

# Safeguarding Policy

QP101

Version 14  
September 2023

## POLICY VERSION CONTROL

Issue	Date	Approved By	Position	Revision Notes
V1	May 2023	Kevin Dowson	Director of Excellence	New policy
V9	Mar 2019	Tina Patel	Safeguarding Lead	Content
V10	Mar 2020	Tina Patel	Safeguarding Lead	Formatting
V11	Mar 2021	Tina Patel	Head of Safeguarding	Content
V11	Aug 2021	Fran Grainger	Admin	No content change. formatting change
V12	Dec 2021	Tina Patel	Head of Safeguarding	Content
V13	Mar 2022	Tina Patel	Head of Safeguarding	Content
V13.1	Mar 2023	Ingrid Kennedy	Head of Compliance	Review date moved to coincide with government publications
V14	Sept 2023	Tina Patel	Head of Safeguarding	Content
<b>Next Review Date:</b> September 2024			<b>Policy Owner:</b> Tinal Patel	

### ROLES AND RESPONSIBILITIES:

Director of Excellence

- Responsible for monitoring changes, update in the law

Head of Safeguarding and Prevent

- Annual policy review
- Investigate concerns raised

Employees

- All Workpays staff to abide by this policy
- Report any concerns related to this policy

## INTRODUCTION

### Introduction

Workpays Ltd is committed to a positive policy of equal opportunity and strives to support learners wherever possible. It also has a duty of care to learners and endeavours to ensure that the wellbeing and health and safety of them are a priority at all times. Staff recognise and accept their responsibility to develop an awareness of risks and issues involved with safeguarding. The company also recognises that it has a responsibility to protect staff from unfounded allegations of abuse and is committed to working with external agencies to ensure the safeguarding of its learners.

All children, young people and adults, without exception, have the right to protection from abuse regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender, sexual orientation or socio-economic background. We aim to create a positive learning and working environment where every individual can be true to themselves and is able to learn and work without fear of harm. Workpays Ltd will engender the principle that safeguarding is 'everyone's responsibility'.

The Head of Safeguarding and Prevent for Workpays Ltd is Tina Patel, who can be contacted on [tina.patel@workpays.co.uk](mailto:tina.patel@workpays.co.uk) or on 07964 396786, the Designated Safeguarding Officer (DSO) Kooner Singh can be contacted on [Kooner.singh@workpays.co.uk](mailto:Kooner.singh@workpays.co.uk) and Individuals can email [safeguarding@workpays.co.uk](mailto:safeguarding@workpays.co.uk)

### Purpose

The key commitments of Workpays' policy for safeguarding children and vulnerable adults are:

1. Workpays is committed to building a 'culture of safety' in which young people and vulnerable adults are protected from abuse and harm in all areas of its service delivery
2. Workpays is committed to responding promptly and appropriately to all incidents or concerns relating to the health, safety and welfare of learners that may occur and to work with statutory agencies following the procedures that are set down in 'What to do if you are worried a Child is being abused' (DCSF 2006).
3. Workpays is committed to promoting awareness of safeguarding issues to both staff and learners, throughout all ongoing training and learning programmes, including induction and through progress reviews - it is also committed to empowering all learners by promoting and reinforcing their rights to be safe and listened to.
4. The purpose of this policy is to set out our approach to safeguarding children, young people and adults and protecting them from a range of potential harm.

Staff understand their responsibilities and limits in recognising and seeking guidance relating to disclosures through robust mandatory and refresher training

## SCOPE

Safeguarding children is defined in 'Working Together to Safeguard Children' as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding vulnerable adults is defined in the 'Care and Support' statutory guidance issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

The term 'learner' for this policy covers learners of Workpays who study at Workpays centres or in the workplace. In addition, it covers learners visiting Workpays for interviews or on induction.

For this policy, children are defined in the Children Act 1989 as a person under the age of 18 years. The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as a person aged 18 or over and:

- receiving a social care service
- receiving a health service
- living in sheltered accommodation
- detained in custody or under a probation order
- requiring assistance in the conducting of their affairs
- receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions.
- being a nursing or expectant mother

### Definitions and Terms of Abuse

**Child** - A child is defined as someone who has not reached 18 years of age.

**Young Person** - A young person is defined as someone normally between the age of 14 - 17 years of age.

**Vulnerable Adult** - Following the Protection of Freedoms Act 2012, the definition of regulated activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time.

An adult is defined as vulnerable when they are in receipt of a 'regulated activity' in relation to vulnerable adults. (*Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012*)

Regulated activity is therefore defined by the following 6 broad categories:

- providing health care
- providing personal care
- providing social work
- assistance with cash, bills and/or shopping
- assistance in the conduct of a person's own affairs
- providing transportation of individuals where that transport is provided because of age, health or disability

### **Discriminatory Abuse**

Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated by a person's age, gender, disability, sexual orientation, race, cultural background or religion. Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal discrimination is the prejudice of the individual, whereas, Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service

Signs and symptoms of discriminatory abuse can include:

- emotional withdrawal
- low self-esteem
- unexplained fear or defensiveness
- isolation / shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions

Other types of abuse which could be considered *discriminatory*:

**Hate Crimes:** any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.

**Ageism:** discrimination based on age, especially against the elderly.

**Gender Discrimination:** is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives and status greater than those of the inferior sex.

**Homophobia:** discrimination against (fear or dislike of) homosexual people and homosexuality.

**Transgender Discrimination:** discrimination against people who are transgender.

**Religious Intolerance:** is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.

**Racism:** the belief that all members of each race possess characteristics or abilities specific to that race, especially so as to distinguish it as inferior or superior to another race or races.

**Disablism:** discriminatory, oppressive or abusive behaviour arising from the belief that disabled people are inferior to others.

**Physical Abuse:** the physical mistreatment of one person by another which may or may not result in physical injury. Physical abuse includes assault, hitting, slapping, scratching, pushing, kicking, burning, force-feeding, misuse of medication or the withholding of medication or treatment, restraint, forced isolation or inappropriate sanctions, unwarranted or unauthorised deprivation of liberty, false imprisonment or abduction.

Signs and symptoms of physical abuse can include:

- unexplained bruises or welts on body, including face, lips, mouth, body, arms, back, buttocks, thighs
- bruises in various stages of healing, clusters forming regular patterns, reflecting the shape of an article or finger marks
- unexplained burns, especially on soles, palms and back, immersion burns, rope burns, electric appliance or carpet burns
- unexplained fractures to any part of the body, especially if in various stages of healing, multiple or spinal injuries

Other types of *abuse* which could be considered *physical*:

**Domestic Abuse:** any incident, or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners, or family members regardless of gender or sexuality.

Behaviour is 'abusive' if it consists of any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

and it does not matter whether the behaviour consists of a single incident or a course of conduct.

**Forced Marriage:** is a marriage conducted without the valid consent of one or both parties where duress is a factor. Forced Marriage is a violation of internationally recognised human rights and contrary to the Matrimonial Causes Act 1973.

**'Honour'-Based Violence:** is an incident or crime carried out to protect or defend the honour or 'izzat' of the family or community. This type of violence can be distinguished from other forms of violence as it is often committed with some degree and/or collusion from the family and/or community. Honour-based violence includes acts of harassment, assault, imprisonment, unexplained death (suicide), forced pregnancy/abortion and in some cases murder. The family may perceive that the person has acted inappropriately and dishonoured the family and community. Consequently, the violence carried out is to punish them for this.

**Online Grooming :** Building relationships with people online or in other parts of your life is natural, grooming is when someone uses those relationships to trick, force or manipulate someone into doing something sexual or illegal.

**Sexting:** Sexting is the act of sending sexual text messages. It often also involves sending nude or seminude photos and explicit videos of yourself.

**One Chance Rule:** The "one chance" rule. That is, they may only have one opportunity to speak to a victim or potential victim and may possibly only have one chance to save a life

**Environmental Abuse:** includes depriving someone of their liberty, sustained restrictions on a person's freedom of movement as a result of the physical environment the person is in, culture of the environment or institution.

**Emotional Abuse:** is the persistent emotional maltreatment, to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued in so far as they meet the needs of another person. It may involve serious bullying (including cyberbullying). Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

**Sexual Abuse:** the involvement of individuals in sexual activities to which they have not had the freedom and capacity to give their informed consent to, before and during the act, and/or may not fully comprehend. These acts include rape and attempted rape, sexual assault by penetration, sexual assault, abuser touching the victim's body for their own gratification, indecent exposure, non-contact abuse (pornography), and sexual harassment, causing or inciting a person to engage in sexual activity without their consent. The use of social media and the internet has introduced 'cyber' sexual abuse such as 'sexting' and un-authorized sharing of sexual images.

Signs and symptoms of sexual abuse can include:

- full or partial disclosure or hints of sexual abuse

- signs of depression, stress
- recoiling from physical contact
- unusual difficulty in walking and sitting
- sexually transmitted disease
- love bites, bruises or finger marks on thighs or arms
- significant change in sexual behaviour, language or outlook

Other types of abuse which could be considered *sexual*:

**Female Genital Mutilation: (FGM)** is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other non-therapeutic reasons.

**Child on Child Abuse:** Peer-on-peer abuse includes, but is not limited to:

- physical and sexual abuse
- sexual harassment and violence
- emotional harm
- on and offline bullying
- teenage relationship abuse

It can even include grooming children for sexual and criminal exploitation. All staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. Downplaying certain behaviours will not be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'. Staff will maintain an attitude 'it could happen here'. All inappropriate behaviour will be addressed.

**Sexual Exploitation:** Sexual exploitation of young people and vulnerable adults involves exploitative situations, contexts and relationships where the vulnerable person receives 'something' (e.g., food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/boyfriend as a result of them performing, and/or others performing on them, sexual activities.

**Upskirting:** a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). This can take place in a range of places; however, the new law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress or alarm. Anyone, and any gender, can be a victim and this behaviour is completely unacceptable. Upskirting is distressing and a humiliating violation of privacy for victims. We want any staff and learner to know they can report incidents of upskirting in a confident manner and reports to the police will be taken seriously.

**Psychological or Emotional Abuse:** action or neglect by a person which impairs the psychological wellbeing of another person. This results from being repeatedly made to feel unhappy anxious afraid humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive



networks. People who use social media can be at risk from being humiliated or abused online.

**Signs and symptoms of psychological/emotional abuse** can include:

- fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach
- ambivalence to carer
- emotional withdrawal
- sleep disturbance
- low self-esteem

Other types of abuse which could be considered *psychological*:

**Anti-Social Behaviour:** acting in a manner that caused or was likely to cause harassment alarm or distress to one or more persons not of the same household as the defendant.

**Discriminatory Abuse:** as described above Cyber Abuse: the use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and wellbeing or discriminate against an adult at risk. This could be through the use of a PC, laptop, tablet, mobile phone, gaming console or television with internet access.

Threats can come through content, contact and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room messages, instant messaging and websites. Signs and symptoms can include spending long periods of time online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming. For more information, see [www.digital-stalking.com](http://www.digital-stalking.com)

**Financial or Material Abuse:** the misappropriation of an individual's funds, benefits, savings, assets etc. or any other action that is against the person's best financial interests. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, denying access to money, or the misuse or misappropriation of property, possessions or benefits.

**Signs and symptoms of financial/material abuse** can include:

- unusual or inappropriate bank activity
- a Power of Attorney obtained when a person is unable to comprehend
- recent change of deeds or title of house
- person lacks belongings or services which they can clearly afford

## County Lines

The 2018 Home Office Serious Crime Strategy states the NPCC definition of a County Line is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to

exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement. Workpays will ensure we will monitor such activities if concerns are raised and report to the Head of Safeguarding who will then report to the external agencies and support any staff that are involved in such incidents, ensuring reports are tracked, updated and monitored until sign off.

### **Neglect and Acts of Omission**

**Neglect** is the deliberate withholding OR unintentional failure to provide appropriate and adequate care and support. Section 44 Mental Capacity Act 2005 states

“Anyone who has a duty of care to a person who lacks capacity is guilty of an offence if they deliberately or recklessly illtreat that person or if they wilfully neglect that person

Signs and symptoms of *neglect* and *acts of omission* can include:

- physical condition of the person is poor
- unexplained or untreated deterioration in health and wellbeing, including not
- seeking appropriate medical attention
- inadequate heating or lighting
- poor personal hygiene
- malnutrition – loss of weight

### **Extremism and Radicalisation**

Extremism and Radicalisation Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Workpays values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Workpays is clear on its legislative and moral duty to view exploitation and radicalisation as a safeguarding concern and act accordingly

Signs and symptoms of extremism or radicalisation can include:

- being in contact with extremist recruiters;
- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour;
- experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis

Workpays has a separate policy to ensure we comply with and support CONTEST, the Government's Counter Terrorism Strategy and in particular the PREVENT strategy to stop people from becoming terrorists or supporting terrorism.

We aim to carry out this policy by:

- promoting learner's rights to be safe and listened to, by creating an environment in our service delivery that encourages young people and vulnerable adults to raise any concerns
- encouraging learners to develop a sense of autonomy and independence in their learning and development
- enabling young people/vulnerable adults to have the self-confidence and the vocabulary to resist inappropriate approaches
- helping learners to sustain beneficial relationships with employers, and where necessary (through additional learning support) with personal relationships
- encouraging employees (individuals who work – or have applied to work for the company either on a permanent, temporary, contractual or voluntary basis) to embed Safeguarding throughout all work streams
- working with employers to build their understanding of and commitment to the principles of safeguarding all our young people and vulnerable adults
- liaising with other statutory agencies to ensure legislative procedures are current and that a young person's risk assessment has been conducted and reviewed

This policy applies to all staff and everyone else working for and on behalf of Workpays Ltd.

Methods

- 1. In accordance with Working Together to Safeguard Children (2023) and Keeping Children safe in Education (2020), Workpays Ltd is committed to building a 'culture**

**of safety' in which young people, vulnerable adults and those regarded as temporarily vulnerable are protected from abuse and harm in all areas of its service delivery.**

#### Staffing and Volunteering

- We provide adequate and appropriate staffing resources to meet the needs of learners
- candidates are informed in writing of the need to carry out 'enhanced disclosure' checks with the Criminal Records Bureau/ DBS before posts can be confirmed
- we abide by regulatory requirements in respect of requesting references and Criminal Record Bureau checks for all staff including volunteers, to ensure no disqualified person or unsuitable person works at the delivery of services or has access to learners - new staff and volunteers are not permitted unsupervised access to young people or vulnerable adults pending return of a satisfactory CRB/DBS check
- we abide by the Children Act 2004 and Safeguarding of Vulnerable Groups Act 2006 requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of learner protection concern
- we have procedures for recording the details of visitors to all our offices and premises.
- we monitor learner health and safety at centres and in the workplace with arrangements put into place to reduce risks, all staff have to complete mandatory training, this training is completed regardless of roles or levels within Workpays. Refresher training reminders are sent out to all staff on a regular basis
- we ensure any relevant history of the learner, particularly concerning potential indicators of abuse or neglect is recorded on their learner profile
- we ensure the Self-Assessment Report evaluates the risk management system in place for vulnerable groups, this is saved in a secure place, with restricted access, this is in line with Data control and GDPR regulations and the Human Rights Act 1998

***2. Workpays is committed to responding promptly and appropriately to all incidents or concerns that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you are worried a child is being abused' (DfES 2006)***

The Head of Safeguarding will respond to the report within 24 hours, the incidents will be logged and tracked on our internal Safeguarding reporting tracker, these will be in chronological order so that the records are dated and reviewed regularly to ensure any concerns have been escalated within a timeline allowing each incident to be monitored, reviewed and closed off

#### Responding to Suspicions of Abuse

- We acknowledge abuse or neglect of basic safety and welfare procedures for learners can take place and this can take different forms - physical, emotional, and sexual as well as employer's neglect of legal responsibilities and neglect of

parental or statutory responsibilities (including where young people are in the care of social services) - we also acknowledge this can take the form of 'virtual' or internet-based abuse or neglect

- we recognise when young people or vulnerable adults are suffering from physical, sexual or emotional abuse, or maybe experiencing neglect, this may be demonstrated through the things they say (direct or indirect disclosure) or through changes in their appearance, their behaviour, or their play
- where such evidence is apparent, a member of staff makes a dated record of the details of the concern on a Safeguarding Report form and discusses what to do with the designated safeguarding officer for investigation and action. Safeguarding reports are held by the safeguarding officer and stored in a restricted access locked cabinet.
- staff take care not to influence the outcome, either through the way they speak to or question young people/vulnerable adults
- Workpays continues to welcome the learner whilst investigations are being made in relation to any alleged abuse - the learner may choose to withdraw from learning activities whilst investigations take place
- we follow the procedures as set by the local safeguarding board in relation to the delivery of services' and designated roles and tasks in supporting the learner, family, and employer subsequent to any investigation
- all suspicions and investigations are kept confidential and shared only with those who need to know - any information is shared under the guidance of the local safeguarding board and local authority designated officer

#### Allegations Against Staff

- We ensure all learners and employers know how to complain about staff, which may include an allegation of abuse or neglect of statutory duties
- we follow the guidance of the local safeguarding board when responding to any complaint that a member of staff or volunteer has abused a learner - each operations manager knows the safeguarding officer is to be made aware immediately of any allegation or complaint against a member of staff or volunteer
- we respond to any disclosure by learners or employers that abuse by a member of staff may have taken, or is taking place, by first recording the details of any such alleged incident on a Safeguarding Report Form
- we refer any such complaint immediately to the local authority's designated officer to investigate
- we cooperate entirely with any investigation carried out by the local authority, police, or independent safeguarding authority

Managing allegations against staff, customer and learners and reporting low level concerns

Keeping in children in Safe in Education released statutory guidance, recommends that all concerns need to be reported and recorded, all concerns and allegations against adults, this includes all low-level concerns

What is a low level concern?

A low-level concern means the allegations against that staff member do not meet the harms threshold and this person does not pose an immediate risk towards the students

The adult in question may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- and is otherwise not considered serious enough to consider a referral to the LADO

Workpays informs staff, customers and learners of reporting all incidents to the Head of Safeguarding and DSO and this discussed at induction training and Safeguarding refresher training.

Disciplinary Action

- It is a criminal offence for a person over 18 in a position of trust to enter into a sexual relationship with any learner under 18 years old, even if the relationship is consensual - if allegations are made against staff, the same procedures as outlined above must be followed - if a member of staff suspects abuse, whether sexual or otherwise, from another member of staff, the safeguarding officer is informed - depending on the severity of the allegations outside agencies may be informed and/or the staff disciplinary procedure may be invoked
- where a member of staff or a volunteer is dismissed from the delivery of services or internally disciplined because of misconduct relating to a learner, we notify the independent safeguarding authority so that appropriate action is taken

***3. Workpays is committed to promoting awareness of learner abuse issues throughout its training and learning programmes for adults. It is also committed to empowering learners through its provision; promoting their right to be safe and listened to.***

Training

All staff and learners complete a comprehensive induction and mandatory training when they joining the business, this training includes but is not an exhaustive list;

- Safeguarding including Equality and Diversity
  - Prevent
  - Modern Slavery and Human Trafficking
  - Fundamental British Values
  - Cyber Security
  - Fire Safety Awareness
  - General Data Protection Regulation
  - Manual Handling
- We seek out training opportunities for all staff involved in the delivery of services to ensure that they can recognise the signs and symptoms of possible physical abuse, emotional abuse, sexual abuse and neglect and so that they are aware of the local authority guidelines for making referrals
  - we ensure all staff know the procedures for reporting and recording their concerns in the delivery of services by checking understanding at appraisal (“any training required”) and during monthly meetings

#### Curriculum

- We introduce key elements of The Safe Learner Model into our programme to promote the personal, social and emotional development of all young people/vulnerable adults so that they develop an understanding of why and how to keep safe. This is done by way of induction, embedding within programmes and is documented during progress reviews
- we create within the delivery of services, a culture of value and respect for the individual, having positive regard for learners’ heritage arising from their colour, ethnicity, languages spoken at home, cultural, social background and their abilities, learning difficulties or illnesses - this is reinforced during progress reviews and lesson delivery
- we ensure this is carried out in a way that is developmentally appropriate for the learner

Workpays is committed to providing timely and effective support to all learners, customers and employees to achieve and maintain a safe and secure environment for all.

This document reflects the following key pieces of legislation: Please note this is not an exhausted List.

- Keeping Children safe in Education (2023)
- Working Together to Safeguard Children (2018)
- Safeguarding Vulnerable Groups Act (2006)
- Education Act (2002)
- Children Act (2004)
- Safeguarding Children (2006)
- Information Sharing (2018)
- The General Data Protection Regulation (GDPR) and Data Protection Act 2018

- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012
- The Voyeurism (Offences) Act, commonly known as the Upskirting Bill, 2019
- Protection of Freedoms Act (2012)
- Data Protection Act (2018)
- The Prevent Duty Guidance for England and Wales (2015)
- The Prevent Duty: departmental advice for schools and childcare providers (2015)
- Prevent Duty Guidance: for further education institutions in England and Wales (2015)
- Mandatory reporting of Female Genital Mutilation – procedural information (2015)
- Sexual violence and sexual harassment between children in schools and colleges (2021)
- Children Missing Education; statutory guidance for local authorities 2016
- The Domestic Abuse Act 2021
- Managing coronavirus (COVID-19) in education and childcare settings
- Promoting and supporting mental health and wellbeing in schools and colleges
- Elective home education (2019)
- Preventing and Tackling Bullying (2017), including Cyberbullying:

## RELATED POLICIES

This policy is to be read in conjunction with other policies and procedures in place including those detailed below:

<b>Policy Name</b>	<b>Policy Number</b>
Code of Conduct	QP041
Whistleblowing	QP002
Safer Recruitment	QP036
Equality, Diversity and Inclusion	QP003
Complaints policy	QP047
Lone Worker Policy	
Information Security Policy	QP005
Internet Usage Policy	QP068
Social Media Policy	QP006