Safeguarding and Child Protection Policy

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Organisational Structure for Safeguarding at Total People

Managing Director for Total People - Melanie Nicholson

Organisational Lead for Safeguarding - Sophie Hayes

As organisational lead Sophie Hayes reports to Melanie and the board and works in partnership with Sophie England HR Business Partner in relation to any staff related safeguarding concerns.

The Designated Safeguarding Lead for learners is Imtiaz Kala. Imtiaz is the lead for all learner safeguarding issues and is also the Single Point of Contact for Prevent (SPoC).

There are 2 Deputy Designated Safeguarding Leads who can deputise for Imtiaz Kala when required. (Simone Healey and Leanne Shaw)

The learner safeguarding team can be contacted anytime internally or externally by emailing Safeguarding - Total People Safeguarding@totalpeople.co.uk

The staff safeguarding team can be contacted anytime internally or externally by emailing Staff Safeguarding and Welfare Concerns staffsafeguarding@totalpeople.co.uk

Further contact details can be found on page 12 of this policy.

Contact information is also published on our external facing website and displayed across our training centres – www.totalpeople.co.uk/about/safeguarding

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 as:

- Providing help and support to meet the needs of children **as soon as** problems emerge
- protecting children from **maltreatment**, whether that is within or outside the home, including online
- preventing the **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 enable all children to have the best **outcomes**.

Total People recognise the new safeguard additions relating to early help, wider maltreatment, and the online threats to all our learners.

Safeguarding as defined by the Care Act is:

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

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 identifies the significance of the Equality Act 2010 to school safeguarding, it states 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.
- Foster good relations between those who hold various protected characteristics.

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).

Total People also acknowledge the 'reasonable steps' that we must make to support staff against all forms of sexual violence and harassment, as well as recognising the protected characteristic of 'sex' being based on the biological at birth definition, whilst also maintaining the protection of those within 'gender reassignment' and 'sexual orientation' characteristics.

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.

New staff receive an EDI induction that focuses on their personal values, the LTE group values, and British Values, as well as reflecting on the topic of biases that can impact on our actions.

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, and 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
- Risk of abuse/grooming/scamming in the 'online world'
- Learners absent from education.

Total People recognise the link between abuse, neglect, and exploitation as per KCSIE.

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 (impero) 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 embedded throughout sector curriculums and will also include specifically designed live online enhancement courses.

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 2023
- Keeping Children Safe in Education 2025
- Information sharing 2024
- Children Missing Education statutory guidance 2016.
- Education Act 2002 (Amended 2011)
- Safeguarding & Vulnerable Groups Act 2006
- Sexual Offences Act 2003 (Amended 2018)
- Counter Terrorism Act and PREVENT Duty 2015 and Prevent Duty Guidance 2023
- 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
- Domestic Abuse Act 2021
- Worker Protection Act 2024 (Equality Act)

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
- ARC behaviours
- Attendance & Punctuality Policy
- LTE Group Modern Slavery
- Equality Policy
- Whistle Blowing Policy
- Code of Conduct

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 (Catherine Hill OBE), 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.

Head of Learner Experience /Organisational Lead for Safeguarding

- Embed Total People's safeguarding strategy.
- Embed Total People's safeguarding policies/procedures against legislation – staff and apprentice/learners.
- Develop and implement an annual calendar of safeguarding training for 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.
- Provide support and challenge to the DSL and Deputy DDSLs

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.
- Manage 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.
- Provide DSP training and offer safeguard support across all sectors as requested by Curriculum Performance Managers.
- Provide support and challenge to any TP / MOL colleague in relation to safeguarding.
- Complete regular sampling of safeguarding records via CPOMS and feedback to relevant people accordingly.
- Provide subcontractors / partners with induction and training into Total People's policy and CPOMS reporting tool.
- Maintain accurate records of DSLs / DSPs for each partner / subcontractor.
- Monitor the effective implementation of partners / subcontractors safeguarding policy and procedures, a minimum of 2 monitoring visits or meetings to take place each year.
- Provide support and challenge to partners / subcontractors as required.
- Complete regular sampling of CPOMS records for partners
- Conduct learner voice activities with learners supported by subcontractors / partners in line with the Learner Voice timetable.

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.
- Ensure CPOMS chronology is updated in a timely way for all learners on their allocated dashboard – see CPOMS guide for more information re: timely.
- Provide support and challenge to any TP / MOL colleague in relation to safeguarding.
- Provide support and challenge to partners / subcontractors as required.
- Complete DSP training as required.
- Critical Incident response team
- Attend specialist safeguarding training.
- Take part in supervision practices.
- Manage apprentice/learner disclosures and implement support package.

- Communication with external agencies to support apprentice/learner.
- Attend external safeguarding strategy meetings.

Operations managers

- Provide support and challenge to DSPs in relation to safeguarding (raising concerns, supporting learners, curriculum embedding) through one to ones.
- Ensure DSPs (in own line management) are effectively managing their CPOMS dashboards and chronology is updated in a timely way for all cases.
- Ensure CPMS / DSPs are using the safeguarding report tool to identify vulnerable learners, and that this information is fed through CPOMS where appropriate.
- Take part in supervision activities – this will usually be via the manager safeguarding bi-monthly meetings. If two consecutive meetings are not attended by any manager, then additional supervision meetings with the DSL will be arranged. Additional supervision meetings can be requested by any manager at any time.

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.
- Ensure CPOMS chronology is updated in a timely way for all learners on their allocated dashboard – see CPOMS guide for more information re: timely.
- 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 regular cluster meetings covering Safegurding, Prevent and EDI. (Contextualised to learner cohorts and industry areas). Also, to include a minimum of 1 individualised objective on colleague PDRs.
- Ensure key safeguarding messages are effectively embedded into their curriculums.
- Complete safeguarding training as required.
- Support site / cluster safe environment and security including third party locations.
- Form part of the critical Incident response team, coordinated by the DSL / DDSL/TLM
- Attend specialist safeguarding training.
- Manage apprentice/learner disclosures and implement support package, seeking advice from the DSL / DDSL as required / appropriate.
- Communication with external agencies to support apprentice/learner where required (in conjunction with DSL / DDSL)
- Attend external safeguarding strategy meetings where required (in conjunction with safeguarding advisor)
- Provide safeguarding events/awareness raising for own teams / curriculum areas.
- Take part in supervision activities – this will usually be via the manager safeguarding bi-monthly meetings. If two consecutive meetings are not attended by any manager, then additional supervision meetings with the DSL will be arranged. Additional supervision meetings can be requested by any manager at any time.

Designated Teacher / DSL and EHCP Lead

- 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.
- Where learners have an active EHCP ensure this is held securely and electronically on the agreed system (P Drive protected folder) and that review meetings take place timely and are tracked and documented. Where learners with an EHCP are monitored on CPOMS then the EHCP category will be selected so data can be effectively monitored.

All Total People Employees

- Know/understand/when/how to refer/report a staff/student safeguarding concern.
- To ensure all 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)*.
- Respond in a timely way to all actions set on CPOMS via the CPM/DSP or DSL.
- 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 Head of Learner Experience / 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.
- Oversee and provide training and support to the safeguarding team in relation to monitoring and filtering systems.

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.

- Conduct appropriate due diligence checks with due regard for safeguarding and child protection.
- Inform the Safeguarding and EDI lead of any new relationships with partners before contracts are signed.
- Share partners relevant policies and procedures with the Safeguarding Lead for support and challenge.
- Ensure all partners are aware of their responsibilities in relation to compliance with Total People's Safeguarding and Child protection policy.
- Ensure DSL / DSPs for each partner understands that all safeguarding and welfare concerns and information must be submitted via CPOMS.
- Provide the safeguarding and EDI lead with a list of all relevant contacts for each partner including the named DSP / DSL.
- Provide support and challenge to DSLs / DSPs for partners in relation to safeguarding (raising concerns, supporting learners, curriculum embedding) through monitoring activities.
- Ensure DSLs / DSPs for each partner are effectively managing their CPOMS dashboards and chronology is updated in a timely way for all cases.

Partners

- Comply with Total People's policy for safeguarding and child protection.
- Maintain accurate up to date vulnerable learner lists and share with TPs Safeguarding and EDI lead.
- Ensure all safeguarding and welfare information and concerns are reported via CPOMS.
- Seek support from Total People's Safeguarding and EDI lead as required.
- Ensure where learners have an active EHCP this is uploaded onto CPOMS.

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
- Organisational Lead for Safeguarding Manager: Sophie Hayes – SHayes@totalpeople.co.uk
- Safeguarding, Prevent and EDI Lead: Imtiaz Kala - IKala@totalpeople.co.uk

- Deputy DSL: Simone Healey – SHealey@totalpeople.co.uk
- Deputy DSL – Leanne Shaw – Lshaw@totalpeople.co.uk

Designated Safeguarding People

- Julie Podesta (Recruitment & Engagement) - JPodesta@totalpeople.co.uk
- Simone Healey (Childcare and Healthcare) – SHealey@totalpeople.co.uk
- Leanne Shaw (Study Programme)– LShaw@totalpeople.co.uk
- Cheryl Kelsall (Professional Services and Hospitality) - CKelsall@totalpeople.co.uk
- Kate Hull (HR) - HullK@totalpeople.co.uk
- Graham Watts (Auto-motive North, Electrical &Scaffolding) - GWatts@totalpeople.co.uk
- Jason Linney (AEB) – Jlinney@totalpeople.co.uk

Confidentiality and Information Sharing

Total People has due regard to GDPR and "Information sharing: advice for practitioners providing safeguarding services" 2024 DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers (publishing.service.gov.uk)

"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."

Key points to remember related to confidentiality and information sharing include:

- 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 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 work 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.

The DSL and Head of Learner Experience work in conjunction with the LTE group Data Protection Officer to minimise risks to data confidentiality, and safe usage.

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.

Staff should use the Total People Risk Guide to assist them in their decision making.

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). All staff are encouraged to log incidents using the 'signs of safety' approach focusing on what's going well and what we are worried about.

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. This is also highlighted in the new definition of KCSIE.

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.

Total People understand that Attendance & Behaviour can be linked and impact on learner's attendance (absence) and exiting provision. Total People have an integrated behaviour policy along with the CEIAG policy that aims to motivate and guide learners to remain in Education, Employment, Training (EET) and hence more likely to achieve their outcomes.

KCSIE 2024 adds additional information on absent learners and learners missing education. The difference is explained and managed via the Total People Attendance Policy as well as alerting the relevant local authority for those that leave the organisation so that they are exited to a partner organisation. The two guides below are referenced in the KCSIE 2024 guide.

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 application and enrolment process at Total People.

Where an unspent criminal conviction has been disclosed a risk assessment will be completed before a decision is made and documented about the learner commencing training with Total People. This will be completed by the relevant sector with support as required from the Safeguarding team. Contributions from relevant external agencies will be documented as part of this risk assessment. This risk assessment must be approved and signed off by the safeguarding and EDI lead or Head of Learner Experience before a learner can commence training with Total People, this is to ensure a safe and inclusive environment for all.

As an additional check Learner Records only process the start if the Safeguarding team confirm there is a current risk assessment completed.

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 DSL and Head of Learner Experience work with the Curriculum Performance managers to manage this risk and hold the information securely on CPOMS.

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).

Home Visits:

Within the context of safeguarding there may be occasions where a visit to the learners and or parents' home may be appropriate. Home visiting is one the many ways to intervene and provide

help as soon as problems emerge, with the aim of supporting learners' attendance and/or welfare. Examples when a home visit may be needed include but are not limited to …

- Learner missing education.
- Learners missing from education.
- Concerns for the learner's safety or welfare, where alternative communication methods have been unsuccessful in relation to providing assurance about the learner's safety and / or welfare.
- Learners with known SEND and Mental Health concerns, where a home visit could provide an appropriate intervention method to engage or re-engage learners into education with Total People.
- Concerns around neglect/abuse/exploitation/grooming/county line (as examples.

Before any member of staff can visit a learner and or parent in their home a risk assessment must be completed and signed off by the DSL or one of the DDSLs. The risk assessment will include the documented reason for the visit as well as identifying possible hazards and appropriate control measures. Control measures will include but not be limited to ensuring that visits …

- Are pre-arranged wherever possible.
- Are conducted in pairs.
- Always include the parent / carer / guardian where learners are under 18 or where capacity may be in question.
- Are communicated with relevant people including managers and the safeguarding team.

Any staff conducting a home visit will have their mobile phone with them. Their manager and the safeguarding team / DSL will be aware of the date and time of the visit which will be documented on the risk assessment and the colleague's digital calendar. Contact will be made with the relevant manager or member of the safeguarding team immediately following the visit.

Staff will not enter the home if learners are under 18 and there are no suitable adults present.

Approved risk assessments will be uploaded to CPOMS by the DSL or DDSL.

The safeguarding team will work in partnership with other relevant agencies where a home visit is required. These may include but will not be limited to…

- Children or Adult social care.
- Early help services.
- Housing support.
- Targeted youth support services such as CAMHS.

It is important to recognise that when visiting learners in their homes staff may be alerted to wider safeguarding concerns, some examples could include…

- Domestic Violence.
- Extremism symbols / displays in the home.
- Overcrowding.
- Safety issues.
- Poverty.

Any additional concerns identified during a home visit must be raised via the usual reporting process. Advice and guidance can be sought at any time from managers (DSPs) or the DSL or DDSL.

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 via this email at staffsafeguarding@totalpeople.co.uk

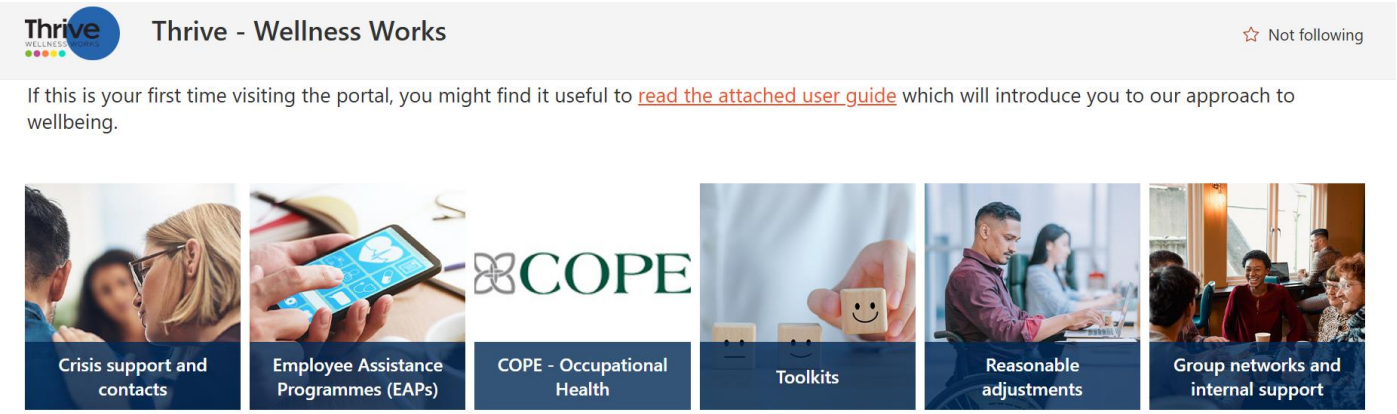
Where a concern is about an employer then the apprentice/learner concern record (Total People website) can be used. Or a concern can be shared directly with HR or Total People's Safeguarding Lead.

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 have access to our Thrive Wellness Works section on the company Hub Thrive - Wellness Works - Home.

Thrive wellness on the hub / company intranet provides a wealth of information that any colleague can access at any time.



Any Total People colleague can access free external support, advice, and guidance through our employee assistance programme. This is a completely independent and confidential service. For Total People UNUM Help@Hand provides this. Services include but are not limited to:

- 24/7 helpline
- 24/7 remote GP
- Mental Health Support
- Physiotherapy
- Financial and legal support

Access more information

- By visiting - Employee Assistance Programmes
- By visiting - Welcome to the Wellbeing Hub
- By downloading and accessing the App via the links provided in your welcome email when joining Total People – for more information / or to be provided with the link to access the

App you can contact Sophie England (SEngland@totalpeople.co.uk) or Lisa Good (LGood@totalpeople.co.uk) (Please note links provided expire after 24 hours)

- Contacting UNUM by phone: 08083 043 698.

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 online platform:

- Introduction to Health & Safety
- Health & Safety at Work
- Safeguarding in FE – All colleagues
- Safer Recruitment – All colleagues with a responsibility for staff recruitment
- Prevent
- Equality, Diversity & Inclusion
- Keeping Children Safe in Education

Total People colleagues also attend an 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.

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 mandatory training schedule is followed.

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

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 bi-monthly safeguarding meetings attended by DDSLs, DPs and relevant managers. In addition, monthly Safeguarding emails with key information, updates and useful resources are shared with this wider safeguarding group, as well as bi-monthly newsletters that are published on our website and shared with colleagues, learners, and employers.

Additional enrichment live on-line courses are delivered 4 times per year by the Safeguarding Lead. These courses cover a range of relevant hot topics in relation to promoting welfare and raising awareness of various forms of abuse and keeping safe online.

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 – conducted on a regular 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 / Partners:

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.

The Operations Manager for Partnerships is responsible for engaging the DSL during the due diligence process of any new partners, so the DSL is kept up to date of all relevant partnership relationships.

The DSL will complete a minimum of two support and challenge visits with each partner per annum and will seek the following information from the partnership OM. These can be combined with the on-going monitoring visits and informal telecalls completed by the DSL and partnership team wherever possible.

Due diligence checks will provide assurance to the DSL and will include, but are not limited to:

- Designated Safeguarding Lead - contact
- Delivery locations
- Relevant safeguarding, attendance, behaviour, Prevent and EDI policies.

- Staff training
- Process for identification of vulnerable learners
- Mental Health offer for learners
- Attendance records / monitoring systems
- Online filtering and monitoring systems
- Learners with convictions and their associated risk assessments

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.
- Engage with Total People's DSL.
- Comply with Total People's policy for safeguarding and child protection.
- Maintain accurate up to date vulnerable learner lists and share with TPs Safeguarding and EDI lead.
- Ensure all safeguarding and welfare information and concerns are reported via CPOMS.
- Seek support from TPs safeguarding and EDI lead as required.
- Ensure where learners have an active EHCP this is uploaded onto CPOMS.

Subcontractor reporting:

Subcontractors may use their own reporting systems to record all safeguarding concerns. However, in addition partners must use Total People's CPOMS reporting system to log any / all safeguarding and welfare concerns, including any relevant safeguarding information.

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 bi-monthly director level safeguarding meetings
- Holding bi-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 (Teaching and Learning Toolbox on TEAMS)



Teaching and learning tool box

Digital Safeguarding: the online world and AI

"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."*

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 AI/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/safeguarding awareness
- Bi-monthly newsletters covering a variety of topics throughout the year, including digital safety and British Values
- Spotlight sessions at our All-Colleague Conferences
- Through Cluster meetings held by Curriculum and Performance Managers
- Through online learning courses (ETF Digital Safety)
- Learner and coach sessions including 1 to 1s, observations, group learning and reviews.

Through these events and more learners/staff can:

- Develop their critical thinking and questioning skills when faced with online/AI matters and develop their 'digital citizenship' using the online platform safely and with respect.
- Be able to spot the signs of deep fakes, mis/dis information, online bullying, grooming, sextortion, and radicalisation. These are just a few examples.

Advances in technology

Total People are aware of the continuous developments in the online world, including the increased focus and use of AI in education.

Total People will comply with all LTE group policies and guidance relating to the use of AI.

Total People will remain mindful when using AI in education, ensuring that it is used safely and in line with DfE guidance.

The following are some examples of the considerations Total People will be mindful of.

- *Understand t limitations: AI isn't perfect, and outputs may be harmful, inaccurate, outdated, biased, or offensive. Human involvement and quality assurance is essential. You need to be sure as a leader when promoting any use that the potential outweighs the risks.*
- *Apply the basics: reinforce existing online safety education.*
- *Keep data secure: protect personal information when using AI tools and be aware of data protection settings. Follow legal guidance, such as the Data Protection Act and UK GDPR.*
- *Stay vigilant: be aware of the realistic nature of AI-generated content and the potential for scams. The safe and effective use of AI in education, DfE, June 2025*

Total People provide on-going education to learners that is critical to personal safety in the online world and when using AI. For example, learners are encouraged

- to develop critical thinking skills
- to challenge biases
- to raise concerns swiftly
- to challenge, debate and discuss difficult topics
- to be receptive to guidance, support and accessing services

These skills are essential when adding the 'human' to the use of AI.

Sources of support and guidance regarding the use of AI

Generative artificial intelligence (AI) in education - GOV.UK

Using AI in education settings: support materials - GOV.UK

Generative AI: product safety expectations - GOV.UK

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, Impero is the key LTE group IT filtering and monitoring system that works alongside the learner online code of conduct and behaviour management policy. Total People will consult the DfE (2023) standards on filtering/monitoring and cyber security where appropriate to manage our learners and staff online safety.

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.

Any safeguarding concerns are followed up using the process that exists for all safeguarding incident reporting, either logging on CPOMS or submitting via the online Safeguard report tool on the Total People website.

Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)

Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)

Sources of support / information:

https://www.saferinternet.org.uk

ETF Digital Safety

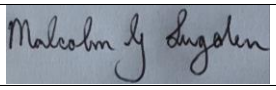
https://ceop.police.uk

https://childnet.com

https://NSPCC.org.uk

Signatures & Review:

This policy will be reviewed in June 2025 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:	Malcolm Sugden	Chair of Total People Board	
Version:	Version 6.1		

Appendices / quick reference guides:

H&S employer and learner check process – page 24/25/26/27

Child on child sexual harassment and violence – page 28/29

Image sharing – 30/31/32

Levels of Risk Guide

CPOMS – How to guides.

TPL018- CPOMS-Student Import Process-Total People

TPL030-CPOMS-Logging in to Total People CPOMS

TPL031 -CPOMS-Adding an incident responding to actions

The role of the DDSL / DSP – pages 33 - 39

Additional information:

There is a wide variety of information available in the Teaching and Learning Toolbox – Teams site, Safeguarding and EDI channel.

Appendix 1: Health and safety on-boarding process 2025

This process applies to all learners / apprentices that are employed or on a placement as part of their programme.

The health & safety employer check (part 1) is completed with all employers and placement providers before a learner can start training with Total People.

This process is used to satisfy Total People that the employer / placement provider has assessed associated risks for apprentices / learners and has sufficient risk management arrangements in place. The employer has primary responsibility for the Health and Safety of students.

Step 1 – H&S Employer Check - part 1

All employers to have a H&S part 1 in place before a learner can be signed up onto programme (per employer every 3 to 5 years decided by risk rating)

- Can be completed remotely.
- Completed at head office site.
- For sales starts - completed by sales team.
- For operational starts - completed by LC.

*Form can be sent to employers to help them prepare for remote visit with Sales or LC. Sales / LC **must complete discussion with employer and ensure sufficiency and accuracy of information**.*

NB: Part 1 invalid = Employer – change of ownership / major re-development of premises / change of premises / no employer contact for 6 months/ serious accident or H&S incident.

Step 2 – Health, Safety and Well-being Young Person Assessment- part 2

- Completed for all Apprentices under 18 and under 25 with an EHCP, completed for all Study Programme learners on a placement.
- **To be** completed at the employer's premises with the learner and employer, **can be completed live online if the employer premises has been visited by the LC in the last 3 months.**
- PicsWeb form submitted with the start.
- Reviewed by learner, employer, and LC at first review.

Step 3 – Learner Induction (employer) - part 3

- Completed via OneFile.
- Completed for every learner who is employed or on a placement.
- Checked by LC this has been completed at first review.

Step 4 – Learner Induction (workshop) - part 4

- Completed via OneFile.
- Completed by all learners who attend practical workshop training at a TP workshop, and to be completed on or before the training begins (RAC / Scaffolding / Automotive and Engineering)

Occupational Areas – Risk Rating:

Occupational Employer Environment	Risk Rating
Engineering	High
Electrical	High
Scaffolding	High
Refrigeration and Air conditioning	High
Automotive	High
Hospitality	Medium
Professional Services	Low
Childcare	Low

Revisiting of Part 1

- High risk bandings – every 3 years
- Medium risk bandings – every 4 years
- Low risk bandings – every 5 years

Vulnerable learners:

All Curriculum Performance Managers / Designated Safegurding People are responsible for regularly reviewing their list of vulnerable learners (including all learners under 18 and under 25 with an EHCP). Vulnerable learner lists are held by CPMS and shared with relevant Operation Managers to ensure support and challenge is in place. These are also shared / discussed with the safeguarding team as needed.

Where a specific safeguarding issue / vulnerability had been identified by the CPM through this process then this information will be detailed on our CPOMS (secure / electronic) safeguarding records.

Progress Reviews:

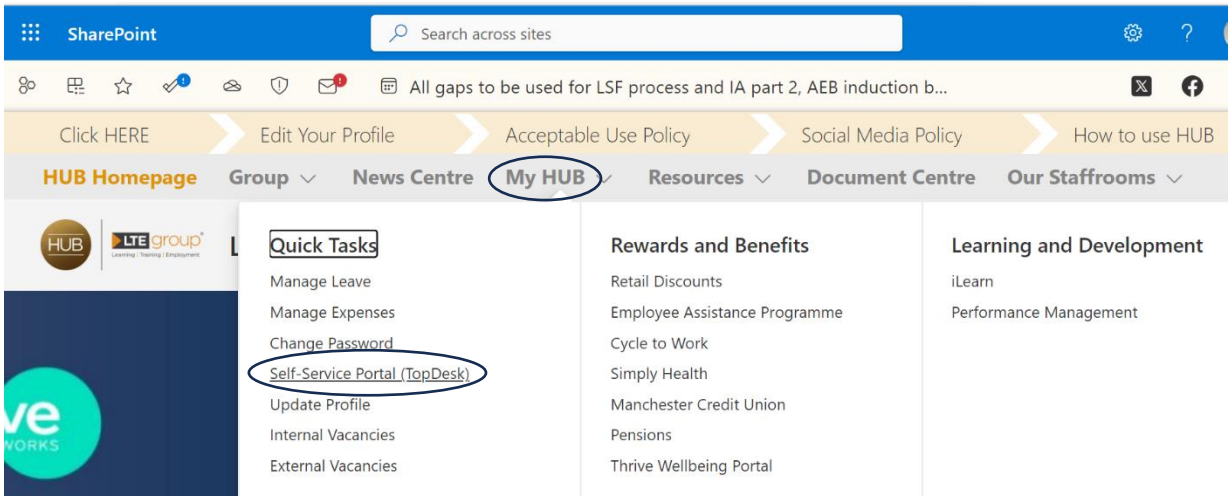
Progress Reviews incorporate regular reviews / updates relevant to learners' health and safety following on from the onboarding and induction process, they provide opportunities to build on learner's knowledge and check their understanding in relation to health and safety and their job role. Progress Reviews are tri-party reviews between Total People, the learner and employer and must include contributions and involvement from the employer. Total People favour a blended learning approach to delivery and therefore it may be appropriate to complete remote reviews. However, where learners are working in high-risk industries reviews are planned to take place at employer's premises wherever possible. Where learners are working in **high-risk industries** the following applies

- Under 18 or under 25 with an EHCP all reviews will be completed at the workplace
- For all other learners at **least,** every other review will be completed at the workplace.

Accident Reporting:

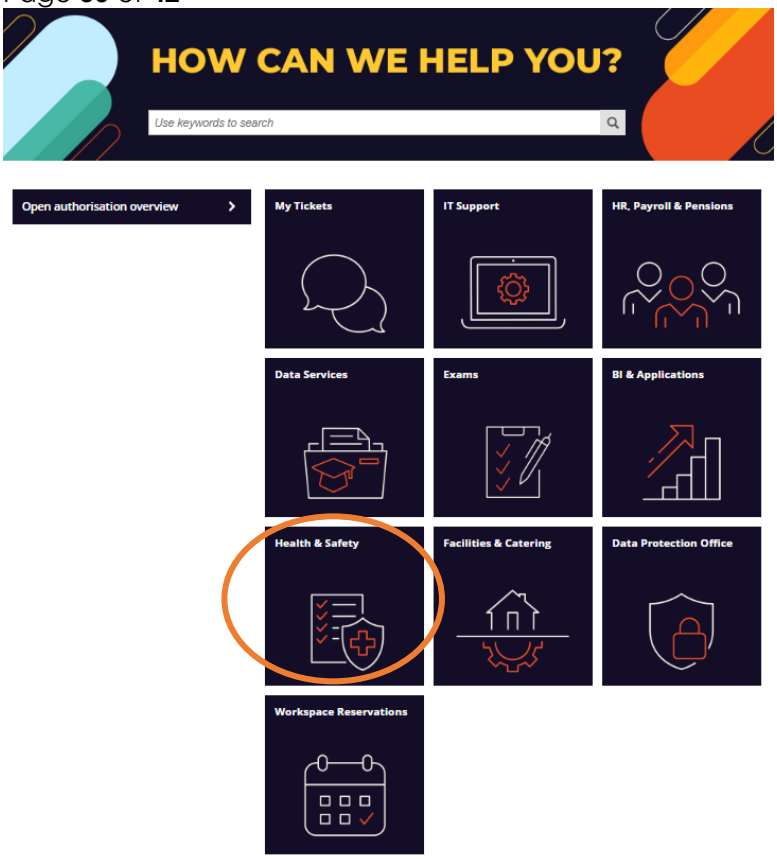
All accidents or near miss accidents that happen in the workplace or at a Total People site must be reported electronically as per LTE requirements. Any Total People colleague can report an accident or near miss. The Curriculum Performance Managers (DSPs) and Health and Safety manager are available for support and guidance in relation to reporting and responding to accidents. Any Total People colleague can report an accident or near miss via the Top Desk system.

1. Visit the Hub, this can be accessed via phones. **My Hub / Self Service Portal** (Top Desk)

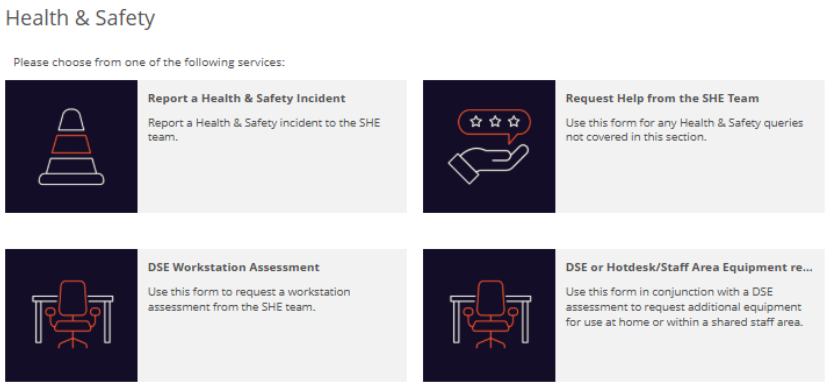


[Home Page - Self-Service Portal]

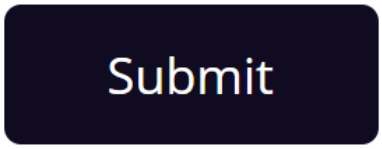
2. **Select report a SHE incident.**



3. Select the best fit category for your concern / report.



4. Complete the record and click submit.



Child-on-child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

Staff working with children (under 18 years) should maintain the attitude 'it could happen here'.

Children's sexual behaviour exists on a wide ***continuum**, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously. between the two. HSB should be considered in a child protection context. (*For more information click here)

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Schools and colleges should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college.

Dos and don'ts

DO – make it clear that Total People have a zero-tolerance approach to sexual violence and sexual harassment – it is NEVER acceptable.

DO – be quick to challenges inappropriate language and inappropriate physical behaviour.

DO – emphasise / educate though appropriate opportunities within the curriculum or through conversations, healthy relationship, and appropriate respectful behaviour.

DO – discuss concerns with relevant Designated People or the Designated Safeguarding Lead or Deputies.

DO – report all incidents (via CPOMS or the webform), concerns relating to sexual violence or sexual harassment (no matter how small, harmless this may appear)

DO – remain vigilant, listen to concerns and take any allegation seriously.

DO – understand that behaviours can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why education and challenge are so important in building an effective safeguarding culture.

DO – access support from wider local and national agencies as well as the safeguarding team.

DO NOT – feel alone when dealing with sexual harassment or sexual violence, contact a member of the safeguarding team who will be able to help and who will be able to provide advice and guidance in relation to the appropriate actions to be taken and support available.

DO NOT – promise confidentiality.

DO NOT – investigate the incident, listen, use appropriate questions (TED technique)

DO NOT – dismiss low level behaviour as "banter" "just having a laugh" "part of growing up" "boys will be boys".

Support:

The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies).

Support from specialist sexual violence sector organisations such as 'Rape Crisis' or 'The Survivors Trust'.

The 'Anti-Bullying Alliance' has developed guidance for schools about Sexual and sexist bullying.

Sharing images under 18:

Taking, making, sharing and possessing indecent images and pseudo-photographs of people under 18 is illegal. pseudo-photograph is an image made by computer-graphics or otherwise which appears to be a photograph.

This can include:

- photos
- videos
- tracings and derivatives of a photograph
- data that can be converted into a photograph.

Definitions of some of the terms used in the legislation are:

- 'indecent' is not defined in legislation but can include penetrative and non-penetrative sexual activity.
- 'making' can include opening, accessing, downloading and storing online content.
- 'sharing' includes sending on an email, offering on a file sharing platform, uploading to a site that other people have access to, and possessing with a view to distribute.

Indecent photographs of children:

- under the **Protection of Children Act 1978** (as amended), the UK has a strict prohibition on the taking, making, circulation, and possession with a view to distribution of any indecent photograph or pseudo photograph of a child and such offences carry a maximum sentence of 10 years' imprisonment.
- section 160 of the **Criminal Justice Act 1988** also makes the simple possession of indecent photographs or pseudo photographs of children an offence and carries a maximum sentence of 5 years' imprisonment.
- there are defences for those aged over the age of consent (16) who produce sexual photographs for their own use within a marriage or civil partnership; these defences are lost if such images are distributed.

The term 'making' could include:

- opening an attachment to an email containing an image
- downloading an image from a website onto a computer screen
- storing an image in a directory on a computer
- accessing a website in which images appeared by way of an automatic "pop up" mechanism.

Types of examples covered by these laws could include the following:

- a person under the age of 18 who creates, possesses and/or shares sexual imagery of themselves with a peer under the age of 18 or adult over 18.
- a person under the age of 18 who possesses and/or shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult over 18.
- a person over the age of 18 who creates, possesses and/or shares sexual imagery of a person under the age of 18.

It is important that learners are advised of the legislation and consequences of sharing and/or making images in line with the sentences described above. Sessions should be carried out with learners as part of the general safeguarding culture within teaching and learning environment, one to ones, reviews, assessments, and any other opportunities where interaction takes place between the learning coach and the learner.

Dos and Don'ts:

DO - Report it to your Designated Safeguarding Lead (DSL).

DO – record the incident on CPOMS as soon as possible following the incident.

DO - explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

DO NOT - view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.

DO – report (as soon as possible) to the DSL and seek support, if you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to)

DO NOT - delete the imagery or ask the young person to delete it.

DO NOT - ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

DO NOT - share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers. (In most cases parents will need to be informed but advice needs to be sought from the DSL or deputy).

DO NOT- say or do anything to blame or shame any young people involved.

If you have any suspicion or concerns that a child may be at risk, always contact the police. If a child is in immediate danger, dial 999 and ask to speak to the police.

Sources: Home Office

Indecent images of children: guidance for young people - GOV.UK (www.gov.uk)

Sharing nudes and semi-nudes: how to respond to an incident (publishing.service.gov.uk)

Sources of support:

Internet Watch Foundation – an independent charity that aims to help victims of child sexual abuse worldwide by identifying and removing online sexual imagery of under 18s, offering a place for the public to report suspected indecent images of children anonymously.

Marie Collins Foundation – a charity enabling children who have suffered sexual abuse and exploitation online to recover and live safe, fulfilling lives.

National Crime Agency CEOP – a command of the NCA working with child protection partners across the UK to identify and eradicate threats to children.

Samaritans – a suicide prevention charity with a 24-hour confidential helpline.

NSPCC – a charity working to protect children and prevent abuse.

Stop It Now! – a child abuse prevention campaign and anonymous helpline for individuals worried about their own sexual thoughts or behaviour towards children or that of others.

The role of the DSL

Managing referrals

- Refer cases of suspected abuse and neglect to the local authority social care services and or any other support agencies as appropriate – for all learners
- Support staff who make have raised concerns that lead to referrals to the local authority social care services.
- Refer cases to the Channel programme where there is a concern for radicalisation.
- Support staff who raise concerns around extremism
- Work with HR and Head of Learner Experience in referring cases to the Disclosure and Barring Service where a person is dismissed or leaves due to risk or harm to a child.
- Work with HR and Head of Learner Experience to refer cases to the police where a crime may have been committed.
- Oversea the referral/vulnerable register of cases referred into children and adult services.
- Support the safeguarding rota Monday to Friday with the DDSLs

Working with staff and other agencies

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners including social care.
- Inform the Head of Learner Experience and Curriculum and Performance Managers of safeguarding issues, especially ongoing enquiries of 'harm' under section 47 of the Children Act 1989 and Section 42 of the Care Act 2014
- Liaise with HR, the Head of Learner Experience and the local authority designated officer(s) (LADO) for protection concerns in cases which concern a staff member.
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the LTE EDI & mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Total People senior management team, relevant strategic leads, taking lead responsibility for promoting educational outcomes by:
    - Identifying the impact that safeguard issues might be having on learner's attendance, engagement and achievement with employers.
- Provide staff with training, models and research via Curriculum and Performance Managers and the colleague learning community portal, and the Hub.

Managing the Safeguard protection file

- Ensure safeguard vulnerable register is kept up to date.
- Keep information confidential and store it securely.
- Ensure CPOMS records include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome.
- Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE) and GDPR/information sharing guidance (2018)
- Be responsible for closing the High-risk cases on CPOMS when appropriate.
- Where learners leave the organization:
- Ensure their file is securely transferred to the new institution as soon as possible, with a receipt of confirmation.
- Consider whether it would be appropriate to share any additional information with the new institution before the learner leaves, to help them put appropriate support in place.

Raising awareness

- Ensure each member of staff has access to, and understands, Total People's safeguard, Prevent and Equality policy and procedures, especially new and part-time staff.
- Work with the Board to ensure the policies are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.
- Ensure the policies are available publicly and partners are aware that referrals about suspected abuse or neglect may be made and the role of Total People in this.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Deliver in house training to staff, new starters and new learners starters.
- Keep DDSL and DSP training up to date.
- Help promote educational outcomes by sharing information with staff about the welfare, safeguarding and protection issues that learners who have or have had a social worker are experiencing.
- Meet with the DDSLs on a regular basis to discuss issues between the DSL and DDSLs
- Share actions with DDSLs and DSP regarding the Prevent Action Plan

Training

- Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the 'Training, knowledge and skills' section of annex C.
- Undertake Prevent awareness training.
- Refresh knowledge and skills at regular intervals and at least annually
- Deliver safeguard refresher sessions for staff and work with HR to keep the register updated.
- Deliver safeguard induction input for new learners and staff.
- Work with HR on staff training compliance

Providing support to staff

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters – talk through cases and good practice.
- Support staff during the referrals process
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Chair monthly safeguard meetings with Curriculum and Performance Managers and send regular email comms.
- Upload safeguard info onto the colleague learning community and Hub
- Share monthly and quarterly safeguard in action and newsletters over the year.
- Provide follow up of the impero IT online alerts with Curriculum and Performance Managers and DDSLs where appropriate.

Understanding the views of learners

- Encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, and in any measures the employers/placement may put in place to protect them.
- Understand the difficulties that learners may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
- Participate in learner voice work that ensures that learners understand the impact of safeguarding, British Values, and their role in society as citizens.

Holding and sharing information

- Understand the importance of information sharing, both within the organisation, with other colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Keep detailed, accurate, secure written records of concerns and referrals on CPOMS.

- Manage the Prevent risk assessment and action plan and task actions for teams to ensure risks are minimized.

The role of the DDSL

Deputy DSLs will be allocated some medium risk cases via CPOMS and will deputise for the Safeguarding Lead when necessary.

Managing referrals

- Raise cases of suspected abuse and neglect with staff at team meets, one to ones so that referrals can be made to the DSL for consideration with the local authority social care services and or any other support agencies as appropriate.
- Liaise with employers and other agencies where appropriate where threshold is not met to refer to social care services.
- Support staff who make have raised concerns that lead to referrals to the local authority care services.
- Refer cases to the DSL to make referrals to the Channel programme where there is a radicalisation concern.
- Support staff who raise concerns around extremism
- Work with DSL, HR and Head of Learner Experience in referring cases to the Disclosure and Barring Service where a person is dismissed or leaves due to risk or harm to a child.
- Work with DSL, HR and Head of Learner Experience to refer cases to the police where a crime may have been committed.
- Support the referral register of cases referred into children and adult services.
- Support the safeguarding rota Monday to Friday with the DSL

Working with staff and other agencies

- Act as a source of support, advice and expertise for all staff within their cluster
- Act as a point of contact with the safeguarding partners alongside the DSL
- Inform the Head of Learner Experience and Curriculum and Performance Managers of safeguarding issues, especially ongoing harm enquiries under section 47 of the Children Act 1989 and Section 42 of the Care Act 2014
- Liaise with DSL, HR, the Head of Learner Experience and the local authority designated officer(s) (LADO) for protection concerns in cases which concern a staff member.
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Work with the DSL from the LTE Safeguard, EDI & mental health meetings where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Total People senior management team, relevant strategic leads, taking lead responsibility for promoting educational outcomes by:
- Identifying the impact that safeguard issues might be having on learner's attendance, engagement and achievement with employers.

Managing the Safeguard protection file

- Ensure safeguard protection register is kept up to date alongside the DSL.
- Keep information confidential and store it securely.
- Make sure CPOMS records include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome – provide support to the coaches and DSPs.
- Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE) and GDPR/information sharing guidance (2018)
- Close medium risk cases on CPOMS where required.
- Where learners leave the organization:

- Ensure their file is securely transferred to the new institution as soon as possible, with a receipt of confirmation.
- Consider whether it would be appropriate to share any additional information with the new institution before the learner leaves, to help them put appropriate support in place.

Raising awareness

- Ensure each member of staff has access to, and understands, Total People's safeguard, Prevent and Equality policy and procedures, especially new and part-time staff.
- Work with the Head of Learner Experience, DSL, and Board to ensure the policies are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing information with staff about the welfare, safeguarding and protection issues that learners who have or have had a social worker are experiencing.
- DSL and DDSL to meet on a regular basis to peer support and raise issues re: the roles.
- Support the actions of the Prevent Action Plan

Training

- Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the 'Training, knowledge and skills' section of annex C.
- Undertake Prevent awareness training.
- Refresh knowledge and skills at regular intervals and at least annually
- Support DSL to deliver safeguard refresher sessions for staff across the Total People
- Support safeguard induction input for new learners and staff

Providing support to staff

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.
- Support staff during the referrals process
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Champion safeguarding across the organization
- Support the DSL and Head of Learner Experience with impero online alerts that have been raised from learners' activities online.

Understanding the views of learners

- Encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, and in any measures the employers/placement may put in place to protect them.
- Understand the difficulties that learners may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

- Understand the importance of information sharing, both within the school, with other schools and colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Keep detailed, accurate, secure written records of concerns and referrals.
- Support DSL and Head of Learner Experience with the Prevent risk assessment and action plan and task actions for teams to ensure risks are minimised.

The role of the DSP *(for own cluster areas)*

Curriculum and Delivery Managers are DSPs for their own cluster areas. All low-level concerns on and some medium level concerns will be allocated to relevant DSPs via CPOMS.

Managing referrals

- Raise cases of suspected abuse and neglect with staff at team meets, one to ones so that referrals can be made by the DSL to the local authority, social care services and or any other support agencies as appropriate.
- Support staff who make have raised concerns that lead to referrals to the local authority care services.
- Refer cases to the DSL to make referrals to the Channel programme where there is a radicalisation concern.
- Support staff who raise concerns around extremism
- Work with DSL, HR and Head of Learner Experience to refer cases to the police where a crime may have been committed.
- Support the referral register of cases referred into children and adult services by keeping safeguarding at as an agenda item at cluster meetings and discussing vulnerable learners on one to ones.
- Where cases do not meet social care referrals, Curriculum and Performance Managers to work with appropriate support agencies such as mental health, domestic abuse, local charities, employers, and others as appropriate.

Working with staff and other agencies

- Act as a source of support, advice and expertise for all staff within their cluster
- Act as a point of contact with the safeguarding partners alongside the DSL and contribute to the monthly safeguard cluster meetings.
- Inform the DSL and Head of Learner Experience of safeguarding issues, especially ongoing harm enquiries under section 47 of the Children Act 1989 and Section 42 of the Care Act 2014
- Liaise with DSL, HR, the Head of Learner Experience and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that learners needs are considered holistically.
- Work with the DSL with actions from the LTE Safeguard and EDI meetings where safeguarding concerns are linked to mental health and raise initiatives within team meetings and learning coaches.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Ensure that safeguarding, EDI and mental health are integrated into the curriculum, teaching, and learner voice/feedback and evidenced in ALL documents.
- Team meetings have agenda item on safeguard and EDI each time they are held.
- Discuss within these meetings whether learners have safeguard issues or known to social care services so that the register can be maintained.
- Keep records of these meetings as evidence
- Work with the Total People senior management team, relevant strategic leads, taking lead responsibility for promoting educational outcomes by:
- Identifying the impact that safeguard issues might be having on learner's attendance, engagement and achievement with employers.

Managing the Safeguard protection file

- Ensure safeguard protection register is kept up to date alongside the DSL by alerting DSL/DDSL of new referrals and changes of existing learners.
- Keep information confidential and store it securely.
- Ensure CPOMS records include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome – provide support to the coaches and learners.

- Question and support coaches where safeguard concerns may not be being inputted into CPOMS in a timely way.
- Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE) and GDPR/information sharing guidance (2018)
- Respond to actions on CPOMS in a timely manner.
- Managing the closure of the low risks on CPOMS
- Where learners leave the organization:
- Ensure their file is securely transferred to the new institution as soon as possible, with a receipt of confirmation.
- Consider whether it would be appropriate to share any additional information with the new institution before the learner leaves, to help them put appropriate support in place.

Raising awareness

- Ensure each member of staff has access to, and understands, Total People's safeguard, Prevent and Equality policy and procedures, especially new and part-time staff.
- Ensure displays, notices, communications and messages sent by the DSL and Head of Learner Experience are cascaded within teams and on show where appropriate – DSL and British Values displays across all Total People sites.
- Work with the Head of Learner Experience, DSL, and Board to ensure the policies are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.
- Link with safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Follow up all mandatory safeguard attendance requirements for coaches including key areas such as sexual violence and harassment, Prevent and Safeguarding
- Have safeguard as an agenda item at team meetings and on one to ones with coaches to raise the profile of safeguarding. This may include as an objective set within personal coach targets.
- Help promote educational outcomes by sharing information with staff about the welfare, safeguarding and protection issues that learners who have or have had a social worker are experiencing.
- Discuss safeguarding/EDI at the cluster manager meetings within the big 4 themes and how they link to safeguarding and H&S
- Ensure actions within the Prevent Action Plan are completed within their teams.

Training

- Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the 'Training, knowledge and skills' section of annex C.
- Undertake Prevent training.
- Refresh knowledge and skills at regular intervals and at least annually
- Participate and support the DSL when delivering safeguard refresher sessions for staff across the Total People network.
- Support safeguard induction input for new learners and staff
- Encourage staff to become safeguard and EDI champions within the cluster to cascade key messages.

Providing support to staff

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters – leading by example as the designated safeguard person.
- Support staff during the referrals process by liaising with the DSL
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Attend and contribute positively to monthly safeguard meetings with Curriculum and Performance Managers, taking actions and feeding back actions.
- Work with employers and/or sub-contractors to ensure they maintain their safeguard, Prevent and EDI/H&S duties for staff and the learners.

- Curriculum and Performance Managers to complete monthly one to ones and PDRs that capture safeguarding and welfare as well as performance reviews.
- Support coaches with learners that may have had impero online alerts raised.

Understanding the views of learners

- Encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, and in any measures the employers/placement may put in place to protect them.
- Understand the difficulties that learners may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication with learner reviews and at key milestones.
- Participate in learner voice surveys ensuring that learners understand the contextual learning of safeguard messages delivered by the coaches – including progress reflections, direct observations, professional discussions, webinars, group training, and any other appropriate areas of meetings.

Holding and sharing information

- Understand the importance of information sharing, both within the school, with other schools and colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Liaising with all employers and partners within the scope of the principles of information sharing
- Keep detailed, accurate, secure written records of concerns and referrals.
- Contribute to the Prevent risk assessment and action plan and task actions for teams to ensure risks are minimised.