

Safeguarding Policy

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Responsible for:

- Safeguarding training of internal employees and communication of safeguarding updates
- Annual review and distribution of the Company safeguarding policy and procedures
- The overview of any safeguarding concerns raised in the business
- Review and training of the reporting process
- Referral of any candidate to the Disclosure and Barring Service

Core Safeguarding Principles

Operam Education Group acknowledges the duty of care to safeguard and promote the welfare of children and vulnerable adults and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All children and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse. This policy applies to all internal staff at Operam Education Group as well as temporary workers, candidates and contractors. Operam Education Group is fully compliant with Keeping Children Safe in Education – September 2020. Operam Education Group is committed to ensuring their work is consistent with safeguarding and promoting the welfare of children and vulnerable adults. All temporary workers, candidates and contractors placed by Operam Education Group are expected to take all reasonable steps to ensure they are alert to possible child abuse and neglect, and to familiarise themselves with safeguarding procedures set by the schools where they are placed.

Safeguarding Aims and Objectives

This policy is designed to meet the above principles by ensuring that:

- Those who are known to be unsuitable do not gain access to children or vulnerable adults.
- Those who become unsuitable are detected at the earliest stage and prevented from continuing to work with children and vulnerable adults.
- Those who intend to do harm are prevented at every possible stage from entering the work force.
- It is as simple as possible for an individual to report that they are being harmed or feel at risk of being harmed.
- Clear procedures will be implemented where child protection issues arise.
- Effective management is provided for staff, temporary workers, candidates and contractors through support and training.
- All necessary checks are made on staff, temporary workers, candidates and contractors.

- Operam Education Group stays up to date with developments on safeguarding best practice, reporting and auditing our safeguarding activities annually and reviewing and updating our policies and practices every 12 months.
- Those who are identified as being at risk of abuse are afforded every practicable protection by Operam Education Group and our subcontractors/partners.
- Operam Education Group will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority.
- Those we discover are being abused are afforded the relevant protection and assistance by the relevant bodies as soon as practicably possible.
- At an individual and collective level employees are involved in ensuring Safeguarding is embedded across our services to ensure a whole organisation approach so that individuals are adequately covered by this policy.

Recruitment and Selection Process

Operam Education Group are also committed to protecting children and vulnerable adults through a careful recruitment and selection process and guidance on appropriate behaviour. Operam Education Group's rigorous procedures ensure that any candidate found to have a history of unacceptable conduct or practice will not be placed. As part of our safeguarding policy, Operam Education Group will:

- Promote and prioritise the safety and wellbeing of children and vulnerable adults.
- Ensure all candidates undergo a full compliance process.
- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and vulnerable adults.
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern.
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
- Prevent the engagement of unsuitable individuals.
- Ensure robust safeguarding arrangements and procedures are in operation.

This policy will be widely promoted and is mandatory for everyone involved in Operam Education Group. Failure to comply with this policy and the company's safeguarding procedures will be addressed without delay and may result in disciplinary action.

Through our induction process, Operam Education are committed to ensuring that all temporary workers, candidates and contractors, understand the different forms of abuse that some children may experience and the signs and symptoms of such abuse. Operam Education Group require that all candidates that work with children and young people carry out the on-line child protection training level 1 and 2, to help them not only identify but also act upon any form of abuse that they may identify.

There are four types of abuse which can cause long term damage to a child or young person. These are defined below:

Physical Abuse: May involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse: Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, (including cyber-bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of abuse include:

- Unexplained or suspicious injuries such as bruising cuts or burns, particularly if situated on a part of the body not normally prone to such injuries or the explanation of the cause of the injury is does not seem right.
- The child discloses abuse or describes what appears to be an abusive act.
- Someone else (child or adult) expresses concern about the welfare of another child.
- Unexplained change in behaviour such as withdrawal, or sudden outbursts of temper.
- Inappropriate sexual awareness or sexually explicit behaviour.
- Distrust of adults, particularly those with whom a close relationship would normally be expected.

- Difficulty in making friends.
- Eating disorders, depression, self-harm, or suicide attempts.

Radicalisation and recognising signs

Individuals can be drawn towards the process of radicalisation in a number of ways, many of which may overlap. When we talk about 'vulnerability' or 'susceptibility' within this context we mean individuals who, because of their circumstance, experiences or state of mind can be led towards a terrorist ideology.

The following list of potential vulnerabilities is not exhaustive and all or none may be present in individual cases of concern. It is important to stress that there may be no direct evidence of criminal behaviour. Remember that safeguarding vulnerable people from radicalisation is no different to safeguarding them from other forms of potential harm.

Operam Education Group extends its commitment to Safeguarding of Adults, defining this as protecting the health, wellbeing and human rights of adults at risk, enabling them to live safely, free from abuse and neglect.

Through our induction of staff, temporary workers, candidates and contractors, our policy highlights the awareness of the types of abuse associated to vulnerable adults:

Physical Assault: Hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint, restricting movement (e.g. tying someone to a chair).

Psychological Abuse: Enforced social isolation, preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.

Sexual Abuse: Rape, attempted rape or sexual assault, inappropriate touch anywhere, non-consensual masturbation of either or both persons, non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, indecent exposure.

Financial and Material: Theft of money or possessions, fraud, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car

Misuse of a power of attorney, deputy, appointment or other legal authority, rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

Neglect and Acts of Omission: Failure to provide or allow access to food, shelter, clothing, heating, stimulation, and activity, personal or medical care, providing care in a way that the person dislikes
Failure to administer medication as prescribed, refusal of access to visitors
Not taking account of individuals' cultural, religious, or ethnic needs, not taking account of educational, social, and recreational needs, ignoring or isolating the person
Preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures, etc. failure to ensure privacy and dignity.

Self – Neglect: Lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm
Failure to seek help or access services to meet health and social care needs, inability or unwillingness to manage one's personal affairs.

Organisation and Institutional Abuse: Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regimes, lack of leadership and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating, not offering choice or promoting independence, misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints

Modern Slavery: Human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.

Discriminatory Abuse: unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as '**protected characteristics**' under the **Equality Act 2010**), verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard service provision relating to a protected characteristic.

Domestic Abuse: Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to psychological, physical sexual, financial, emotional.

Operam Education Group's Policy recognises the 6 principals that underpin Adult Safeguarding and ensures that all staff and temporary workers, candidates and contractors are made aware of these in order to enhance their understanding of their 'Duty of Care'.

- Empowerment
- Protection
- Proportionality
- Accountability
- Partnership
- Prevention

Operam Education's Safeguarding Policy also adopts the 9 areas of wellbeing that are highlighted in the Care Act 2014 and through communication ensures that all employees and temporary workers, candidates and contractors are aware of the statutory guidance that the Act presents:

- personal dignity (including treatment of the individual with respect)
- physical and mental health and emotional wellbeing
- protection from abuse and neglect
- control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- participation in work, education, training or recreation
- social and economic wellbeing
- domestic, family and personal domains
- suitability of the individual's living accommodation
- the individual's contribution to society

Additional information and support

Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

Responsibilities

All staff, temporary workers, candidates and contractors placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff, temporary workers, candidates and contractors to promote good practice by being an excellent role model; contributing to discussions about safeguarding; and to positively involve people in developing safe practices. All staff, temporary workers, candidates and contractors should: Read, understand, accept and act in accordance with this policy.

- Be vigilant and follow professional codes of conduct to maintain professional boundaries.
- Report any concerns or disclosures related to the protection and safety of children and vulnerable adults.
- Undertake mandatory child protection and vulnerable adult training and awareness sessions where provided.
- Help educate learners, including children, young people and adults in matters of keeping safe, and acting as a good role model. All staff, temporary workers, candidates and contractors working through Operam Education Group are expected to keep children safe by contributing to:
 - Providing a safe learning environment.
 - Identifying children who are suffering or likely to suffer significant harm and taking the appropriate action with the aim of making sure they are kept safe at home and in the education setting.

- Making a note and reporting to the designated member of staff any major incident, or signals which give cause for suspicion or concern. It is the candidate's responsibility to adhere to the specific guidelines set out in each Schools own safeguarding policy.
- Under no circumstance should a candidate intervene on his or her own.

The Reporting Process

Passing on a safeguarding concern, however small it may be, needs to be done as soon as possible, allowing the nominated Child Protection Lead to alert children's social care or the police should they decide a referral is needed.

Through our induction, all staff, temporary workers, candidates and contractors are advised of their commitment to safeguarding and if they recognise any concern they must respond, report and record.

Step 1

- Initially talk to a child/young person about what you are observing. It is okay to ask questions, *for example: "I've noticed that you don't appear yourself today, is everything okay?"* But never use leading questions
- Listen carefully to what the young person has to say and take it seriously. Act at all times towards the child as if you believe what they are saying.
- It is not the responsibility of groups to investigate incidences of suspected child abuse but to gather information and refer only.
- Always explain to children and young people that any information they have given will have to be shared with others, if this indicates they and or other children are at risk of harm.
- Record what was said as soon as possible after any disclosure; the person who receives the allegation or has the concern should complete a safeguarding concern form and if needed a body map. All forms should be completed in full and signed and dated. Confidentiality is required.

Step 2

- Immediately report the concern to the Named Lead Designated Officer at the school. They will report the concern to the Lead Authority Designated Office (LADO) or the Police. A decision on a referral will be made.
- It is the decision of the Named Lead Designated Officer at the school to decide if parents or carers need to be informed about any referral to Children and Young people's Social Care, taking into account that the decision would place the child at an increased risk of harm.

Local Authority Designated Officer – LADO

In accordance with Working Together (2018), where an organisation has received an allegation that a member of staff who works with children has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

A referral should be sent to the Local Authority Designated Officer (LADO) within one working day, giving as much detail as possible.

Step 3

Duty to make a referral to the Disclosure and Barring Service -DBS

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child or vulnerable adult, there is a legal duty on Operam Education Group to report that person to the Disclosure and Barring Service using their guidance. Available here <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>. The DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

Operam Education Group will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with children. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a child's or vulnerable adult's welfare or who believe that a child or vulnerable adult may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

Operam Education Group will make clients and candidates aware of the Safeguarding Policy through:

- The interview with the candidate
- Displayed on the website
- Displayed in each branch

All staff, temporary workers, candidates and contractors must be aware that they have a professional duty to share information with other recruitment businesses in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by Operam Education Group.

Legislation and Company Reference Links

The principal pieces of legislation governing this policy are:

- Working Together to Safeguard Children 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf
- The Children Act 1989 ▪ The Adoption and Children Act 2006:
- The Children act 2004 <https://www.legislation.gov.uk/ukpga/2004/31/contents>
- Rehabilitation of Offenders Act 1974
<https://www.legislation.gov.uk/ukdsi/2019/9780111185520>
Reporting Child Abuse <https://www.gov.uk/report-child-abuse>
- Keeping Children Safe in Education (2020)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Disqualification under the Childcare Act 2006 (2018)
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>
- Counter Terrorism and Security Act 2015 (inc. the 'Prevent Duty')
<https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
- Modern Slavery Act 2015 <https://www.legislation.gov.au/Details/C2018A00153>
- Mental Capacity Act 2005 <https://www.legislation.gov.uk/ukpga/2005/9/contents>
- Human Rights Act 1998 <https://www.equalityhumanrights.com/en/human-rights/human-rights-act>
- The Care Act 2014 <https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>
The Disclosure and Barring Service
<https://www.gov.uk/government/organisations/disclosure-and-barring-service>
- DBS Making a Referral <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>
- DfE Guidance for Safer working practices for those working with children and young people in education settings
<https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>