

## Safeguarding Policy

### 1. Policy Statement

Cogent Skills fully recognises its responsibilities for child protection and this policy is produced in conjunction with 'Every Child Matters'.

Cogent Skills works to:

- Safeguard the welfare of children and young people (aged under 18 years) and vulnerable adults we work with in education and training by protecting them from physical, sexual and emotional harm.
- Support the creation of a safe environment where young people and vulnerable adults are listened to and encouraged to talk about concerns.
- Fully support the Government's aim for every child, whatever their background or circumstances, to have the support they need to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being.

### 2. Principles

- Cogent Skills works in partnership with work-based learning organisations. We ensure that partners operate in ways that best safeguard the interests of young people and vulnerable adults by sharing this policy and checking they have adequate arrangements.
- This policy to be used in conjunction with the procedure and process map.
- Cogent Skills is committed to ensuring that the principles and practices of child and adult protection are adhered to, and the needs and interests of young people and vulnerable adults are paramount. This is done by ensuring that all employees of Cogent Skills have access to appropriate information, instruction and training to ensure that policies, practices and procedures are used and understood by all members of the organisation.

- Failure of Cogent Skills employees to follow this policy and the associated documentation, may result in formal action being taken in line with the company disciplinary policy, and may lead to summary dismissal for gross misconduct. All employees have a responsibility to seek further guidance if at any time they are unsure of their responsibilities in relation to this policy.
- This policy applies to all employees, contractors and associates who have a Safeguarding responsibility.
- A company Director at Cogent Skills will be informed if there is a concern that needs to be escalated; a member of the Safeguarding board (see section 3.5.1) will do this.
- DBS checks are carried out on all employees and contractors that have regular contact with any young person under 18 years on a 1-1 basis.
- Cogent Skills is committed to supporting the Prevent agenda.
- The Safeguarding committee is responsible for updating this policy and all the associated documentation to support Safeguarding practices.

### 3. Procedure

#### 3.1 Behavioral Statement

Cogent Skills will act in a way that facilitates partners to develop good practice by:

- Preventing abuse through safer recruitment practices. All Cogent Skills employees working with young learners will be recruited against the Cogent Skills Recruitment and Selection policy. This policy and Cogent Skills recruitment practices include ensuring that relevant all checks have been completed.
- For those roles where a DBS (Disclosure and Barring Service) check is required, there is also a DBS process map that should be used by all those involved in recruitment. This can be found on SharePoint.

- If there are any concerns by a line manager as to whether a DBS does need to apply to a role, the HR & Payroll Manager should be informed and will provide support working with the Warrington Vetting Service.
  - Complete Teacher Status checks within our safer recruitment process.
  - Ensuring partners have procedures to monitor safe and secure environments for learning with supervision.
  - Creating supportive environments, which enable young people and vulnerable adults to speak out, with escalation procedures in place.
  - Protecting young people and vulnerable adults from abuse by ensuring appropriate policies, practices and procedures are in place with the relevant partners.
  - Collecting and securely storing information detailing children/young people involved with our work - this will include medical details and contact numbers in case of an emergency.
  - Respecting a child's/young person's right to personal privacy (subject always to the provision that confidentiality may not always be maintained where dictated by the welfare and best interest of the young person concerned - disclosures of any type of abuse **must** be reported and the child/young person **must** be made aware of this obligation).
  - Showing tolerance and understanding towards children / young people.
  - Being aware of the damaging effects of sarcasm, insults, inappropriate jokes and put downs on the fragile ego and self-respect of children / young people.
  - Exercising due care so that children / young people are not exposed to risk through negligence or incompetence.
  - Being aware of the dangers of leaving yourself open to accusations.
  - Recognising that caution is required when working with children / young people and vulnerable adults, particularly in sensitive moments e.g. dealing with bullying, grief or abuse etc.
  - Setting realistic plans and goals.
- ### 3.2 Induction and Training
- All employees of Cogent Skills must ensure that they carry out their responsibility for safeguarding and promoting the welfare of young people and vulnerable adults. This will be supported by an induction and regular reviews with the host employer and the Cogent representative.
  - All employees, contractors and associates who work with young people or vulnerable adults will be asked to attend Safeguarding training, this is classed as mandatory training and will be repeated every 2-3 years.
  - Cogent Skills will provide a full induction on Cogent policies including, Safeguarding, Prevent, agency working regulations, H&S, Bullying and Harassment policies, EO policy and electronic communications.
  - The young learner will be provided with a copy of all Cogent Skills policies, and they are also available on Cogent Learn along with a mandatory induction assessment test which must be taken within three months of starting employment. The training provider will also deliver an induction and Safeguarding practices should also be communicated to the apprentice. The host employer will also complete an induction to the workplace.
  - Cogent Skills Induction will take place within two to four weeks of the young learner beginning employment.
  - Details of any residential or trips that are undertaken will be investigated in advance with an 'Adventure Activity Health and Safety checklist' being completed by a Cogent representative in advance of the activity taking place.
  - The induction will be documented, and a signed Induction checklist will be kept on file.

### 3.3 Communication and Confidentiality

- A Cogent Skills representative will advise all parents / guardians or carers of learners under 18, of the existence of the company's Safeguarding policy and associated documentation, and the fact that cases may be required to be referred to the investigative agencies in the interests of the child. This is completed within the first four weeks.
- Cogent Skills will proactively ensure that there is good open communication by ensuring regular reviews. A review visit will be held every 12 weeks.
- Cogent Skills will advise young learners on standards of behaviour and conduct, the induction, reviews and Completion of ERR workbook.
- If a concern is raised, as a general rule, the Cogent Skills representative should make clear that there are limits to confidentiality, at the beginning of the conversation. These limits relate to ensuring student's safety and wellbeing. The learner will be informed when a confidence has to be broken for this reason and will be encouraged to do this for themselves whenever this is possible.
- If a young person is sent home for any reason, parent's will be contacted. The young person will not be able to leave the college or work place until contact has been made.

### 3.4 Health and Safety

- Appropriate training and guidance is provided to all young learners by the host employer, provider and Cogent Skills to ensure they understand their responsibilities. The young learner has a duty to inform the line manager or the Cogent Skills representative if there is anything that needs to be reiterated through further guidance.
- Appropriate systems of inspection, monitoring and review are maintained throughout the apprenticeship.

- The young learner should follow safe working practices at all times as directed by the host employer and Cogent Skills.
- If a young person is missing from either the workplace or college, the AWOL procedure will be used to deal with the situation unless there have been previous safeguarding concerns, in which case immediate action will be taken. Cogent Skills HR Manager should be contacted, for details of the next of kin if no contact has been established by phone or email. If the next of kin is not contactable then the relevant organisations should be contacted.

### 3.5 Action Statement

#### 3.5.1 Dealing with an issue of concern regarding a child or young person:

- The Cogent representative is made aware of or has concerns of a safeguarding issue, must decide whether there is any immediate danger to the learner and if there is enough reason to believe this is the case then the authorities must be alerted, 999 should be called immediately and to contact you designated safeguarding lead.
- The Cogent Representative will work with the safeguarding committee, provider and (host) employer to resolve any concerns in an appropriate manner, involving the necessary internal and external resources.
- If the Cogent Representative is unsure about any concerns regarding a child or young person this should be communicated to the designated Cogent Skills Services or Cogent Skills Training safeguarding lead.
- The Human Resources Director may be contacted or advised if either of the

Safeguarding leads are unavailable for further advice and guidance.

- A risk assessment to be used internally to identify the risk and possible actions required.
- Upon the safeguarding Committee receiving a safeguarding referral and there is immediate risk or concern to the learner, the Safeguarding Committee will inform the head of department whom will inform the trustees.
- The Safeguarding Committee will refer the safeguarding concern to the relevant Local Safeguarding Childrens Board/Authority.
- The Safeguarding Committee will internally case manage the referral, act upon Local Authority feedback and update the Cogent Representative.
- These concerns could include but are not limited to:
  - **Radicalisation or extremist behaviour** – Cogent Skills have a duty of care to work within the Prevent Strategy (Counter Terrorism and Security Act 2015), institutions, colleges and other providers in helping to prevent young people being drawn into terrorism. This could include violent and non-violent extremism that could create an atmosphere conducive to terrorism and popularise views which terrorists can exploit.
  - When operating this policy, Cogent Skills Services use the following accepted government definition of extremism:

‘Vocal or active opposition to fundamental British values, including democracy, the rules of law, individual liberty and mutual respect and tolerance of

different faiths and beliefs; and/or calls for the death of members of our armed forces, whether it is this country or overseas.’

There is no place for extremist views of any kind within Cogent Skills Services, and extremist views will be challenged so to protect our apprentices and placement workers and dealt with in line with the disciplinary policy.

Examples of extremism may include (but is not limited to) white supremacists, Nazi parties, anti-Semitism, holocaust denial, race and religious hatred, animal rights extremism, far right extremism, religious extremism, nationalist extremism and homophobia.

As part of a wider safeguarding responsibility, all Cogent Skills Services representatives will be alert to disclosures of extremist actions, graffiti or art work promoting extremist messages, accessing on-line extremist information, changes in behaviour or the using of ‘hate’ terms, intolerance or indifference, attempts to impose extremist views on others, and anti-western or anti-British views.

- **Neglect** – This is the persistent and severe failure to meet a young person’s basic physical / psychological needs and will result in the serious impairment of the student’s health or development.
- Physical abuse – May involve hitting, shaking, throwing,

poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

- **Sexual abuse** – This could involve a young person being forced or into participating or watching sexual activity.
- **Emotional abuse** – Occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the young person's behaviour and emotional development, resulting in low self-worth.
- **Bullying including online and prejudice based bullying** – This abuse can result in anxiety and distress.
- **Racist, disability, homophobic or transgender abuse**, or any other abuse based on a person's age, disability, gender, race, religion and belief, sexual orientation, gender re-assignment, pregnancy and maternity, ability and socio-economic position. It can include hurtful comments, victimisation and harassment.
- **Gender based violence or violence against girls** – This could include rape, domestic violence, forced marriage, FGM and sexual harassment.
- **Domestic violence or abuse** – This is a pattern of control, coercion and threats and can involve physical abuse (such as assault), emotional abuse (such as intimidation) sexual abuse (such as rape), psychological abuse (such as isolation), and financial abuse (using money to control). Domestic violence can also be inflicted in gang-associated relationships and where a family or community honour is perceived to be at stake.
- **Female genital mutilation** – Please refer to [www.gov.uk/government/publications/female-genital-mutilation-guidelines](http://www.gov.uk/government/publications/female-genital-mutilation-guidelines)
- **Forced marriage** – This is where a young person could be forced into a marriage against their will, sometime this includes violence, coercion and emotional blackmail.
- Online pornography
- **Child sexual exploitation or trafficking (including online)** – Child sexual abuse involves any form of sexual activity with a child under the age of consent and can be committed by adults or peers; it can be single event or one that is repeated. Child sexual exploitation is a form of sexual abuse based on an ongoing exploitative relationship between the perpetrator and the child.
- **Teenage relationship abuse**
- **Substance misuse** – This may include misuse of a range of drugs or drinking on a daily basis.
- **Issues that may be specific to a local area or population such as gang activity**
- **Fabricated or induced illness** – This could include self-harm, deliberate harm (such as eating or drinking toxic substances and breaking of bones).

- **Financial abuse**

- If a Cogent employee working with a young person has concerns and is unclear whether any of the above concerns may apply, they are urged to seek support from the HR department and the relevant Cogent representative specified in section 3.5.1.
- The above points within this section form Cogent's Prevent strategy.

### **3.5.2 Dealing with abuse which is suspected, disclosed or discovered**

- There is a Safeguarding referral procedure document which includes details of what should be covered during a conversation with a learner (please refer to point 9 in the procedure document for further information).
- Cogent Skills employees, apprentices and placement learners may also choose to use the Whistleblowing policy to raise any concerns in confidence.

### **3.5.3 If there is immediate danger**

- In all cases, it is vital to take whatever action is needed to safeguard the young / vulnerable person.
- If a child / young person is in immediate danger the police should be contacted (dial 999) as they alone have the power to remove a child immediately if protection is necessary.

### **3.5.4 Being pro-active**

- Being proactive is about being alert to the potential of abuse, recognising the signs and symptoms of abuse, both physical and behavioural, and passing on any suspicions that you have to the designated Safeguarding Officer (see section 3.5.1).

### **3.5.5 Dealing with Allegations against an Employee or Contractor**

- Cogent Skills will investigate and deal with any allegations in a thorough and prompt manner.
- Safeguarding issues to be investigated further include allegations of:
  - Behaviour that has harmed a child or may have harmed a child;
  - Possibly committing a criminal offence against or related to a child;
  - Behaviour towards a child or children in a way that indicates the employee would pose a risk or harm.
- All concerns relating to an employee will be dealt with via the disciplinary policy.
- All concerns relating to a contractor will be dealt with in line with the agreement to provide services.
- A member of the Safeguarding Committee will be involved in any action that is taken.
- External support may also be needed via the police (if there has potentially been criminal activity), or via children's services (should protection be required).
- If, the concerns are substantiated internally, a decision should be taken as to whether the Disclosure Barring Service should be informed.
- If the employee is a member of a professional service, a decision should be taken as to whether the professional service needs to be informed.
- If the complaint is found to be unsubstantiated or malicious, this should be referred to a member of the Safeguarding Committee to understand whether the young person should be referred to Children's Services.
- At the conclusion of any case in which an allegation is substantiated, the Safeguarding Committee will complete a review of the case to determine whether any changes to procedures or practices needs to take place.

## **4 Notes and Associated Documentation**

- Safeguarding Referral procedure and process map;
- Recruitment and Selection policy;
- Induction documentation and checklist;
- Grievance policy;
- Health & Safety policy;
- Equal Opportunities policy;
- Harassment and Bullying policy;
- Disability policy;
- Electronic Communications policy;
- Lone Working policy;
- Whistleblowing policy;
- IT and Social Media policy.