecting apprentices/learners including domestic abuse and violence, Female Genital Mutilation (FGM) and 'honour'-based abuse and forced marriage.
- 'Upskirting' and 'down blousing' - upskirting is a criminal offence and reportable by all staff.
- Financial abuse
- Organisational abuse
- Self-neglect
- Psychological abuse

Total People have a statutory responsibility to:

- At all times **seek to create a safe environment for the apprentices/learners in their training and at work**. On sites this includes using and evaluating the effectiveness of appropriate filters and monitoring systems (imperio) to ensure maximum levels of online safety.
- Ensure that any safeguarding concern is swiftly referred as appropriate, non-emergency referrals to be communicated to partner agencies within one working day of disclosure.
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse.
- Operate the policy to specifically encompass children, young people, vulnerable adults and adults who may be temporarily vulnerable.
- Acknowledge that abuse may take many forms, for example, physical, sexual, financial and material, emotional, neglect, 'Missing', sexual exploitation, human trafficking, female genital mutilation, forced marriage, hate crime, radicalisation, extremism, and risk to self and/or others.
- Comply with statutory safeguarding legislation including the Prevent Duty, which is covered in the separate PREVENT policy.
- Work with external agencies, such as Local Safeguarding Partnerships and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken.
- Ensure employers and other partners are aware of the safeguarding duties and receive timely information and support to promote these duties to apprentices/learners in the workplace.
- Educate and support apprentices/learners in relation to staying safe and being healthy including healthy relationships.
- Ensure that any child, young person or individual with additional needs going missing either from education, home or care home, particularly if repeated, is reported to the appropriate authority.
- Apprentices/learners who are regularly absent from training or work may be vulnerable and at potential risk. All Total People staff will follow procedures for dealing with apprentices/learners who are absent/ go missing, (as in the Attendance and Punctuality Policy), particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future.
- Encourage an atmosphere in which apprentices/learners find all Total People trained staff approachable to enable communication of any problems which may be affecting their lives.
- Provide opportunities for children in need of additional support to identify themselves through the process of applications, enrolment, and initial assessment.
- Provide appropriate mandatory training and development as part of the colleague CPD programme and induction, raising awareness of all staff and governors of the need to

safeguard children, young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse.

- Provide environments where everyone feels valued, safe and respected where individuals are encouraged to talk and are listened to. This will be achieved through the on-going promotion of British Values and enhancement activities, including specifically designed online enhancement courses (Total People use OneFile as a virtual learning platform, online enhancement courses are created and set via OneFile which enables engagement with courses to be monitored).

Scope:

This Policy applies to all those working in, learning at or visiting Total People, including apprentice/learners, staff, governors, volunteers and visitors, including contracted services such as agency staff, employers offering work placements, employers employing apprentices, transportation companies, contractors and subcontractors with direct access to young people and vulnerable adults.

A 'child' is defined as a person aged up to 18.

An 'adult' is defined as a person over the age of 18.

'Looked After Young People/Children', 'Care Leavers' and apprentices/learners with special educational needs up to age 25 may also need additional services, assistance, protection, and consideration.

An adult at risk is a person aged 18 years or over who is, or may be in need of, community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves or is unable to protect themselves against significant harm or exploitation. It may also include adults who are vulnerable for some other reason, for example those who have caring responsibilities, special educational needs, addiction, or who have suffered abuse or trauma.

This policy is published on Total People's website and Total People's internal Hub. The policy is shared with all colleagues through induction training and mandatory yearly update training. Updates to policies are also communicated through email communications, monthly newsletters, cluster meetings and all colleague calls.

This policy is reviewed annually and in response to updates and changes to relevant legislation and guidance.

Legislation and Guidance:

This policy has regard to the following pieces of legislation and guidance, to ensure practices meet legislative requirements and best practice. (Note this is not an exhaustive list).

- The Children Act 1989
- Children Act 2004
- The Care Act 2014
- [Working Together to Safeguard Children \(2018\)](#)
- [Keeping Children Safe in Education \(2022\)](#)
- Children and Social Work Act 2017
- Education Act 2002 (Amended 2011)
- Safeguarding & Vulnerable Groups Act 2006
- Sexual Offences Act 2003 (Amended 2018)
- Counter Terrorism Act and [PREVENT Duty](#) 2015 (PREVENT 3 updated 2018)

- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(2021\)](#)
- Guidance for Educational Providers on Youth Produced Sexual Imagery (2016, updated 2021)
- General Data Protection Regulations (GDPR) 2018
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Mental Capacity Act 2005
- Mental Health Act 1983 (original)
- The Rehabilitation of Offenders Act 1974

Relevant Policies:

All colleagues must read this safeguarding policy in conjunction with the policies listed below and ensure they are familiar with their roles and responsibilities in relation to safeguarding within each of these policies.

- Health & Safety Policy
- Prevent
- Behaviour Management Policy
- Staff Code of Conduct
- Attendance & Punctuality Policy
- [LTE Group Modern Slavery](#)

Roles and Responsibilities:

Board

- Total People's Board has ultimate responsibility for safeguarding.
- TP Board receive the annual safeguarding report for scrutiny and assurance.
- TP Board operates with a nominated safeguarding board governor (Cath Hill), with an oversight from the LTE group board governor for safeguarding (Lady Rhona Bradley).
- Total People Board members complete as a minimum requirement ETF training modules – Safeguarding in FE and Prevent for Board members and annual update training.

Managing Director

- Lead Total People's safeguarding strategy
- Lead Total People's safeguarding policies/procedures against Legislation – staff and apprentice/learners
- Critical incident lead for Total People
- SLT members reporting critical / high risk disclosures

Deputy Managing Director & Senior Leadership Team

- Embed Total People's safeguarding strategy
- Embed Total People's safeguarding policies/procedures against legislation – staff and apprentice/learners
- Ensure all staff comply with mandatory safeguarding training requirements
- Ensure staff adhere to safeguarding and Prevent CPD plans
- Critical Incident Senior Manager
- Ensuring Total People is a safe place to learn and work

Teaching & Learning Manager

- Implement safeguarding strategy / policies / procedures against legislation

- Develop and implement an annual calendar of safeguarding training staff and apprentice/learners
- Analyse/track/monitor safeguarding data
- Critical incident coordinator
- Report to SLT
- External relationships/Boards/LADO
- OFSTED link for safeguarding
- Ensure DDSLs and DSPs are in place across TP

Safeguarding and EDI Lead (Designated Safeguarding Lead - Apprentice/ learners)

- Attend LTE group Safeguarding and EDI meetings, sharing relevant information with the TLM and SLT where required
- Complete DSL training as required
- Support site / cluster safe environment and security including third party locations in partnership with the H&S manager
- Critical Incident response team lead
- Support staff safeguarding training on hot topics monthly in line with the CPD plan
- Attend specialist safeguarding training
- Take part in supervision practices
- Design/deliver apprentice/ learner safeguarding training/awareness and campaigns with CPD plan
- Handle apprentice/learner disclosures and implement support package
- Communication with external agencies to support apprentice/learner
- Attend external safeguarding strategy meetings
- Provide safeguarding events/awareness raising
- Collate/analyse/track/monitor safeguarding data and report to safeguarding lead
- Chair TP safeguarding meeting

Deputy Designated Safeguarding Leads (apprentice/ learners) *see DSL/DDSL/DSP role for further detail

- Manage own CPOMS caseload / dashboard effectively, seeking advice, support and guidance from the Safeguarding lead where required
- Complete DSP training as required
- Critical Incident response team
- Attend specialist safeguarding training
- Take part in supervision practices
- Handle apprentice/learner disclosures and implement support package
- Communication with external agencies to support apprentice/learner
- Attend external safeguarding strategy meetings

Curriculum and Performance Managers / Designated Safeguarding Person

- Be the Designated Safeguarding Person for own cluster areas
- Manage own CPOMS caseload / dashboard effectively, seeking advice, support and guidance from the Safeguarding lead where required
- Manage all low-level safeguarding and welfare incidents for own areas
- Support the effective management of medium and high-level incidents for their areas
- Provide supervision to Learning Coaches as part of the one-to-one process
- Raise the profile of Safeguarding, including a standard agenda item in monthly cluster meetings covering Safeguarding, Prevent and EDI. (Contextualised to learner cohorts and industry areas). Also, to include a minimum of 1 individualised objective on colleague PDRs.
- Complete safeguarding training as required
- Support site / cluster safe environment and security including third party locations

- Critical Incident response team
- Attend specialist safeguarding training
- Handle apprentice/learner disclosures and implement support package
- Communication with external agencies to support apprentice/learner where required (in conjunction with safeguarding advisor)
- Attend external safeguarding strategy meetings where required (in conjunction with safeguarding advisor)
- Provide safeguarding events/awareness raising

Designated Teacher / Learning Support Manager (SENCo)

- Promote the education of and champion apprentices/learners who are LAC (Looked After Children) apprentice/learner
- Communicate with the Virtual School and attend PEP (Personal Educational Plan) meetings
- Has responsibility for the oversight of the attendance, attainment, and progress of learners with a Social Worker.

All Total People Employees

- Know/understand/when/how to refer/report a staff/student safeguarding concern
- To ensure all incidents safeguarding and welfare incidents (from lowest level of concern / information) are fully documented at the earliest possible opportunity (timely recording) using the appropriate reporting systems – CPOMS / Webform (*NB webform for external reports, initial MOL learner concerns and any potential learners not yet live on TPL systems*).
- Compliance with safeguarding training against legislation annually
- Compliance with TP mandatory CPD training (within allocated timescales)
- Compliance with safeguarding policies/procedures
- Creating a safe environment for all
- Promote professional conduct/behaviour/safe working practices
- Challenge unsafe conduct/behaviour
- Embed safeguarding practices and educational activities

HR – responsible for Staff Safeguarding

- Staff safeguarding Policies and Procedures including safer recruitment and code of conduct
- Staff referral and support, linking in with TLM / Safeguarding lead where a LADO referral is required
- Support for Managers
- DBS Process and effective management of the single central register
- Staff safeguarding concerns tracking and monitoring
- External referrals for staff
- Solicitors

IT Services (in addition to all Total People requirements)

- Implementation of Safeguarding IT system
- Network Firewalls and security
- Reporting of individuals
- IT acceptable use policies/procedures

Marketing Department (in addition to all Total People requirements)

- Social Media policy and guidance
- Social Media and news monitoring and tracking

- Communication response to a critical incident
- Imagery consent safety for under 18 students
- Promotion and delivery of safeguarding campaigns/messages

Employers

- To understand their responsibilities in relation to Safeguarding (including Health and Safety).
- Take part in apprentice/learner / employer induction.
- To fully induct learners / apprentices into workplace health, safety, and well-being processes, supporting learners/apprentices to complete their H&S induction checklists (part 3) prior to enrolment
- Read Total People's published policies and guidance including (to be checked by the Learner Coach at the 6-week progress review).
 - Prevent
 - Safeguarding
 - Equality Diversity & Inclusion
 - Health & Safety
 - Employers guide to safeguarding
- Actively engage in regular tri-party reviews with apprentices/learners and their Learning Coach.
- Report any concerns they have following Total People procedures.
- Make Total People aware of any major changes to premises that impact H&S checks.
- Fully participate in H&S premises checks in line with TPL procedures.

Safeguarding Key Contacts:

- Managing Director: Melanie Nicholson - MNicholson@ltegroup.co.uk
- Deputy Managing Director: Gina Steele – GSteele@totalpeople.co.uk
- Teaching & Learning Manager / Safeguarding Lead: Sophie Hayes – SHayes@totalpeople.co.uk
- Safeguarding and EDI Lead: Imtiaz Kala - IKala@totalpeople.co.uk
- Deputy DSL: Karen Carruthers – KCarruthers@totalpeople.co.uk
- Deputy DSL: Simone Healey – SHealey@totalpeople.co.uk
- Deputy DSL: Cheryl Kelsall - CKelsall@totalpeople.co.uk

Designated Safeguarding People

- Julie Podesta (Recruitment & Engagement) - JPodesta@totalpeople.co.uk
- Simone Healey (Childcare & Education) – SHealey@totalpeople.co.uk
- Leanne Shaw (Health, Social Care, Pharmacy and Dental) – LShaw@totalpeople.co.uk
- Cheryl Kelsall (Professional Services) - CKelsall@totalpeople.co.uk
- Laura Davies (Custody and Detention G4S) – LDavies@totalpeople.co.uk
- Kate Hull (Custody and Detention) - HullK@totalpeople.co.uk
- Dawn Haynes (Hair, Hospitality) - DHaynes@totalpeople.co.uk
- Adam Smith (Building Services, RAC) - AdSmith@totalpeople.co.uk
- Graham Watts (Auto-motive North and Engineering) - GWatts@totalpeople.co.uk
- Roger Hawlor (Auto-motive South) - RHawlor@totalpeople.co.uk
- Liam Farrell (Study Programme) - LFarrall@totalpeople.co.uk
- Nicola Williams (AEB) - WilliamsN@totalpeople.co.uk
- Julie Sparke (Commercial FS) - JSparke@totalpeople.co.uk
- Janet Brown (MOL) - JaBrown@mollearn.com

Confidentiality and Information Sharing

Total People has due regard to GDPR and "Information sharing: advice for practitioners providing safeguarding services" HM Government, 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

"In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners."

- When information must be shared with Police and the Multi-Agency Safeguarding Hub (MASH) where a child or young person is / may be at risk of significant harm.
- When the child or young person's and/or parent's confidentiality must not be breached
- That information is shared on a need-to-know basis
- Colleagues are reminded to work within the 7 principles of information sharing
 - Necessary
 - Relevant
 - Proportionate
 - Adequate
 - Accurate
 - Timely
 - Securely

Once a disclosure and referral have been made, information is assessed for indications that the person is at risk of harm from others or to themselves.

Information will be shared with the DSL (or Safeguarding Team) and/or other agencies/professionals who are able to take protective action.

All information regarding child protection issues will be kept in secure electronic files on the nominated safeguarding software (CPOMS).

Total People are obliged to work and share information with external agencies charged with the protection of children, young people and adults. This includes Social Services, the police, local schools, LADO, the Multi Agency Safeguarding Hub (MASH), based on the 'need to know' principle.

Total People works with the area Prevent team and through them refers to the Channel process when necessary. (See the Prevent Policy)

Note: 'confidentiality' is often misunderstood. An over emphasis on confidentiality can leave young people or vulnerable adults in danger of harm. If something is confidential, this does not mean that it cannot be shared. GDPR should be no barrier to information sharing about a person in need, as long as appropriate protocol is followed.

However, it is important to:

- Share only what it is necessary to share to protect a child, young person or a vulnerable adult
- Record what is shared, and with whom
- Record reasons for sharing

For further information refer to: Information sharing: advice for practitioners providing safeguarding services.

Inform the individual making the disclosure that information they provide will be shared, why and with whom.

Parents and Guardians:

We will work with apprentices/learners to encourage them to give consent to sharing information with parents / carers where possible.

Reporting a Concern:

Anyone can raise an apprentice/learner concern – a Total People member of staff, an employer, a parent, the apprentice/ learner – for themselves or someone else. A concern must be raised if:

- Abuse or harm is suspected
- A disclosure of abuse or harm is made
- A crime is suspected to have been / is to be committed
- There is a welfare concern about the apprentice/ learner
- Relevant safeguarding or welfare information is known

CPOMS

All Total People learners (live on PICS) are on CPOMS and for these learners' colleagues report incidents / information / concerns directly via CPOMS. (All colleagues are trained to report via CPOMS).

For more information, our CPOMS our process and guides can be found on the Hub. See links below.

[TPL018- CPOMS-Student Import Process-Total People](#)

[TPL030-CPOMS-Logging in to Total People CPOMS](#)

[TPL031 -CPOMS-Adding an incident responding to actions](#)

For any external reports or where a learner is not yet on CPOMS (prior to enrolment & MOL initial concerns) incidents / information / concerns will be submitted via our concern record on the Total People website.

Visit the **Total People website**, click **About** and select **Safeguarding** then select **Report a Concern:**

<https://www.totalpeople.co.uk/about/safeguarding/report-a-concern/>

If a concern is raised to a Total People member of staff and the concern indicates at risk of immediate harm. Then action must be taken immediately, and a member of the safeguarding team contacted (see key safeguarding contacts) **The Safeguarding concern record must be completed as soon as it is safe to do so.**

The Designated Safeguarding Lead will be responsible for ensuring all relevant external agencies have been contacted. A referral for a high-risk concern will be made on the same day.

Where a concern is raised about an apprentice/learner and the apprentice/learner is identified as not being at immediate risk then a Safeguarding concern record should be completed **as soon as possible (as soon as is safe to do so).**

There must be no delay in relation to the completion and submission of a Safeguarding concern record by a member of Total People.

Total People's safeguarding policy and procedure for reporting concerns will be shared with apprentices/learners and employers as part of induction and throughout their programme.

Early Identification:

Total People recognise that early identification is crucial in relation to effectively supporting apprentice/learners, including children, young people and vulnerable adults.

The recruitment and onboarding process plays a vital role in early identification. All members of the recruitment team and all Learning Coaches are required to demonstrate professional curiosity during the recruitment, initial assessment, and onboarding process. Any pieces of safeguarding information or safeguarding concerns are to be reported immediately this includes relevant information and concerns that are identified before an apprentice/learner is enrolled onto their programme. Report via the concern record on the website (learners not yet on CPOMS) and CPOMS (enrolled learners with Total People).

The safeguarding training completed by all Total People staff annually includes detail about the different types of abuse, harm & neglect and the many possible signs, symptoms and indicators that may be a cause for concern. Training and awareness raising alongside vigilance and professional curiosity is crucial to enable all colleagues to **recognise, respond, report, record, refer** and **review** concerns at the earliest possible opportunity.

The DSL/ DDSLs will determine what information and how information is shared between all Total People staff involved in the apprentice/ learner's training programme.

Responding to Disclosures:

When responding to a direct disclosure of abuse or harm (apprentice/learner disclosure directly to member of staff) it is important to:

- Listen carefully
- Stay calm
- Do not appear shocked
- Thank the apprentice/learner for confiding in you / provide reassurance
- Do not promise confidentiality
- Where able provide practical advice, support & guidance

It may be appropriate to clarify information using open question techniques, such as tell, explain, describe (TED techniques).

Missing from Education/Learning:

Total People recognise that non-attendance issues may indicate a welfare or safeguarding concern and that concerns about attendance at training or in the workplace must be recognised and responded to appropriately.

In relation to apprentice/learner up to the age of 18 years Total People will have due regard to their duty in relation to reporting concerns to the relevant Local Authority.

<https://www.gov.uk/government/publications/children-missing-education>

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

Criminal convictions:

Learners are asked for a criminal record disclosure (disclosure of any unspent criminal convictions) as part of the enrolment process at Total People. The start is only processed by Learner Records if the Safeguarding team confirm there is a current risk assessment completed.

Where an unspent criminal conviction has been disclosed a risk assessment will be completed. This will be completed by the relevant sector with support as required from the Safeguarding team. A copy of the risk assessment and any associated actions will be held on the learners CPOMS record.

Risk assessments are used to ensure any potential risks are mitigated for the safety, well-being, and inclusivity of all learners, including the learner with the unspent conviction.

The collection and storage of this sensitive information is covered by an LTE Data Protection Impact Assessment (led by DPOs and including all relevant people across relevant business units).

Concerns about staff or employers:

If a concern is about a member of staff at Total People (including any low-level concerns / relevant information) whether this be about their welfare and safeguarding or a concern about their conduct, then the concern must be shared immediately and directly with the HR Manager – Rachel White. HR@totalpeople.co.uk

Where a concern is about an employer then the apprentice/learner concern record (Total People website) can be used. Or a concern can be shared directly with HR or Total People's Safeguarding Lead.

If a concern relates to HR then it should be shared directly with the Deputy Managing Director GSteele@totalpeople.co.uk

Colleague Support:

Responding to safeguarding and welfare concerns can be upsetting for colleagues. In addition to support available through line managers and the safeguarding team, all Total People colleagues can access a free confidential support service – Unum. More information can be found on Total People's Hub.

[Employee Assistance Programme UNUM.pdf \(sharepoint.com\)](#)

Colleague Training to implement the Policy:

Total People staff are required to undertake a variety of safeguarding training sessions to implement this policy, training is provided for all as well as receiving regular updates through various channels.

Induction:

Mandatory induction training includes the following online learning courses, delivered via our I-Learn platform:

- Introduction to Health & Safety
- Health & Safety at Work
- Equality, Diversity & Inclusion
- Safeguarding
- Pathways to Extremism and the Prevent Programme
- Keeping Children Safe in Education

From October 2022 all Total People colleagues will attend a 2.5-hour face to face induction session with the Safeguarding and EDI lead – Safeguarding, Prevent and EDI in Education.

All Total People colleagues will be trained to use the CPOMS system and live online sessions will be provided monthly to cover all new colleagues.

All Total People colleagues are also required to complete mandatory Education Training Foundation (ETF) training modules, these are:

- Safeguarding in FE – All colleagues
- Safer Recruitment – All colleagues with a responsibility for staff recruitment
- Prevent – All colleagues, the course completed is determined by job role – Prevent for Board Members, Prevent for Leaders and Managers, Prevent for Practitioners, Prevent for Subcontractors

In addition to these online learning courses Curriculum and Performance Managers plan additional induction activities including an induction into Total People's policies and procedures and a variety of practical shadowing activities so new colleagues can see policies in practice. Colleague induction is reviewed at week 3 and followed with monthly one to ones.

Total People believe in providing on-going safeguarding training to all colleagues. A yearly CPD timetable is compiled covering a range of appropriate safeguarding topics.

In addition, safeguarding updates are provided regularly through monthly meetings and support material, email communications and through all colleague calls.

Safeguarding is also a mandated monthly agenda item at Cluster Meetings and Learning Coach one to ones.

We believe in on-going professional development to raise awareness and confidence in relation to recognising and reporting concerns. We also aim to provide on-going training that supports effective embedding of activities within the apprentice/ learner's curriculum throughout their learning journey. Through the curriculum we aim to; educate, empower, and protect all our apprentice/ learners.

To support embedded curriculum activities, we plan interactive updates and good practice sharing through monthly safeguarding meetings attended by DDSLs, DPs and relevant managers. In addition, weekly (Monday morning) emails with key information, updates and useful resources are shared with this wider safeguarding group. Additional enrichment courses are developed and held on our OneFile VLE, relevant courses are identified by clusters through the curriculum and used to support awareness raising as appropriate. These courses cover a range of relevant hot topics in relation to promoting welfare and raising awareness of various forms of abuse.

Promoting and gaining Commitment to the Policy:

Total People will ensure that this Safeguarding Policy is promoted, and commitment gained via the following activities. This is not an exhaustive list, as other mechanisms will be used as and when the situation arises.

This policy will be agreed by the Total People board of governors with promotion and commitment to this policy gained through:

- Staff Induction/Training/CPD/Online learning modules
- Intranet/Hub section on safeguarding and prevent, and what it means for staff and apprentices/learners
- Visible media in and around office and employer locations
- Learning resources for all apprentices and other learners
- Email headers and footers
- Apprentice/learner reviews – carried out on an 8-weekly basis.

We will ensure that we gain and measure the promotion and commitment within Total People to this Safeguarding Policy by:

- Monitoring the outcomes from online and interactive training for both staff and learners
- Ensuring updates to are effectively communicated to colleagues, learners and employers
- Managers will produce evidence (e.g. meeting notes) staff training and 1-2-1 reviews, that this policy has been discussed
- Monitoring of learner review documentation
- Monitoring specific responses to safeguarding and prevent in learner and employer surveys and learner voice activities and focus groups
- Through our use of internal quality checks and reviews and through audits checks.

Subcontractors:

Total People's partnership team are responsible for completing required due diligence checks and for the on-going monitoring of quality & compliance. Subcontractors will have their own policies and procedures in relation to Safeguarding and Prevent but are also expected to comply with Total People's safeguarding policies and reporting procedures.

Subcontractor roles & responsibilities:

- Compliance with safeguarding training against legislation annually including mandatory ETF training modules identified by Total People
- Compliance with safeguarding policies/procedures
- Know/understand/when/ how to refer/report a staff or student safeguarding concerns
- Creating a safe environment for all
- Promote professional conduct/behaviour/safe working practices
- Challenge unsafe conduct/behaviour
- Embed safeguarding practices and educational activities into study programmes

Subcontractor reporting:

Subcontractors will use their own reporting systems to record all safeguarding concerns. In addition, where a safeguarding concern is identified then this must be reported to Total People as the main provider, following Total People's reporting process. A member of the subcontractors safeguarding team must submit the concern record, clearly detailing the safeguarding concern and actions taken to support the apprentice/ learner.

<https://www.totalpeople.co.uk/about/safeguarding/report-a-concern/>

Continuous Improvement

Total People understand that continuous improvement is vital to effective practice. We do this by:

- Analysing and evaluating our safeguarding data, to identify common trends, patterns or concerns and use this to inform changes to practice and training we provide.
- Completing an annual self-assessment against the EIF and plan for improvement
- Providing CPD for colleagues
- Holding monthly director level safeguarding meetings
- Holding monthly meetings for all DDSLs, DPs and relevant managers
- Adapting our practice and reacting quickly to unforeseen circumstances such as adapting practices during the Covid pandemic.
- Providing a forum for colleagues to explore and share best practice in relation to teaching, learning & assessment (Colleague Learning Community TEAMS)

Digital Safeguarding:

"All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content."* [Keeping Children Safe in Education 2021](#). *INCEL movement

Being online is an integral part of apprentice/learner's daily lives and the benefits of accessing the virtual world are vast. At Total People we understand the need to ensure safety online so apprentices/learners can benefit fully from the use of technology, enhancing learning and their educational experiences.

We expect the same standards of behaviour and conduct from our Total People staff and apprentices/learners in the online / digital world as we do in face-to-face situations.

We are aware that any behaviour acceptable or unacceptable can be translated to the online world and we recognise that our policies and procedures and our Total People Code of Conduct are equally relevant in the virtual world as they are to the physical environment.

At Total People we favour a blended approach to learning.

Virtual one to one meetings and coaching sessions are conducted through Microsoft Teams. Group teaching sessions online are delivered via Microsoft Teams or WebEx.

Cameras:

Total People operate a camera on policy during online sessions (one to one and group) as we recognise the benefits of this to learning, engagement and safeguarding. MOL encourage a camera on policy. During online learning, Learning Coaches will ensure that appropriate safeguards are in place.

Safeguards such as:

- Gain permission / announce recording for all online sessions.
- Know your apprentice/learners, prepare apprentices/learners for online learning, provide induction around the use of online / digital tools (including use of the learner account which provides all apprentices/learners with free access to Microsoft Office and an online library).
- Colleagues – use Total People devices only, a personal device must never be used for any learning or communication with apprentices/learners or employers.
- Provide clear rules / guidance at the start of meetings / training (housekeeping)
- Colleagues – background to reflect an appropriate office type / blank background or use an appropriate Teams background.
- Colleagues have an appropriate photograph linked to their Teams account.
- Colleague's detail virtual appointments on their schedulers in the same way they do face to face appointments

Learner online code of conduct (Total People learners):



Learner online code of conduct (MOL learners):



Education:

One of the most effective ways to safeguard apprentices/learners in the digital world is to educate apprentices/learners and empower them to keep themselves safe. Digital safety is embedded throughout the apprentice/ learner's curriculum.

At Total People we understand the importance of creating safe environment during training and meetings, placing the apprentice/learner's welfare at the centre of our practice. We aim to create an environment where apprentices/learners feel confident and empowered to share concerns and the critical thinking skills to question information, make appropriate judgements and safe choices.

Apprentice/ learner induction outlines clear expectations, rules and guidance in relation to safe use of technology.

Regular online enhancement courses are used to support apprentice/learner's knowledge and understanding of various safeguarding topics, including online safety.

Progress Reflections which are tri-party reviews between the Learning Coach, apprentice/learner and employer take place every 8 weeks. These meetings provide regular opportunities to monitor apprentice/learner's welfare and safeguarding and promote awareness of and educate apprentices/learners about relevant key issues / contextualised safeguarding.

Regular updates and CPD opportunities are provided to all Total People staff to improve their awareness of digital safety. Forums for this include:

- Weekly short online courses / updates in relation to security awareness
- Monthly Newsletters covering a variety of topics throughout the year, including digital safety
- Spotlight sessions at our All-Colleague Conferences
- Through Cluster meetings held by Curriculum and Performance Managers
- Through online learning courses (ETF Digital Safety)

Monitoring IT usage:

Colleagues:

Total People colleagues should only use Total People devices for any communication with apprentice/learners, potential apprentice/learners, colleagues, external agencies, employers, subcontractors. Personal devices must not be used for any business purposes.

All IT equipment is monitored and managed by the IT department.

All colleagues must read and sign the LTE groups Acceptable Use Policy (internal policy) and comply with all requirements listed in this policy.

Apprentices/learners:

All apprentices/learners must access systems through their own Total People apprentice/learner account when using Total People IT equipment.

All Total People IT equipment is monitored and managed by our IT department.

Firewalls are used to block specific online activity on all Total People's IT equipment.

In addition, Total People use 'impero' as a key safeguarding tool to monitor IT usage on Total People's equipment at Total People sites. This system identifies and flags key words, activities, images and phrases that may be a cause for concern. If any incidents are flagged by the 'impero' system this is instantly raised to the Safeguarding Team and / or HR as appropriate.

Learning Coaches and Tutors are expected to remain vigilant and alert in relation to use of technology, and as with all safeguarding concerns recognise, respond, record, report and review any concerns at the earliest possible opportunity.

Sources of support / information:

<https://www.saferinternet.org.uk>

[ETF Digital Safety](#)



<https://ceop.police.uk>

<https://childnet.com>

<https://NSPCC.org.uk>

Signatures & Review:

This policy will be reviewed in August 2023 prior to and in line with the next update to Keeping Children Safe in Education. The review date of this policy may be brought forward if there are any changes in legislation, national or local guidance before this date that are relevant to this policy. The policy will be communicated to all colleagues via I-Learn as well as being published on the Hub, on the Total People website and in the staff e-booklet issued on offer of employment.

	Name	Position	Signature
Approver:	Melanie Nicholson	Managing Director Total People	
Board Approver:	Barry Lynch	Total People Board Chair	
Version:	Version 3.1		