Safeguarding

Policy

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Date of Next Review	September 2022
Responsibility	Managing Director
Signature	

Statement

The purpose of this document is to set out the policy of Digital Marketing Mentor (DMM) in relation to the Safeguarding of children and vulnerable adults. Everyone working with or on behalf of children and vulnerable adults has a responsibility to safeguard and promote their welfare. Anybody can become the victim of abuse; therefore, DMM aims to provide a safe environment for all. We have due regard for "Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges", September 2021 and "Working Together to Safeguard Children", 2015 (updated 2018).

DMM will safeguard and promote the welfare and wellbeing of all learners.

- Children includes everyone under the age of 18
- Vulnerable Adults - adults at risk defined in the Care Act 2014 as
  - has needs for care and support (whether or not the local authority is meeting any of those needs)
  - is experiencing, or at risk of, abuse or neglect
  - as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

Safeguarding is an all-encompassing term used to describe many aspects of keeping our learners safe, including:

- Learner health, safety including emotional health and wellbeing
- Child protection
- Protection of adults at risk
- Bullying, harassment, victimisation and discrimination including racial abuse
- Abuse and neglect
- Safety from sexual exploitation, sexual violence, sexual harassment (including child on child), female genital mutilation and forced marriage
- Alcohol, drug and substance misuse
- E-safety including all aspects of electronic communication and use of social media
- Financial exploitation
- Protecting people from radicalisation and extremism

Legislation and Guidance

This policy is governed by Government Legislation and Guidance in respect of protecting children and vulnerable adults including:

- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2015
- Keeping Children Safe in Education September 2021
- The Education Act 2001
- The Children Act 1989 and 2004
- The Police Act 1997
- Mental Capacity Act 2005
- Rehabilitation of Offenders Act 1974
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Data Protection Act 2018
- UN Convention of the rights of the Child 1991
- NSPCC 2016 – 'How safe are our children'
- Counter Terrorism and Security Act 2015
- Prevent Duty 2015
- The Care Act 2014
- 'No Secrets' guidance (2000)
- Equality Act 2010
- UK Modern Slavery Act 2015
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

Scope

This procedure applies to all DMM learners and covers all aspects of a learner's programme regardless of where it takes place. It is the responsibility of all staff to undergo relevant safeguarding training and Prevent awareness training to understand their role in supporting Safeguarding across DMM's provision and for familiarising themselves with the appropriate procedures and other policies that support this document.

Digital Marketing Mentor's Policy

Digital Marketing Mentor will operate within the following key principles when it relates to Safeguarding:

- Safeguarding is recognised as everyone's responsibility

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- All people will be treated with respect and with courtesy by staff and learners in an environment that is free from harassment or discrimination.
- All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards.
- Digital Marketing Mentor will use appropriate filtering software such as "SafeSearch" to ensure inappropriate websites cannot be accessed using DMM computers and systems.
- Digital Marketing Mentor will work with learners and other agencies to promote a safe and healthy culture.
- Digital Marketing Mentor will develop partnerships to proactively protect learners at risk of abuse or neglect.
- Staff will be trained to identify indicators and changes in behaviours that may signify a learner is at risk (including at risk from radicalisation and extremism) and will understand how concerns should be reported.
- Staff will have a clear understanding of personal safety and good Safeguarding practices.
- Digital Marketing Mentor will work with learners to promote their own personal health, well-being and safety including their safety online.
- Digital Marketing Mentor will work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism.
- Learners will 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.
- Digital Marketing Mentor will support learners to have personal resilience and be able to make informed and sensible decisions about their safety and wellbeing.
- The focus will be on minimising the risk of harm to learners, particularly young people and vulnerable adults.
- The different needs of individuals are properly understood and adjustments made as appropriate.

Employers of Apprentices

Digital Marketing Mentor carries out robust due diligence checks when working with employers of apprentices to ensure appropriate policies are in place.

DMM requires:

- Employers of apprentices take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the apprentices they employ.
- Any staff working with apprentices in a position of trust are appropriate for the role and do not present any danger or threat.
- Any people working with young or vulnerable people have had an appropriate check completed with the Disclosure and Barring service.
- Where possible, DMM to identify a designated safeguarding contact within each Employer.
- Each employer to adhere to the requirements of the Equality Act 2010.
- Each employer to ensure their apprentices are made aware of the organisation's policies on using the internet and technology in the workplace.
- Each employer to have an understanding of the dangers apprentices may face using technology in the workplace and act to minimise risks.

Learner's Entitlement

In order to promote a healthy and safe environment, our learners will be 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 that is free from bullying or harassment.
- 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 how to access support on personal health and safety issues either within Digital Marketing Mentor or from outside agencies.
- To be provided with up-to-date information around personal safety issues.
- The opportunity to comment and feedback on the extent to which Digital Marketing Mentor 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.

Safe learning

The principles of the 'Keeping Children Safe in Education' and Safeguarding agendas will be embedded within Digital Marketing Mentor's teaching and learning practices and within quality

assurance and quality improvement frameworks. Safe recruitment practices will be implemented as outlined in the relevant section of this policy.

Digital Marketing Mentor 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.

Prior to any literature being distributed to our learners through Digital Marketing Mentor from external agencies or by learners when this literature is not related to their programme of study, the permission of the Managing Director and Quality Director must be sought.

Digital Marketing Mentor welcomes and actively encourages guest speakers and external agencies into Digital Marketing Mentor as a powerful mechanism to enrich the learning and wider learning experience. However, Digital Marketing Mentor will refuse entry to those speakers whose values are contrary to Digital Marketing Mentor's own and who may be wishing to engage with Digital Marketing Mentor as a mechanism to promote extremist views.
Guest speakers are booked and authorised by the Managing Director, however if staff are unsure about the validity of speakers or organisations wishing to host events in Digital Marketing Mentor, advice should be sought from the Managing Director or the Quality Director. The delivery of guest speakers is observed by either the Managing Director or the Quality Director.

Safe environment

Digital Marketing Mentor will provide an environment that is safe and secure for all users, whilst at the same time is friendly and welcoming. Robust systems and processes will be in place for staff and learner identification and for visitor registration. Health and safety are of paramount importance and as such all facilities and resources will comply with legislative requirements for health and safety.

Digital Marketing Mentor's commitment to the safe environment is held within the following policy and procedure documents: the Health and Safety policy; the Information Security policy and the incident reporting procedures.

Safe recruitment

Digital Marketing Mentor will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. Staff will undergo the appropriate DBS checks for their

role where applicable and will undertake mandatory Safeguarding awareness training appropriate to their role. Staff will understand the principles of safe working practices and how not to put themselves in situations that compromise themselves or learners. All new starters will receive an appropriate induction, including Safeguarding awareness and Prevent training.

Governance and reporting

Digital Marketing Mentor 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

Digital Marketing Mentor will work with the Local Authority Designated Officer and the Multi Agency Safeguarding Hub to ensure a comprehensive Safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate.

Digital Marketing Mentor will work proactively with the regional Prevent Coordinator and where appropriate the local steering group and Channel panel.

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 will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

Keeping Learners Safe

Digital Marketing Mentor has appropriately trained staff that are designated safeguarding leads (DSL). The DSL and Deputy DSL will 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. We will 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 concerns or making allegations of abuse in their learner induction and it is documented in the Learner Handbook. Safeguarding is also covered in each one-to-one meeting and progress review.

Digital Marketing Mentor operates a culture of openness and transparency and embeds the Principles of the 5R's across all our services and ensures all staff, delivery partners and contractors understand their responsibilities with regard to Safeguarding. These are:

1. Recognise
2. Respond
3. Report
4. Record
5. Refer

Key Responsibilities

Digital Marketing Mentor's Managing Director has overall responsibility for ensuring that Digital Marketing Mentor meets its obligations within the area of Safeguarding including Prevent. The Managing Director is responsible for the approval of the Safeguarding and the Prevent policies and to ensure that all staff are appropriately trained in safeguarding and understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel may be at risk. Our Managing Director is our Designated Safeguarding Lead (DSL) supported by our Director of Quality as the deputy Designated Safeguarding Lead.

Digital Marketing Mentor's Founder (the Chair of the Board) is responsible for ensuring that the Safeguarding processes and procedures including Prevent referrals are robust and consistently applied and that Digital Marketing Mentor fulfills its legal duties.

The Operations Manager is responsible for monitoring that all staff have completed relevant training and have access to relevant materials for Safeguarding and Prevent awareness.

All employees have a responsibility for completing mandatory training including Safeguarding awareness, Health and Safety and Prevent awareness. In addition, to familiarise themselves with *Keeping Children Safe in Education 2021: Part One,* Digital Marketing Mentor's Safeguarding policy, Prevent policy and any other related Safeguarding policies and procedures. They must ensure they understand their own role in the promotion of all aspects of Safeguarding and the

appropriate action to be taken should they receive a disclosure or have concerns about a learner.

Responding to an allegation

This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a child or vulnerable adult has been abused.

All complaints, allegations or suspicions must be taken seriously and must be reported to the Designated Safeguarding Lead on that working day where possible, if the Designated Safeguarding Lead is unavailable within this working day, then reporting must be made to the Deputy Designated Safeguarding Lead. If, in exceptional circumstances, the DSL or the deputy DSL are not contactable, the Founder should be contacted.

DMM Safeguarding Contact Details:

Phone: 0116 2166620 - ask for the Designated Safeguarding Lead or Deputy Lead

Email: safeguarding@digitalmarketingmentor.co.uk

In the event of an allegation being made against the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead, then the DMM Founder must be contacted. If the allegation or complaint extends to all of the senior management team, then contact can be made with external safeguarding authorities.

Where appropriate, the Designated Safeguarding Lead must telephone and report the matter to the Local Authority. A Safeguarding report must be completed within 24 hours detailing the name of the person reporting the allegation of abuse to the Local Authority, along with the date and time this was actioned.

An incident report form (see Appendix 1) must be completed within 24 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 child / vulnerable adult and the Designated Safeguarding Lead to resolve the issue where appropriate. Send the completed form to safeguarding@digitalmarketingmentor.co.uk

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 your manager for Support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support

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 to keep their secrets
- 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 legislation and guidelines. Records will only contain details required in the initial contact 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 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.

When 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 / adult's involvement in the process of sharing information should be fully considered and their wishes and feelings taken into account.

SECTION B:

SAFEGUARDING ISSUES

This section explains briefly some of the 'safeguarding issues' that education providers must be aware of. Most come under the heading of 'abuse' of which there are four main types (see below).

Some of these aspects will require staff to have more training than others and responses may differ slightly when dealing with a particular issue. It is important that further reading and knowledge than that contained in this section may well be required when dealing with a particular aspect of safeguarding, including reference to KCSiE 2021.

Some sections contain a link to further reading around the particular aspect of safeguarding concern. Staff should always seek the support from their DSL and follow DMM reporting guidelines.

Abuse Categories

There are four recognised types of abuse:

Physical Abuse (NSPCC): is any way of intentionally causing physical harm to a child, It also includes making up the symptoms of an illness or causing a child to become unwell.

Emotional Abuse (NSPCC): is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child. 'Active' emotional abuse can include things like 'bullying' and 'passive' emotional abuse could take the forms of ignoring, showing no love to, etc.

Sexual Abuse (NSPCC): when a child or young person is sexually abused, they're forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong. Sexual abuse can be through 'contact', i.e., an abuser makes physical contact with a child, and 'non-contact', i.e., where a child is abused without being touched by the abuser either in person or online.

Neglect is the ongoing failure to meet a child's/young person's or vulnerable adult's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. Types of neglect are; physical, emotional, educational and medical.

It should be noted that these forms of abuse can also occur by children to children, i.e., 'peer-on-peer'.

There can be some general 'non-specific' signs of abuse that can appear in any of the types of abuse which are listed below:

- Attention-seeking behaviour
- Anxiety levels higher than 'should' be
- Depression
- Extreme anger or sadness
- Lack of self-esteem
- Lacks social skills and may have few friends, if any
- Self-harm
- Significant change in behaviour and/or personality
- Suspicious bruises with unsatisfactory explanations
- Withdrawal from activities and/or others

In addition, some specific signs of abuse for each type of abuse may be present:

Physical Abuse:

- bruises (especially on certain areas and/or in clusters)
- broken or fractured bones
- burns or scalds (with clear shapes and/or on certain parts of body) ·
- bite marks ·
- breathing problems from drowning or suffocation ·
- effects of poisoning such as vomiting, drowsiness or seizures ·
- scarring

Emotional Abuse:

- act in a way that's inappropriate for their age
- difficulty making or maintaining relationships

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- seems unconfident or lack of self-assurance
- struggle to control emotion

Sexual Abuse

- avoiding being alone with or frightened of people or a person they know
- bleeding, discharge, pains or soreness in genital or anal area
- knowledge and/or use of sexual language or behaviour that wouldn't be expected of their age
- having nightmares or bed-wetting
- drug or alcohol issues
- pregnancy
- self-harm
- sexually transmitted infections

Neglect:

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes or the wrong clothing, such as no warm clothes in winter
- health and development issues such as:
  - Poor muscle tone or prominent joints
  - dental issues
  - poor language or social skills
  - regular illness, infections and/or accidental injuries, through lack of supervision
  - weight or growth issues
- housing and family issues such as:
  - living in an unsuitable home environment, such as having no heating
  - being left alone for a long time
  - taking on the role of carer for other family members
  - Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Indicators of concern

The following are often regarded as indicators of concern in regard to behaviours, signs which may be displayed by parents/carers/others who may be aware of the abuse a child is suffering

and do not disclose it to professionals, possibly due to one or more factors such as; being the perpetrators themselves, in fear of someone else, simply unaware due to mental or learning issues (e.g. neglect), etc.

Parents/carers may:

- offer an explanation which is inconsistent with an injury or child's behaviour
- offer several different explanations provided for an injury or behaviour
- be unable to explain a reason for any delay in seeking treatment
- be uninterested or undisturbed by an accident/injury or change in behaviour
- be absent without good reason when their child is presented for treatment
- move their children around schools frequently
- be reluctant to give information or mention previous injuries/episodes
- use different doctors

Child on Child Sexual Violence & Sexual Harassment (including Peer-on-peer Abuse)

Children can abuse other children. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence (see below)
- sexual harassment (see below)

Keeping Children Safe in Education 2021 devotes Part Five of the guidance to this aspect of safeguarding and reference should be made to this section alongside the DfE's more detailed document *Sexual violence and sexual harassment between children in schools and colleges (2021).*

All staff must be aware of this issue and report any concerns to the DSL in accordance with DMM's reporting procedures.

DMM recognises that children, young people and vulnerable adults sometimes display abusive behaviour and that such incidents must be referred on for appropriate support and intervention.

Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children, young people and vulnerable adults and in worst case scenarios a culture that normalises abuse leading to children, young people and vulnerable adults accepting it as normal and not coming forward to report it.

It is important that all victims are taken seriously and offered appropriate support. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult learners and staff are supported and protected as appropriate.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys and that SEND learners are three times more likely to be abused than their peers.

Behaviours (potentially criminal in nature) such as; grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts, must always be challenged. Dismissing or tolerating such behaviours risks normalising them.

Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non-consensual sharing of nude and semi-nude images and videos.

As set out in UKCIS (UK Computer Internet Safety)

- Sharing nudes and seminudes: taking and sharing nude photographs of U18s is a criminal offence

- sharing of unwanted explicit content

- upskirting (is a criminal offence)

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- sexualised online bullying

- unwanted sexual comments and messages, including, on social media

- sexual exploitation; coercion and threats

It is important that we consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Appendix 1 – Safeguarding report log.

Safeguarding Report	
Where a concern has been raised to a designated safeguarding lead, this must be actioned immediately and reported to the Local Authority within 24 hours.	
Learner's name:	**Date of concern raised:**
Summary:	
How the complaint was made *(phone/email/letter/in person etc.)*	
Actions already been taken to resolve the safeguarding issue	

Staff Signature:	Date:	Print Name:

Safeguarding Lead Signature:	Date:	Print Name: JULIE THOMPSON

Actions taken/Final Outcome (Include names and agency the concern was reported to and date and time of reporting):

Signature	Date

Links to Digital Marketing Mentor policies:

Equality and Diversity Policy

Health & Safety Policy

Social Media Policy

Prevent Policy

Harassment and Bullying Policy

Complaints and Feedback Policy

https://digitalmarketingmentor.co.uk/policies-and-procedures/

Links to external policies and information:

Department of Education 'Keeping Children Safe in Education' Document

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf

The Prevent Duty

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

Gov.uk 'Working Together to Safeguard Children' Document

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

UK Council for Internet Safety
https://www.gov.uk/government/organisations/uk-council-for-internet-safety

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf