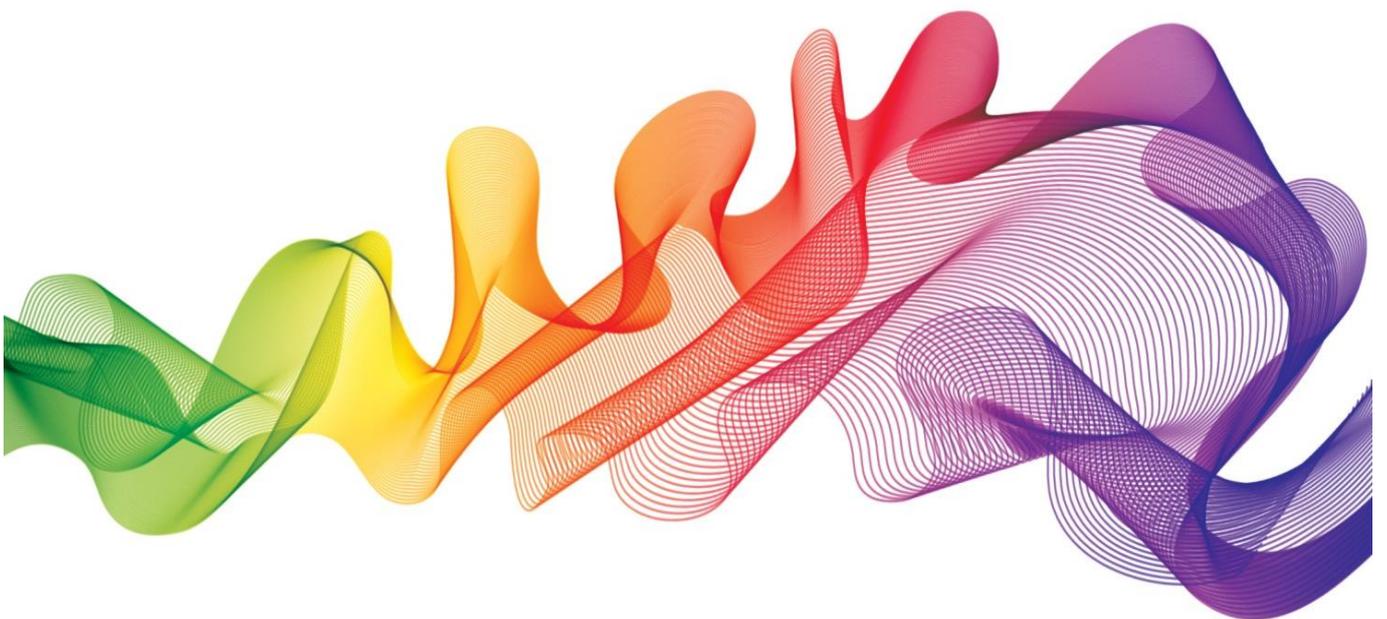


**Safeguarding Code of Conduct for all
Employees, Associates, Contractors and
Volunteers**



Contents	Page 1
Safeguarding Information for Staff	2
Promoting a child centred and coordinated approach to safeguarding	2
The role of TTE and associated staff	3
What TTE staff should look out for	3
What TTE staff should do if they have concerns about a child/learner	3
Procedure for responding to an allegation of abuse	4
Record keeping	4
Why is all of this important?	4
What TTE staff should do if they have concerns about another staff member	5
Allegations against a member of staff	5
What TTE staff should do if they have concerns about safeguarding practices within TTE	6
Abuse of Positions of Trust	6
TTE Safeguarding Team	7

Safeguarding Information for Staff (Referenced to "[Keeping Children Safe in Education](#) – Part One" – Statutory guidance for Schools and Colleges; DoE September 2016)

Promoting a child centred and coordinated approach to safeguarding

Schools, colleges, training providers and their staff are an important part of the wider safeguarding system for children and learners.

Safeguarding and promoting the welfare of children and learners is **everyone's** responsibility. **Everyone** who comes into contact with children/learners and their families and carers has a role to play in safeguarding them. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child/learner.

No single professional can have a full picture of a child's/learner's needs and circumstances. If children/learners and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children/learners is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18. Learners are defined in company policy as any person on a programme of learning regardless of age.

The role of TTE and associated staff

TTE staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All TTE staff have a responsibility to provide a safe environment in which children/learners can learn.

TTE has a Designated Safeguarding Lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

All TTE staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

Any staff member who has a concern about a child's/learner's welfare should follow the referral processes set out in [QP38 Safeguarding](#). Staff may be required to support social workers and other agencies following any referral.

What TTE Staff need to know

All staff members should be aware of systems within TTE which support safeguarding and these are contained within the following policies and guidance notes:

- [TTE Safeguarding Policy](#);
- Safeguarding Code of Conduct for all Employees, Associates, Contractors and Volunteers, Inclusive of the Role of the Designated Safeguarding Lead
- [Safeguarding Children and Learners](#) – A Quick Guide for Staff

Copies of the Safeguarding Policy and the above documentation are provided to all staff during Induction.

All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All TTE staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals (e.g. Welfare Officer) to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

All staff will be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments. Guidance and support will be provided by the Designated Safeguarding Lead following any referral. Additional information can be found in Chapter 1 [of Working Together to Safeguard Children](#): DofE - March 2015

What TTE staff should look out for

All TTE staff should be aware of the types of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Types of abuse and neglect, and examples of safeguarding issues are described in [Safeguarding Children and Learners - A Quick Guide for Staff](#).

The HMG Publication [What to do if you are worried a child is being abused](#)- Advice for practitioners – July 2015 provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on types of abuse and what to look out for.

Staff members working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure, they should always speak to the designated safeguarding lead or person.

What TTE staff should do if they have concerns about a child/learner

If TTE staff members have any **concerns** about a child/learner (as opposed to a child/learner being in immediate danger - see latter section) they must report the matter to a Designated Safeguarding Person as detailed below:

Procedure for responding to an allegation of abuse

The following procedure must be followed whenever an allegation is made that a child, young person or learner has been abused or when there is a **suspicion** that a child, young person or learner has been abused.

Do not make promises regarding confidentiality. Explain to the person **at the outset** that you will need to report the disclosure and share the information with the TTE Designated Safeguarding Person. The Designated Safeguarding Person will, where possible respect the wishes of the individual; however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

The member of staff or learner who has concerns about possible abuse or neglect contacts their Designated Safeguarding Person as soon as possible for advice and support. A record of the incident or concern should be made on the [Safeguarding Concern Record](#). If the complainant is the child, young person or learner him / herself, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and court proceedings.

The Designated Safeguarding Lead must report the matter to the Local Authority Designated Officer (LADO) as a matter of urgency, whether or not they feel this action is justified in the particular circumstances of the case. The matter will be reported over the telephone to the Local Authority Designated Officer (LADO) (or such other person as required by the local Area Child Protection Committee (ACPC) procedures). In the unlikely event that the relevant local authority contact cannot be reached the DSP will contact the relevant police safeguarding team for the area.

A written record of the report will be retained by the Designated Safeguarding Lead. The written record will note the date and time of the report and must include the name and position of the person to whom the matter is reported. The Designated Safeguarding lead should discuss with the LADO/Local Safeguarding Children's Board what action will be taken to inform the parents / guardians of the child, young person or learner and a note of that conversation should be made.

If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool "Reporting child abuse to your local council" directs staff to their local children's social care contact number.

[QP38 Safeguarding](#) outlines the process for staff when they have concerns about a child/learner.

If, after a referral, the child's situation does not appear to be improving, the designated safeguarding lead (or the person who made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

If early help is appropriate, the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

If a **TTE member of staff**, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18, the **TTE staff member** must report this to the police.

What TTE staff should do if a child is in danger or at risk of harm

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead, the designated safeguarding lead should be informed as soon as possible that a referral has been made. "Reporting child abuse to your local council" directs staff to their local children's social care contact number.

Record keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead.

Why is all of this important?

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; and a lack of challenge to those who appear not to be taking action.

What TTE staff should do if they have concerns about another staff member

If staff members have concerns about another staff member, or in any event where there is any suspicion, allegation or apparent abuse of a child, young person or learner by a member of staff the matter should be reported to the Designated Safeguarding Person as soon as possible.

On being notified of any such matter the Designated Safeguarding Person shall:

- Take such steps as they consider necessary to ensure the safety of the child, young person or learner in question;
- Liaise with the person who reported the original concern and ensure that a report of the matter is completed;
- Notify the Designated Safeguarding Lead who has the responsibility to ensure that matter is reported to the LADO in accordance with the procedure set out above if not already done so;
- Notify the TTE Group Managing Director;
- If the Designated Safeguarding Person is the subject of the allegation or complaint the matter must be reported direct to the Group Managing Director. If a complaint has been made against the Group Managing Director the matter must be reported to the Board.

All staff should be aware of the fact that allegations may be made against them, and that the allegation may have grounds for substantiation or not. Any such notification may result in immediate suspension of the member of staff, and may result in the enforcement of the company's disciplinary procedure where it is considered appropriate.

Where there are concerns about the Safeguarding Lead, or any Directors, this should be referred to the chair of the Board of Directors as appropriate.

Allegations against a member of staff

In the event there is any suspicion, allegation or apparent abuse of a child, young person or learner by a member of staff the matter should be reported to the Designated Safeguarding Person as soon as possible.

On being notified of any such matter the Designated Safeguarding Person shall:

- Take such steps as they consider necessary to ensure the safety of the child, young person or learner in question;
- Liaise with the person who reported the original concern and ensure that a report of the matter is completed;
- Notify the Designated Safeguarding Lead who has the responsibility to ensure that matter is reported to the LADO in accordance with the procedure set out above if not already done so;
- Notify the TTE Group Managing Director;
- If the Designated Safeguarding Person is the subject of the allegation or complaint the matter must be reported direct to the Group Managing Director. If a complaint has been made against the Group Managing Director the matter must be reported to the Board.

Repeat of above

What TTE staff should do if they have concerns about safeguarding practices within TTE

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures within TTE's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Appropriate whistle blowing procedures (see [Grievance Policy](#)), which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the school or college's senior leadership team.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistle blowing channels may be open to them:

- General guidance can be found online at- Advice on whistle blowing
- The NSPCC whistle blowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Abuse of Positions of Trust

The Sexual Offences (Amendment) Act, 2000 specifies that an adult who is in a position of trust – for example as a tutor/trainer or supervisor/line manager – may not engage in any sexual activity with a young person under the age of 19 who is in their care. The offence applies even where the sexual activity is consensual. Such an activity is likely to constitute gross misconduct under the TTE Disciplinary procedures. All social contact between staff and learners, outside events organised and supervised by TTE, is strongly discouraged. Contact between staff and learners through Internet social networking sites is open to misinterpretation and is also strongly discouraged. Staff should be aware that time spent alone with a learner, or physical contact, could place them in a vulnerable position.

- **Do not** spend excessive amounts of time alone with children, young persons and learners, away from others. Meetings with individual children, young persons and learners should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff, should be aware of the meeting;
- You are advised **not to** make unnecessary physical contact with children, young persons and learners. However, there may be occasions when physical contact is unavoidable, eg providing comfort at times of distress. In all such cases contact should only take place with the consent of the child, young person or learner;
- It is **not good practice** to take children and learners alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardian) and discussed with your line manager;
- You **should not** meet children, young persons and learners outside of the work environment;

You **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should record the facts and report these to the Designated Safeguarding Person You should never (even in fun):

- Initiate or engage in sexually provocative conversations or activity;
- Allow the use of inappropriate language to go unchallenged;
- Do things of a personal nature for children, young persons and learners that they can do themselves;
- Allow any allegations made by a child, young person or learner go without being reported and addressed;
- Trivialise or exaggerate child, young person or learner abuse issues;
- Make promises to keep any disclosures confidential from relevant authorities;
- You **should not** show favouritism to any one child, young person or learner, nor should you issue or threaten any form of physical punishment.
-

You must:

- **Respect** children, young persons and learners' rights to privacy and encourage children, young persons and learners to feel comfortable enough to report attitudes or behaviour they do not like;
- Act with discretion with regards to their personal relationships. They should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff, children, young persons and learners **must** be declared;
- **Be aware** of the procedures for reporting concerns or incidents, and familiarise yourself with the contact details of the Designated Safeguarding Person;
- If you find yourself the subject of inappropriate affection or attention from a child, young person or learner, **you should** make your line manager aware of this;
- If you have any concerns relating to the welfare of a child, young person or learner in your care, be it concerns about actions / behaviours of another staff member or concerns based on any conversation with the child, young person or learner; particularly where the child or vulnerable adult makes an allegation, they should report this to a Designated Safeguarding Person.

TTE Safeguarding Team

Steve Grant - TTE Group Managing Director

Keith Leslie – Non-Executive Director

Designated Safeguarding Lead:

Ian Ward – The TTE Group Health, Safety, Security, Environmental and Facilities Manager;

Designated Safeguarding Persons (DSP's)

Craig Brannigan - Health and Safety Adviser;

Nicola Jones – Welfare Officer.



Steve Grant
Group Managing Director
June 2017

