



Lakota Hub C.I.C. - Safeguarding Policy

Purpose and Scope

All providers of adult, community and work-based learning in England are required by the *Safeguarding Vulnerable Groups Act 2006* to secure the safety of children, young people and vulnerable adults who are their learners. As a provider of further education, Lakota is committed to ensure all learners are kept safe so that they can learn and thrive. The drive for 'Inclusive Learning' has succeeded in bringing into the system learners with a wide range of needs, including many who can now be deemed 'vulnerable'.

A child is defined as anyone who has not yet reached their 18th birthday.

Particular attention will be given to Part Four: Allegations of abuse made against teachers and other staff, Duties as an employer and an employee [DfE (2016), Keeping Children Safe].

Prevent

An element of CONTEST, the UK Government's counter-terrorism strategy, defined as: Stopping people becoming or supporting terrorists or violent extremism.

Violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs.

An integral element of Lakota Safeguarding ethos is encouraging learners to respect the Fundamental British Values of:

- Democracy;
- the rule of law;
- individual liberty and mutual respect;
- tolerance of those with different faiths and beliefs

What is Safeguarding?

The term '*Safeguarding*' describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children and young people from any potential harm or damage.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices and procedures around the learner for them to succeed.

Safeguarding must be the informed responsibility of all staff, senior management, volunteers and board members to ensure the learning environment is safe and secure for all. In order to do so they will need to consider and act on the 5 R's:

- Recognition
- Response
- Reporting
- Recording
- Referral

Recognition

- The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on Lakota premises, in the home or in any other setting in which the learner may find themselves, all those playing a role in meeting learners' needs should be aware and informed so that possible abuse can be recognised, investigated and acted upon effectively. Signs and symptoms of abuse of young people and/or vulnerable adults may include direct disclosure. All staff should be trained to understand signs of possible abuse and know how, where and to whom to report concerns. Staff will be able to recognise signs of abuse, will know how to respond to students, how to use appropriate questioning and how to record information accurately. They will be aware of the Designated Person Flowchart and how to follow this procedure.

Response

- Appropriate response by our staff is vital. No report of or concern about possible abuse should ever be ignored. Staff are trained how to determine the most appropriate response and to clarify precise details. They are aware of the correct protocol, i.e.:
- Do not lead or probe with questions.
- Remain calm and demonstrate interest and concern while investigating.
- Do not agree confidentiality, this may restrict you from taking any action later
- Reassure that they have done the correct thing in reporting their concerns and that they will do anything possible to help.
- Record any disclosures.

Reporting

Report your concern or allegation to the company Safeguarding Officer or member of staff with specific designated responsibility for dealing with issues relating to Safeguarding - Designated Safeguarding Person (DSP)

- All allegations against people who work with children and that meet the specific criteria below should be reported by the employer within one working day to Local Authority Designated Officer, (LADO)
- Staff who have behaved in a way that has harmed a child or may have harmed a child
- Staff who have possibly committed a criminal offence related to a child
- Staff who have behaved towards a child or children in a way that indicates that he/she is unsuitable to work with children.

The current named Designated Safeguarding Officers and how to contact them can be found on signs around the company and the Safeguarding policy is available to view on all notice boards.

Please follow the Safeguarding Children & Vulnerable Adults Flowchart in Appendix

2. No one other than the designated person or their deputy should mount an investigation into complaints, allegations or suspicions of abuse. If actions are carried out by someone other than the designated person or deputy it could be seen as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

Recording

Staff are trained to ensure allegations are recorded precisely on the ***Safeguarding Children/Vulnerable Adult Incident Report*** form which can be found in Appendix 1 of this policy. Please use the words of the complainant and include accurate quotation. This can include observations about the physical and emotional state of the individual sharing their concerns. Information is recorded and stored securely, confidentially and only accessible to those who need to access it as part of the action taken to resolve the complaint or allegation.

Referral

The decision to refer a complaint or allegation lies with the designated safeguarding officers, having gathered and examined all relevant information. No one else will investigate such a situation. Investigation will involve questioning colleagues, learners, carers, parents, learners, assessors and the complainant. Designated Safeguarding Officers will have access to organisations and websites in order to seek guidance and help for learners.

Key guidance and legislation:

The key guidance and legislation for the safeguarding of children responsibilities for Lakota is contained within:

- The Children Act 1989
- The Victoria Climbié Inquiry Report by Lord Laming; 2003
- Every Child Matters Green Paper 2003
- Every Child Matters 'Change for Children' 2004
- National Service Framework for Children, Young People and Maternity Services 2004
- The Children Act 2004
- Working Together to Safeguard Children 2026
- Safeguarding Vulnerable Adults Act 2006
- Safeguarding Children and Safer Recruitment in Education 2007
- Vetting and Barring Scheme 2009
- Rehabilitation of Offenders Act 1974
- Counter Terrorism and Security Act February 2015
- Education Act 2002
- Keeping Children Safe in Education September 2016

Employees

All employees will be introduced to their rights and responsibilities with regards to Safeguarding through their induction and initial assessment. Learners will go through a thorough sign-up procedure with an assessor, where any special needs will be determined, logged and appropriately dealt with. All employees in work-based learning will have their place of work vetted by a trained assessor for Health and Safety purposes. Employees who work in places deemed medium or high risk will be revisited at regular intervals. Reviews with learners include specific safeguarding questions, covering areas including Health & Safety, Equality and Diversity; these reviews are carried out 12 weekly as a minimum. Learners have direct access to their assessor at all times and use this person as their first point of contact if they have any concerns.

Training

All new employees will be introduced to their rights and responsibilities with regards to Safeguarding at their initial national induction. The relevant policies are available to all employees via the HR/Safeguarding page of the HR Manual. All staff are required to complete the Safeguarding training provided by Lakota. On completion they will undertake the summative assessment and print out a certificate to prove completion of the course.

All staff in contact with learners who are under 18 or vulnerable adults will receive appropriate safeguarding training and regular safeguarding updates. Effective training is the key to carrying out our responsibilities of promoting and safeguarding children and young

people. Staff need to be trained on how to identify a child in need, and what subsequent action to take. Training will take place on a variety of levels, and will depend upon the needs of the staff concerned. All staff will have a basic induction which will include how to report safeguarding concerns. The Designated Child Protection Co-ordinator who undertakes regular inter-agency training and refresher training every 2 years and our Deputy Child Protection Co-ordinator who will act in the designated person's absence or to support them will also undertake appropriate training.

ICT Training facilities

Cyber bullying is the act of communicating harmful, violent and/or malicious words and or pictures through the means of technology.

Cyber bullying is the term used to refer to bullying and harassment by use of electronic devices though means of e-mail, instant messaging, text messages, blogs, mobile phones, pagers, and websites.

No longer does bullying transpire only on school grounds. The cyber world has allowed for children and vulnerable adults to be vulnerable to bullying in the safe haven of their home. This new ability to socially network in the cyber world is rapidly expanding the harmful effects children suffer from being bullied. Lakota plays an active role in protecting their learners from this rising trend by barring them from sites and all social networking sites. All our computers are audited regularly by qualified IT staff.

Spotting signs of abuse

Physical Abuse – may involve hitting, shaking, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of/or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as factitious illness by proxy or Munchausen's by proxy.

Emotional Abuse – is the persistent emotional ill treatment of a child/vulnerable adult which causes severe and persistent side effects on their emotional development. It may involve conveying to the child/vulnerable adult that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on them.

These may include interactions that are beyond their development capability as well as overprotection and limitation of exploration and learning or preventing them participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing them to feel frightened or in danger, or the exploitation or corruption of children/vulnerable adults. Some level of emotional abuse is present in all types of ill treatment of a child/vulnerable adult, though it can still occur alone.

Sexual Abuse – involves forcing or enticing a child or vulnerable adult to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The

activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging children to act in sexually inappropriate ways.

Neglect - is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect the child or vulnerable adult from physical harm or danger, or failure to ensure access to medical care or treatment. It may also be neglect of or unresponsiveness to the child's emotional needs.

Forced Marriage

A forced marriage is one where one or both of the partners do not, or perhaps in the case of an Adult at Risk, are not able to consent to the marriage and an element of duress is involved. Duress or "force" can include physical, psychological, sexual or emotional pressure. Forced marriage is a form of domestic abuse for adults, and where children are involved, child abuse. It happens to males and females and should not be confused with an "arranged marriage", where the partners have a choice to accept or reject the arrangements.

If you suspect this abuse, please contact DSL or contact;

- Telephone: +44 (0) 20 7008 0151
- Email: fmu@fco.gov.uk
- Email for outreach work: fmuoutreach@fco.gov.uk
- Facebook: Forced Marriage page
- Twitter: @FMUnit

Financial or material abuse

Financial or material abuse involves the use of a vulnerable adult's property, assets or income without their informed consent or making financial transactions that they do not understand to the advantage of another person.

Some examples are: theft, fraud, exploitation, and pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect and acts of omission

Neglect is behaviour that results in the vulnerable adult's basic needs not being met.

Some examples are: ignoring medical or physical care needs, persons physical condition/appearance is poor e.g. ulcers, pressure ulcers, soiled or wet clothing, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating and undermining personal beliefs.

Professional abuse

Is the misuse of power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability as a result of poor management systems/structures.

Domestic abuse and violence

Domestic abuse and violence is best described as the use of physical and/or emotional abuse or violence, including undermining of self-confidence, sexual violence or the threat of violence, by a person who is or has been in a close relationship.

Recording, Sharing of Information and Consent Issues:

In the climate of 'working together' with other agencies, young people and families, information will have to be shared, so it is important that our records are always kept up to date.

It is important that records are updated as and when information is received, and with any action taken in following these procedures. As with other records, we need to bear in mind that a young person can request their records, so until official 'consent' has been sought we need to be sensitive as to what we record.

It is also necessary to keep written records for yourself, you may need to refer to these at a later stage, or keep them as evidence. These should be locked away in a secure designated location.

The Designated Safeguarding person should keep a 'confidential' file containing all Safeguarding matters for the company which can be locked for safety and confidentiality.

Sharing Information

Important statutory duties in relation to vulnerable adults and children in need cannot be met without effective and appropriate sharing of information. For agencies to work together to the benefit of children, they must be able to share relevant information.

This includes a referral to Children's Social Care but could simply be sharing information between supporting agencies regarding a young person, for example, before a referral is made. However, sharing of information should take place according to the principles of good practice and on a need to know basis. When a request for information is made we need to be clear about why the information is needed and the way it is going to be used.

Prior to information being shared with other agencies, or a referral being made, consent should normally be sought from the young person and/or from one parent/career with agreed parental responsibility.

However, there are certain important circumstances where consent should not be sought. These are:

- If this would put the child or young person at greater risk of significant harm.
- Interfere with criminal enquiries.
- Raise concern about the safety of staff.
- Good practice ideas:
 - Always work in an open environment avoiding private or unobserved situations and encouraging open communication
 - Treating all children equally with respect and dignity always putting the welfare of each child first
 - Maintaining a safe and appropriate distance with children
 - Being an excellent role model – this includes not smoking or drinking alcohol in the company of children Keep physical and professional distance
 - Be aware of the effect that your words and actions may have
 - Assessments should be scheduled to be within the normal working day of the institution
 - Ensure training and work experience providers are fully briefed on Safeguarding issues and that they agree to a Safeguarding policy or appropriate control measures.

Practices to be avoided

- Spending excessive amounts of time alone with children away from others.
- Straying from the task in the specification or assignment.
- Being unnecessarily inquisitive – only ask for what is necessary to fulfil the requirements of the assessment or matter in hand.
- Saying anything that might make the child feel uncomfortable or debased.
- Saying anything that could be interpreted as aggressive, hostile or impatient.
- Being drawn into personal conversations or introducing personal subjects.
- Sitting or standing too close to the child.
- Standing over the child or otherwise making the child feel pressured.
- Meeting other than at the pre-arranged venue.
- Exchanging personal contact details.

Practices never to be sanctioned

You should never:

- Allow or engage in any form of inappropriate touching
- Allow children or vulnerable adults to use inappropriate language unchallenged
- Make sexually suggestive comments to a child or vulnerable adult, even in fun
- Reduce a child or vulnerable adult to tears as a form of control
- Allow allegations made by a child or vulnerable adult to go unchallenged, unrecorded or not acted upon
- Promise a child or vulnerable adult that their confidences will be kept secret.

- **Monitoring and evaluation**
- The designated persons will conduct an annual review of our safeguarding and child protection systems and policies. This will include consideration of specific cases dealt with by staff in the last year. The resulting information – including feedback from staff, will be used by the designated person to inform any improvements necessary

Our procedures for safeguarding children will be in line with Government legislation and the Skills Funding Agency guidelines. When this is changed our policy will be amended to reflect the changes.

Staff Recruitment:

The Lakota recruitment policy acknowledges our responsibility for protecting young people through safe recruitment practices. When recruiting we will consider whether a role is regulated or controlled and whether any safeguarding measures are needed. Regulated activities- are activities that involve contact with children or vulnerable adults frequently, intensively and/or overnight. Regulated activity is frequent (once a month or more) or intensive (takes place on three or more days in a 30-day period). Controlled activities - Frequent or intensive support work in further education. A controlled activity is when this type of activity is frequent (once a month or more) or intensive (takes place on three or more days in a 30-day period).

The following roles are regulated:

1. Teaching or training anyone who is under 18 years old or a vulnerable adult.
2. Care of anyone who is under 18 years old or a vulnerable adult.
3. Supervision of anyone who is under 18 years old or a vulnerable adult.
4. Advice to anyone who is under 18 years old or a vulnerable adult.
5. Transport of anyone who is under 18 years old or a vulnerable adult.
6. Operations Director and anyone in positions of responsibility.

The following roles are controlled:

1. Cleaners
2. Catering staff
3. Receptionists
4. Anyone with access to children's or vulnerable adult's details.

However this list of controlled and restricted roles is not exhaustive.

Vetting and barring procedures ensure that all relevant staff have enhanced DBS checks which are updated every 3 years. All employees regardless of whether they are in a regulated or controlled role will be checked by the DBS Children's Barred List, the date of birth and full name will be taken from a passport or driving licence or other official document. We will report to the Department of Education and Skills anyone who is not on List 99 but under DBS checks cannot work with children. We will also send them any appropriate evidence as well as informing the employee of this report and the need for them to keep any appropriate documentation.

Monitoring and review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. Our policy will be reviewed and updated annually

Other relevant policies

Please refer to the following policies on the HR Manual for further guidance:

- Equality and Diversity
- Health and Safety
- Whistle blowing Policy
- Learner code of conduct
- Staff code of conduct

This policy also covers Prevent Agenda, Fundamental British Values, Child Sexual Exploitation, FGM and Forced Marriage.

Appendix 1

Safeguarding Children/Vulnerable Adult Incident Record

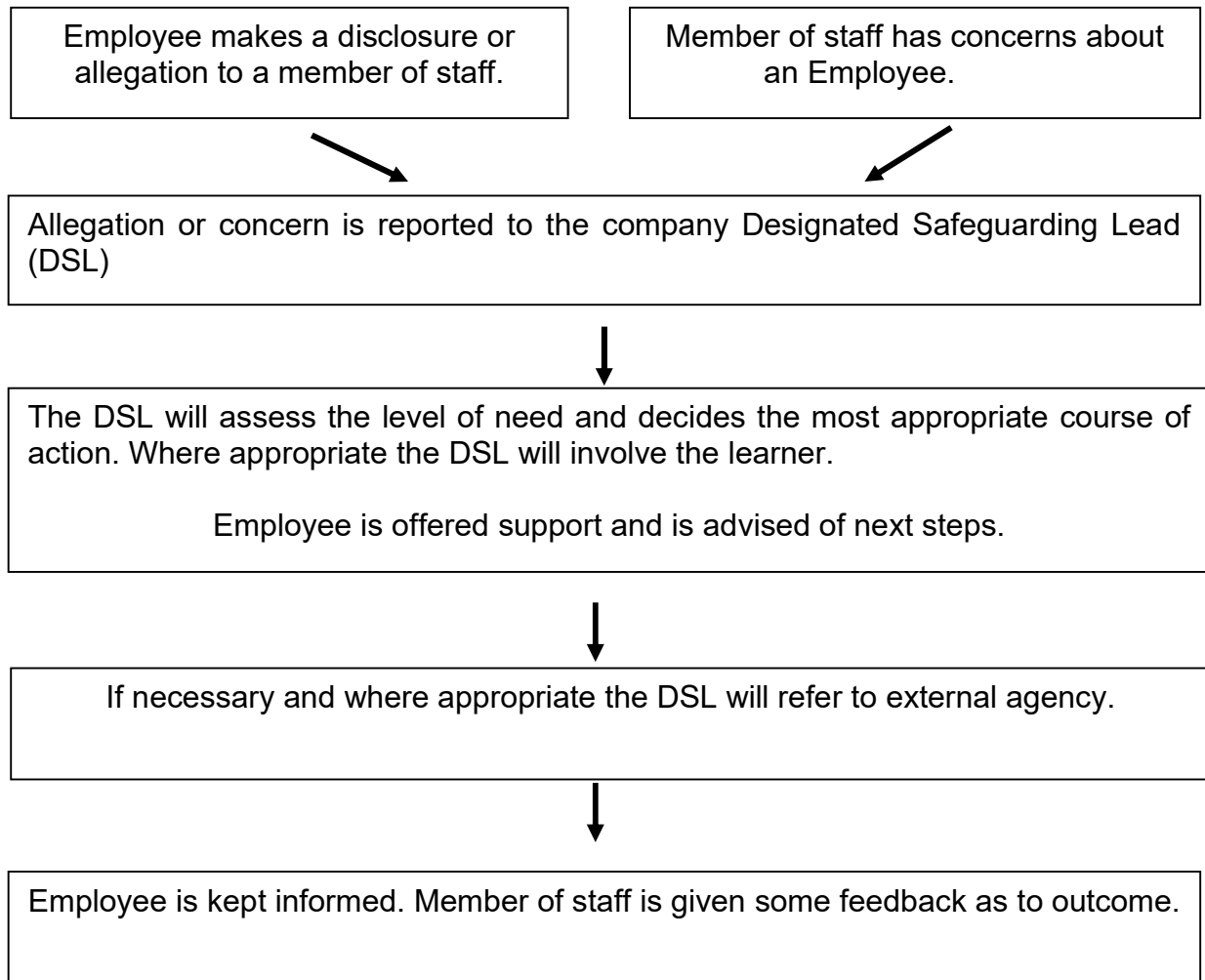
<i>SAFEGUARDING CHILDREN/ VULNERABLE ADULT INCIDENT RECORD</i>	
Your name:	
Your position:	
Child's/Vulnerable adult's name:	
Child's/Vulnerable adult's date of birth:	
Child's/Vulnerable adult's address	
Parents and or carers names and address:	
Date and time of any/alleged incident:	
Exactly what the Child/Vulnerable adult said and what you said (use separate sheet if necessary -remember, do not	

lead the Child/Vulnerable adult, record actual details)		
Action taken so far (use separate sheet if necessary):		
Details of any witnesses to incident/conversation including names		
Your observations (e.g. signs of physical abuse)		
External agencies contacted (date & time)		
Police yes/no (circle)	If yes – which:	
	Name and contact number:	
	Details of advice received:	
Social services - yes/no (circle)	If yes – which:	
	Name and contact number:	
Local authority - yes/no (circle)	If yes – which:	
	Name and contact number:	
Other (e.g. NSPCC)	If yes – which:	
	Name and contact number:	
Print name:	Signature:	Date:

Appendix 2

Lakota

Safeguarding Children & Vulnerable Adults Flowchart



- If an Employee makes a disclosure or staff member has concerns
- **You should**
- Listen, do not ask questions
- Take the matter seriously
- Act without delay – if you are unsure whether the matter needs reporting consult the DSP.
- Note down the details and pass all records to the DSP.
- **You should not**
- Promise confidentiality – say ‘you can keep it a secret’ as you may have to pass the information on.
- Make promises you cannot keep

Lakota Designated Safeguarding Lead is:

Paul Marriner
Managing Director
07950 520815
paul@lakota.org.uk

www.lakota.org.uk

If designated lead is unavailable, please contact

Joanne Horner
Managing Director
07894 241870
joanne@lakota.org.uk

Policy preparation and review

Policy prepared by Paul Marriner Managing Director of Lakota Limited and after consultation with staff/associated outside agencies on 17th March 2017. Policy will be reviewed after 12 months or earlier if there are changes in relevant legislation or in response to any significant incidents or changes in circumstance.

Last Reviewed: April 2026

Signed: *P Marriner*
Managing Director

Next Review March 2027