



Safeguarding Policy

What is its purpose?

The purpose of this policy is to state the responsibilities and commitment of Squaricle Group in relation to safeguarding and promoting the welfare of children, vulnerable young people and vulnerable adults, in response to current legislation and guidance. It provides a framework for protecting children/vulnerable young adults, young people and adults from abuse of any kind; details how we will establish a safe environment in which learners can learn and develop, details how we identify children/vulnerable young adults and young people who are suffering or likely to suffer significant harm, and how we will take appropriate action with the aim of making sure they are kept safe; ensures employees are appropriately recruited, trained and managed and understand their responsibilities with regard to safeguarding; ensures employees are clear that they are responsible for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions; identifies the arrangements for dealing with allegations of abuse against members of employees; ensures all arrangements are effective in practice and remain up-to-date with current legislation through regular review. This policy has also been updated to detail our commitments with regards to safeguarding children, vulnerable young people and vulnerable adults from the risk of contracting Covid 19 when in our care either as learners, employees or associates.

Note:

A Child/vulnerable young person – in accordance with The Education Act 2011, and therefore in accordance with the law, is “anyone who has not yet reached their 18th birthday...” Squaricle Group regards any young person below the age of 18 as a child/vulnerable young adult.

The term “vulnerable” has now been amended in the Protections of Freedoms Act 2012 to identify the activities which, if an adult requires them, lead to that adult being considered “vulnerable” at that particular time, e.g. if a person provides personal care for an adult.

The word ‘learners’ when used throughout this policy includes children/vulnerable young adults, young people and adults within the broader definition of safeguarding.

The word ‘associates’ when used throughout this policy indicates individuals engaged by us on a freelance basis or paid to provide services for a specific project: they are self-employed, not employees of Squaricle Group.

Why is it important to us?

Squaricle Group is committed to safeguarding and promoting the welfare of children, vulnerable young people and vulnerable adults, and to providing a safe environment in which they can develop educationally, socially and emotionally, free from harm or abuse. Squaricle Group expects all employees and others who work with or come into direct contact



with Squaricle Group learners to share this commitment. We recognise that all learners, associates and employees regardless of age, disability, gender reassignment, marital status, pregnancy / maternity / paternity status, race, religion or belief, gender or sexual orientation have the right to equal protection from all types of harm or abuse.

Why is it important to our clients and learners?

This policy gives assurance to our clients, learners and all other stakeholders and official bodies that we take our commitments to safeguarding the welfare of children, vulnerable young people and vulnerable adults seriously, and ensure we provide a safe environment for all our employees, associates and learners.

Who within the organisation does it apply to?

This policy applies to all Squaricle Group employees, associates, agency workers and volunteers.

When will it be effective from?

March 2020.

What are our responsibilities and accountabilities?

Definitions:

Safeguarding and protection are different in that:

Safeguarding is the word that applies to all the work an organisation does to provide a safe, positive and friendly environment for its learners and employees. It means actively seeking to involve everyone in keeping learners, associates and employees safe and promoting their welfare. In this sense, 'safeguarding' is anticipatory and preventative and is the responsibility of one and all.

Protection is a central part of safeguarding and promoting welfare. It is the process of protecting individual learners, associates and employees identified as either suffering or at risk of suffering significant harm as a result of abuse or neglect. In this sense, 'protection' refers to the procedures that come into force when there is a particular concern or incident. Protection is a statutory responsibility; it only focuses on abuse or neglect. Effective safeguarding helps to reduce the need for protection, but it is vital to have rigorous and clear procedures in place in case a problem arises. If an individual suggests that they are being abused or if someone reports abuse or bad practice that could put an individual's welfare at risk, these procedures must be understood and followed by everyone involved.

- Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
- Development means physical, intellectual, emotional, social or behavioural development.
- Health includes physical and mental health.



- Ill-treatment includes sexual abuse and other forms of ill treatment which are not physical.
- Vulnerable young adult sexual exploitation (CSE) is a type of sexual abuse. Children / vulnerable young adults in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.
- Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
- Female Genital Mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed without medical reason, also referred to as female circumcision, usually carried out on young female children, and is a form of child abuse.
- Abuse and Neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable young adult by inflicting harm or failing to act to prevent harm. Children / vulnerable young adults may be abused in a family or in an institutional or community setting, by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults or another child / vulnerable young adult or children / vulnerable young adults.
- Incidents of abuse may be multiple, either to one person in a continuing relationship or service context - or to more than one person at a time. Patterns of abuse and abusing vary and reflect very different circumstances. These include:
 - Serial abusing – “grooming” vulnerable individuals. Sexual abuse usually falls into this pattern as do forms of financial abuse
 - Long term abuse in the context of an ongoing family relationship such as domestic violence, situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour
 - Neglect of a person’s needs because those around him or her are not able to be responsible for their care, for example, the carer may have issues such as debt, alcohol or mental health problems
 - Failure to ensure employees receive appropriate guidance on anti-racist and anti-discriminatory practice
 - Failure to access key services
- Examples:
 - Physical Abuse: This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child/vulnerable young adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child / vulnerable young adult.
 - Emotional Abuse: This is the persistent emotional ill-treatment of a child / vulnerable young adult such as to cause severe and persistent effects on the child / vulnerable young adult’s emotional development. It may involve conveying to the child / vulnerable young adult that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations



being imposed on the child / vulnerable young adult. These may include interactions which are beyond the child / vulnerable young adult's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child / vulnerable young adult from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve causing the child /vulnerable young adult frequently to feel frightened or in danger, or the exploitation or corruption of the child / vulnerable young adult. Some level of emotional abuse is involved in all types of ill-treatment of a child / vulnerable young adult, though it may occur alone.

- Sexual Abuse and child/vulnerable young adult sexual exploitation: This involves forcing or enticing a child / vulnerable young adult to take part in sexual activities, including prostitution whether or not the child / vulnerable young adult is aware of what is happening. For those under 16, even if the child /vulnerable young adult is not forced or enticed and the sexual relationship is consensual, this is a criminal offence and must be reported. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving child / vulnerable young adult in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging child / vulnerable young adult to behave in sexually inappropriate ways.
- Neglect is the persistent failure to meet a child / vulnerable young adult's basic physical and / or psychological needs, likely to result in the serious impairment of the child / vulnerable young adult's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
- Once a child / vulnerable young adult is born, neglect may involve a parent or carer failing to: Provide adequate food and clothing, shelter (including exclusion from home or abandonment) / Protect a child / vulnerable young adult from physical and emotional harm or danger / Ensure adequate supervision (including the use of inadequate caretakers)
- Significant Harm: Some young people may be in need because they are suffering or likely to suffer significant harm. The Child/vulnerable young adult Act V Section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the young person.
- Self-Neglect: This is not a direct form of abuse but employees need to be aware of it in the general context of risk assessment / risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him / herself at risk in this way.

Creating a safe environment:



Squaricle Group's ethos promotes a positive, supportive and secure environment and gives learners, employees and associates a sense of being valued. Squaricle Group recognise that:

- Some children / vulnerable young adults may be especially vulnerable to abuse.
- Children/vulnerable young adults who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst in training, their behaviour may be challenging.
- Children /vulnerable young adults can be victims and perpetrators of abuse.
- Children / vulnerable young adults and young people who harm others may have been abused themselves.
- Allegations can be made against employees, however careful and safe our recruitment practices.

Squaricle Group will endeavour to support learners, associates and employees through:

- Ensuring they are made aware of whom at Squaricle Group they can approach if they are worried and how to make contact.
- Providing appropriate opportunities during course programmes (learners) and professional development (associates and employees) to develop the skills they need to recognise and stay safe from abuse, e.g. through induction.
- Ensuring they know that some behaviour is unacceptable but also ensuring they know they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support learners.
- Adopting a culture of vigilance by ensuring that Squaricle Group's safeguarding arrangements are widely known.
- Ensuring all staff are trained and regularly updated in the company's safeguarding arrangements and practices.
- Ensuring all staff are made aware of how to recognise and report effectively and appropriately safeguarding concerns.
- Ensuring all safeguarding concerns raised are dealt with or referred appropriately.
- Keeping written records of concerns about learners, associates or employees even where there is no need to refer the matter immediately.
- Ensuring all records are kept securely, separate from the main learner / personnel file and in a locked location.
- Notifying relevant services if there is an unexplained absence of more than two days of a learner, associate or employee who is subject to a child / vulnerable young adult protection plan.
- Ensuring that where a learner who is subject to a child / vulnerable young adult protection plan leaves, the individual's social worker is informed
- Developing effective links with relevant agencies and co-operating as required with their enquiries regarding child / vulnerable young adult protection matters including attendance at case conferences.
- Ensuring that safe staff recruitment practices are in place.



- Having in place and then following procedures where an allegation is made against an employees, associate, agency worker, volunteer or other person engaged by Squaricle Group.
- We will adhere to all government guidelines and our obligations as an employer and education provider with respect to keeping our workplace and working practices Covid 19 safe. As this guidance and regulations are regularly updated, please refer to the Squaricle Group Covid 19 Safe Policy for further information.

Standards of Behaviour Expected:

Squaricle Group recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby employees come into contact with others, or to guarantee the protection of learners, associates and employees at all times.

Notwithstanding the above, there are standards of behaviour required of all associates and employees in order to fulfil their roles and to protect both learners and each-other. In order to protect safety and well-being, all associates and employees:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Should work in an open and transparent way, and work with other colleagues where possible in situations that could be open to question.
- Take advice from the Designated Safeguarding Officer over any incident which may give rise for concern.
- Apply the same professional standards to working with all others, regardless of their age, disability, gender reassignment, marital status, pregnancy / maternity / paternity status, race, religion or belief, gender or sexual orientation.
- Be aware of data protection and confidentiality policies.
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
- Employees and associates must never:
 - Allow or engage in indecent or inappropriate touching of any kind and ensure professional boundaries are maintained at all times.
 - Restrain a child / vulnerable young adult or young person physically unless the restraint is to prevent physical injury of the child / vulnerable young adult /other child / vulnerable young adult /visitors or employees / themselves. In all circumstances, physical restraint must be appropriate and reasonable; otherwise the action can be defined as assault.
 - Make sexually suggestive comments to or within earshot of a child / vulnerable young adult or young person.
 - Have a child / vulnerable young adult or young person on their own in a vehicle. However, in exceptional circumstances requiring the transportation of a child / vulnerable young adult or young person in their vehicle, another employee or associate or volunteer must also travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting



- a child / vulnerable young adult or young person as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a child / vulnerable young adult or young person on their own, it is essential that another employee and, where practicable, the parent is notified immediately.
- Take a child / vulnerable young adult or young person to the toilet unless another authorised adult is present or has been made aware. •
 - Spend time alone with a child / vulnerable young adult or young person on his / her own, outside of the normal learning /classroom situation. If you find you are in a situation where you are alone with a child / vulnerable young adult or young person, make sure that you can be clearly observed by others.
 - Engage in a personal relationship with learner that would not be appropriate for a normal trainer / learner relationship.
- Implications for employees and associates failing to meet the required standards of behaviour:
 - Employees and associates who breach the standards of behaviour may be subject to the provisions of the Squaricle Group Disciplinary Procedure.
 - If an allegation against an employee or associate has occurred, then an investigation will be carried out in accordance with the above.

Dealing with Referrals:

If you suspect that a learner, employee or associate who is under 18 years of age is at risk of or is being abused, or is injured, marked, or bruised in a way which might raise doubt, you are legally required to report it immediately to the Designated Safeguarding Officer.

If in any doubt, always report.

Where an explanation given by the child / vulnerable young adult or young person appears inconsistent or suspicious, staff must report immediately to the Designated Safeguarding Officer.

If the individual is over 18 you should still report to the Designated Safeguarding Officer who may be able to signpost the individual to appropriate support outside of Squaricle Group.

Even if you have only heard rumours of abuse, or have a suspicion but do not have firm evidence, you must still contact the Designated Safeguarding Officer to raise concerns.

In the absence of the Designated Safeguarding Officer, the Group Managing Director will act as the referral point for all safeguarding matters.

Guidelines for Staff When Responding to Disclosures

Disclosures or information may be received from learners, employees, associates, parents or members of the public. Squaricle Group recognises that those who disclose such



information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all employees will handle disclosures with sensitivity.

Employees must not investigate the matter themselves but must follow the guidelines set and pass on immediately to the Designated Safeguarding Officer.

- If an individual comes to you with a report of apparent abuse, respond calmly and positively. Do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them.
- Listen carefully to the individual and allow them to speak without interruption.
- Never trivialise or exaggerate the issue.
- Never make suggestions.
- Never coach or lead the individual in any way.
- Reassure the individual and let them know you are glad they have spoken up and that they have done the right thing in telling you.
- Make a factual note of what the individual is saying. Try to use their own words; do not add your own interpretation, although factual details of how they looked and behaved are useful, e.g. “He had a black eye and was crying”.
- Always ask enough questions to clarify your understanding but do not probe or interrogate – no matter how well you know the individual – spare them having to repeat themselves over and over.
- Be honest – let them know that you cannot keep this a secret; you will need to tell someone else but explain that only those who “need to know” will be told. Try to remain calm – remember this is not an easy thing for them to do.
- Let them know that you are taking the matter very seriously and make them feel safe and secure without causing them any further anxiety.
- Report the matter immediately to the Designated Safeguarding Officer.
- Your report must contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions. If they have disclosed details, then provide a written account of the information given to you by the individual as accurately as you were able to record it. A report template is attached at Appendix 1. However, staff must not delay reporting due to lack of time to complete the template.
- Immediate referrals can be made using the Designated Safeguarding Officer’s email or direct line.
- The Designated Safeguarding Officer will let you know who will be dealing with the referral.
- Once you have reported the concern the responsibility for taking any further decisions or actions resides with the Designated Safeguarding Officer.
- Only the Designated Safeguarding Officers or the Managing Director can make a decision to refer a complaint or allegation to external agencies, including the Local Authority Designated Officer (LADO) , Social Services, the Police, or other relevant agencies, having gathered and examined all relevant testimony and information.



- Once a referral is made, the Designated Safeguarding Officer will follow Squaricle Group's procedures for handling Safeguarding referrals. This includes arrangements for confidential storing of records.

Confidentiality Statement

The safety and well-being of the child / vulnerable young adult or young person is paramount. Employees or associates may have access to confidential information about learners or other employees or associates in order to undertake their everyday responsibilities. In some circumstances, they may be given highly sensitive or private information. They must never use confidential or personal information about an individual or their family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass an individual.

Confidentiality and trust must be maintained as far as possible, but employees and associates must act on the basis that the safety and well-being of the individual is paramount. The degree of confidentiality will be governed by the need to protect the individual. The employee or associate to whom the individual is making the disclosure needs to be open and honest with them from the outset and not promise to keep information confidential.

When abuse is alleged or suspected, the employee or associate has a duty to pass information on without delay to the Designated Safeguarding Officer. If they are in any doubt about whether to share information or keep confidential, they should refer the matter to the Designated Safeguarding Officer.

Squaricle Group complies with the requirements of the Data Protection Act 1998 but the DPA does not prevent the sharing of information where this is necessary to protect the safety and well-being of the individual.

Safer Recruitment of Staff

Squaricle Group undertakes to ensure that our employees and associates are fit to work with all learners. We also reserve the right to refuse to employ individuals whom we have a reasonable belief may pose a risk to our learners.

Squaricle Group has systems in place to prevent unsuitable people from working with learners and to promote safe practice. These systems apply to all new employees and require the following checks to be made pre-appointment or directly following appointment (of contracted staff)

- A minimum of 2 satisfactory references, one of which should be from the current or most recent employer. All references must cover a 5-year employment period.
- Original documentary evidence checks of identify, nationality, residence and "right to work" status will be checked at the formal interview stage.
- An Enhanced Disclosure and Barring of employment Service (DBS) Disclosure is completed for all employees or associates in "regulated activity" with learners.



- All employees or associates will be shadowed during work with learners or children / vulnerable young adults until a DBS has been received.
- A check under Section 142 of the Education Act 200 (previously known as “List 99”) will be undertaken for all workers who are not eligible for an enhanced DBS.
- Original documentary evidence of qualifications will be provided by the new applicant at the formal interview stage.
- Employees and associates new to Squaricle Group receive a comprehensive overview of safeguarding during their initial induction, in particular how to recognise, respond and report abuse or suspected abuse, followed by a full safeguarding training session.
- All new employees complete a 3-month probationary period to monitor and review whether they are suitable for the post and safe to work with children / vulnerable young adults or adults at risk of harm. During this time, close supervision takes place regularly and written records are kept of all sessions. If the probationer's performance (including work performance, conduct, behaviour and attendance) does not meet required standards, performance or conduct then action may be taken which includes, but is not limited to the following:
 - The probationer's employment may be confirmed.
 - The probationary period may be extended.
 - The probationer may continue employment but in a lower graded job.
 - The probationer may be dismissed with notice.
- Our recruitment practices for both employees and associates will where possible be conducted remotely whilst under Covid 19 restrictions. Where this is not possible, social distancing guidelines will be adhered to and all Covid 19 safe working practices will be in place. As these may need to be updated regularly following government guidance, these are detailed separately in our Squaricle Group Covid 19 Safe Policy.

Allegations against employees or associates

Squaricle Group recognises that the vast majority of employees and associates who work with our learners act professionally and aim to provide a safe and supportive environment which secures the well-being of all individuals.

However, it is also recognised that there are times when tensions and misunderstandings can occur. It is here that the behaviour can give rise to allegations of abuse being made. Allegations may be malicious or misplaced and may arise from different perceptions of the same event. However, when they occur they are inevitably distressing and difficult for all concerned.

Equally, Squaricle Group recognises that some allegations will be genuine and there are adults who will deliberately seek out, create or exploit opportunities to abuse young people. It is therefore Squaricle Group's responsibility to ensure that appropriate steps are taken to safeguard all individuals and that the adults working with children / vulnerable young adults, regardless of their responsibilities or role within the Company, are safe to do so.



The primary concern for Squaricle Group is to ensure the safety of our learners, employees and associates. It is essential in all cases of suspected abuse by an employee or associate that action is taken quickly and professionally whatever the validity.

All allegations of abuse, or concerns raised against employees or associates are always treated seriously and will be investigated by the Company in the first instance unless it is serious enough that immediate intervention by the Local Safeguarding Board and/or the police is required.

Indicative Responsibilities of the Designated Safeguarding Officer

- To be accountable for Squaricle Group's safeguarding practice.
- To ensure that safeguarding is afforded priority at the most senior level within Squaricle Group
- To ensure that sufficient resources are available to fulfil safeguarding responsibilities.
- To develop organisation-wide procedures, practice and guidance for safeguarding ensuring procedures are in place for managing allegations against employees and associates, safeguarding, whistle-blowing and safe recruitment practices.
- To ensure that secure records of safeguarding concerns are stored and shared appropriately.
- To ensure that review systems are in place to incorporate new guidance and legislation as appropriate.
- To maintain currency of training relating to identifying signs of abuse and appropriate referral.
- To ensure Squaricle Group's safeguarding policy is updated and reviewed regularly
- To refer cases of suspected abuse or allegations to the relevant investigating agencies.
- To act as a source of support, advice and expertise within Squaricle Group when deciding to make a referral by liaising with relevant agencies.
- To ensure all employees, associates and other relevant parties have access to and understand the Safeguarding policy.
- To ensure all employees and associates have induction training covering Safeguarding and are able to recognise and report any concerns immediately.
- To keep detailed, accurate and secure written records of referrals / concerns.
- To arrange on-going training and guidance for employees and associates appropriate to ensuring safeguarding.

Sources of further knowledge to support understanding and personal development

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828763/Inspecting_safeguarding_in_early_years_education_and_skills.pdf



<https://learning.nspcc.org.uk/safeguarding-child-protection#:~:text=Safeguarding%20is%20the%20action%20that.children%20from%20abuse%20and%20maltreatment>

Related documents and procedures

- Squaricle Group recruitment policy
- Squaricle Group onboarding policy
- Squaricle Group learning & development policy
- Squaricle Group Covid 19 Safe Policy
- Safeguarding Concern Form (attached to this document)

Governance

The Squaricle Group Board have overall responsibility for the implementation of this policy.

Impact and effectiveness

The Director of Operations: Brands, People & Quality is responsible for the management and monitoring of effectiveness of this policy, and is Designated Safeguarding Officer.



Safeguarding Concern Form

Full name of individual	
Date of Birth	
Age	
Gender	
If the individual is a learner, state their course and employer	
If the individual is an employee, state their job role	
If the individual is an Associate, state their current work with Squaricle Group	
Who does the individual live with?	
What are the individual's emergency contact details?	
Full nature and description of concern, including specific dates times and incidents if appropriate:	
Name, contact number and email of person making the referral	
Date	
Safeguarding Officer	
Date received	

Below section to be completed by the Designated Safeguarding Officer :

Individuals/agencies involved to date

Role / Service	Contact Name	Contact number
----------------	--------------	----------------



Actions to be taken

Action	Who is involved?	By when?

Outcome:

Review Date.....

Details of review findings: