

# Safeguarding Policy



**VARSITY**  
TRAINING

Professional  
Health Care Education

This policy is owned and maintained by our Senior Management Team and Director who hold responsibility for reviewing and updating this policy on an annual basis.

Name of reviewer: D Wraight

Signature:

Date of review: 08/01/2024

Next review due date: 08/01/2025



T: **01934 808591** E: **enquiries@varsitytraining.co.uk**  
Pure Offices, Pastures Avenue, St Georges, Weston-Super-Mare, BS22 7SB  
**www.varsitytraining.co.uk**

Company number: 9508899 Registered address: 253 Henleaze Road, Henleaze, Bristol BS9 4NQ

## Policy Statement

Varsity Training believes it is unacceptable for a child, young person, apprentice or adult to experience any kind of abuse and recognises its responsibility to safeguard their welfare by a commitment to practice which protects them.

### We recognise that:

- The welfare of the child, young person, apprentice, and vulnerable adults is paramount.
- All people regardless of gender, disability, age, sexual orientation religious belief.
- Working with Children, young people, adults and other agencies is essential in promoting people's welfare.
- We endeavour to treat all children, young people, apprentices and adults with respect, regardless of ability or culture.
- Varsity recognises that extreme political and religious views and exposure to extremist materials and influences can be damaging so should be addressed as a safeguarding issue. If Varsity Training fail to challenge extremist views, we are failing to protect our learners and staff. There is no place for extremist views of any kind within Varsity Training whether from internal sources, external agencies or individuals.

### The purpose of this policy statement is:

- To provide protection for children, young people, apprentices and vulnerable adults who receive our services.
- To provide staff with guidance on procedures they should adopt in the event they suspect a child, young person or vulnerable adult may be experiencing, or be at risk of harm and enable them to protect themselves from accusations.

This policy applies to all staff, including Directors and anyone working on behalf of Varsity Training. We will endeavour to safeguard children, young people and vulnerable adults by:

- Valuing them, listening to and respecting them.
- Maintaining child protection policy through procedures and a code of conduct (where applicable) for staff.
- Recruiting staff safely by ensuring all necessary checks are made in line with government guidance and legislation.
- Provide effective management for staff through supervision, support and training.
- Sharing information about concerns with agencies who need to know and involving relevant individuals appropriately.

We are committed to reviewing our policy and good practice annually.

### **Confidentiality, Privacy & Data Protection**

Varsity Training has a clear approach to confidentiality and information sharing and our approach is made available to all adults, young people, children via the Varsity Training website, discussions with staff during their Inductions and information available on Moodle our virtual learning platform. We also have a GDPR statement available on our website: [GDPR Statement – Varsity Training](#)

The welfare of children, young people and vulnerable adults has priority over the confidence to others. Individual cases will only be discussed or shared where necessary.

### **IT Usage**

Varsity Training has an IT User and Social Media Policy which staff and learners are requested to read and sign. Misuse of devices cause concern and may include the distribution of indecent images, exploitation, bullying. This policy describes the control measures in place to ensure individuals keep themselves safe as well as consequences if IT equipment is misused.

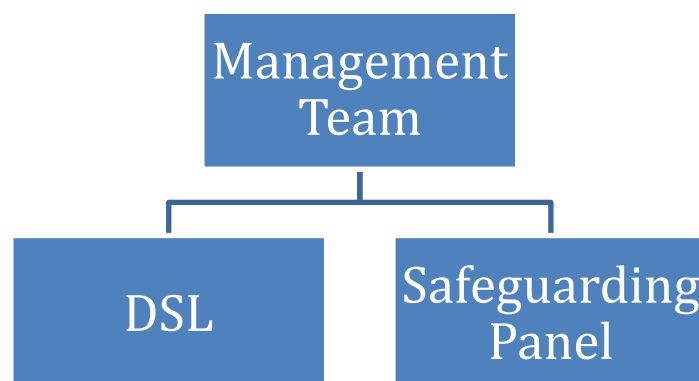
### **Varsity Safeguarding, Organisation Roles and Responsibilities**

Varsity Training carries out its responsibilities in relation to safeguarding through the following structure:

- VT Management Team.
- The Safeguarding Panel.
- Designated Safeguarding Lead.

The VT Management Team oversees the currency of the Policy and its implementation. The VT Management Team has responsibility for the:

- Safeguarding Panel (constituted of members from the VT Management Team) which investigates safeguarding incidents.
- Safeguarding Lead (designated by the VT Management Team) who undertake direct activities related to safeguarding.



## Varsity Safeguarding Panel

The Safeguarding Panels responsibilities are to:

- Ensure safeguarding standards are communicated to all staff.
- Ensure all staff receive appropriate safeguarding training.
- Ensure all reporting and external referral procedures (where applicable) are adhered to.
- Review all safeguarding reports and make recommendations.

### Varsity Safeguarding Panel

Del Wraight	Director
Carol Wraight	Director
Hilary Douglas – Smith	Designated Safeguarding Lead & IQA
Karen Green	Deputy Safeguarding Lead & Senior Assessor

### Designated Safeguarding Lead

The responsibility of the Safeguarding Lead is to:

- act as a source of advice on safeguarding matters.
- receive copies of the Safeguarding Concerns Report form.
- respond to communications made to the vtregulation@varsitytraining.co.uk email address.
- constitute the Safeguarding Panel with members of the Management Team.
- co-ordinate action within Varsity Training and liaise with the appropriate authorities or agencies about suspected or actual cases of child, young person or vulnerable adult abuse.
- provide guidance and support to those dealing with any issues about safeguarding children, young people or vulnerable adults involving the inappropriate behaviour or actions of a member of Varsity Training staff.
- advise on safeguarding training within Varsity Training.

The Safeguarding Lead will be Varsity Training staff member, identified and nominated based on their registration and/or experience as a social care worker, probation officer, nurse, teacher or police officer. The Safeguarding Lead is designated by and accountable to the VT Management Team.

DSL	Deputy DSL
Hilary Douglas-Smith ☎ 07449 599 982	Karen Green ☎ 01934 808591

## Staff Recruitment & Training

We adhere to relevant DfE guidelines and when recruiting staff we obtain full personal details via a detailed application form. The recruitment process is as follows:

1. A detailed application form is received and vetted by the Administration Co-ordinator
2. The applicants' references are verified wherever possible prior to commencing employment, the employee's probationary period is not passed until satisfactory references are received.
3. Original qualification certificates are checked, and copies are retained on file.
4. A Government Right to Work check is carried out to verify the applicant's identity.
5. The Disclosure and Barring Service enhanced check is applied for prior to employment starting.
6. All employees undergo a compulsory probationary period lasting a minimum of three months.
7. Their contract is confirmed upon receipt of a satisfactory DBS check, satisfactory references and successfully passing their probationary review.
8. Ongoing support, development training and monitoring is undertaken by senior managers.

At least one person involved in the recruitment process will have undertaken Safer Recruitment Training

## Induction and Training

All new staff undertake a comprehensive induction which includes a module on safeguarding training which includes a short assessment. Staff are required to refresh their safeguarding training annually.

Training and qualifications for all Varsity Training staff is set out below:

Role	Modules
Safeguarding Panel	ETF Safeguarding Module Online Prevent Training
Designated & Deputy Safeguarding Leads	Designated Safeguarding Lead training ETF Safeguarding Module Online Prevent Training
Assessors	ETF Safeguarding Module Online Prevent Training
HR & Administration Co-ordinator	ETF Safeguarding Module Online Prevent Training Safer Recruitment Training

\*Annual refresher training is required by all staff for Safeguarding and Prevent.

## **Prevent Duty Statement**

Under the United Kingdom Governments 'Counter – Terrorism and Security Act 2015' a requirement was laid upon 'specified authorities' including Training providers when exercising their functions to have due regard to the need to PREVENT people from being drawn into terrorism.

Varsity Training is fully committed to safeguarding and promoting the welfare of all learners and staff against radicalisation and extremism.

We expect all staff, learners and services contracted by Varsity Training to uphold and promote the fundamental principles of 'Human Rights' and British Values' and exemplify these in their practice including, democracy, Individual Liberty, rule of law, mutual respect and tolerance of those with different faiths and beliefs.

Varsity Training expectation is that all staff are fully engaged in being vigilant about safeguarding, radicalisation and extremism. We will ensure that we work in partnership with professional bodies, external agencies and partners in our community to ensure all learners are safe from harm.

## **Policy Promotion**

The policy is promoted on Moodle our Virtual Learning Environment which both staff and Learners has access to as well as being available on our website <http://varsitytraining.co.uk/vt-policies/>

## **Responding to Safeguarding concerns: Guidance for Varsity Training Staff**

Concerns about safeguarding children, young people and vulnerable adults may arise in different situations. You may become aware of suspected or likely abuse because:

- You witness or observe something.
- Someone has informed you they have a concern.
- An individual has directly informed you they are/ have been abused.
- There has been an allegation against a member of staff.
- There has been an anonymous allegation.

### **Remember the 4 R's of safeguarding children:**

1. Recognising – the signs of abuse. This maybe emotional, sexual, physical or neglect (see Key definitions section below).
2. Recording – the information you have, to the best of your ability, without adding your own opinions.
3. Reporting – to the designated Safeguarding Lead who may also need to report to the Safeguarding Panel to decide the next steps.
4. Referral – to the appropriate external agencies.
  - Police
  - Local safeguarding Partnership
  - Children's Social Care Services
  - Disclosure & Barring Service

Please refer to Varsity Training **Safeguarding Procedure** document for further guidance on our procedure.

## **Key Definitions**

Although the legal context is different for vulnerable adults, much of the following information on the types of abuse and neglect of children and young people is also applicable to vulnerable adults.

### **Abuse and Neglect – Children and young people**

The following definitions are based on those from Working Together to Safeguard Children (HM Government 2006) and Safeguarding Children: Working Together under the Children Act 2004. Abuse and neglect are forms of maltreatment of a child or young person. Someone may abuse or neglect a child or young person by inflicting harm, or by failing to act to prevent harm. Children or young people may be abused in a family, institutional setting or community setting; by those known to them, or more rarely by a stranger. They may be abused by adult/s, another child or children or young people.

#### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness. An important indicator of abuse is where bruises or injuries are unexplained, or the explanation does not fit the injury.

#### **Emotional Abuse**

Emotional abuse is the persistent emotional ill treatment of a child or young person such as to cause severe and persistent adverse effects on the child's or young person's emotional development. It may involve making a child or young person feel or believe they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve serious bullying causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children or young people. Some level of emotional abuse is involved in all types of ill treatment of a child or young person, though it may occur alone.

#### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution whether the child or young person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may also include non-contact activities, such as involving children or young people in looking at pornographic material or watching sexual activities or encouraging children or young people to behave in sexually inappropriate way.

#### **Neglect**

Neglect is the persistent failure to meet a child's or young person's basic physical and psychological needs, likely to result in the serious impairment of the child's or young person's health or development. It may involve a parent or carer failing to provide adequate food, shelter



and clothing, failing to protect a child or young person from physical harm or danger, or the failure to ensure access to appropriate medical care or may also include neglect of a child's or young person's basic emotional needs.

### **Bullying & Cyberbullying**

Bullying may come from another child or young person or an adult. Bullying is defined as - deliberate hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.

There are four main types of bullying.

1. Physical (e.g., hitting, kicking, slapping),
2. Verbal (e.g., racist or homophobic remarks, name-calling, graffiti, threats, abusive text messages, abuse via social media),
3. Emotional (e.g., tormenting, ridiculing, humiliating, ignoring, isolating from the group),
4. Sexual (e.g., unwanted physical contact or abusive comments).

It can also happen online. This can include sending threatening or abusive texts messages, creating and sharing embarrassing images or videos, trolling- the sending of menacing or upsetting messages on social networks, chat rooms or online games, excluding children from online games, activities or friendship groups, shaming someone online, setting up hate sites or groups about a particular child, encouraging young people to self-harm creating fake accounts or hijacking and stealing online identities to embarrass a young person or cause trouble using their name, sending explicit messages (sexting) or pressuring individuals into sending sexual images or engaging in sexual conversations.

No single sign will indicate for certain that an individual is being abused in this way but belongings getting lost or damaged, physical injuries, such as unexplained bruises, being afraid, being mysteriously 'ill' each morning, not going to school/work asking for or stealing money, loss of confidence, becoming distressed and withdrawn or even bullying others.

### **Online Abuse**

Any type of that happens on the internet facilitated through technology like computers, tablets, mobile phones. It can happen anywhere online such as: social networks, text messages and messaging apps, email and private messaging, online chats, online gaming and live streaming sites.

Children and young people can be revictimised (experience of further abuse) when abusive content is recorded, uploaded or shared by other online, this could happen if the original abuse happened online or offline. Children and young people may experience several types of abuse online: Bullying, Cyberbullying as discussed above, emotional abuse, sexting, sexual abuse and sexual exploitation.

An individual experiencing abuse online might spend a lot more or a lot less time than usual online, texting, gaming or using social media, seem distant, upset or angry after using the internet

or texting, be secretive about who they're talking to and what they're doing online or their mobile phone or have lots of new phone numbers, texts or email addresses on their mobile phone laptop or tablet.

### **Harmful Sexual Behaviour (HSB)**

Harmful sexual behaviour is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive. Peer-on-Peer sexual abuse is a form of HSB where sexual abuse takes place between children of a similar age or stage of development. Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected, sexualised behaviour which doesn't have an overt element of victimisation or abuse.

### **Sexting**

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', rude pics, or nude selfies. It is also known as nude image sharing. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. This may have happened with or without consent of all the people involved.

An individual may tell you directly that they have been involved in 'sexting' or they might mention something which gives you cause for concern. Or you may notice that a child is behaving differently or being bullied and the sexting may come to light when you try to find out what is going on.

### **Female Genital Mutilation (FGM)**

This is when a female's genitals are deliberately altered or removed for non- medical reasons. It is also known as female circumcision or cutting. It is often performed by someone with no medical training who uses instruments such as a knife, scalpel, scissors, glass or razor blade. Children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained. It can happen at various stages of a child's life, including when a baby is new-born, during childhood or as a teenager, just before marriage or during pregnancy.

Signs it might happen include a relative or someone known as a 'cutter' visiting from abroad, a special occasion or ceremony to 'become a woman' or 'prepared for marriage', a female relative, like a mother, sister or aunt has undergone it, a family arranges a long holiday overseas or visits a family abroad during the summer holidays, a girl has unexpected or long absence from school, a girl struggles to keep up in school or a girl runs away – or plans to run away – from home.

Signs it has happened include having difficulty walking, standing or sitting, spending longer in the bathroom or toilet, appearing quiet, anxious or depressed, acting differently after an absence from school or college, or reluctance to go to the doctors or have routine medical examinations. They may also ask for help- though they might not be explicit about the problem because they're scared or embarrassed.

### **County Lines**

County Lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and vulnerable people to store drugs and money and/or transport them to suburban

areas, market towns and coastal towns. Dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users and contact people to instruct them where to deliver drugs. In some cases, dealers may take over a local property normally belonging to a vulnerable person and use it to operate criminal activity from. This is known as 'cuckooing'.

Signs of this may include increase in visitors and cars to a property, new faces appearing, new and regular changing residents, change in residents mood or demeanour, substance misuse and/or drug paraphernalia, changes in the way young people you may know dress, unexplained, sometimes unaffordable things, residents or young people you know go missing, maybe for long periods of time, young people seen in different cars driven by unknown adults, antisocial behaviour, truancy, exclusion and unexplained injuries.

### **Prevent/ Extremism**

Prevent is about safeguarding and supporting those vulnerable to radicalisation. Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

Prevent uses a range of measures to challenge extremism including supporting people who are at risk of being drawn into terrorist or extremist activity through the channel process, working with and supporting community groups and social enterprise projects who provide services and support to vulnerable people, supporting local schools, local industry and partner agencies through engagement, advice and training and working with faith groups and institutions to assist them in providing support and guidance who may be vulnerable.

Prevent is about making sure you can identify worrying behaviour and know how to refer those who may be at risk of radicalisation for appropriate support. If you have a concern, you should follow the safeguarding reporting procedures.

### **Radicalisation**

The process may involve being groomed online or in person., exploitation including sexual exploitation, psychological manipulation, exposure to violent material and other inappropriate information or the risk of physical harm or death through extreme acts.

Anyone is at risk but there are some factors which may make an individual vulnerable. These include being influenced or impressionable having low self-esteem or being isolated, feeling the rejection, discrimination or injustice is taking place in society experiencing community tension amongst different groups, being disrespectful or angry towards family and peers, having a strong need for acceptance or belonging, or experiencing grief such as loss of a loved one.

### **Child Sexual Exploitation**

This occurs when a child is given things, like gifts, drugs, money, status and affection in exchange for performing sexual activities. Children and young people are often tricked into believing they're in a loving and consensual relationship. They may trust their abuser and not understand that they are being abused.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse to control them.

Anyone can be a perpetrator, no matter their age, gender or race. The relationship could be framed as friendship, someone to look up to or romantic. Children and young people who exploited may also used to 'find' or coerce others to join groups.

Sexual exploitation can be difficult to spot and sometimes mistaken for 'normal' teenage behaviour. Knowing the signs can help protect them when they've no one else to turn to. Signs include unhealthy or inappropriate sexual behaviour, being frightened of some people, places or situations, being secretive, sharp changes in mood or character, having money or things they can't or won't explain, physical signs of abuse, like bruises or bleeding in their genital or anal area, alcohol or drug misuse, sexually transmitted infections or pregnancy.

Other things you might notice is them having an older boyfriend or girlfriend, staying out late or overnight hanging out with older people, other vulnerable people or in antisocial groups, involved in a gang or criminal activities like selling drugs or shoplifting.

### **Up-skirting**

Up-skirting is the invasive practice of taking non-consensual photographs under a person's skirt or kilt, capturing an image of the crotch area, underwear and sometimes genitalia. An 'upskirt' is a video, photograph or illustration which incorporates such an image.

As of April 2019, up-skirting is an offence of the Voyeurism Act under the Sexual Offences Act 2003. The maximum sentence for the offence is two years imprisonment and in more serious sexual cases those convicted are added to the Violent and Sex Offender Register.

### **Domestic Abuse**

This is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people witnessing domestic abuse. It is important to remember domestic abuse can happen inside or outside the home, over the phone, on the internet, on social networking sites, in any relationship and can continue after a relationship has ended, both men and women can be abused or abusers.

Domestic abuse can be emotional, physical, sexual, financial or psychological such as kicking, hitting punching or cutting, rape, controlling someone's finances and withholding money or stopping someone from earning, controlling behaviour, like telling someone where they can go and what they can wear, not letting someone leave the house, reading emails, text messages or letters., threatening to kill someone or harm them, threatening to another family member or pet. It can be difficult to tell if domestic abuse is happening and those carrying out the abuse can act very differently when other people are around. Signs that an individual may have witnessed domestic abuse can include aggression, or bullying, anti-social behaviour, anxiety, depression or suicidal thoughts, attention seeking, drug or alcohol use.