



Career Tree

Safeguarding & Child Protection Policy

2021 -22

Includes Safeguarding Policy for Online Tutoring

Owner	Designated Safeguarding Officer (DSO)
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POLICY STATEMENT

Career Tree fully recognises its statutory and moral duty to ensure that we function with a view to safeguarding and promoting the health and welfare of those to whom we provide education, training and services.

We endeavour to create and maintain a safe learning environment for all learners. We have a strategic safeguarding lead within the Senior Management Team ('Link Director') together with Designated Safeguarding Officers and designated staff to ensure that appropriate protocols are in place. Any identified concerns or requests for early support and intervention can be addressed and supported in partnership with other agencies, as appropriate.

ABOUT CAREER TREE

Career Tree is a specialist Career Advice & Guidance provider that provides tutoring to school age children, and works to prepare and connect young people to the world of work and higher education through a range of interventions which are delivered under a programme framework.

The interventions include:

- Tutoring
- Mentoring
- Workplace visits
- Internships and work placements
- Employment advice to schools, colleges and adults concerning their future education/employment

Interventions take place on both a group and individual basis. All interventions may take place at school, in the classroom, at Career Tree offices, online or at an Employer premises.

Students who participate in a Career Tree programme are aged over 11 for career support and above the age of 5 for tutoring. They may be enrolled at a school, school sixth form, FE College or Sixth Form College. A few of our students are aged 19 and over. Our students are based in England.

STATEMENT OF PRINCIPLES

Career Tree recognises the responsibility it has regarding safeguarding and promoting the welfare of children, young people and vulnerable adult learners, including the need for early support and intervention.



This policy is designed to provide guidance for members of staff in dealing with suspicions of, and incidents of abuse. Any member of staff can make a referral to relevant external agencies, e.g. the Police or Social Services, but should wherever possible, access the support of a Designated Safeguarding Officer (including the DSO of the relevant school, as appropriate).

The policy aims to provide staff with guidance around acting on a learner concern and the procedure to be followed when responding to a learner in immediate danger.

It is the responsibility of all members of staff to record and report concerns under this policy.

All staff will receive safeguarding and child protection training during their induction, and annual update training, to familiarise themselves with safeguarding issues and their responsibilities relating to the Group's policies and procedures. All staff members will receive required safeguarding and child protection updates via email, bulletins and staff meetings as required.

The Designated Safeguarding Officers and any other designated staff for child protection and safeguarding will undertake refresher training each year and will attend further training as and when required to enhance their knowledge base and function in this specialist capacity.

This policy and allied procedures have been devised after taking account of relevant legislation and guidance issued.

Additionally, the Directors note and draw to the attention of staff the criminal offences that may be committed in connection with the welfare of children, young people and vulnerable adults, in particular those involving abuse of trust which prohibits staff from engaging in or encouraging sexual activity with learners who are under the age of 18 or deemed vulnerable. This policy makes protection responsibilities clear and gives the Group the ability to dismiss or otherwise discipline employees who fail in this duty.

SCOPE

1. All children / young people who have not reached their 18th birthday. Throughout this policy reference is made to "children and young people". This term is used to mean "those under the age of 18" as defined in Working Together.
2. All vulnerable adults aged over 18. A vulnerable adult could be classed as vulnerable due to reasons of disability, age or illness and who may be unable to take care of, or unable to protect themselves, against significant harm or exploitation.
3. The policy applies to all staff part time, full time, permanent, temporary and agency, whether teaching, administrative, management or support, as well as volunteers and visitors. The word "staff" is used for ease of description.



4. The policy applies to all aspects of our service, including tutoring, mentoring, work placements/internships, workshops and employer visits

LEGISLATION

This Policy affirms the company's commitment to the current and any subsequent legislation associated with Safeguarding. This policy takes into account, amongst others, the following legislation and publications:

- Children Act 1989/2004
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- GDPR
- Equality and Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding and Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Care Act 2014
- Keeping Children Safe in Education [KCSIE] & supplementary guidance (DfE September 2016)
- Working Together to Safeguard Children (DfE 2015)
- Education Act 2002 Section 175
- Safeguarding Procedures of the relevant Local Authority (based on school location)
- Protection of Vulnerable Adults Scheme (2005)
- Prevent Duty Guidance (2015)
- Counter Terrorism & Security Act 2015
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Working together to safeguarding children; a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015

SAFEGUARDING ROLES AND RESPONSIBILITIES

We are committed to ensuring that we fulfil the following objectives:

- providing a safe environment for children, young people and vulnerable adults to learn in and be cared for;
- providing the means to identify children, young people and vulnerable adults who may benefit from early help and intervention.



- identifying children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm;
- recognising that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children and young people.
- identifying concerns regarding children, young people and vulnerable adults who may be subject to radicalisation.
- taking appropriate action to see that such individuals are kept safe, both at our training locations and at home, school, or within the wider community.

In pursuit of these objectives, the Directors will approve and annually review procedures dealing with:

- a. raising awareness of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for learning within the organisation;
- b. aiding the identification of children, young people and vulnerable adults at risk of significant harm, and providing procedures for reporting concerns;
- c. allegations of abuse against members of staff;
- d. the safe recruitment of staff.

The Directors fully recognise their responsibilities with regard to safeguarding and promoting the welfare of children, young people and vulnerable adults and will ensure that the organisation:

- a. has a designated Link Director for Safeguarding who will oversee this Policy. The nominated Director will champion vulnerable learner issues and raise awareness of issues relating to safeguarding and promoting their welfare;
- b. has procedures in place for reporting and dealing with allegations of abuse;
- c. has procedures in place to identify children, young people and vulnerable adults who may benefit from early help and intervention;
- d. considers bi-annual reports on safeguarding / child protection matters to include changes affecting Child Protection and Safeguarding Policy and related procedures, safeguarding training received, the number of incidents / anonymised cases;
- e. reviews and updates this policy annually;
- f. operates safer recruitment practice;
- g. promotes a staff code of conduct;
- h. has trained Designated Safeguarding Officers who provide support to staff and learners in relation to safeguarding issues, including to support referrals to local, appropriate support organisations. DSOs are responsible for collating all paperwork relating to Safeguarding, and for reviewing safeguarding, including supporting the Link Director in preparing update reports for senior management. We will continue to train key personnel in order to ensure good capacity and availability of DSOs, including across UK training locations.



- i. seeks assurance from agencies that provide services or activities separately for our learners that the agency concerned has appropriate policies and procedures in place for safeguarding children, young people and vulnerable adults and there are arrangements to liaise with Career Tree on these matters where appropriate. Further, that where we provide services in support of other organisations, we include a joint review of safeguarding policies during initiation and confirm how safeguarding will be managed and operate in consideration of the 'buyer's' duties and responsibilities. Information on agreed operation will be included in the Memorandum of Understanding between our organisations.

DEFINITIONS

Understanding different types of abuse is crucial as it dictates the way in which the situation needs to be dealt with. Each case is unique and therefore sensitivity to each case and its details is necessary in order to ensure the child is protected in the best way possible. We are aware that some of the forms of abuse below may not be applicable to the work Career Tree carries out, but it is still important to have a good understanding of all of them.

This policy applies to everyone in the Career Tree community but includes specific reference to safeguarding children and vulnerable adults. Definitions of these two groups are:

The broad definition of a child is:

'Anyone who has not reached their 18th birthday. 'Children' therefore means 'children and young people' The fact that a child has reached 16 years of age, is living independently or is in further education,... ... does not change his or her status or entitlement to services or protection under the Children Act 1989.' (Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children DCSF, March 2010 / updated 2013).

The broad definition of a vulnerable adult is:

Anyone aged 18 years and over who are dependent on family members, their social network, professionals or volunteers, as a result of a special need arising from the ageing process, physical or mental ill-health, learning disability or physical or sensory impairment. It is the level of dependency in respect of the meeting of basic needs that renders these adults particularly vulnerable. Vulnerable adults may be victims and/or abusers and they may themselves be in a caring role.

Safeguarding: This document defines safeguarding 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, and



- taking action to enable all children to have the best outcomes.

Definitions of Significant Harm (Extracts from Working Together & KCSIE 2016)

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a duty to make enquires to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child or young person, and / or relatively greater difficulty in helping them to overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development.

What is abuse and neglect?

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or in an institutional or community setting, by those known to them, or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms or, or deliberately induces, illness in an individual. For vulnerable adults this may also include inappropriate restraint or sanction or the misuse of medication.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of an individual such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to an individual that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate

expectations being imposed on an individual. These may include interactions that are beyond the individual's development capability, as well as overprotection and limitation of exploration and learning, or preventing the participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing an individual frequently to feel frightened or in danger, or the exploitation or corruption of an individual. Some level of emotional abuse is involved in all types of maltreatment of an individual, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving an individual in looking at, or in the production of, sexual images, watching sexual activities, encouraging an individual to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children.

Neglect

Neglect is the persistent failure to meet a child, young person or vulnerable adult's basic physical and / or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of material substance abuse. Neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect an individual from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to basic emotional needs.

Missing & Sexually Exploited and Trafficked – MSET

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Sexually exploitation is often linked to periods of going missing from home or education and in some cases individuals may be trafficked.



Child sexual exploitation can occur through the use of technology without the child's or young person's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Female Genital Mutilation

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. An estimated 137,000 women in the UK are affected by female genital mutilation (FGM). However, the true extent is unknown, due to the "hidden" nature of the crime. The girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to "heal" before the return to school. There are also worries that some girls may have FGM performed in the UK.

Psychological Abuse

Psychological abuse will include emotional abuse, threats of harm or abandonment, deprivation of contact, harassment, isolation and or withdrawal of services or supportive networks.

Discriminatory Abuse

Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. This can be because of age, sex, religion or belief, disability/ability, sexual orientation, gender (including gender reassignment). This includes abuse that is racist, sexist, homophobic, or is based on age or disability or any forms of harassment.

Financial Abuse

Financial abuse relates to the unauthorised and improper use of funds, money or resources belonging to the individual.

Institutional Abuse

Institutional abuse includes the practice of an abusive regime or culture which destroys the dignity and respect to which every person is entitled. It is the mistreatment of people brought about by poor or inadequate care or support, and poor practice that affects the



whole setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

All staff should be aware of the signs of abuse and neglect so that they can identify children or vulnerable adults who may be in need of help or protection. Career Tree recognises that children and adults are capable of abusing their peers. Peer on peer abuse can take many forms and some types can be gender specific. It can include bullying (including cyberbullying), gender based violence and assault and sexting. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

Mental Health

Teenage years are when good mental health patterns are developed. Young people can have a range of experiences which may affect their ability to build emotional resilience and their ongoing psychological development. The types of challenges that young people may experience include:

- family breakdown
- pressure to have access to money
- body image pressure
- 24 hour social networking
- Bullying on and offline
- early sexualisation
- academic pressure.

The guidelines in this policy relate to not just abuse but also any concerns that arise regarding mental health.

Young people may seem distressed, distant or retracting 'into themselves', may seem to have developed very low self esteem, weight loss, may be self harming, showing signs of being particularly depressed or even 'hyper'.



CODE OF CONDUCT FOR TUTORS

All adults coming into contact with children and young people through Career Tree's work must comply with this Child Protection and Safeguarding Children Policy and this Code of Conduct.

You must:

- Act in accordance with the partner school's policies and procedures regarding child protection and safeguarding.
- Treat all young people with respect.
- Avoid being alone with a young person or cause someone else to be alone with a young person because of your actions e.g. being late. If alone in a room with young people keep the door open at all times.
- Remember that someone else might misinterpret your actions, no matter how well intentioned.
- Be aware that any physical contact with a young person can be misinterpreted and should always be avoided. Shaking hands in a public setting is considered acceptable.
- Be aware that social networking sites are in the public domain if not protected by privacy settings. Strongly consider strengthening any privacy settings so that young people would not be able to access your online profiles and be privy to any information you would not want in the public domain.
- Block any young people that approach you online and inform Career Tree's Designated Safeguarding Officer immediately.
- Recognise that special caution is required when discussing sensitive issues with young people.
- Challenge unacceptable behaviour and report all allegations/suspicions of abuse to the Career Tree's Designated Safeguarding Officer.
- Operate within Career Tree's procedures in the event of any disclosure/concern.
- Raise any questions or concerns about child protection and safeguarding with Career Tree's Designated Safeguarding Officer, or if unsure of a school's procedure, information should be sought from school staff.

You must not:

- Promise confidentiality to young people in any situation.
- Seek out or add young people on any social networking site.
- Respond to any online communication from a young person, for example on a social networking site.
- Share any personal contact details with young people, or, seek out their personal contact details.



- Arrange to meet a young person outside of the allocated tutoring time, unless on the school premises and with the prior knowledge of a member of School and Career Tree staff.
- Act in a manner that excludes the young people you are working with.
- Make suggestive or derogatory remarks in front of young people.
- Have inappropriate physical contact or verbal contact with young people.
- Show favouritism to any individual.
- Be under the influence of alcohol or other substances when working on activities involving young people.
- Take photographs of young people.

SAFEGUARDING POLICY FOR ONLINE TUTORING

For all online tutoring, Career Tree Tutoring will provide:

- Clear staff training in how to monitor child protection and safeguarding in online tutoring sessions.
- Clear tutor (volunteer) training on how to conduct themselves in a safe and appropriate manner throughout online tutoring sessions.
- A designated Safeguarding Officer who is responsible for supporting and training all staff and tutors, ensuring that all Career Tree staff and volunteers are sufficiently vetted, acts as the main point of contact in the event of any allegation or disclosure, acts as the as the main point of contact between Career Tree and partner schools.
- Designated Safeguarding Officer:
Cherelle Whyte (cherelle.whYTE@careertree.com), Cherelle can also be contacted on: 02087957636 / 07723922665.
In the event of the Designated Safeguarding Officer being unavailable please email: admin@careertree.com or call the above telephone number.
- The safe and limited access storage of all data and recording generated as a result of online sessions. GDPR apply as per the Career Tree Data Protection policies found here: <https://careertree.com/privacy-policies/>.

TUTOR ONLINE CODE OF CONDUCT

All tutors are required to adhere to the following code of conduct:

- Tutors will only conduct online tutoring with their pupils at the designated tutoring times and dates advertised by Career Tree.
- Tutors will conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content.
- Tutors will be dressed appropriately in a manner that would be suitable for their attendance at a school in person.
- Tutors will keep their video stream ‘on’ for the duration of their sessions.
- Tutors will not record video, still images or audio of any tutoring sessions.



- Tutors will never disclose their phone, email or other communication details with their pupil nor request their pupils' through the online platform.
- Tutors will conduct their sessions without disruption (mobile phones should be set to silent and away from gaze) or supervision by any other persons not approved by Career Tree.
- Tutors will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions and Career Tree workbooks. If in doubt of the validity of any websites or material please get in contact with the Career Tree team.
- Tutors consent to the recording and safe storage of online sessions for up to one term past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer. This is for monitoring and safeguarding purposes only.
- Tutors consent to the monitoring of all online sessions by Career Tree staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures.
- Tutors will report any concerns about safeguarding or child protection as well as follow all Career Tree safeguarding and child protection procedures outlined in the main text of this policy.
- Tutors will follow any additional requirements as requested by and agreed with individual school policies regarding digital working.

PUPIL ONLINE CODE OF CONDUCT

All schools who partner with Career Tree agree to the following code of conduct for their pupils involved in online sessions:

- Pupils will only receive online tutoring at the designated tutoring times and dates advertised by Career Tree, in agreement with their school.
- Pupils who receive online tutoring from their home shall do so with a parent or guardian present in the same room.
- Pupils will be dressed appropriately in either their uniform or appropriate attire for attendance at a school event.
- Pupils who receive online tutoring at school shall do so with a responsible adult present in the same room.
- Pupils will conduct online tutoring either in a workplace or location that does not expose personal information.
- If broadband speed permits, pupils will keep their video stream 'on' for the duration of their sessions.
- Pupils will have any mobile phones on silent and out of gaze during sessions, or completely away as dictated by their school's policy.
- Pupils will not record video, still images or audio of any tutoring sessions.
- Pupils will never disclose their phone, email or other communication details with their tutor nor request those of their tutor through the online platform.



- Pupils will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions and Career Tree workbooks.
- Pupils consent to the recording and safe storage of online sessions for up to one term past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer.
- Pupils consent to the monitoring of all online sessions by Career Tree staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures.

MENTORING GOOD PRACTICE GUIDELINES

All adults working with Career Tree, in whatever capacity, should demonstrate exemplary behaviour. The following are common sense examples of how to create a positive culture and environment. Following these guidelines will serve as protection for adults working with Career Tree as it will help to prevent inappropriate situations from arising.

Mentoring best practice

Career Tree processes all DBS/PVG clearance for mentors. When a mentor has begun the DBS/PVG clearance process, but has not received full clearance, Career Tree policy is that:

- The mentor and student meet only in a school/college setting which is supervised (i.e. in the library in sight of a member of staff)
- The mentor and student do not exchange contact details. Arrangements for the next meeting should be confirmed at the current meeting, or facilitated by a member of staff.

The Career Tree programme is delivered at school/college level and therefore implementation of the Career Tree Safeguarding Policy is the responsibility of the school/college/local authority. Where the school/college/local authority policy does not align with the Career Tree policy, then Career Tree must be informed how relationships between mentors not cleared and their allocated student are being managed.

For example:

- If a school/college/local authority wants mentors and students to meet external to the school/college before clearance is gained, written notice must be given to Career Tree.
- If a school/college/local authority wants student contact details to be shared with mentors who are not cleared, using the Career Tree dashboard, written consent must be given to Career Tree



What mentoring good practice means

- Where possible, work in an open environment, avoiding private situations and encouraging open communication
- Treat all Career Tree students with respect and dignity
- Always prioritise the welfare of each Career Tree student
- Maintain an appropriate distance from the Career Tree student
- Put the Career Tree student based in an office in a space with other people around
- Keep doors open and blinds up, if a staff member is alone in a room with a Career Tree student, unless there is an issue of confidentiality
- Be an excellent role model e.g. not smoking in the company of the student
- Give enthusiastic and constructive feedback where possible rather than negative criticism
- If the need arises, administer emergency first aid and/or other medical treatment, but this must be reported in line with the hosting organisation's/venue's policy and procedure, and Career Tree must be notified
- Report any incidents (see below)
- Not spending unnecessary amounts of time alone with a Career Tree student away from others
- Not taking or dropping off a Career Tree student by car to another location without letting someone else know and only if it is absolutely necessary or an emergency
- Not saying or doing anything that might be interpreted as aggressive or hostile
- Not doing things of a personal nature for a Career Tree student that they can do for themselves

Under no circumstances should any adult working with Career Tree:

- Engage in rough physical or sexually provocative games
- Allow or engage in any form of inappropriate touching
- Allow Career Tree students to use inappropriate language unchallenged
- Make sexually suggestive comments to a Career Tree student
- Meet with their student in an inappropriate place, e.g., a nightclub
- Allow allegations made by a Career Tree student to go unchallenged, unrecorded or not acted upon
- Fail to report to Career Tree anything inappropriate that the student does or says.

Incidents that must be reported/recorded

If you witness or are a party to any of the following, as an adult working with Career Tree, you should report this immediately to the Career Tree Safeguarding Officer (see page 8 for contact details) and record the incident.

- You hurt a Career Tree student, even if unintentionally
- You witness any inappropriate behaviour, whether from another adult or from another Career Tree student
- The student seems distressed
- The student mentions they are in danger at home or school
- The student mentions they want to harm themselves/others



- The student appears to be physically attracted to you or to another adult
- The student misunderstands or misinterprets something you have done
- The student makes suggestive or inappropriate comments, either in person, online or using any other form of communication.

You should always feel confident to voice concerns about the attitude or actions of colleagues. Where a Career Tree student is on an internship, the Internship Provider is expected to notify Career Tree and the school/college immediately upon becoming aware of any safeguarding/child protection issues.

CAREER TREE EVENTS

Career Tree has a duty of care towards students who are participating in Career Tree organised events. This duty of care covers the duration of the event from the designated meeting point until the event finishes. Career Tree is responsible for undertaking, or obtaining from the venue, a risk assessment for the visit and ensuring there are an adequate number of qualified first aid staff present.

When a teacher/ school/college representative attends an event with the students

When a teacher or other school/college representative is attending with students, the students remain the duty of care of the school/college. Career Tree will provide a risk assessment of the venue but it is expected that the school/college representative takes full responsibility for their students for the entire duration of the visit.

When students attend an event independently of the school/college

Career Tree expects students to travel to the event. Career Tree will provide a risk assessment to the school/college and a letter that can be passed to parents – this is at the school/college's discretion. Career Tree staff should ensure that they have emergency contact details for each student that attends, and should call a parent/carer should a student become unwell or if there is a concern regarding the student's welfare. Career Tree accepts no responsibility for personal belongings brought by students to events.

Staff ratios and supervision

Each Local Authority defines the appropriate number of staff for trips and visits and therefore it is the responsibility of the school or college to ensure they send enough staff as per their school/college/local authority guidelines. Career Tree follows a guideline of one member of staff for every 15-20 students. These members of staff may include adults from the hosting organisation who support the event.



COMMUNICATIONS

Electronic Communication

Communication between Career Tree staff and students must take place within clear professional boundaries, and staff must ensure that all communication is transparent and open to scrutiny.

Career Tree staff must use their Career Tree mobile phone to contact students, rather than sharing their personal phone number. If their Career Tree phone is damaged, not working or lost, and staff must call the student, then they may use their personal phone but ensure their number is blocked and do not share their personal number with the student. Staff may only communicate with students on social media via the official Career Tree social media outlets. Personal phones may be used by staff when acting as mentors.

Photography and Videos

Career Tree will take photos and videos at events and Career Tree activities. Career Tree will gain permission from parents/guardians before using the photos. Students or their parents/guardians will be asked to sign a Photography Permission Form. Media captured will be used for promotional purposes only. Promotional purposes include; official Career Tree social media, website and Career Tree publications.

RECRUITMENT

All Career Tree staff, tutors and mentors (volunteers) are to have Enhanced Disclosure and Barring Service (DBS) checks, Access NI checks or PVG checks depending on where in the UK they are based. These need to be up-to-date. Should there be any information revealed by the DBS/other check which was not previously disclosed, this will be followed up by a member of the Career Tree staff; if any criminal record is found, Career Tree will deal with this on a case by case basis and if it is found that it is not suitable for the individual to volunteer as a mentor on the programme, the individual will be excluded. Staff DBS checks will be updated every 2 years.

TRAINING

Employees, tutors and mentors will be trained so they know how to deal with any safeguarding concerns and will be in possession of the Career Tree Safeguarding Policy. Training will be provided upon induction, prior to any operational duties involving learners; it is subject to assessment and all staff must pass the knowledge and understanding test. Monthly observations of teaching are undertaken and effective practice in safeguarding is reviewed during observations, with feedback to the staff member and any required development identified and planned for in time-bound action. Annual update training is provided to ensure currency of knowledge; where there is any

change/update to this policy, training is provided to ensure that staff understand the changes and their implications for practice. The purpose of training is to ensure that staff understand:

- their personal responsibility.
- the locally agreed procedures.
- the need to be vigilant in identifying cases of abuse or neglect.
- how to support and to respond to a learner who tells of abuse or neglect.

MONITORING AND EVALUATION

The designated safeguarding team will continually monitor and evaluate all issues relating to safeguarding children, young people and vulnerable adults. A bi-annual report will be presented to the Directors on Safeguarding issues; DSOs will contribute to this from the outcomes of any safeguarding incidents/concerns and the Link Director will be responsible for ensuring that reports are submitted, considered and acted upon; further, that any required policy/procedure updates are identified and implemented. The Link Director will also ensure that our improvement plan is updated with key time-bound actions and that impact is assessed and learned from.

RELATED POLICIES

Prevent Policy

Complaints and Whistle Blowing Policy

Anti-Bullying Policy

RESPONDING TO ALLEGATIONS OR SUSPICIONS OF ABUSE OR NEGLECT

Learners may choose to share concerns with staff they feel they can trust and with whom they feel comfortable. Likewise, staff may identify concerns through their interaction with a learner. Staff need to know how to respond sensitively and who to approach for advice. Whilst staff are not responsible for investigating abuse it is essential that any allegations or suspicions of abuse are acted upon without delay and are treated seriously. Concerns should be passed on immediately to the Designated Safeguarding Officer so that appropriate action can be taken.

The following guidelines should be followed:

- a. Do not put yourself at risk, stay calm and reassure the person that he/she was right to tell you.
- b. Do not interview them, but instead listen carefully, allow the person to recall significant events – they may not tell anyone again.



- c. It may be necessary for you to request information in order to be clear about what is being disclosed. You must ask open questions and must not lead the individual as this may jeopardise future investigations.
- d. Do not promise confidentiality. Be honest. Explain that you need to pass the information to the Designated Safeguarding Officer at Career Tree and at School and explain that you must do this in order to ensure that an experienced person can provide support/investigation. Ensure the individual is aware that only those who need to know will be told.
- e. Note the details of what you witnessed (if applicable) and what has been disclosed to you, in the individual's own words, and write down the place, date and time of disclosure/witnessing. Also note any questions you asked and the answers that were provided. Do this as soon as possible after the event.
- f. Note the setting and anyone there at the time – describe any significant points about the person's appearance, demeanour and mood and also the environment, e.g. furniture disturbed, or if any property was missing or damaged.
- g. Be careful to only report factual information and take care not to interpret responses.
- h. A body map can be used to illustrate any physical injuries.
- i. Use dark ink so your notes can be photocopied if required, sign and date everything you have written and pass notes to the DSO as quickly as possible and within 24 hours.
- j. Be aware that, where there is such evidence, medical and criminal evidence may need to be preserved, so do not attempt to remove torn or soiled clothing and avoid touching or moving anything in the immediate environment, or allowing others to do so, or move around the scene.
- k. Do not talk to the alleged perpetrator(s) or pass on any information about the individual at risk. It is particularly important in every safeguarding circumstance that you maintain confidentiality of information and only release it to a DSO, a senior manager in their absence, or relevant external authority eg Police, Social Services, Paramedic or Health Service Professional.
- l. Alerts to the DSO should be made as soon as abuse or neglect is witnessed or suspected and without delay, using a safeguarding concerns / disclosure form. At a maximum, this must be within 24 hours. They may involve the police, other emergency services or the relevant social services provider in the local authority area.
- m. You should refer all safeguarding concerns to the DSO but it may sometimes be necessary to take action immediately to a situation to prevent further harm and all staff must exercise their Duty of Care to learners and each other, and act as responsible citizens to ensure that emergency services/social services provider are contacted immediately, where needed.
- n. Immediate protective actions should not incur irresponsible risk for the person identifying the concern.
- o. If the Designated Safeguarding Officers are not available advice can be sought from a member of the senior management team, who will support you in any required actions, including liaison with School DSOs, Social Care providers, or the Police, as required.
- p. The DSO investigating may take one or more of the following actions:
 - i Referral to Social Services of the relevant local authority using the normal referral or consultation procedure required by the locally agreed framework. *



- ii An internal investigation and consideration of any action involving staff or learners (Disciplinary Procedure for Staff).
- iii Investigation of a possible criminal offence by the Police. If a crime is suspected, the staff member investigating will report it to the Police.

Incidents of alleged abuse may constitute potential criminal behaviour and must be treated as such until otherwise determined by the Police/Crime Prosecution Service.

Generally referrals to social care / police are made by a member of the Safeguarding Team and this would normally be the School Safeguarding Team, however if after discussion with the Designated Safeguarding Officer the member of staff believes that a referral should be made but the Designated Safeguarding Officer does not, then he or she may make the referral directly. This is because all staff have a Duty of Care within safeguarding, so if you feel the learner is in danger, or has been the victim of a crime, or is subject to abuse or neglect, you are able to disclose this to the relevant authority, without any recourse.

*It is possible to request a formal pre-referral consultation and seek advice from a safeguarding worker at the relevant Local Authority, where specialist advice and support is required.

RESPONDING TO ALLEGATIONS OF ABUSE MADE AGAINST A STAFF MEMBER

In addressing allegations of abuse made about staff, Career Tree will seek to ensure compliance with the prevailing guidance from the relevant local Safeguarding Adults Board, United Kingdom employment legislation, laws of natural justice and its own internal procedures. These arrangements relate to all staff and volunteers working for the company.

- a. The person to whom an allegation or concern is first reported should treat the matter seriously, keep an open mind and follow the guidance on responding to an allegation or suspicion of abuse.
- b. The concern should be reported immediately to the DSO or in their absence to the Link Director for Safeguarding. Where the allegation is made against the DSO, the Link Director should be informed. Where a concern is reported against the Link Director an external body will be used to investigate and in so doing, we will ensure fairness and impartiality.
- c. The DSO investigating may take one or more of the following actions:
 - i Referral to Social Services of the relevant local authority using the normal referral or consultation procedure required by the locally agreed framework.*
 - ii An internal investigation and consideration of any action involving staff or learners (Disciplinary Procedure for Staff).

- iii Investigation of a possible criminal offence by the Police. If a crime is suspected, the staff member investigating will report it to the Police.

Incidents of alleged abuse may constitute potential criminal behaviour and must be treated as such until otherwise determined by the Police/Crime Prosecution Service.

Generally referrals to social care / Police are made by a member of the Safeguard Team, however if after discussion with the Designated Safeguarding Officer the member of staff believes that a referral should be made but the Designated Safeguarding Officer does not, then he or she may make the referral directly.

In all cases the DSO will work with the DSO from the school concerned.

Note:

The Sexual Offences Act 2003 introduced additional occupations to which Section 21 'Position of Trust' applies. These cover employees who look after young people under 18 on an individual basis by providing services under the Learning and Skills Act 2000. As necessary, Career Tree will comply with guidance on making staff referrals to the Independent Safeguarding Authority.

*It is possible to request a formal pre-referral consultation and seek advice from a safeguarding worker in the relevant Local Authority, where specialist advice and support is required.

Provided that it is possible to do so without impeding the investigation or posing any risk to the young person's safety, Career Tree recommends to the school/college that the parents/carers of the young person involved should be informed of the allegation, and kept informed of any progress. If there has been any physical injury to the young person the parents/carers should be informed immediately.

Once the investigation has concluded, Career Tree senior managers must then take any necessary steps if the matter involved a member of staff or volunteer.

SPECIFIC ROLES

Due to the type of work that Career Tree is involved in, the way in which concerns and allegations are dealt with may vary depending on who the subject of allegation is and what their role and interaction with the child involves. When concerns are reported, all adults working with Career Tree should follow the response guidelines set out above, using the processes described in Appendix 1. However, the subsequent steps may differ depending on the individual's role:

- In the case where a complaint is made about an individual involved in a student's internship, Career Tree staff will speak with a senior manager from the individual's



organisation to review the evidence and consider the seriousness of the allegations.

The student must cease participation in the internship until the outcome is determined and next steps decided upon. In the case that it is decided that the individual is not suitable to continue participating in the internship, the internship will be stopped and the student will be moved to another internship where this is possible. If no criminal offence has been committed but the individual's behaviour was deemed to be inappropriate, the individual's employer will be responsible for taking disciplinary action. If a criminal offence has been committed the police (and any other relevant body) will be contacted to take the matter further.

- With regard to mentors, if an allegation is made against them Career Tree staff will look for any inappropriate content that has been shared and in the cases where this is found, it will be recorded. Both mentor and mentee will be consulted to discuss the matter, and may be withdrawn from the programme if necessary.
- It may be that a Career Tree student (A) is alleged to have behaved inappropriately towards another Career Tree student (B). Career Tree will investigate the matter following the procedures outlined in this Policy. If necessary for the safety and wellbeing of the students, both students A and B may be suspended from the programme while the allegations are considered. If the allegations are upheld, student (A) will be removed from the Programme. Student (B) may be removed from the programme if the allegations are found to false or malicious. Unless it is inappropriate to do so, the student's parents/carers will be informed, together with any other relevant authorities.

CONFIDENTIALITY

Career Tree will make every effort to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Information should be restricted to those who have a need to know in order to protect young people, facilitate enquiries, or manage related disciplinary or suitability processes.

DISCIPLINARY ACTION AND SUSPENSION

Where disciplinary action is taken against Career Tree employees, it should be done so in accordance with Career Tree's disciplinary policy. It may be necessary to suspend the individual against whom allegations have been made if, for example:

- There is cause to suspect a child is at risk of significant harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might be grounds for dismissal.

Career Tree will not suspend an employee for longer than is reasonably necessary, and the employee will continue to receive full pay and benefits during any period of suspension. If the individual in question is not a Career Tree employee, we will liaise with the relevant organisation (e.g. the individual's employer) to determine what disciplinary action should be taken. Career Tree may terminate an individual's participation in the programme with immediate effect.



RECORD-KEEPING

Career Tree will keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and details of any action taken and decisions reached. This will be recorded on the Disclosure and Incident Report Forms; paper-based records will be stored and electronic records will be stored on secure servers with restricted access.

TIMING

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Career Tree will make every effort to avoid any unnecessary delay.

However, the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness, and complexity of the allegation.

CONCLUSION OF INVESTIGATION

If the allegation is substantiated against staff or a learner, the individual may be dismissed from Career Tree, or their participation in the Career Tree programme may be terminated. Further action may be pursued by the relevant authorities. Career Tree will make any notifications that are required by law. If it is decided on the conclusion of the case that a person who has been suspended can return to work Career Tree will consider how best to facilitate that.

If an allegation is determined to be unfounded or malicious, Career Tree will alert the relevant people or external bodies. In the rare event that an allegation is shown to have been deliberately invented or malicious, Career Tree will ask the police to consider whether any action might be appropriate against the person responsible.

Career Tree is aware of the importance of balancing the welfare of the young person against the potential damage that can be caused to an individual's career and reputation. All cases will be dealt with in a sensitive manner and in a carefully measured way. In cases of abuse Career Tree will ensure that the young person is put in contact with social services and/or other relevant bodies so that the necessary support is provided.

Contacts

Initial queries should be directed to Cherelle Whyte on cherelle.whYTE@careertree.com

Designated Safeguarding Officer (DSO)

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