



Safeguarding and Prevent Policy

February 2023

Version History			
Version	Date	Reason for release / version update	Issued by
V1.0	05/09/2021	Version release	Lisa O'Reilly
V2.0	01/06/2022	Policy signatory and inclusion of revised safeguarding report form	Stephanie Richardson
V3.0	01/02/2023	Reference to Martyn's Law	Stephanie Richardson

Document Approval		
Job Role	Name	Date approved
Head of Learning	Martin Parnham	05/09/2021
Commercial Director	Lisa O' Reilly	01/06/2022
Chief Executive Officer	Lisa O'Reilly	01/02/2023

Date of Next Review	September 2023
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Statement

The purpose of this document is to set out The TESS Group's policy in relation to the Safeguarding of children and vulnerable adults and The Prevent Duty; ensuring compliance with all relevant recommendations and guidance including the recommendations of the Department for Education (DfE) in the March 2015 Statutory Guidance for Keeping Children Safe in Education, and all subsequent updates including the September 2022 update. This policy covers our responsibilities as a provider of further education, relating to the Prevent Duty.

At the TESS Group we adopt an 'all organisation' and 'it could happen here' approach to the management of Safeguarding through this policy and procedures.

Safeguarding is an all-encompassing term used to describe many aspects of keeping our learner's safe from harm related to but not limited to:

- Learner health, safety and wellbeing
- Child protection
- Child Criminal Exploitation (CCE)
- Protection of adults at risk
- Peer to peer abuse including sexual harassment and violence
- Domestic Violence
- Honour based violence (HBV)
- Bullying, harassment and discrimination including racial abuse
- Abuse and neglect
- Safety from Child Sexual Exploitation (CSE), violence, abuse female genital mutilation (FGM) and forced marriage
- Alcohol, drug and substance misuse
- E-safety including all aspects of electronic communication
- Financial exploitation
- Protecting people from radicalisation and extremism
- The security and safety of The TESS Group Head Office or any place of learning
- Breast ironing
- Slavery and trafficking
- Up-skirting
- Homelessness
- Addiction and drug abuse
- Radicalisation
- Issues related to being a young carer or a care-leaver

The Prevent Duty: Section 26 of the Counter Terrorism and Security Act 2015 places a duty on educational establishments to have "due regard to the needs to prevent people from being drawn into terrorism". (This policy seeks to ensure that The TESS Group meet the expectations to mitigate against such risks and meet the legal requirements.

The UK faces a range of terrorist threats including those from Islamist, far right and INCEL groups. We will be mindful of all potential radicalising threats to which our learners are exposed and terrorist groups who pose a threat to us seek to recruit and radicalise individuals to their cause. Nationally Prevent seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote those views.
- Provide practical help and support to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including the education sectors, criminal justice, faith groups, the internet and health service.

The UK has a system of threat levels which represents the likelihood of an attack in the near future. The five levels are:

- Critical – an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely.

Training providers are major education providers for the 16-24 year old age group, who are particularly vulnerable to radicalisation. The TESS Group has an integral part to play in fostering a set of shared 'British values' and promoting community cohesion.

The government's own definition of extremism as contained within the Prevent strategy will be the definition used within this policy and is:

- Vocal or active opposition to fundamental British Values
 - Democracy
 - The rule of law
 - Individual liberty
 - Mutual respect and tolerance of different faiths and beliefs
- We also include in our definition of extremism, calls for the death of members of our armed forces.

Review

This policy is reviewed annually or immediately upon changes in legislation. All policies are approved by the senior management team and ratified by the Governance Board. All policies are held in a register which records all required review dates.

Scope

This policy and procedures apply to all TESS Group learners and covers all aspects of a learner or learner's programme regardless of where it takes place.

All staff are required to demonstrate high standards in their management of risk and in the active protection of children and vulnerable adults from discrimination and avoidable harm fulfilling their duties for learners under-18 in accordance with;

- Education and Training (Welfare of Children) Act 2021 - [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](#)
- Keeping Children Safe in Education (DfE statutory guidance for schools and colleges) 2022 - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (HM Government) July 2018 - [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](#)
- What to do if you're worried about a child being abused (HM Government) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](#)
- Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governingbodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)
- Prevent duty guidance: DfE for further education institutions in England and Wales April 2021 - [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](#)

Designated Safeguarding and Prevent Duty Officers

- Board Safeguarding Lead – Debbie Gardiner MBE debbie.gardiner@thetessgroup.com
07375 111517
- Safeguarding link to the Board – lisa.o'reilly@thetessgroup.com
07539 012690
- Safeguarding Lead – Stephanie Richardson stephanie.richardson@thetessgroup.com
07701 395521
- Deputy Safeguarding Lead - Martin Parnham martin.parnham@thetessgroup.com
07985 423972
- Designated Safeguarding Officer - Ian Palmer ian.palmer@thetessgroup.com
07701 395516
- Designated Safeguarding Officer – Elaine Denney elaine.denney@thetessgroup.com
07701 395512
- Prevent Duty Champion – Peter Dignam peter.dignam@thetessgroup.com
07971 677030

Executive Summary

Promote the policy: TESS Group will promote the policy across its employees and all learners, including Learners and employers. This will be shared as part of the induction process for learners and onboarding employers. The policy forms a key part of the employee induction, with their knowledge of the subject being tested through case studies and example scenarios. We also ask that all employees sign to confirm they have understood the policy and will adhere to following it within their role, which is used as a method of gaining commitment. The policy will be promoted at internal meetings that occur monthly and at quarterly team events to share ideas, best practice and check knowledge and understanding.

All learner-facing staff will be trained regularly to enable them to recognise signs and indicators of abuse, neglect and radicalisation and to know that they must report those signs and indicators, and any learner disclosures, to the safeguarding team without delay.

The TESS Group values promote and reflect this policy which include:

Values

- Be Collaborative
- Be Reliable
- Be Inspiring
- Be Bold

Value Statements

- We celebrate diversity
- We promote equality and inclusion
- We treat others with respect
- We safeguard all our learners and staff

SAFEGUARDING AND THE PREVENT DUTY

Promoting the policy, commitment and engagement: We use quarterly team events for engagement with the policy and facilitate regular discussions with learners and employers at forums, backed up by safeguarding content in marketing material. We use regular surveys across learners, employers and employees to check understanding and gain feedback on safeguarding resources used across the business. On weekly team calls we use current media stories as a topic of discussion for the teams which can then be used for sessions with learners. This is shared as part of the induction process for learners and onboarding employers, as well as forming a key part of employee inductions to the TESS Group and work as a method of gaining commitment. Managers are responsible for promoting the Safeguarding Policy at monthly and quarterly team events to share ideas, best practice and check knowledge and understanding.

Training employees in implementing the policy: We recognise that training is critical in the engagement and protection of our learners and employees. Our employees engage with safeguarding training annually, consolidated with regular safeguarding refresher sessions to increase awareness, knowledge, skills and confidence for the implementation of this policy. The format, frequency and objectives of training is tailored to reflect the needs of staff and learners and will take local factors and issues into account..

From day one, employees are trained in implementing the policy and upon joining the company are required to complete the relevant safeguarding, Prevent and equality and diversity training modules online. This is reviewed continuously, listed on their CPD log and annual objectives. We supply a variety of resources and topic ideas to support staff in day-to-day implementation of the policy with learners and employers.

We make use of local and national news items that highlight issues relating to safeguarding, The Prevent Duty (terrorism and radicalisation) and County Lines.

Protecting our learners: All staff are DBS checked at the appropriate level before joining. We provide learners with a safeguarding card when starting their programmes, listing several safeguarding contact details. We explain to learners what a safeguarding issue may be and provide embedded training through their programme as a way of increasing awareness and understanding. We deliver a mix of group and 1-2-1 sessions which allows for opportunities to discuss concerns learners may not wish to disclose in a group setting. We encourage learners attending remote webinar sessions to have their camera switched on and have implemented the internationally recognised hand-gesture that indicates a person requires immediate help. This is displayed during PowerPoints so learners can use a non-verbal sign for help, making us aware that they are in danger and need urgent assistance. This is aimed at supporting learners who are working and learning from home, where home may not be a safe place for them.

How learners get support or guidance: Learners can get support or guidance 24/7 from the safeguarding contact details shared on the safeguarding card they receive when starting their programme, with 4 contact details listed.

Monitoring IT usage: IT usage across the business is monitored as detailed in accordance with the IT security policy. This includes promoting appropriate and acceptable use of information and communication technology (ICT). This also outlines the roles and responsibilities of all individuals who have access to and / are users of, work related ICT systems. We conduct training to ensure all ICT users have an awareness of risk, a clear understanding of what constitutes misuse and the sanctions that may be applied.

Identify changes in behaviour of learners and employees: staff are made aware of the importance of being observant and identifying changes in their learner's behaviour. This could relate to attendance, not completing work, being withdrawn, losing weight, unexplained absence from work, becoming dishevelled, unexplained bruises, possession of expensive goods, tiredness etc. Staff training brings behavioural training to life, covering a range of potential safeguarding issues, including sexual and physical abuse, County Lines and criminal gang activity, as well as radicalisation and terrorism. Managers have been trained to identify signs that could mean a member of staff is experiencing a safeguarding or Prevent related issue. We also monitor our young learners in order to mitigate risk.

SAFEGUARDING

Prevent abuse towards our learners: We train staff to recognise signs of abuse, neglect and radicalisation and to take action to prevent abuse occurring. In all our work, we consider how to make communities safer. We ensure that our team has the correct knowledge and skills to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the learner's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. We understand that peer-to-peer abuse, especially sexual harassment and violence, has increased nationally. Our staff are aware of this and have received training to identify and deal with such issues efficiently and promptly.

Raising, recording and investigating concerns: All complaints, allegations or suspicions must be taken seriously and must be reported to the Designated Safeguarding Lead without delay. An incident report form must be completed within 12 hours, detailing the nature of the

allegation and any other relevant information. The person to whom the allegation of abuse has been reported should work closely with the learner and the Designated Safeguarding Lead to resolve the issue where appropriate. If a learner is in immediate danger of significant harm a report to the Designated Safeguarding Lead must be made immediately and if need be, the reporting staff member will take mitigating action.

Where appropriate, the Designated Safeguarding Lead must telephone and report the matter to the most suitable external authority i.e. the police, Local Children / Adult Safeguarding Board.

THE PREVENT DUTY

TESS Group has a legal responsibility to fulfil the prevent duty statement: Section 26(1) of the Counter Terrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for Tess as an independent training provider, in helping prevent people being drawn into terrorism, violent and non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that we must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners. The Board accepts the accountability for upholding this legislation. All employees have a responsibility to meet these requirements and implement our policy and procedures.

Protect learners and employees / ensure learners and employees are resilient to extreme narratives

The management team establish and use existing mechanisms for understanding the risk of radicalisation and ensure staff understand the risk and build capabilities to deal with it. Staff undergo training at the beginning of their employment and have an annual refresher as part of our CPD programme. We communicate and promote the importance of the Duty and ensure staff implement the Duty effectively at regular team meetings and 1-2-1 meetings with employees. This enables employees to identify and reject extreme narratives and support learners to do the same. The Prevent Duty, including radicalisation and resilience against extreme narratives is embedded in our curriculum. We use case studies as an interactive teaching method.

Deal with any issues raised by learners or employees: All safeguarding issues are taken seriously at TESS Group. We adopt an approach of ‘it could happen here’. Any identified concerns as the result of observed behaviour or reports of conversations to suggest that a person supports terrorism and / or extremism, must be reported to the Safeguarding Lead immediately. Where a person is thought to be in need / or at risk of significant harm, and / or where investigations need to be carried out, a referral to the local Police Prevent / CHANNEL Team is made in line with the company’s Safeguarding Policy and Procedures.

Martyn’s Law

The Government announced details for the Protect Duty, now to be known as ‘Martyn’s Law’ in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017.

Martyn’s Law will keep people safe, enhancing our national security and reducing the risk to the public from terrorism by the protection of public venues.

It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

The legislation will ensure parties are prepared, ready to respond and know what to do in the event of an attack. Better protection will be delivered through enhanced security systems, staff training, and clearer processes.

Premises will fall within the scope of the duty where “qualifying activities” take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central government buildings (e.g. town halls), visitor attractions, temporary events, places of worship, health, and education.

It is proposed that the duty will apply to eligible premises which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or a location / event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will then be drawn into the relevant tier.

Therefore, premises will be drawn into the scope of the duty if they meet the following three tests:

- That the premises is an eligible one – i.e., building or event with a defined boundary.
- That a qualifying activity takes place at the location; and
- That the maximum occupancy of the premises meets a specified threshold – either 100+ or 800+

The Bill will impose a duty on the owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place there.

Proportionality is a fundamental consideration for this legislation. It will therefore establish a tiered model, linked to the activity that takes place at a location and its capacity:

A standard tier will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.

An enhanced tier will see additional requirements placed on high-capacity locations in recognition of the potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time. This could include live music venues, theatres, and department stores.

Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

There will be some limited exclusions and exemptions from the duty. This includes locations where transport security regulations already apply; and those that are vacant over a reasonable period or are permanently closed. Those with a large floor space and low occupancy in practice (e.g. warehouses and storage facilities) as well as offices and private residential locations, will not be in scope.

The TESS Group's Policy

Definitions

We define children as all those who have not yet reached their 18th birthday.

We define vulnerable adults as those aged 18 years or over, who are or may be in need of community care services by reason of mental or other disability, age or illness; and who are or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation (Department of Health in the No Secrets Guidance 2000).

Our Safeguarding Policy and procedure covers all of our learners irrespective of age or vulnerability.

British Values

For the purposes of this policy British values will be defined as:

“democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths”

This definition is a natural extension of the TESS Group's value statements:

- We celebrate diversity
- We promote equality and inclusion
- We treat others with respect
- We safeguard all our learners and staff

Key Principles

The TESS Group operates within the following key principles:

- All people will be treated with respect and courtesy by staff and learners in an environment that is free from harassment or discrimination
- We promote and reinforce a set of shared value statements, founded on tolerance and respect for others
- We work with learners and other agencies to promote a safe and healthy culture
- We develop partnerships to proactively protect learners at risk of abuse or neglect
- Staff are trained and have a clear understanding of personal safety and good Safeguarding practices
- We work with learners to promote their own personal health, well-being and safety including their safetyonline
- We work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism
- We support learners who may be at risk from radicalisation by providing materials and holding discussions and signposting them to further external sources of support where appropriate.
- We create a safe space for free and open debate

- We promote a sense of community cohesion both within the TESS Group and within its wider external community
- We ensure that learners are safe and that we create an environment that is free from bullying, harassment and discrimination including sexual harassment and violence
- Learners receive confidential advice, guidance and support for a range of issues that they may face. They will be signposted to external agencies where specialist support is required
- We support learners to have personal resilience and be able to make informed and sensible decisions about their safety and well-being
- To promote awareness of Female Genital Mutilation (FGM) and report to the police in the first instance of any occurrence
- All training rooms, communal areas, facilities and equipment comply with legislative health and safety standards
- There is a focus on minimising the risk of harm to learners, particularly young people and vulnerable adults
- We ensure that staff are aware of their responsibilities under this policy and are able to recognise and respond to vulnerable learners
- We strive to create a company-wide “culture of vigilance”

This policy should be read in conjunction with TESS Group’s Equality and Diversity Policy and Anti-Harassment and Bullying Policy.

Learner Entitlement

In order to promote a healthy and a safe environment, our learners are entitled to the following:

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively and appropriately
- To learn in an environment free from bullying or harassment including sexual harassment and violence
- To be made aware of the basic principles of safe learning and Safeguarding relevant to the programme that the learner is completing
- To be made aware of the risk associated with radicalisation and terrorism, gangs and County Lines
- To be made aware of how to access support on personal health and safety issues either within TESS Group or from outside agencies
- To be provided with up-to-date information regarding personal safety issues
- The opportunity to comment and feedback on the extent to which The TESS Group and courses promote and maintain well-being and personal safety
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment
- Learn about how to keep themselves safe online including how to recognise sexual and political grooming.

Safe learning

The principles of the Department for Education's 2015 Statutory Guidance for Keeping Children Safe in Education is embedded within TESS Group's teaching and learning practices and within quality assurance and quality improvement frameworks. Safer recruitment practices are implemented as outlined in the relevant section of this policy.

TESS Group is committed to engaging learners on issues related to financial health, mental health and physical health in order to improve their quality of life. The aim is to provide learners with the tools to make healthy and safe decisions.

Safe environment

TESS Group provides an environment that is safe and secure for all users, whilst at the same time is friendly and welcoming. Robust systems and processes are in place for staff and learner identification and for visitor registration. A culture of respect that is free from bullying and harassment is engendered. Health and safety is of paramount importance and as such all facilities and resources will comply with legislative requirements for health and safety, including communicable diseases.

TESS Group's commitment to the safe environment is enshrined within the following policy and procedure documents: Health and Safety Policy; Information Security Policy and the incident reporting procedures.

Sexual harassment and violence

TESS Group recognises the significance of the 'Everyone's Invited' campaign and delivers a focus on protecting learners from sexual harassment and violence

We adopt the safeguarding posture of assuming this issue impacts our learners even if there is little or no reporting of it. Adopting this posture leads us to:

- Train staff in how to respond to reports of sexual harassment and violence
- Train staff to recognise the signs and indicators of sexual harassment and violence
- Train staff always to take such reports seriously
- Support learners to recognise harassing behaviour and to understand that it is not a "norm" and is unacceptable
- Support learners to understand the principles of healthy relationships and sexual consent
- Encourage learners to report any experiences they may have of sexual harassment and violence within the company, at work or elsewhere in their lives, including historically
- Train the safeguarding team to deal effectively with this issue
- Include in the safeguarding report to the Board an analysis of reports of this issue received within the company and how they have been managed

Safer staff recruitment

As part of our approach to safer staff recruitment the Head of Data and MIS is responsible for ensuring all new employees have a current DBS check at the level appropriate for their role. This includes working with the individual to submit a check or checking on the Update Service. We expect all employees to enrol for the Update Service. The Head of Data and MIS will pass

any disclosures onto the Chief Executive Officer in order that a decision can be taken about the continuation of a job offer or employment.

The Head of Data and MIS carries out checks to confirm that potential new starters are eligible to work in the UK and they carry out identity checks using documents such as passport / birth certificates. References are also sought for all new starters and all appointments are made subject to acceptable references being received,

The Head of Data and MIS ensures that we adhere to our safer recruitment process which includes guidelines for advertising roles, clearly stating our commitment to safeguarding and identifying the DBS requirement, CV check and checking gaps in employment history, a completed application form (we will only progress applicants that complete our application form) and qualification checks. When shortlisting candidates, the Head of Data and MIS asks the candidate to declare in writing, if they have a criminal record or if they are on the child / adult barred list.

Where a DBS check is not available upon commencement of employment, the individual concerned must not undertake unsupervised contact with any learners until this is in place and has been verified and should be accompanied by a DBS approved member of staff during all contact / visits.

All staff undertake mandatory safeguarding training appropriate to their role. Staff understand the principles of safe working practices and how to avoid putting themselves in situations that compromise themselves or learners. All new starters receive an appropriate induction, including training on safeguarding, Prevent, equality and diversity and wider-related safeguarding topics.

Whistleblowing

TESS Group has certain duties enshrined within the Public Interest Disclosure Act 1998. All staff are aware of their whistleblowing duties and rights, which are outlined in our Whistleblowing Policy and our Managing Allegations Against Staff Policy.

Suspicion, allegation or actual abuse or a safeguarding cause for concern of a learner / child / vulnerable adult by a member of staff

Staff are required to read and adhere to the Staff Code of Conduct and always act professionally and within professional boundaries in their interactions with all learners. It is recognised that staff can be vulnerable to the possible consequences of their close professional relationships with children and vulnerable adults and to the potential for malicious and misplaced allegations being made, whether deliberately or innocently, arising from the normal and proper associations that staff may have with learners. All staff should be aware of their duty to raise concerns, where they exist, about the unsafe practice of colleagues in regard to children, young people, vulnerable adults and all learners.

- Any allegation or suspicion of abuse or a safeguarding concern about a member of staff must be reported directly to the Designated Safeguarding Lead (DSL), without delay. The DSL will support the person raising the concern to complete the Safeguarding Report Form.
- The DSL will inform the Board Safeguarding Lead, unless they are the accused.
- If the allegation meets any of the criteria of Keeping Children Safe in Education 2022, the DSL shall report it to the Local Authority Designated Officer(s) (Head of Targeted Services) on the same day, as well as informing the TESS Group Chief Executive Officer and the ESFA.

- If the allegation concerns a vulnerable adult learner, the DSL must report the matter to the Police or Local Social Services Department Safeguarding Adults Coordinator where the vulnerable adult is considered to be suffering or is likely to be suffering significant harm.
- It is unnecessary to make a referral to Social Services or inform the ESFA where an allegation can be shown beyond doubt to be demonstrably false. It is also unnecessary to make a referral to Social Services where the allegation is judged to be a trivial nature.
- In any case, the DSL must take such steps that they consider necessary to ensure the safety of the learner who has made the allegation and other vulnerable adults or children or learners who might be at risk. Company disciplinary procedures will be followed. These steps are likely to include:
 - Suspension is deemed a neutral act - safeguarding both the child / vulnerable adult making the allegation and the member of staff concerned. Suspension is recommended in the following circumstances:
 - A person is at risk
 - The allegation is so serious that summary dismissal for gross misconduct is possible.
 - It is necessary to allow unimpeded investigation
- The ESFA must be informed via the Contact Form: [Education and Skills Funding Agency \(ESFA\) enquiryform - Customer type - DFE Online Forms](#) using UKPRN 10031093 as required within 48 hours and contact is made with our ESFA Account Manager.
- Confidentiality must be maintained.

Governance and reporting

The Designated Safeguarding Lead (DSL) and Officers maintain accurate and secure records of all incidents and referrals. A central log is managed by the DSL. The DSL produces an annual report that is presented to the Board by the TESS Group Chief Executive Officer. The Chief Executive Officer ensures that the Governance Board is aware of any major incidents.

The TESS Group holds performance monitoring meetings, where all aspects of safeguarding are reviewed as a standing agenda item. Actions arising from these meetings are monitored through the management line.

Good practice identified through these meetings is recorded and shared.

Links with external agencies

Safeguarding: TESS Group work with the Local Authority Designated Officer and the Multi Agency Safeguarding Hub to ensure a comprehensive safeguarding network is in place. Advice is taken from professionals within these organisations as appropriate.

The police play a vital role in safeguarding children / vulnerable adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police are the lead agency and will direct investigations in line with legal and other procedural protocols. The company maintains direct contacts with local and regional police services and Police Community Support Officers (PCSO's).

County Lines is directly linked to gangs and the sale of drugs, weapons and other valuable

illegal commodities. County Lines could also involve aspects of safeguarding or the Prevent Duty. Our initial reporting should be through the local safeguarding team / Authority Designated Officer. However, if for any reason we are unable to make contact, we will go direct to the local police.

The Prevent Duty: TESS Group work proactively with the Regional Prevent Coordinators and where / if required, the local steering group and CHANNEL panel.

The CHANNEL panel have a key multi-agency role that is centred around the prevention of radicalisation and terrorism.

Keeping learners safe

TESS Group has appropriately trained staff that form a 'safeguarding team' who ensure that disclosures made by learners are dealt with quickly, sensitively and appropriately.

All staff are trained in the appropriate response to a learner disclosure and the correct procedure for dealing with concerns about a learner. Teams work with learners to proactively protect them from abuse and neglect and prevent learners being placed in an abusive situation.

All learners are made aware of the procedure for reporting safeguarding, radicalisation and terrorism concerns or making allegations of abuse in their learner induction which is documented in the Learner Handbook.

Key Responsibilities

Managing Director has overall responsibility for ensuring that the TESS Group meets its obligations for safeguarding and the Prevent Duty.

Chief Executive Officer is the safeguarding link between the Board and the Senior Leadership Team (SLT). The Chief Executive Officer is the conduit to the Board with responsibilities for the delivery of the annual safeguarding report, updating the Board of any serious incidents, supporting the DSL with policy and procedure reviews, ensuring compliance with DBS requirements, monitoring / managing the DSL activities and other support requirements. Annual update training is a feature of CPD for all Directors.

Apprenticeship Delivery Manager is our Designated Safeguarding Lead (DSL) and is responsible for ensuring that the Safeguarding and Prevent Duty processes and procedures are robust and consistently applied and that the TESS Group fulfils its legal duties as enshrined within legislation. The DSL works with the Chief Executive Officer to update policy and procedures, produce the annual report and ensure that the single central record is accurately maintained and that all staff have received appropriate training and development. The DSL coordinates all activity and directs the Designated Safeguarding Officers (DSO's). Additionally, the DSL is the first point of contact for accusations against members of staff. The DSL can seek support from the Governance Advisor responsible for safeguarding or the Chief Executive Officer if required. The Deputy Designated Safeguarding Officer (DDSL) will deputise for the DSL during times of absence.

The Head of Programmes is our Deputy Designated Safeguarding Lead (DDSL) and will deputise for the DSL in their absence and has the responsibility for ensuring the effective promotion of British values and how these values are embedded within the TESS Group's curriculum.

TESS Group has 2 Designated Safeguarding Officers (DSO) – please see page 4 for their names and contact details. They are responsible for the following:

- Providing professional advice, support and guidance to staff regarding any suspicion of abuse, if a young person or vulnerable adult makes a disclosure or in relation to the possible abuse of trust
- Provide professional advice, support and guidance to staff regarding causes for concern other than abuse with regards to children and vulnerable adults
- Gathering statements and information regarding child and vulnerable adult safeguarding issues and securely passing the information to the DSL
- Making decisions, in consultation with the DSL, regarding appropriate action
- If requested to do so by the DSL, sharing information and making referrals with Children’s Social Care or the Local Safeguarding Board
- Monitoring learners after a referral is made and ensuring that the Company is adhering to any work agreed with Social Services or other agencies

TESS Group has a Prevent Duty Champion (PDC) – please see page 4 for their name and contact details. They are responsible for providing support, information and guidance to staff who raise a concern relating to the Prevent Duty and has responsibility for liaising with Prevent Regional Coordinators, gathering information from Counter Terrorism Local Profiles (CTLP’s) to disseminate across the business and for updating the TESS Group Prevent Risk Assessment and Action Plan.

The Head of Data and MIS is responsible for ensuring that safer recruitment practice is embedded and implemented across TESS Group.

The TESS Group’s Senior Management Team are responsible for ensuring that all staff have an understanding of safeguarding and the Prevent Duty and that they have received appropriate training and development and that the safer recruitment policy is followed at all times. They will ensure that safeguarding and the Prevent Duty is given high priority within their teams.

All employees have a responsibility for completing their training, familiarising themselves with *Keeping Children Safe in Education: safeguarding information for all staff* (Department for Education 2022) the Safeguarding and Prevent policy and any other related safeguarding policies and procedures and for ensuring they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns about a learner.

Responding to an allegation

If the issue reported relates to Female Genital Mutilation (FGM) it **MUST** in the first instance be reported as a priority to the police.

All complaints, allegations or suspicions must be taken seriously and must be reported to the DSL on that working day. An incident report form (see Appendix 1) must be completed within 12 hours, detailing the nature of the allegation and any other relevant information.

The person to whom the allegation of abuse has been reported should work closely with the DSL to provide as much detail as possible regarding the allegation.

Depending upon the level of need, the DSL must contact and report the matter to the Local Safeguarding Board / Authority.

DO

- Make sure the individual is safe
- Assess whether emergency services are required and if needed, call them
- Listen
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to the Designated Safeguarding Lead or Officer
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support
- Take seriously all concerns and reports, including those of sexual harassment and violence

DON'T

- Panic
- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes

Confidentiality

- Child and vulnerable adult protection raises issues of confidentiality which should be clearly understood by all
- Staff and associates have a professional responsibility to share relevant information about the protection of children and vulnerable adults with other professionals, particularly investigative agencies and adult social services
- Clear boundaries of confidentiality will be communicated to all
- All personal information regarding a child / vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial reporting form
- If a child / vulnerable adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells them sensitively that he or she has a responsibility to refer cases of alleged abuse to the Safeguarding Team or appropriate agencies

- Within that context, the child / vulnerable adult should, however, be assured that the matter will be disclosed only to people who need to know about it
- Where possible, consent should be obtained from the child / vulnerable adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the child / vulnerable adult is the priority
- Where a disclosure has been made, staff should let the child / vulnerable adult know the position regarding their role and what action they will have to take as a result
- Staff should assure the child / vulnerable adult that they will keep them informed of any action to be taken and why. The child / adults' involvement in the process of sharing information should be fully considered and their wishes and feelings taken into account

Embedding values within the TESS Group

Equality and diversity, the values of respect and tolerance will be embedded within teaching and learning sessions. This will be supported by additional tutorials where necessary on a range of subjects that support values and values-based decision making. Skills Coaches / trainers will be empowered to encourage open and safe debate with support from specialist staff where this is deemed necessary. The Head of Programmes will take responsibility for ensuring this is adhered to and encouraged throughout personal CPD and delivery.

Partnership and working with other agencies

TESS Group foster good working relationships with other agencies including the local authority, police and Regional Prevent Coordinators. TESS Group will share information with external agencies as appropriate to safeguard learners.

Risk assessment

TESS Group undertake a Prevent risk assessment. This risk assessment and subsequent action plan will be reviewed on a quarterly basis by the DSL and Prevent Duty Champion who will carry oversight responsibility for Prevent activities within TESS Group.

Staff training

All members of staff are required to undertake annual safeguarding training; which includes the prevention of radicalisation and extremism awareness, County Lines and British Values. Training will enable staff to identify and understand the factors that make people vulnerable to being drawn into extremism and the knowledge of TESS Group processes and procedures to report concerns. This forms a mandatory element of staff training.

The distribution of leaflets and other literature within TESS Group

Prior to any literature being distributed in TESS Group from external agencies or by learners when this literature is not related to their programme of study, the permission of the Chief Executive Officer and Head of Programmes should be sought.

Speakers and events within TESS Group

TESS Group welcomes and actively encourages guest speakers and external agencies as a powerful mechanism to enrich the learning and wider learning experience. However, TESS Group will refuse entry to those speakers whose values are contrary to TESS Group's own and who may be wishing to engage with TESS Group as a mechanism to promote extremist views.

Guest speakers are, in the main, booked and authorised by the Chief Executive Officer. However if staff are unsure about the legitimacy of speakers or organisations wishing to host events in TESS Group, advice should be sought from the Managing Director.

External agencies wishing to hold an event at TESS Group should provide at least a month's notice and be willing to share an outline of the event and presentational content prior to the event.

Risk assessments will be undertaken for all external bookings for the TESS Group's facilities.

Online safety

TESS Group employs web-filtering intended to stop staff or learners accessing inappropriate material whilst on TESS Group premises. This is encapsulated in TESS Group's IT Acceptable Use Policy and breaches of the policy will be dealt with in accordance with the staff and learner disciplinary procedures. TESS Group will continue to promote online safety and educate learners about safe and responsible internet use.

The Learners Voice

We will work alongside TESS Group managers using email surveys to promote safety, safeguarding and the prevention of extremism and radicalisation.



Lisa O'Reilly
Chief Executive Officer