Safeguarding Policy

Key Personnel

1.1. Jack Edwards is the **Designated Safeguarding Lead (DSL)** and will have overall accountabilities for all policies and procedures relating to safeguarding, welfare, Prevent Duty and British Values. Specific duties are highlighted within this policy, but the DSL will implement all necessary measures to develop and maintain a culture of safeguarding and welfare.

1.2. There are 3 **Designated Safeguarding Officers (DSO's):** Emil Taswar and Jessica Jones and Cheryl Dunn. These 3 officers will deputise for the DSL in their absence. They will have responsibility for upholding and promoting the aims and purpose of this policy, supporting the DSL to develop and maintain a culture of safeguarding and to complete the specific tasks referred to in this policy.

2. Policy Context and Scope

2.1. This policy relates to all activities of Leaping Man Learning Limited trading as Swift.

2.2. All references to "Swift" below should be recognised as pertaining to Leaping Man Learning Limited.

2.3. All references to "learners" below should be recognised as pertaining to "apprentices" and vice versa.

2.4. All stakeholders working with, working for, or in learning with Swift are expected to comply with this policy, including employers. For the avoidance of doubt, all contracts entered by swift will be covered by this policy, including those for contract, volunteers and contractors.

2.5. This policy will apply from the initial engagement of all relationships with stakeholders. This includes the recruitment process for Learners and apprentices, employees, volunteers and contractors.

3. Policy Statement

3.1. Swift is fully committed to safeguarding the welfare of all stakeholders. Swift will take all reasonable steps to safeguard the welfare, health, safety and well-being of all stakeholders, including and particularly children, young people and vulnerable adults.

3.2. The company commits to creating an environment for employees, Learners and apprentices that:

3.2.1. Promotes British Values.
3.2.2. Safeguards welfare.
3.2.3. Reduces the risk of exposure to violence.

3.2.4.   Reduces the risk of exposure to abuse.

3.2.5.   Reduces the risk of exposure to extremism.

3.2.6.   Reduces the risk of exposure to discrimination.

3.2.7.   Reduces the risk of exposure to victimisation.

3.2.8.   Reduces the risk of exposure to exploitation.

3.3. All stakeholders, by working with Swift confirm that they will conduct themselves in a manner that upholds Swift's commitment to safeguarding individuals and in accordance with this policy.

3.4. Swift embeds the principles of the 5 R's; Recognition, Response, Reporting, Recording, Referral.

4.   Policy Aims and Objectives

4.1. Swift believes it is unacceptable for any person to experience abuse, violence, discrimination etc. of any kind. This is particularly abhorrent if it involves a vulnerable group, such as children, young people or vulnerable adults.

4.2. This policy has been developed to outline the responsibilities of employees, volunteers, contractors, sub-contractors, employers, learners and apprentices and other stakeholders for the recognition, reporting and prevention of abuse.

4.3. This policy provides the overarching principles of the organisation concerning Safeguarding.

4.4. This policy should be read in conjunction with The Safeguarding Processes, The Equality and Diversity Policy, Learner Code of Conduct and Employee Code of Conduct.

4.5. The Safeguarding Processes provide a detailed framework within which all staff should operate when dealing with safeguarding concerns.

4.6. Swift is committed to the following objectives:

4.6.1.   To recognise that all children and vulnerable adults regardless of gender, religion, age, ethnic origin, disability, and sexuality, learning difficulties or any other grounds have a right of equal protection from all types of harm or abuse.

4.6.2.   To ensure that all reported concerns, issues or incidents are dealt with in an appropriate and timely fashion.

4.6.3.   To ensure that all personnel have a comprehensive induction that provides them with the knowledge and skills needed to support the aims of this policy, and our adjoined Prevent Duty Policy; and to be confident in identifying Learners and apprentices at risk of becoming vulnerable to abuse.

4.6.4.   To provide regular refresher training to all personnel around Safeguarding and Prevent Duty.

4.6.5.   To comprehensively support our Learners and apprentices to understand British Values, Prevent Duty and ways they and others may become vulnerable

throughout their lives. To support their understanding of how to support themselves and others and how to raise a concern.

4.6.6. To ensure that all Learners and apprentices and others within scope of this policy understand their obligations pursuant to this policy and are committed to its implementation. This includes the parents of children and young people as part of our workforce or cohorts of Learners and apprentices.

4.6.7. To promoting this policy to and gaining commitment from, employers.

4.6.8. To promoting the right of all persons to be free from abuse of any kind.

5. Policy Review

5.1. Swift is committed to reviewing all its polices regularly, including the Safeguarding Policy. This will be conducted every year as a minimum but also in the following circumstances:

5.1.1. A change to legislation.

5.1.2. An external incident that is publicised.

5.1.3. A serious occurrence within the business that requires further consideration.

5.1.4. A trend analysis identifies an increase in reports of a specific type of vulnerability.

5.1.5. Recommendations made by an Awarding Body, OFSTED or the EFSA.

6. Promotion of this Policy

6.1. All personnel will receive a comprehensive induction that provides them with the knowledge and skills needed to support the aims of this policy, and our adjoined Prevent Duty Policy, and be confident in identifying Learners and apprentices at risk of becoming vulnerable to abuse.

6.2. All Learners and apprentices will receive a comprehensive induction that ensures they understand how to access this policy, how to report concerns and provides a broad understanding of Equality and Diversity, Safeguarding, Prevent Duty and British Values. Personnel undergo regular continuous professional development to refresh these skills.

6.3. Employers are engaged at the very start of the relationship, to develop their understanding of the concepts and aims of this policy and to support them to support the protection of all individuals against abuse.

6.4. Regular progress reviews are utilised to provide further support and refreshers to employers around the concept of this policy. Supportive materials such as welfare and wellbeing support resources are regularly provided via social media and direct connect routes.

6.5. The policy and its procedures are available to personnel via the company intranet and all other stakeholders via the company website.

6.6. Regular "Safeguarding Hot Topics" are promoted via assessors, the intranet, local notice boards, the website and the learning platform. These are provided to all stakeholders, including employers.

6.7. Safeguarding, Prevent Duty and British Values are integrated into all curriculum plans and workbooks and are regular refreshed with Learners, apprentices and employers, by assessors.

6.8. A quarterly Safeguarding Focus Group Meeting is held involving all DSLs & DSOs to identify trends, areas of concern and areas of improvement to shape, review and inform Safeguarding Policy & Process. Apprentice and employer voice mechanisms are considered during this process.

7. Statutory Obligations and Useful Guidance

7.1. In all cases, Swift will fully comply with its obligations when dealing with all individuals. When dealing with children, young persons or vulnerable adults, the following legislation is particularly pertinent:

7.1.1. Keeping Children Safe in Education 2019
7.1.2. Working Together to Safeguard Children 2018
7.1.3. GDPR Act 2018
7.1.4. The Protection of Children Act 1999
7.1.5. The Safeguarding Vulnerable Groups Act 2006
7.1.6. The Equality Act 2010
7.1.7. Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (guidance) 2018/ 2021

Recognise

8. Definitions

8.1. For this policy, a child is defined as anyone under the age of 18 including unborn children right up to teenagers. The following guidance provides more clarity around this definition:

8.1.1.https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

8.2. A vulnerable adult is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. (Care Act 2014 England)

8.3. A vulnerable adult may be a person who:

8.3.1. Has physical or sensory disability
8.3.2. Is physically frail or has chronic illness
8.3.3. Has a learning difficulty
8.3.4. Misuses drugs or alcohol
8.3.5. Has social and emotional issues
8.3.6. Exhibits challenging behaviours

Abuse

8.4. Abuse is a form of mal- treatment that is inflicting either by causing harm or failing to prevent harm.

8.5. Abuse can occur in many settings. Some common settings of occurrence are; familial, institutional, individual and in groups.

8.6. Swift recognises that abuse can occur to anyone in any situation but identifies the following clear types of abuse that can occur:

8.6.1. Physical
8.6.2. Emotional
8.6.3. Sexual
8.6.4. Neglect
8.6.5. Financial

8.7. Abuse does not need to fall solely into one of these categories. Often an individual suffering abuse may experience several different types of abuse.

9. **Physical Abuse**

9.1. Physical abuse means causing harm, or failing to prevent harm, to an individual's person. Where individuals have specific care needs, this can include a failure to properly restrain or a misuse of medication.

9.2. This includes but is not limited to:
9.2.1. Poisoning
9.2.2. Burning
9.2.3. Hitting
9.2.4. Scalding
9.2.5. Drowning
9.2.6. Suffocating
9.2.7. Shaking

9.3. Signs that someone may be suffering physical abuse may be:

9.3.1. Unexplained bruising
9.3.2. Flinching when approached
9.3.3. Withdrawal or a change in behaviour
9.3.4. Aggressive behaviour and temper outbursts
9.3.5. Injuries inconsistent with the explanation
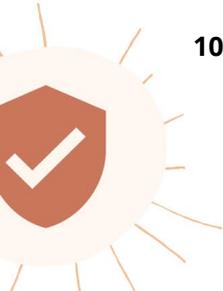
10. **Sexual Abuse**

10.1. Sexual abuse involves the forcing or enticement of an individual (child or adult), to take part in sexual activities. This can include violence, but equally can be an act of coercion that restricts the individual's ability to provide informed consent.

10.2.   Sexual abuse includes but is not limited to:
  10.2.1.   Rape
  10.2.2.   Penetration with an object
  10.2.3.   Kissing
  10.2.4.   Oral intercourse
  10.2.5.   Masturbation
  10.2.6.   Looking at pornographic material or sex acts.

10.3.   Sexual abuse can be committed by persons of any gender and any age group towards any gender and any age group.

10.4.   Swift recognises the rise in peer-on-peer sexual assault cases and advocates an "it can happen here" approach to addressing sexual abuse/ assault.

10.5.   Swift also recognises that sexual abuse can be perpetrated by those with institutional power. Swift again advocates the "it can happen here", approach and provides for many prevention measures referred to later in this policy.

10.6.   Swift recognises that it can be difficult for individuals, particularly children, young people, and vulnerable adults to talk about sexual abuse. Swift provides effective training to its personnel and stakeholders and commits to removing all barriers to the reporting of issues, incidents, or concerns.

10.7.   Swift works closely with a counselling service that can provide confidential and specialist advice and support around sexual abuse.

10.8.   Signs that a person (adult or child) is being sexually abused:

  10.8.1. Avoidance of a specific person. In cases of familial child sex abuse, this can include a family member.
  10.8.2. Sexually inappropriate behaviour to their individual developmental stage.
  10.8.3. Physical problems include medical problems with their genitals or pregnancy.
  10.8.4. Clues. Children, young people and vulnerable adults, due to their development stage, may struggle to articulate the issue, but they drop clues that abuse is occurring.

11. Emotional Abuse

11.1.   Occurs where there is persistent emotional ill treatment or neglect or rejection.

11.2.   It causes severe and adverse effects on a person's behaviour and emotional, resulting in low self-worth.

11.3.   Some level of emotional abuse is usually present in all forms of abuse.

11.4.   Emotional abuse can involve, but is not limited to:

11.4.1. Overprotectiveness that limits the individual to learn and experience
11.4.2. Silencing them
11.4.3. Inference of conveyance that the individual is unloved or worthless
11.4.4. Bullying (face to face/ cyber)
11.4.5. Causing fright to fear consequence
11.4.6. Exploitation
11.4.7. Expectations placed on an individual beyond their understanding or developmental capability

11.5. Signs that an individual is being emotionally abused include, but are not limited to:

11.5.1. Confusion
11.5.2. Developmental delay
11.5.3. Self-harm
11.5.4. Personally over-critical
11.5.5. Socialisation issues
11.5.6. Behaviour change

12. Neglect

12.1. Is the persistent or severe failure to meet a vulnerable person basic physical and/or psychological needs. It will result in serious impairment of the person's health or development.

12.2. Neglect may include, but is not limited to:

12.2.1. Failure to provide sustenance
12.2.2. Failure to provide care needs
12.2.3. Failure to adhere to medical practitioners' guidance
12.2.4. Failure to provide housing or removal of housing

12.3. Signs that an individual is being neglected can be:

12.3.1. Dishevelled and unkempt appearance
12.3.2. Appears dirty or smelly
12.3.3. Is hungry; perhaps steals food
12.3.4. Is constantly tired

13. Psychological Abuse

13.1. Psychological abuse involves the regular and deliberate use of a range of words and non-physical actions used with the purpose to manipulate, hurt, weaken, frighten a person mentally and emotionally, and influence a person's thoughts within their everyday lives.

13.2. Psychological Abuse can include:

13.2.1. Gaslighting
13.2.2. Name calling
13.2.3. Insulting the person
13.2.4. Threats against the person or a threat to take something away from the person
13.2.5. Mocking
13.2.6. Isolating the person
13.2.7. Ignoring the person
13.2.8. Excluding the person.

13.3.   Signs that an individual is being psychologically abused can be:

13.3.1. Isolation
13.3.2. Withdrawal from support networks
13.3.3. Deference
13.3.4. Unexplained paranoia
13.3.5. Ambivalence about care giver
13.3.6. Excessive tiredness
13.3.7. Low self esteem

14. Financial Abuse

14.1.   It is a misconception that financial abuse always involves fraud or theft. In fact, financial abuse is often subtle and can be therefore very difficult to detect.

14.2.   Financial abuse is often used as part of other forms of abuse including domestic violence and psychological abuse.

14.3.   Financial abuse may look like:

14.3.1. Denying access to personal finances
14.3.2. Tricking someone into bad investments
14.3.3. Borrowing money or property and not returning it
14.3.4. Forcing the sale of assets

14.4.   Signs of Financial abuse include:

14.4.1. Inability to access bank accounts
14.4.2. Lack of money to pay for essentials
14.4.3. Unusual payments in bank statements

Respond

Variety of Concerns

15. Personnel will receive initial concerns, reports or complaints from all stakeholders in the apprenticeship relationship, from time to time. This may include, children, young people and vulnerable adults, as well as employers, concerned third parties, members of the general public, medical practitioners and other educational institutions.

16. All personnel are trained to respond to an initial disclosure, complaint, incident etc. in an appropriate manner and in line with company Safeguarding Processes.

17. All personnel will:

17.1. Make the disclosure/ complainer feel as comfortable as possible without crossing personal boundaries.

17.2. Will listen effectively to the situation. Any interviews etc will be completed by trained personnel at a later stage in this process.

17.3. Remain calm.

17.4. Explain the Safeguarding Process to the individual to reassure them of how things will be dealt with.

17.5. Avoid making unrealistic promises around confidentiality.

Report and Record

18. Recording Initial Disclosures, Incidents, Issues, Concerns

18.1. All disclosures, incidents, issues and concerns need to be reported and recorded. This applies in all situations and remains important even where the eventual decision of the organisation is to take no further action.

18.2. When recording a disclosure, incident, issue or concern, the Safeguarding Officer or front-line personnel should:

18.2.1. Record all conversations exactly as they are stated. This should use the exact language of the individual, including their turn of phrase, swear words and event descriptions.

18.2.2. Include factual observations where appropriate. This is likely to be required when reporting concerns, issues or incidents, or in situations where a disclosure is made and there are concerns relating to self-harm or continued harm against that individual. Factual observations should be just that. Try to avoid including personal opinions. Include only symptoms, such as visible bruises or withdrawn behaviour. Avoid interpreting these symptoms as supporting the disclosure.

18.2.3. Notify the Designated Safeguarding Lead immediately following the conversation.

18.2.4. Provide the record by email to the Designated Safeguarding Lead and all copies to be placed into a sealed envelope marked "Confidential". This information should be

sent to the Designated Safeguarding Lead. This is discussed in more detail in The Safeguarding Processes.

18.2.5. Do not update the learner's file. The Designated Safeguarding Lead will determine the best course of action and will update any files as required.

19. The Role of the Designated Safeguarding Lead and Safeguarding Team

19.1. The Designated Safeguarding Lead (DSL) is accountable for the safeguarding practices and culture within the organisation. They are also the final decision maker regarding serious disclosure, issues, incidents or concerns and their external referral to Local Authority Designated Officer (LADO) or other relevant body.

19.2. The DSL will ensure a minimum of 2 deputies are in place, who are trained and possess the skills and authority to take accountability for these final decisions, in their absence.

19.3. The DSL will ensure processes are in place to record all disclosures, issues, incidents and concerns, are recorded in a central, confidential and GDPR compliant central location.

19.4. On receipt of a Safeguarding record, the DSL will review the matter and determine the course of action to be taken. Actions can include, pastoral intervention, further investigation, no further action (monitoring) and serious external referral.

19.5. In all instances, the DSL will ensure that all decisions will prioritise the need to safeguard the individual from harm. In serious situations, this may involve the referral to a third-party body, against the wishes of the disclosing individual.

19.6. The DSL will ensure arrangements are considered when dealing with a child, young person and vulnerable adult.

19.7. The DSL will never make a decision that stretches the organisational resources (including personnel) beyond their capacity or capability. This measure ensures that individuals are always provided with the best care and support, by experts and the organisation avoids detailed specific involvement in matters for which they have no expertise.

19.8. The DSL will consider all the facts before making a decision on the appropriate course of action.

19.9. The DSL may utilise the Welfare Board to make decisions regarding appropriate actions to take in each case.

20. Taking No Action (Monitoring)

20.1. The DSL may decide that no action is required. If no action is determined, the DSL will ensure that the Safeguarding Record is centrally recorded and will confirm whether further monitoring of the situation is required.

20.2. Where monitoring is required, the DSL will ensure the appropriate arrangements are in place.

21. Pastoral Intervention

21.1. Pastoral Intervention covers a wide range of actions and is the most common action taken.

21.2. Pastoral intervention offers individuals support for a situation or group of situations that is causing them to currently be vulnerable to abuse or harm. The intervention will assist them with; obtaining financial support, receiving education, obtaining help with welfare needs, obtaining counselling or other therapy, or receiving medical support.

21.3. Pastoral interventions are ordinarily completed via an external referral to an approved third party. The DSL will make the appropriate arrangements with the individual (their parents if required) and the referring company.

21.4. The DSL will ensure that a central record is kept of the intervention.

22. Further Investigation

22.1. The DSL may decide that further investigation of the situation is required. It should be noted that in cases where a serious referral is required, the referral body such as the Police or LADO will conduct an investigation independently. Before deciding whether further investigation is needed, the DSL should give consideration to the seriousness of the situation, so has not to commence an investigation that could ultimately prejudice the investigation of a body with more authority.

22.2. Further investigation can be either formal or informal.

22.3. Informal investigation may be a chat with the individual or a review of a particular ILP or learning plan.

22.4. In the case of further formal investigation for potentially serious issues, the DSL will ensure:

22.4.1. A full record of the investigation is centrally stored.
22.4.2. Confidentiality (where disclosure is not required by law) is maintained.
22.4.3. All individuals are treated with respect and in accordance with The Equality and Diversity Policy and in within the aims of this policy.

22.4.4. All statements made are recorded in the actual language of the speaker and that in no circumstance are the personal views of the investigation team considered as part of the decision-making process.

22.5. The DSL will review the output of the investigation and consider the appropriate action to take.

Refer

22.6. In the most serious of cases, the DSL may be required to make a serious external referral. These types of referrals are detailed below.

23. Allegations Relating to the Abuse of Position of Those in Authority

23.1. Swift may receive allegations that relate to the abuse of a position or power. These allegations can relate to positions such as medical practitioners, carers, educational professionals, policepersons etc.

23.2. Whilst every effort is made to safeguard Learners and apprentices in the care of Swift, it may be the case that allegations are made relating to the abuse of position of our personnel. In this instance, personnel refers to employees, associates, subcontracts and volunteers.

23.3. In all instances of Abuse of Power, the DSL will make a referral to the Local Authority Designated Officer (LADO). The LADO should be alerted in all instances of allegation that a person in a position of power has:

23.3.1. harmed, or behaved in a way that may have harmed a person in their care.
23.3.2. Committed a criminal offence against a person in their care.
23.3.3. Caused a person in their care to feel at risk.

23.4. The purpose of the LADO is to ensure effective recording of allegations of abuse against those in positions of power who work with children, young persons or vulnerable adults. They act as an effective conduit between the provider and other organisations such as the Police and medical professionals.

23.5. The LADO should be notified within 24 hours of an allegation being paid. The DSL retains accountability for this notification. Whilst the LADO does not investigate the case, they should be notified of the allegation prior to the investigation commencing. Thereafter, LADO will seek to provide advice and guidance to Swift on the best way to commence investigations.

23.6. On referral, the LADO will determine whether the allegation meets the threshold for their involvement, so where there is doubt, Swift will refer the matter to LADO in the first instance.

23.7.   The LADO may determine that the allegation requires investigation by the Police. If this is the case, they will provide this advice. **No internal investigation should begin until the LADO has made this determination.**

23.8.   In cases concerning an allegation relating to Swift personnel, the alleged perpetrators resignation does not bring the matter to a close. A full investigation should still be carried out. Whilst matters relating to the alleged perpetrators contract of employment are for Swift to determine internally, no settlement agreement will remove the co-operation of Swift from any investigation to determine allegations of abuse of power against its personnel.

24. Allegations of Abuse Against a Third Party

24.1.   Swift is committed to upholding its obligations to the legislation detailed in this policy and to the moral obligations of providing education.

24.2.   Swift may receive allegations of physical or sexual abuse from a child, young person, vulnerable adult.

24.3.   In these circumstances, Swift has a legal obligation to protect them from harm. This obligation includes the involvement of Local Authorities, the Police, the Ambulance Service and Social Services.

24.4.   The Designated Safeguarding Lead will decide on the whether the situation requires the involvement of a third-party authority and will fully co-operate with any third party notified thereafter.

Referrals Around Peer Abuse

24.5.   Swift operates an "it can happen here" approach to peer on peer abuse and recognises that smaller disclosures of bullying, sexting, social media abuse etc. can be symptoms of a much bigger pattern of abuse between peers.

24.6.   Swift personnel are effectively trained to appropriately encourage conversations around peer abuse and support individuals following disclosure.

24.7.   Swift understands that often the fear of formality can deter Learners and apprentices from reporting peer abuse. Swift values the voice of the learner and will (where it is appropriate to do so i.e.) support their wishes in dealing with matters.

24.8.   "Appropriateness" in this instance refers to the seriousness of the circumstance and the individual learner's age and capacity to understand the nature of the abuse. For the avoidance of doubt, in all situations Swift will prioritise the need to protect Learners and apprentices from harm.

24.9.   Given the range of situations of that could occur under this title, Swift acknowledges that methods of addressing abuses can range from informal discussions

with Learners and apprentices to expulsion from programme, or even the referral to the police.

24.10. In all instances of peer-on-peer abuse, the reporting process should be followed. The DSL will have accountability for deciding the best way to deal with the individual situation.

Gaining Commitment - Swift's Prevention and Support Framework

25. Swift has established several measures designed to protect children, young people and vulnerable adults from abuse occurring whilst in learning or employment with Swift.

26. Safer Recruitment

26.1. Swift recognises that to safeguard all stakeholders from harm, it is required to thoroughly and continually vet all contractors including volunteers.

26.2. To safely recruit, Swift will:

26.2.1. Ensure that recruitment practice is fair and inclusive.

26.2.2. Thoroughly screen and check prospective personnel qualifications and suitability to work, prior to their appointment.

26.2.3. Undertake DBS checks at the appropriate level for all successful applicants. Personnel will not be permitted to commence work until a DBS status is determined and a Risk Assessment completed where appropriate.

26.2.4. Maintain records of all DBS details on a single, central register and ensure this is refreshed with a minimum regularity of 3 years.

26.2.5. Ensure that personnel involved in the recruitment and vetting of new personnel are fully trained and that this training is regularly refreshed.

26.2.6. That a system of governance and monitoring is in place to ensure that the safer recruitment practice is being followed.

27. Employee, Contractor and Volunteer Induction

27.1. Swift commits that no category of employee will be permitted to begin work with Learners and apprentices and potentially children, young people and vulnerable adults, until they have completed a thorough induction process which includes the organisational practices around safeguarding and Prevent Duty.

27.2. A record of the attendance of personnel will be maintained by the HR department.

27.3.   A system of governance is in place to ensure that this induction is completed for all categories of employee.

28. Learner Induction

28.1.   All Learners and apprentices enrolled onto programmes with Swift will complete safeguarding awareness training as part of their learner induction. This training will be recorded as part of the portfolio evidence for the programme and evidenced in the ILP.

28.2.   An effective system of quality assurance is in place that will periodically sample the quality of this induction process. Quality assurance processes also provide for the consistency of delivery and learner experience through the induction process.

28.3.   This induction will provide:

28.3.1. Understanding around what safeguarding is.
28.3.2. Understanding of what the Prevent Duty is.
28.3.3. Recognising situations that they could become vulnerable to harm.
28.3.4. A code of conduct for their behaviour.
28.3.5. Minimum expectations of behaviour for those in positions of power or authority and how to sport inappropriate behaviour.
28.3.6. Clear identification of the Safeguarding Team
28.3.7. How to raise a concern.

29. Continued Training

29.1.   Swift recognises that knowledge and skills need to be periodically refreshed to ensure that all stakeholders are fully equipped to meet their obligations and responsibilities pursuant to this policy.

29.2.   A matrix detailing the status of Safeguarding and Prevent training will be maintained as part of the central register and retained by the HR department.

30. Employee and Volunteer Continued Training

30.1.   Swift has a comprehensive CPD policy which provides for the continued refresher training of employees and volunteers.

30.2.   Safeguarding, Prevent and Health and Safety training will be refreshed every three years at a minimum or in accordance with change to practice, policy or provision.

31. Contractor Continued Training

31.1.   Contractors will retain responsibility for refreshing their qualifications in this area.

31.2.   A system of governance is in place to ensure that all refresher training is conducted.

32. Learner Continued Training

32.1.　　Learners and apprentices are provided an individual Safeguarding Workbook as part of their programme that provides for periodic refreshment on the topic during their programme of study.

32.2.　　Safeguarding, Prevent, Health and Safety and British Values are embedded into all curricula and contextualised to the subject matter. This keeps the topics refreshed in Learners and apprentices' minds throughout the programmes.

32.3.　　Periodic "hot topics" are explored with Learners and apprentices spotlight specific topics within Safeguarding and Prevent.

33. Online Safety

33.1.　　Swift recognises that the increase in online learning and the benefits of this medium of learning, increases the risk of harm to all stakeholders but particularly children, young people and vulnerable adults.

33.2.　　Swift has Acceptable Use Policies covering the use of IT equipment by all categories of employee and Learners and apprentices.

33.3.　　Swift recognises its responsibility to educate Learners and apprentices to the risks online and to support the development of critical thinking skills to support Learners and apprentices to remain safe. Critical thinking skills are embedded into all programmes.

34. Social Media

34.1.　　Swift discourages the use of applications other than those platforms provided by Swift, for communication by personnel with Learners and apprentices. The exception to this is where there is a significant and material benefit to the quality of education delivered. Such contact should be pre-approved by the Directorship and full transcripts provided for the LMS.

34.2.　　Unapproved contact of Swift Learners and apprentices by Swift personnel outside of the approved, internal learning platforms will be dealt with as gross misconduct in accordance with the Disciplinary Policy. This type of contact will be considered as an "abuse of position" in accordance with this policy and may also result in a referral to a LADO.

34.3.　　Where inappropriate contact from personnel to Learners and apprentices via social media involves a child, young person or vulnerable adult, or contains explicit content, incitement to commit criminal acts, or achieves the definition of any form of abuse pursuant to this policy; Swift will immediately involve the police.

34.4.   Swift however recognises that the use of these platforms by our Learners and apprentices and personnel is highly likely in their personal lives.

34.5.   Swift recognises its role in educating these categories of persons around safety online.

34.6.   Being safe online includes awareness of the risks associated with communicating via the internet.

34.7.   References to social media include social networking sites (such as Instagram and Twitter), social communication applications (such as WhatsApp), blogging sites, vlogging sites, community sites (such as Pinterest), auction sites (such as eBay) and sales platforms (such as Facebook).

34.8.   Swift acknowledges the difficulty in legislating for all these different platforms and consequently adopts overarching principles when using these platforms.   These principles are embedded into the program curriculum. Online principles:

34.9.   Careful Content. To always communicate on these platforms as if you were face to face. Avoid the use of ambiguous statements that could be misinterpreted. Do not swear or use inuendo. Be as careful in content online as you would be in person. Be polite and respectful.

34.10.   Maintain confidentiality. Do not disclose things that should not be in the public domain. For personnel this includes adopting GDPR principles and avoiding referencing Swift or any learner. Learners and apprentices should avoid disclosing personal information such as their address, bank details etc.

34.11.   Avoid the Secret. Certain applications allow communications to be completely anonymous. These situations represent a greater risk to children, young people and vulnerable adults.

34.12.   Email. Private communications are safer when they are easily traceable. Email is a safer way to make sure you are communicating with someone genuine with good intentions.

35. **Useful Contacts:**

Board Representative - Hayley Faulkner (Quality Director)
Email: hf@swiftcc.co.uk
Telephone: 07966 494946

Designated Safeguarding Lead - Jack Edwards
Email: je@swiftcc.co.uk
Telephone: 07791 204527

Designated Safeguarding Officer - Jessica Jones
Email: jessicaj@swiftcc.co.uk
Telephone: 07757 779539

Designated Safeguarding Officer – Emil Taswar
Email: et@swiftdm.com
07791 539814

Designated Safeguarding Officer Cheryl Dunn – Head of Apprenticeships (CI)
Email: CD@swiftci.co.uk
07875009333

Board Representative - Phil Walters (Operations Director)
Email: pw@swiftci.co.uk
Telephone: 07375 956747

Author: Hayley Faulkner (Quality Director)
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Authorisation by the Managing Director:

Name: Greg Morrall

Signed: *Gregory Morrall*

Date: 20/09/2021