TWIN EMPLOYMENT AND TRAINING (T.E.T)

Safeguarding Children and Vulnerable Adults Policy

A) POLICY STATEMENT

A1 Context

Twin Group offers progression opportunities for UK residents, international learners, individuals and groups. This includes education, travel, work experience, volunteer opportunities and employment both in the UK and internationally.

Twin Employment & Training (TET) is a welfare-to-work provider for job seekers and young people aged 16+ delivering government-funded training programmes and free recruitment services, leading to employment opportunities in the UK.

A2 Terminology

Safeguarding
The promotion of the welfare of learners under the age of 18 and their protection from any potential maltreatment.
Child Protection
The processes involved in protecting children from direct harmful behaviour or abuse either physical or psychological.
Child / Children
In accordance with The Children Act 2004, and therefore in accordance with law, Twin Group shall regard any person below the age of 18 as a child. People aged 18 and over may in some circumstances be regarded as vulnerable and may therefore fall within the remit of the policy.
Vulnerable Adult
Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are "substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered".
Staff
Everyone who is employed by, or provides services for, T.E.T, and has contact with children. This includes trainers, advisors, administrators, managers, cleaners.
Designated Safeguarding Lead (DSL)
The designated member of staff responsible for the implementation of this policy and related training.
Designated Safeguarding Staff (DSS) – designated people who look after day to day matters, training and recording systems.
Local Childrens Safeguarding Board (LCSB) – a multi-agency body set up in every local authority to safeguard and promote the welfare of children in the area.
Prevent Duty - responsibility under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism

A3 Statement

T.E.T is fully committed to safeguarding the welfare of all learners under 18 and vulnerable adults studying at our centres.
We are passionate about our participants' learning experience and strive to ensure we provide a safe and appropriate learning experience. We recognise our responsibility to promote safe practice and protect children and vulnerable adults from harm, abuse, exploitation and radicalisation.
In implementing this policy, T.E.T will abide by the following principles:

- Make a commitment to safe recruitment: selection and vetting of staff, and suppliers
- Ensure partners of Twin Group are acquainted with the relevant sections of this policy
- Ensure T.E.T has a trained Designated Safeguarding Lead (DSL) and that staff are aware of the procedures involved for reporting any concerns
- Foster a culture where safeguarding is taken seriously through regular staff training and commitment to safeguarding procedures
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately. In these cases, Twin Group will work in connection with the appropriate Local Safeguarding Children Board, and where necessary the Police and Social Services (See Appendix 1 for details of the appropriate Local Safeguarding Children Board)
- All personal data will be processed in accordance with the requirements of the GDPR18
- Ensure all adults working with learners under 18 and vulnerable adults know their legal and moral responsibility to protect them from harm, abuse and exploitation
- Ensure all adults working with learners under 18 and vulnerable adults understand their responsibility to maintain standards set out in the policy and to make Twin Group a safe and caring educational environment
- Ensure adult participants are protected against allegations of misconduct towards juniors
- Meet its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism (Appendix 6)

A4 Under 18's entitlement

All under 18s and vulnerable adults have the right to safeguarding from abuse, regardless of their age, gender, disability, racial origin, religious beliefs, sexuality, language, socio-economic status or appearance.

A5 Adult's responsibilities

All staff have a legal duty of care and responsibilities to safeguard the children in their care, including the responsibility to provide a safe environment, to identify children who are suffering from, or likely to suffer from, abuse, and to report any concerns about welfare to a DSL or the LCSB immediately. The DSL will deal with the concern following the procedures documented in this policy.

All staff will follow (the relevant version of) this policy and have appropriate training.

A6 Associated policies

The policies associated with this one are:
Staff code of conduct (Appendix 3)
Learner code of conduct (Appendix 4)
Prevent Policy (Appendix 6)
E-safety Policy (Appendix 7)
Health and Safety Policy (Available on request)
Whistleblowing Policy to Safeguard and Promote the Welfare of Children (Appendix 9)
SEND policy (Appendix 10)

A7 Policy Review

This policy and all associated procedures will be regularly monitored and reviewed:
- In accordance with changes in legislation and guidance on the safeguarding of children and vulnerable adults or any changes within Twin Group
- Following any issues or concerns raised about the safeguarding of children or vulnerable adults within Twin Group

- If the DSL or any of the DSS leave the company
- In all other circumstances, at least annually.

This policy will be reviewed by the DSL, and feedback will be sought from the DSS. It will be signed off by the DSL.

A8 Structure, Roles and Responsibilities

Specific responsibilities are as follows.

Designated Safeguarding Lead (DSL):
- Oversight of the Safeguarding Children and Vulnerable Adults' Policy and any relevant documents and files
- To support and advise the DSS and T.E.T team in the day-to-day implementation of the policies
- To receive information from any staff, volunteers, children, parents or carers who have safeguarding concerns and record it
- To keep staff updated regarding training and policies
- To consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty
- To make a formal referral to a statutory child safeguarding agency or the police
- To record all information in writing in accordance with the Data Protection Act
- To ensure the Prevent Duty is met
- To be ready to respond to any major incidents
- To be available to respond to any safeguarding concerns 24/7 or assign DSS to be so
- To ensure any partners working with must have a satisfactory safeguarding policy in place

Deputy DSL:
- Delivering training
- Deputising for the DSL

Designated Safeguarding Staff (DSS):
- Review and implementation of all aspects of the safeguarding policy.
- Dealing with any safeguarding concerns following the procedures documented in the safeguarding policy.
- Maintaining accurate records.

HR Director:
- Safer recruitment of all T.E.T staff.

Receptionists:
- All visitors are required to report to reception when they enter T.E.T and will be escorted by a member of staff.

A9 Under 18s Involvement

- Learners under the age of 18 are encouraged to play an active part in their own safeguarding, both by looking out for each other and by raising concerns with adults.

A10 Documents/ Legal Framework

Legal acts and official documents used to help produce this policy are:

The Sexual Offences Act 2003
Counter Terrorism & Security Act 2015
Obscene Publications Act 1959
Safeguarding Vulnerable Groups Act 2006
Public Interest Disclosure Act 1998
Data Protection Act 1998
Keeping Children Safe in Education

A11 Designated Team Working Methods

The designated team meet annually to review policy, and to plan and deliver training, and as often as required to discuss any incidents or concerns. The team are responsible for implementing the code of conduct, training, safer recruitment, and welfare, and are given time during their usual working hours to fulfil these duties. Dealing with a safeguarding concern should take priority over all other work.

A12 Policy Availability and Formats

The full policy is provided to all staff at induction.

B) CODE OF CONDUCT

B1 Overview and Principles

T.E.T has clear codes of conduct for both staff and learners (Appendix 3 and 4). Staff and learners receive the code of conduct during Induction where the main points are also covered. The purpose of the codes of conduct is to create a safe culture, and to protect both participants and staff members from behaving in a way that may be misconstrued.

B2 Position of Trust

As per the Sexual Offences Act 2003, it is a criminal offence for anyone working in an education setting to have a sexual relationship with a learner under the age of 18.

B3 Setting Standards

All staff must provide an excellent role model to children by following the guidelines below.

B4 Staff-U18 Interaction

In order to protect the U18s in your care, and at the same time to protect yourself from allegations of abuse, please follow this guidance.
- Always work where you can be seen by others
- Avoid working in isolation with children if possible
- Never give out personal contact details such as mobile phone numbers or private e-mail addresses
- Do not give children lifts home in your car (unless this has been specifically agreed by senior management)
- Do not arrange to meet children outside of business hours
- Physical contact between adults and U18s is usually unacceptable. When physical contact is deemed necessary, for example to comfort a young child, it must be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Staff should use their professional judgement at all times.
- Do not use physical force or restraint unless such action is identified as absolutely necessary to prevent significant harm.
- Be even in your treatment of U18s. For example, if two different learners break the same rule, make sure they receive the same punishment.

- Use positive reinforcement to encourage good behaviour
- Always address the behaviour, not the learner
- Always use appropriate language. Never swear or use derogatory or insulting terminology. Avoid sarcasm and irony.
- Do not discuss inflammatory subjects with learners.
- Challenge radical or extremist views in any context.
- Promote the core British values of: (i) democracy, (ii) the rule of law, (iii) individual liberty (iv) Respectful tolerance of different faiths or beliefs.

B5 Appropriate Appearance

Staff must dress appropriately at all times when working with under 18s. What is classed as appropriate will depend on the role and situation. However, the following should always be avoided:
- T-shirts with inappropriate slogans/ pictures
- Clothing that is too revealing
- Clothing that is overly tight or baggy

Remember that it will be difficult for some learners to respect you if you do not present yourself appropriately.

Learners should also follow the guidance above. Cultural sensitivity is important as what is acceptable in one culture may not be acceptable in another. Staff are asked to report cases of learners dressing inappropriately to management.

B6 Alcohol, Drugs and Smoking

Staff must never use drugs or drink alcohol in front of under 18s, and smoking should be avoided as far as possible. Alcohol, drugs and smoking should not be in any way promoted. It is better to educate under 18s about addictive substances rather than to joke about them.

It is illegal for U18s to buy alcohol or cigarettes (including e-cigarettes). If you suspect a child is taking drugs or drinking alcohol, you should report it to DSL.

B7 IT & Social Networks

School staff must not invite, accept or engage in communications with learners in any personal social media whilst in employment at Twin Group. The following guidelines should be adhered to:
- Staff should not use personal email accounts or mobile phones to make contact with any current participants of any age or any ex–participants under the age of 18, nor should any such contact be accepted. Staff are advised not to use personal email accounts or mobile phones to make contact with other staff, or any members of Twin Group's community, for work-related purposes.
- Staff should not accept any current participant of any age or any ex–participant under the age of 18 as a friend, follower, subscriber or similar on any personal social media account
- Any communication received from participants on any personal social media sites must be reported to DSL
- If any member of staff is aware of any inappropriate communications involving any participants in any social media, these must be reported immediately
- If any member of staff is aware of anyone accessing extremist/ terrorist websites or using social networks to exchange extremist/terrorist views, this must be reported immediately.
- Staff are strongly advised to set all privacy settings to the highest possible levels on all personal social media accounts
- Staff are advised to avoid posts or comments that refer to specific, individual matters related to Twin Group and members of its community on any social media accounts
- Staff should not post photographs or videos of participants on any social media accounts

There are many legitimate uses of social media for marketing purposes and to support participant learning. For example, Twin Group has an official Twitter account. When using social media for marketing or educational purposes, the following practices must be observed:

- Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts, and ideally should be linked to an official school email account.
- The URL and identity of the site should be notified to the Head of Operations before access is permitted for participants.
- The content of any Twin Group's sanctioned social media site should be solely professional and should reflect well on the company
- Staff must not publish photographs or videos of participants without the appropriate consent Care must be taken that any links to external sites from the account are appropriate and safe
- Any inappropriate comments on or abuse of Twin Group sanctioned social media should immediately be removed and reported to the Head of Operations
- All social media accounts created for educational purposes should include a link to the T.E.T website. This will indicate that the account is officially sanctioned by Twin Group.

B08 Adult learner -U18 interaction

Twin Group recognises its responsibility to educate adult learners regarding the safeguarding of children. It is highlighted during learners induction that it is illegal for an adult to have a sexual relationship with a person under the age of 16.

Twin English Centre London (E.C.L) shares its premises with TET. TET uses the facilities to provide training and services for jobseekers and young people aged 16+. There are procedures in place to ensure that under 18s on programmes at E.C.L are safeguarded from any potential risks posed by TET participants (Appendix 11).

B09 Favouritism & Gifts

It is important that staff treat all participants equally and do not show any favouritism, as this can make other participants feel left out and could leave the staff member open to allegations. For this reason Twin Group would advise that staff avoid meeting any participants outside of the work place, regardless of their age.

It is Twin Group's policy to actively discourage the acceptance by employees of gifts from learners, or suppliers. Any approaches should be politely declined or, if they become persistent, referred to a member of management. Any employee found to have accepted a gift may have disciplinary action taken against them. The only exceptions to this rule are cards and calendars.

B10 Whistleblowing

Staff have a legal obligation to inform management of any concerns about colleagues not following the Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential. Please refer to the Whistleblowing Policy (Appendix 9) for more information.

Learners are informed that they must report inappropriate adult behaviour and of the pathway for doing so at induction. They are reassured they won't get into trouble for doing so.

C) CHILD PROTECTION

C1 Overview

Twin Group meets its child protection responsibilities by employing a Designated Safeguarding Lead and Designated Safeguarding Staff; providing a clear procedure as to how to report concerns; and keeping accurate and detailed records.

- Any concerns regarding the welfare of under 18s must be reported to the DSL immediately and the relevant course of action will be taken
- Any incidents and outcomes will be recorded by the DSL in line with the Data Protection Act
- All staff should be aware of the appropriate responses and actions when a learner volunteers information to them
  All staff should be aware that in accordance with statutory requirements where child safeguarding issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported

Vulnerable Adult Procedures
- Before participants commence their programme, any information regarding potential vulnerability has to be provided by appropriate referral streams , and Twin Group will assess whether the appropriate measures can be put into place to meet the potential participants' needs
- Twin Group staff members will work together to identify any participants or staff members they believe to be a vulnerable adult. If there are any concerns, the DSL should be contacted immediately and the appropriate support measures will be put into place
- Any special arrangements and concerns will be recorded by the DSL in line with the Data Protection Act

C2 Nominated/Designated Persons

T.E.T DSL is
Bianka-Jade Nixon (Business Manager)
bnixon@twinuk.com
020 8269 5770/07854 250 911

T.E.T Deputy DSL and DSS is
Amanda Brade (Contracts & Supply Chain Manager)
Abrade@twinuk.com
020 8269 5682/07772 219 119

Outside of office hours, please call the emergency phone: **020 8269 5788**.

You can also e mail us at: TETsafeguarding@twinnuk.com

C3 Situations when adults need to respond

Any of the following scenarios may cause you to have concerns about a learner under 18:
- A learner discloses an incident to you
- A learner tells you they are worried about another learner
- A staff member tells you they are worried about a learner
- You observe signs of abuse yourself
- You observe a staff member acting inappropriately

If you have a concern, you must not keep the information to yourself. The DSL should be informed immediately to ensure as much information is recorded as possible. Vital information could be missed if this is not done.
- It is the duty of staff to inform only, not to investigate - this is the role of the DSL and, where appropriate, the Police and Social Services

- In the event that the DSL is not available, any concerns should be directly addressed to the Deputy DSL/DSS.
- Safeguarding issues will take priority over any other work a person has
- All concerns will be recorded by the DSL and kept in accordance to the Data Protection Act
- The DSL will consult the relevant authorities if they need any advice or support

C4 Recognising symptoms of abuse

A child/ vulnerable adult may be abused or neglected by having harm inflicted upon them or by a person failing to act to prevent harm. A child may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger.
There are four main types of abuse:
- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Please see Appendix 5 for other types of abuse, definitions, and possible symptoms.

C5 A child telling an adult

A participant under 18 may choose any adult to confide in - this could be a trainer, advisor or other trusted member of staff. If a participant discloses significant personal problems to you, they should be acknowledged and taken seriously. Follow this procedure:
- Explain to the participant that you may have a legal obligation to pass this information on, to protect both them and possibly other people. The following wording may be used:
  "I will keep our conversation secret but not if you tell me something that might be dangerous for you or that is illegal I will tell you if I am going to tell other people and what I will tell them."
- Listen, do not ask any questions.
- Write down the details, if appropriate ask the participant to write it down. If it is not appropriate to write the details down while the participant is talking to you, do it as soon as possible after the conversation.
- Contact the DSL immediately and pass on all of your records and notes, no duplicates of these should exist.
- The DSL then has the responsibility to decide what further action should be taken.

C6 Confidentiality

Any child protection information must be treated with the strictest confidence – the 'need to know' principle must be employed. Confidentiality about both the victim and the accused must be maintained.

C7 Difference between concern and serious issue

A concern is when something seems to be not right; however there is no immediate danger to U18. All concerns should be reported to the DSL or DSS as soon as possible.

A serious issue is when a child is in immediate danger or is at risk of harm. In this case a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, they should be informed as soon as possible.

C8 Identifying vulnerable participants & early help

Vulnerable participants are more susceptible to abuse. There are several factors that might make a participant vulnerable, for example Special Educational Needs and Disabilities (SENDs), or coming

from difficult home situations. Designated safeguarding staff have a responsibility to pay close attention to these participants.

Quick reporting of any concerns to the designated team allows for early help, which reduces the chances of things becoming more serious.

C9 Record Keeping

Records should:
- state who was present, time, date and place
- use the child's words wherever possible
- be factual/state exactly what was said
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation

All concerns are kept private and confidential and recorded in line with the Data Protection Act

C10 If an adult is accused

The DSL will respond to any allegations following this procedure:
- Where appropriate, see the learner is offered support
- Decide what action to take based on the allegation
- If necessary, contact the Local Safeguarding Children Board or the Local Prevent Lead (see Appendix 1), and follow the advice and suggested actions they provide
- Whilst a complaint is being investigated, the member of staff will be suspended, and if the complaint is upheld, they will be dismissed and any relevant authorities informed immediately
- Keep the participant informed
- Give feedback as to the outcome to the member of staff who raised the concern

C11 If the DSL/ Senior Manager is accused

The procedure outlined in C10 should be followed, with the concern being reported straight to the LSCB instead of the DSL.

C12 If a child is accused

The DSL will respond to any allegations following this procedure:
- Where appropriate, see the that both the victim and the accused are offered support
- Decide what action to take based on the allegation
- If necessary, contact the Local Safeguarding Children Board or the Local Prevent Lead (see Appendix 1), and follow the advice and suggested actions they provide
- Whilst a complaint is being investigated, the child should be closely supervised, and if the complaint is upheld, they will be excluded and any relevant authorities informed immediately
- Keep the victim and the accused informed
- Update the accused's and the victim's parents as appropriate
- Give feedback as to the outcome to the member of staff who raised the concern

D) TRAINING

D1 Responsibility

The DSL is responsible for ensuring that training is provided to everyone who is employed by T.E.T and has contact with children. All staff are required to have basic awareness safeguarding and Prevent training; DSL and DSS are required to complete the following training: Safeguarding Young people Level 2 and Child Protection: Advanced Level3. All staff are required to attend an annual in-house safeguarding training session which includes Prevent.

D2 How training is delivered

- All staff are provided with the relevant version of the safeguarding policy and part one of Keeping Children Safe in Education prior to commencing employment.
- It is compulsory for all staff members working with children to take online basic awareness safeguarding training prior to commencing employment
- It is compulsory for all staff members working with children to have Prevent training, either in person or online, prior to commencing employment
- DSS must complete the following training on an annual basis: Safeguarding Young people Level 2 and Child Protection: Advanced Level3
- The DSL must complete the following training on annual basis: Safeguarding Young people Level 2 and Child Protection: Advanced Level3
- In-house training is delivered annually to all staff by the DSL &DSS, and includes the Prevent Duty. In-house training may also occur if there are any changes to policy/ legislation, or if a serious incident occurs.

D3 Ensuring understanding

The online basic awareness safeguarding training concludes with a multiple choice test. Trainees will only receive their certificate if they pass the test.
The in-house training sessions always conclude with a quiz or similar to confirm understanding.

D4 Recording training

All certificates from external or online training sessions are saved in staff files. Records of in-house training are kept detailing (i) date of training (ii) who completed training (iii) content of training (iv) evidence that it was completed and understood.

E) SAFER RECRUITMENT

E1 Overview

Twin Group's commitment to safeguarding begins at the recruitment stage. Twin Group's recruitment procedures aim to prevent the appointment of people who may pose a risk to children. Safe recruitment is carried out in the following ways:
- Applicants are informed of our commitment to safeguarding in the job advertisement, the invitation to interview, and during the interview.
- At interview, some questions are asked regarding care of under 18s.
- At interview, any gaps in CVs are questioned.
- References are followed up.
- DBS or criminal record checks are performed on all successful candidates.

E2 Recruitment materials

In both the job advertisement and the invitation to interview, our commitment to safeguarding is stated and the following points are detailed:
- References will be followed up with specific questions as to applicant's suitability to work with persons under 18
- All gaps in CVs must be explained satisfactorily
- Proof of identity and qualifications will be required

- Successful candidates will be required to undertake a DBS check or equivalent police check from overseas
- Successful candidates will be required to complete safeguarding and Prevent training prior to commencing employment
- Successful candidates will be expected to actively engage in the safeguarding of under 18s

E3 Interviews

During the interview, the candidate is reminded of the company's commitment to safeguarding, and several questions are asked regarding care of under 18s. Two interviewers are always present and a consensus must be reached as to the applicant's suitability.

E4Applicants awaiting DBS/ police checks

New starters may only commence employment without receiving criminal clearance in exceptional and justifiable circumstances. A record of the decision is kept and signed off by the relevant senior manager. The judgement is an assessment of the risk versus the consequences of the decision.
If a new starter does commence employment prior to clearance being received, they must sign a self-declaration. A record of what alternative risk mitigation has been put in place to cover this period must be kept. A new starter must never commence employment prior to the submission of their completed application or paperwork to obtain criminal clearance. The barred list must also be checked - it is against the law to allow somebody to start regulated activity with under 18s without doing a Barred List check.

E5 Applicants with a criminal record

As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, Twin Group undertakes not to discriminate unfairly against any subject of a DBS/ police check on the basis of a conviction or other information revealed. Having a criminal record will not necessarily prevent applicants from working for Twin. An assessment will be undertaken to assess the relevance of any conviction to the particular post; the assessment will include consideration of the nature of the work and the working environment.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should T.E.T be informed of a previous conviction which could be considered as relevant to the post but does not indicate an obvious direct threat to the safety of the participants, the staff member will be interviewed to obtain more information.

Twin Group will consider any convictions which have been recorded in terms of the following:
- Nature, seriousness and relevance of the offence
- How long ago the offence occurred
- If the offence was a one-off or part of a history
- Circumstances of the offence being committed
- Country of conviction
- Decriminalisation

The disclosure will be discussed with the prospective employee, and the discussion will also aid the decision making process. The DSL and HR/Ops Director will make the final decision; the Local Safeguarding Children Board may be consulted if necessary. If it is considered there is no threat, a rationale will be provided and kept on file stating the reasons. This record will not contain details of the offences.

Employees must report any subsequent criminal convictions to their Line Manager immediately, who will then pass the information on to the DSL. Failure to do so will result in disciplinary action being taken.

E6 Single Central Record

A spreadsheet is kept with required headings to ensure that nothing is missed when recruiting staff

E9 Prohibited Check List

A Prohibited List check is carried out on staff who have worked in an EEA country's primary or secondary education (state or private). Appearing on the list will prevent applicants from working for Twin Group.

F) WELFARE/ IMPLEMENTING SAFEGUARDING

F1 Use of risk assessments

A general risk assessment is in operation for the premises.

F2 Fire Safety

Please refer to Twin Group's Health and Safety policy.

F3 First Aid and Medical

Please refer to Twin Group's Health and Safety policy.

F4 U18 Behaviour and Discipline

Learners are made aware of T.E.T code of conduct (Appendix 4) during their induction and are reminded of this again throughout their programme. It is also displayed in the classrooms. Cases where learners fail to comply with the code of conduct must be reported to the Head of Operations, who will decide an appropriate course of action. In some cases, this may be lead to dismissal. Staff must set a good example by conforming to the staff code of conduct (Appendix 3).

F5 E-safety

Twin Group is committed to ensuring that all participants will be able to use all technologies safely by providing the following guidelines in the learners' code of conduct:
- Do not give any user names, passwords, or any other personal information to anyone.
- Do not use another person's user name or password.
- You must not enter, create, share or keep any illegal or unsuitable material.
- Be polite when you communicate with others online.
- Report any unpleasant or unsuitable material or messages that make you feel upset or unhappy.
- Do not take, send or share on social media, pictures of anyone without their permission

Twin Group employs the following monitoring strategies and systems to ensure learner safety online:
- All staff web traffic goes through a web filter (Barracuda security gateway) that blocks websites that are not safe for work, hate speech etc. It also logs all web browsing activity.

- The PCs in the participant area are on a separate network for security purposes, and all web traffic is filtered and all inappropriate websites are blocked. The same filter applies to our Wi-Fi so any personal device that connects to our Wi-Fi is subject to the same restrictions.
- Having web filtering systems in place to filter and block inappropriate websites.
- Where possible, having staff directly supervise children whilst using technology.
- Investigating and intervening promptly in case of any incident or breach alert of the filtering system

Twin Group recognizes the inevitable use of the internet and social media by learners and the challenges of monitoring it. In addition to the above, staff are therefore trained to identify signs of cyberbullying and/or any online abuse.

For more information, please see the E-safety policy (Appendix 7)

F6 Radicalisation and Extremism Prevent

Twin Group is committed to preventing radicalisation. Participants are educated about democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs during their induction, in class.

Staff are trained on signs to look out for and how to respond.

For more information, please see the Prevent policy (Appendix 6)

F7 Parental Consent

A signed parental consent form must be received for all U18s either before or on arrival at T.E.T (Appendix 2).
It is the responsibility of the Safeguarding Team to ensure that these are received.

F14 Provision for those more vulnerable

T.E.T makes special provision for more vulnerable participants, for example those with Special Educational Needs and Disabilities (SENDs), or coming from difficult home situations. T.E.T has a SEND Coordinator, and trainers, advisors are trained to recognise and support participants with SENDs.

For more information, please see the SEND policy (Appendix 10)

List of Appendices

APPENDIX 1

Contacts

Designated Safeguarding Lead & Prevent Officer

Bianka-Jade Nixon (Business Manager)
bnixon@twinuk.com
020 8269 5770/07854 250 911

Deputy Designated Safeguarding Lead & Prevent Officer

Amanda Brade (Contracts & Supply Chain Manager)
Abrade@twinuk.com
020 8269 5682/07772 219 119

Designated Safeguarding Staff

Amanda Brade (Contracts & Supply Chain Manager)
Abrade@twinuk.com
020 8269 5682/07772 219 119

Local Safeguarding Children Board

Greenwich Safeguarding Children Board, First Floor, The Woolwich Centre, 35 Wellington Street, London SE18 6HQ
Tel: 0208 921 4477
email: safeguardingboard@royalgreenwich.gov.uk or safeguardingtraining@royalgreenwich.gov.uk
web: http://www.greenwichsafeguardingchildren.org.uk/site/index.php
LSCB Independent Chair: Nicky Pace, nickyjpace@gmail.com
Acting LSCB Manager: Dan Timariu, dan.timariu@royalgreenwich.gov.uk
LSCB Administrator: lorraine.harry, lorraine.harry@royalgreenwich.gov.uk

Local Prevent Lead

Safer Communities Team, 4th Floor, The Woolwich Centre, 35 Wellington Street, SE18 6HQ
Prevent Coordinator: Adam Browne, adam.browne@royalgreenwich.gov.uk
Tel: 020 8921 8324
Mobile: 07791 701 077

APPENDIX 2

Parental consent form individuals

Under UK law, all people under the age of 18 are regarded as children. For this reason, we require all participants who are under 18 years old to obtain consent from a parent or guardian before participating at any of the programmes delivered under T.E.T

Letter of Consent

Name of participant : …………………………………….. **Date of birth:** ………...……. **Passport Number:** ………..………

Full name of Parent/Guardian:…..……………………………………………………………..…….….……………..

Parent/Guardian telephone number (including country code):…..………………………………….………………..

Parent/Guardian passport/ID number:...……………………………………………………………….………………...

Address:…………………………………………………………………………………………….…………..

Country:…………………………………………………………………………………………………..……...

Email:…………………………………………………………Mobile Phone:…………..……………………………………

Does parent/ guardian speak English?   Yes/ No

Medical conditions
Parents must inform T.E.T of any mental or physical conditions, allergies, disabilities, problems with sight/ hearing, or special educational need (for example dyslexia or attention deficit hyperactivity disorder). Please give full details below.

Medical condition …………………………………………………………….…..
Medication your child takes …………………………………………………………………….…....................................
Special requirements ………………………………………………………………….…...

I consent to my child attending Twin's [Name of Programme]. Please sign to indicate that you agree to the following:

Please check all boxes that apply:
I understand that if my child does not follow the code of conduct, they may be
dismissed from the programme   ☐
I understand that my child will not be supervised by Twin Group Staff outside of programme times. ☐
I agree for my child to receive first aid from a trained First Aider, and/or for medical
treatment to be arranged in the event of accident, injury or illness.   ☐
I understand that 16/17 year olds will regularly mix with learners aged 18+   ☐
I agree for photographs of my child to be used in Twin's publicity materials   ☐

Signature: ………………………………………………………… (Parent or Guardian)   **Date**:…..…………………

APPENDIX 3

Staff code of conduct

The way we do business

Acting in a professional manner. Conducting business with integrity. Treating people and the environment with respect. Acting in an ethically and socially responsible manner. Working together as a team and being innovative. Upholding our and our customers' reputations. This is the way Twin Group does business and is expressed in our code of conduct...

Code of conduct*

* Principles, values, standards and rules of behaviour that guide the decisions, procedures and systems of our organisation in a way that contributes to the welfare of our key stakeholders, and respects the rights of all individuals affected by our operations.

To be successful, we must strive to develop and expand both as a company and individuals. Our core values of **professionalism**, **teamwork** and **respect** help us to achieve this growth.

We have written a **code of conduct** as guidelines for all Twin Group staff to follow. This code is based on our values.

While the code provides a broad range of guidance about the standards of integrity and business conduct, no code can address every situation that individuals are likely to encounter. As a result, this code is not a substitute for our responsibility and accountability to exercise good judgment on proper conduct.

Behaving professionally

We deliver services in accordance with Twin Group policies and professional standards.
We offer only those services we can deliver and strive to deliver no less than our commitments.
We compete vigorously, engaging only in practices that are legal and ethical.
We respect the confidentiality and privacy of our agents, learners, our staff and others with whom we do business. Unless authorised, we do not use confidential information for personal use, Twin's benefit or to benefit a third party.
It is unacceptable for us to receive or pay bribes.

Respecting others and the environment

We treat our colleagues, customers and others with whom we do business with respect, fairness and courtesy.
We take pride in the diversity of our workforce and view it as a competitive advantage to be nurtured and expanded.
We are committed to maintaining a work environment that is free from discrimination or harassment.
We try to balance work and private life and help others to do the same.
We invest in the ongoing enhancement of our skills and abilities.
We provide a safe working environment for our staff.
We aspire to act in a manner that minimises the detrimental environmental impact of our business operations.

Upholding the Twin Group name

Our learners and colleagues trust Twin Group based on our professional competence and integrity - qualities that underpin our reputation. We uphold that reputation.
We respect our competitors, embrace competition and do not condone verbal or written abuse against others.
We seek to serve only those clients whom we are competent to serve, who value our service and who meet appropriate standards of legitimacy and integrity.

When speaking in a forum in which audiences would reasonably expect that we are speaking as a representative of Twin Group, we generally state only Twin's view and not our own.

APPENDIX 4

Learner code of conduct

Please follow this simple **Code of Conduct** to help make your time with Twin Group in London a success.

- Please speak English at all times.
- Always wear your lanyard with your learner ID.
- Follow instructions in class.
- Take an active part in your lessons and complete all the activities your trainer/advisor gives you.
- Do not be late for class. If you are more than 30 minutes late you must not enter the class until after the break.
- Always tell your trainer/advisor if you are sick or cannot come to class for any reason.
- Always tell your trainer/advisor if you change your address, email address, or telephone number.
- Mobile phones should only be used in class as a dictionary, or as part of a learning activity.
- If you need to take an important phone call, take it quietly OUTSIDE the classroom.
- No drinks [except water] or food in classrooms.
- No chewing gum in the premises.
- Please keep your personal possessions (wallets; phones) with you at all times. Twin Group is not responsible if they are lost or damaged.
- Please take care of Twin Group property.
- Treat other learners, Twin Group staff with consideration. Respect the different cultures, races, religions and genders at Twin Group.
- Bullying (hurting someone either physically or emotionally) is not acceptable. If you, or someone you know, is being bullied, please report it to a member of staff immediately.
- You must not break the law. For example, do not try to buy alcohol or cigarettes if you are under 18.
- Please only smoke in the smoking areas.
- All Twin Group staff are available to help you if you have any questions or problems.

Online safety
- Do not give any user names, passwords, or any other personal information to anyone.
- Do not use another person's user name or password.
- You must not enter, create, share or keep any illegal or unsuitable material.
- Be polite when you communicate with others online.
- Report any unpleasant or unsuitable material or messages that make you feel upset or unhappy.
- Do not take, send or share on social media, pictures of anyone without their permission.

IMPORTANT: Please note that if you break the code of conduct or the law, we may decide to remove you from the programme you are currently attending.

APPENDIX 5

Types of abuse

This policy recognises the following definitions in regard to the types of abuse:

(i) **Physical Abuse** – May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

Children who are physically abused may have:
bruises
burns or scalds
bite marks
fractures or broken bones
other injuries and health problems

(ii) **Emotional Abuse** – Emotional abuse is the persistent emotional ill treatment of a person such as to cause severe and persistent adverse effects on emotional development. It may involve conveying to the person that they are worthless, inadequate, or valued only insofar as they meet the needs of another. Developmentally inappropriate expectations being imposed causing the person frequently to feel frightened, or the exploitation or corruption of the person will also constitute emotional abuse.

Children who are emotionally abused may:
be overly-affectionate towards strangers or people they haven't known for very long
lack confidence or become wary or anxious
not appear to have a close relationship with their parent
be aggressive or nasty towards other children and animals
use language or act in a way or know about things that you wouldn't expect them to
struggle to control strong emotions or have extreme outbursts
lack social skills or have few, if any, friends

(iii) **Sexual Abuse** – Involving forcing or enticing a child, young person or vulnerable adult to take part in sexual activities whether or not they are aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example it may also include involving the child or vulnerable adult looking at, or being involved in the production of, pornographic material or watching sexual activities, or encouraging the child, young person or vulnerable adult to behave in sexually inappropriate ways.

Children who are sexually abused may:
Stay away from certain people
Show sexual behaviour that's inappropriate for their age
Have physical symptoms

(iv) **Neglect** – Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development, or unresponsiveness to their basic emotional needs.

Children who are neglected may have:
Poor appearance and hygiene

Health and development problems
Housing and family issues

Other types of abuse include:

Psychological – repeatedly being made to feel unhappy, humiliated, and afraid or devalued by others

Financial or material – stealing or denying access to money or possessions

Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender sexual orientation, disability or cultural background

Child sexual exploitation - children are sexually exploited for money, power or status. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. It does not always involve physical contact and can happen online.

So-called 'honour-based' violence (HBV) - encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Radicalisation - the process by which a person comes to support terrorism and forms of extremism.

Other signs of abuse include:

Being withdrawn
Suddenly behaving differently
Anxiety
Being clingy
Depression
Aggression
Problems sleeping
Eating disorders
Taking risks
Missing school
Obsessive behaviour
Use of drugs
Use of alcohol
Self-harm

APPENDIX 6

Prevent Policy

Under the Counter Terrorism & Security Act 2015, you have a legal duty to prevent people of all ages being radicalised or drawn into terrorism.

Understanding the risk of extremism
Staff, learners & other adults may arrive at Twin Group premises already holding extremist views, or, whilst part of the programme, they may be influenced by a range of factors: global events, peer pressure, media, family views, and extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks.
People who are vulnerable are more likely to be influenced.
Their vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, becoming a victim of hate crime or discrimination, bereavement.

Ways to counteract risks
Promote a safe and supportive international environment via clear expectations of accepted behaviours and those that will not be tolerated, including radicalisation and extremism.
Promote the core British values of (i) democracy, (ii) the rule of law, (iii) individual liberty
(iv) respectful tolerance of different faiths or beliefs.
Where possible, develop critical awareness and thought to counter accepting extremism without question, especially of online material.
Challenge radical or extremist views in any context, and then report concerns.
Be observant and vigilant in noticing any signs of radical or extremist behaviour.

Signs that may cause concern
Participants talking about exposure to extremist materials or views outside Twin Group premises
Changes in behaviour, e.g. becoming isolated
Fall in standard of work, poor attendance, disengagement
Changes in attitude, e.g. intolerant of differences /having a closed mind
Asking questions about certain topics (e.g. connected to extremism)
Offering opinions that appear to have come from extremist ideologies
Attempting to impose own views/beliefs on others
Use of extremist vocabulary to exclude others or incite violence
Accessing extremist material online or via social network sites
Overt new religious practices
Drawings or posters (e.g. in accommodation) showing extremist ideology/views/ symbols
Participants voicing concerns about anyone

How and when to react to concerns
All concerns, however small, should be reported in confidence to the Business Manager, Bianka-Jade Nixon.
bnixon@twinuk.com
020 8269 5770/07854 250 911

Your concern will be dealt with sensitively and carefully.

APPENDIX 7

T.E.T E-safety Policy

Appendix 8:   Social Media Policy

1.   Introduction

1.1   Twin Group recognises the internet and other digital technologies provide a vast opportunity for children and young people to learn. Unlike any other mode of technology, the internet and digital technologies allow all those involved in the education of children and young people to promote creativity, stimulate awareness and enhance learning.

1.2   As part of our commitment to learning and achievement we at Twin Group want to ensure that the internet and other digital technologies are used to:
   • Raise educational standards and promote learner achievement.
   • Enable learners to gain access to a wide span of knowledge in a way that ensures their safety and security.

1.3   Twin Group as part of this policy, holds steadfastly to the ethos that there should be an equitable learning experience for all learners using ICT technology. We recognise that ICT can often allow SENDs learners increased access to the curriculum and other aspects related to learning.

1.4   Twin Group is committed to ensuring that **all** its learners will be able to use existing, as well as up and coming, technologies safely. We are also committed to ensuring that all those who work with children and young people, are educated as to the dangers that exist so that they can take an active part in safeguarding them.

1.5   The nominated person for the implementation of this policy is **Bianka-Jade Nixon , Business Manager.**

2.   Scope of Policy

2.1 The policy applies to:
   • all learners;
   • all Twin Group staff

2.2   Twin Group will ensure that the following elements are in place as part of its safeguarding responsibilities to learners:
   • a list of authorised persons who have various responsibilities for E-safety;

- Safeguarding and Child Protection policy which includes relevant IT & Social Media section that is regularly reviewed and updated;
- adequate training for staff;
- adequate supervision of learners when using the internet and digital technologies;
- education that is aimed at ensuring safe use of internet and digital technologies;
- a reporting procedure for abuse and misuse.

3.   Policies and Procedures

3.1   Use of internet facilities, mobile and digital technologies

3.1.1.   Twin Group will seek to ensure that internet, mobile and digital technologies are used effectively for their intended educational purpose, without infringing legal requirements or creating unnecessary risk.

3.1.2   Twin Group expects all staff, learners to use the internet, mobile and digital technologies responsibly and strictly according to the conditions below:[1]
Users shall not:

- Visit internet sites, make, post, download, upload or pass on, material, remarks, proposals or comments that contain or relate to:
     o   Indecent images of children
     o   Promoting discrimination of any kind
     o   Promoting racial or religious hatred
     o   Promoting illegal acts
     o   Any other information which may be offensive to peers or colleagues.

3.1.3   Incidents which appear to involve deliberate access to websites, newsgroups and online groups that contain the following material will be reported to the Police:
- Images of child abuse (images of children whether they are digital or cartoons, apparently under 16 years old, involved in sexual activity or posed to be sexually provocative)
- Adult material that potentially breaches the Obscene Publications Act 1959 in the UK
- Criminally racist or anti-religious material
- Violence and bomb making
- Illegal taking or promotion of drugs
- Software piracy
- Other criminal activity

3.1.4   In addition, users may not:
- Use host institution/ host institution's facilities for running a private business;
- Visit sites that might be defamatory or incur liability on the part Twin Group or adversely impact on the image of Twin Group;
- Upload, download, or otherwise transmit (make, produce or distribute) commercial software or any copyrighted materials belonging to third parties outside of Twin Group, or to Twin Group itself;
- Reveal or publicise confidential or proprietary information, which includes but is not limited to:

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[1] For the purposes of this document, internet usage means any connection to the internet via web browsing, external email, news groups or messaging services, mobile technologies e.g. mobile phone, including Bluetooth applications, PDA's etc.

- financial information, personal information, databases and the information contained therein, computer/network access codes, and business relationships;
- Intentionally interfere with the normal operation of the Internet connection, including the propagation of computer viruses and sustained high volume network traffic (sending or receiving of large files or sending and receiving of large numbers of small files or any activity that causes network congestion) that substantially hinders others in their use of the Internet;
- Use the Internet for soliciting, representing personal opinions or revealing confidential information or in any other way that could reasonably be considered inappropriate.
- Transmit unsolicited commercial or advertising material either to other user organisations, or to organisations connected to other networks, save where the material is embedded within, or is otherwise part of, a service to which the member of the user organisation has chosen to subscribe.
- Assist with unauthorised access to facilities or services accessible via the institution/ host institution's network.
- Undertake activities with any of the following characteristics:
  - wasting staff effort or networked resources, including time on end systems accessible via the Twin Group network and the effort of staff involved in support of those systems;
  - corrupting or destroying other users' data;
  - violating the privacy of other users;
  - disrupting the work of other users;
  - using the institution/ host institution's network in a way that denies service to other users (for example, deliberate or reckless overloading of access links or of switching equipment);
  - continuing to use an item of networking software or hardware after Twin Group has requested that use cease because it is causing disruption to the correct functioning of Twin Group;
  - other misuse of the institution/ host institution's network, such as introduction of viruses.
- Use mobile technologies or mobile internet services in any way to intimidate, threaten or cause harm to others. Moreover, mobile technologies should not be used to access inappropriate materials or encourage activities that are dangerous or illegal.

3.2   Reporting Abuse

The following outlines what to do if a child or adult receives an abusive email or accidentally accesses a website that contains abusive material:

Any incidents must be reported to the DSL. The Safeguarding Policy must be activated to ensure safeguarding of the child/vulnerable adult and the appropriate authorities must be informed. The disciplinary process will be activated as appropriate.

4.   Inspection and Standards

Twin Group recognises the need to have regular inspections of policies and procedures in order to ensure that its practices are effective and that the risks to learners are minimised.

4.1   Monitoring

Twin Group will employ a range of monitoring strategies and systems to ensure compliance with this policy and intervene when issues arise:

4.1.1   Ensure there are web filtering systems in place to filter and block inappropriate websites.

4.1.2   Where possible, staff directly supervise children whilst using technology.

4.1.3   Staff investigate and intervene promptly in case of any incident or breach alert of the filtering system.

Twin   Group recognizes the inevitable use of the internet and social media by learners and the challenges of   monitoring it. In addition to the above, staff are therefore trained to identify signs of cyberbullying   and/or any online abuse.

4.2   Sanctions

4.2.1   Twin Group has been careful to develop in conjunction with its partners, policies and procedures to support the innocent in the event of a policy breach and enable the Group to manage such situations in, and with, confidence.

4.2.2   Where there is inappropriate or illegal use of the internet and digital technologies, the following sanctions will be applied:

- Learners
    - Learners will be disciplined according to the Learner code of conduct. Serious breaches may lead to the incident being reported to the Police or other regulatory bodies, for instance, illegal Internet use or child protection concerns.
- Adult (Staff, Volunteers)
    - The adult may be subject to the disciplinary process, if it is deemed he/she has breached the policy
    - Serious breaches may lead to the incident being reported to the Police or other regulatory bodies, for instance, illegal Internet use or child protection concerns.

4.2.3   If inappropriate material is accessed, users are required to immediately report this to the DSL, so this can be taken into account for monitoring purposes.

Appendix 8

SOCIAL MEDIA POLICY

Rationale

The widespread availability and use of social media applications bring opportunities to understand, engage, and communicate in new and exciting ways. It is important that we are able to use these technologies and services effectively and flexibly. However, it is also important to ensure that we balance this with our duties to Twin Group learners, the community, our legal responsibilities and our reputation.

For example, our use of social networking applications has implications for our duty to safeguard our international learners - children, young people and adults.

The policy requirements in this document aim to provide this balance to support innovation whilst providing a framework of good practice. They apply to all members of staff.

The purpose of the policy is to:

- Protect Twin Group from legal risks
- Ensure that the reputation of Twin Group and its staff is protected
- Safeguard all our learners [children, young persons and adults]
- Ensure that any users are able clearly to distinguish where information provided via social media is legitimately representative of Twin Group

Definitions and Scope

Social networking applications include, but are not limited to: Blogs, Online discussion forums, Collaborative spaces, Media sharing services, 'Microblogging' applications, and online gaming environments. Examples include Twitter, Facebook, Windows Live Messenger, YouTube, Flickr, Xbox Live, Blogger, Tumblr, Last.fm, and comment streams on public websites such as newspaper sites.

Many of the principles of this policy also apply to other types of online presence such as virtual worlds.

All members of staff should bear in mind that information they share through social networking applications, even if they are on private spaces, are still subject to copyright, data protection and Freedom of Information legislation, the Safeguarding Vulnerable Groups Act 2006 and other legislation. They must also operate in line with Twin Group Safeguarding Policy.

Twin Group staff must not invite, accept or engage in communications with learners in any personal social media whilst in employment at Twin. The following guidelines should be adhered to:

- Staff should not use personal email accounts or mobile phones to make contact with any current learner of any age or any ex-learner under the age of 18 nor should any such contact be accepted. Staff are advised not to use personal email accounts or mobile phones to make contact with other staff, or any members of Twin's community, for work-related purposes.
- Staff should not accept any current learner of any age or any ex-learner under the age of 18 as a friend, follower, subscriber or similar on any personal social media account

- Any communication received from learners on any personal social media sites must be reported to a DSL
- If any member of staff is aware of any inappropriate communications involving any learners in any social media, these must be reported immediately
- If any member of staff is aware of anyone accessing extremist/ terrorist websites or using social networks to exchange extremist/terrorist views, this must be reported immediately
- Staff are strongly advised to set all privacy settings to the highest possible levels on all personal social media accounts
- Staff are advised to avoid posts or comments that refer to specific, individual matters related to Twin Group and members of its community on any social media accounts
- Staff should not post photographs or videos of learners on any social media accounts

There are many legitimate uses of social media for marketing purposes and to support learner learning. For example, Twin Group has an official Twitter account. When using social media for marketing or educational purposes, the following practices must be observed:

- Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts, and ideally should be linked to an official school email account.
- The URL and identity of the site should be notified to the Head of Schools before access is permitted for learners
- The content of any Twin Group sanctioned social media site should be solely professional and should reflect well on the company
- Staff must not publish photographs or videos of learners without the consent of parents/carers (given in the parental consent form), identify by name any learner featured in photographs, or allow personally identifying information to be published on school social media accounts
- Care must be taken that any links to external sites from the account are appropriate and safe
- Any inappropriate comments on or abuse of Twin Group sanctioned social media should immediately be removed and reported to the Head of Schools
- Staff should not engage with any direct messaging of learners through social media where the message is not public
- All social media accounts created for educational purposes should include a link to the school website. This will indicate that the account is officially sanctioned by Twin.

APPENDIX 9

Whistleblowing Policy to Safeguard and Promote the Welfare of Children

Policy Statement

All staff and employees including temporary staff, volunteers, learners, contractors or external partner agencies have a duty to express any concerns that they may have with regards to the conduct of any individual(s). The term 'staff' will hereafter include all of the wider workforce, as stated above.

Twin Group is committed to the highest standards of openness, integrity and accountability. All persons working for, or with this organisation, must feel safe and supported in order to express their concerns.

This policy document is intended to encourage and enable our staff to raise their concerns and to do so without fear of victimisation or discrimination. It does not replace the Complaints Procedure or the Safeguarding Policy or the organisation's standard procedures for reporting allegations or concerns about staff or volunteers.

The Public Interest Disclosure Act (PIDA) protects the public interest by providing a remedy for individuals who suffer workplace reprisal for raising a genuine concern, whether it is a concern about child safeguarding and welfare systems, financial malpractice, danger, illegality, or other wrongdoing. The concern may relate to something that is happening or has happened in the past. The PIDA covers all workers, including temporary agency staff. It does not cover the self-employed or volunteers. The Act also provides protection should individuals have difficulty gaining a reference from an employer because they have raised a concern. It makes it clear that any clause in a contract that purports to gag an individual from raising a concern that would be protected under the Act is void.

Aims

This policy aims to:

- Encourage adults working for or within the organisation to feel confident in raising concerns;
- Provide a process by which concerns can be raised and dealt with;
- Receive feedback on the process (where appropriate); and
- Provide a means by which staff can receive support where concerns have been raised.

What does the safeguarding whistle blowing policy cover?

This policy is designed to cover concerns that staff have about the conduct of individuals in a position of trust within the organisation which could be detrimental to the safety or wellbeing of young people and where staff, for whatever reason, *feel unable* to raise them under the organisation's standard child protection procedures around dealing with such allegations. It would include issues about:

- Unprofessional behaviour
- Bullying by staff
- Any form of abuse (physical, sexual, emotional or neglect)
- Name calling

- Personal contact with children and young people which is contrary to the organisations policies and codes of conduct
- Any form of racial abuse
- Inappropriate sexualised behaviour
- Knowledge about an individual's personal circumstances which may indicate they could be a risk to children or unsuitable to work with children

Please be mindful that these are examples of concerns, and are not exhaustive.

Safeguarding against harassment or victimisation

Twin Group is committed to professional standards and to supporting staff. It is recognised that the decision to report a concern is a difficult one to make. Harassment or victimisation will not be tolerated and Twin Group will take appropriate action in order to protect the person raising the concern when they are acting in good faith.

Confidentiality

All concerns will be treated in confidence, however, there may be a need for the whistle blower to give evidence e.g. if they have witnessed a crime or in regard to disciplinary procedures if this is the outcome.

Anonymous allegations

This policy encourages staff to raise concerns to be identified in doing so as part of their professional role/responsibility. However, anonymous allegations will be investigated as thoroughly as possible.

False allegations

If staff raise a concern in good faith which is not confirmed by an investigation, no action will be taken. However, if a concern is raised maliciously, disciplinary action may be taken.

How to raise a concern

Staff should normally raise their concerns with the Designated Safeguarding Lead (DSL) or another member of Designated Safeguarding Staff (DSS). In certain circumstances, staff may feel they are unable to follow the organisation's standard procedures e.g. because they feel their position in the organisation would be in jeopardy, they would be subject to intimidation, or that the person of concern is the designated manager to whom they should report such matters and there is no one senior to refer to. They should then contact a more senior member of management or, if this is not possible, the Local Safeguarding Children Board directly:

> Greenwich Safeguarding Children Board,
> First Floor,
> The Woolwich Centre,
> 35 Wellington Street,
> London SE18 6HQ
> tel: 0208 921 4477
> email: safeguardingboard@greenwich.gov.uk or safeguardingtraining@greenwich.gov.uk
> web: http://www.greenwichsafeguardingchildren.org.uk/site/index.php

LSCB Independent Chair: Nicky Pace, nickyjpace@gmail.com

Acting LSCB Manager: Dan Timariu, dan.timariu@royalgreenwich.gov.uk

LSCB Administrator: lorraine.harry, lorraine.harry@royalgreenwich.gov.uk

The Local Safeguarding Children Board should also be contacted in circumstances when the matter has been raised under appropriate organisation procedures for referring child protection concerns, but the referrer considers that the manager has not taken the concerns seriously or acted appropriately with relation to them.

When following the Whistleblowing Policy, concerns may be shared verbally, but should also be recorded in writing by completing an incident report form.

Staff may wish to invite their trade union representative to be present during any subsequent interviews.

How Twin will respond:

Twin will respond to any allegations following this procedure:

- Where appropriate, see the learner is offered support
- Decide what action to take based on the allegation
- If necessary, contact the Local Safeguarding Children Board, and follow the advice and suggested actions they provide
- Whilst a complaint is being investigated, the member of staff will be suspended, and if the complaint is upheld, they will be dismissed and any relevant authorities informed immediately

Within 10 working days of a concern being raised the referrer will receive a written response from the responsible person which will:

- Acknowledge that the concern has been received;
- Supply information on relevant support mechanisms
- Advise whether further investigations will take place; or
- Advise that no further action has taken place and why.

Who to contact

Designated Safeguarding Lead

> **Bianka-Jade Nixon (Business Manager)**
> **bnixon@twinuk.com**
> **020 8269 5770/07854 250 911**

If it is felt that it would be unsafe for any reason to share concerns with the named person from your organisation the following are appropriate contacts with whom to discuss your concerns:

Joanne Sayer (Operations and HR Director)
jsayer@twinuk.com
020 8269 5680

Other support

INSPCC Whistleblowing Helpline 0800 028 0285

APPENDIX 10

SEND Policy

T.E.T L operates a Special Educational Needs & Disabilities (SEND) policy. Learners and/or their parents are strongly urged to declare any specific learning requirements, special needs, or physical disabilities at the referral stage. In cases where the learner is accepted, the trainers/advisors will be informed and steps will be taken to help the learner. These may include:

- modifying classroom materials (within reasonable expectation)
- provision of classroom materials in large print
- use of a computer
- allocation of extra time and rest breaks during tests
- individualised homework

If a special need or disability is not disclosed pre-arrival, but one is identified after arrival at Twin, then the trainer/advisor should discuss their concerns with the SEND coordinator who will decide what action needs taking.

For all SEND learners, a risk assessment is carried out, and all staff involved informed, both verbally and in written instructions, of any necessary action need or precautions arising.

Twin Group recognises the fact that SEND learners may be more vulnerable to the risk of abuse, and staff and safeguarding officers are extra vigilant for signs of such.

Language Difficulties

Twin Group recognises that some learners will have language difficulties

Learning Difficulties

Severe learning difficulties

Twin Group does not cater for learners with severe learning difficulties. We have neither the resources nor the expertise to provide adequate provision in such cases.

Twin Group asks prospective learners about SENDs at the referral stage. If a prospective learner has severe learning difficulties then Twin advises them that we cannot cater for their needs and will suggest an alternative provider if appropriate.

Moderate learning difficulties

Twin will have a consultation process with any prospective learner who indicates moderate learning difficulties at the referral stage. A decision will then be made as to whether to accept the learner based on each individual case. If we feel that we are not able to accept the learner, we will suggest an alternative provider if appropriate.

Mild learning difficulties

Twin accepts learners with mild learning difficulties and indicates these on ILP documents to enable trainers/advisors to be aware of them, and to consider them both in terms of learning goals and classroom management. Trainers/advisors are given any extra support or resources necessary to help the learner make the most of their time at Twin Group.

Learners with literacy problems

If a learner has a severe imbalance between their communicative skills of speaking and listening, and their reading and writing, then additional support will be provided.

Learners with behavioural problems

Our policy reflects the fact that the vast majority of learners behave impeccably. Our aim is to focus on what learners do well, and thus minimising attention given to 'inappropriate' behaviour.

For 'inappropriate' behaviour there is a clear procedure. This starts with the trainer/advisor first addressing the issue, and then referring the learner to the Business Manager if the problems continue. If this fails to solve the problem, the Head of Operations will intervene. As a last resort, T.E.T has the right, to dismiss the learner.

Help and support

Trainers/ Advisors and learners can find additional support and discuss their concerns with the SEND co-ordinator:

Bianka-Jade Nixon (Business Manager)
bnixon@twinuk.com
020 8269 5770/07854 250 911

If the SEND co-ordinator is unable to advise, help will be sought from an organisation specific to the SEND (National Dyslexia Association, Royal National Institute of Blind People, British Deaf Association etc.).

APPENDIX 11

TET Learner Safeguarding Procedures

Twin English Centre London (ECL) shares its premises with Twin Employment and Training (TET). TET uses the facilities to provide training and services for jobseekers and young people aged 16+. These procedures are in place to ensure that under 18s on ECL programmes (referred to here as ECL juniors) are safeguarded from any potential risks posed by TET learners.

1) Timetables and break times
TET timetables are shared with the ECL team and the registers are available at reception. TET programmes start half an hour later than ECL programmes and finish one hour earlier, to avoid the two learner groups entering and leaving the premises at the same time. TET break times are held at separate times to ECL juniors. A classroom is made available to junior groups for lunch, and junior individuals must leave at 12.30.

2) Classrooms
TET are assigned six classrooms which are towards the end of the corridor. ECL juniors are normally taught in the classrooms located closest to the learner services office and furthest away from the TET classrooms. TET learners are not allowed to enter ECL classrooms and vice versa, even if they are empty.

3) Identification of learners
All ECL learners wear lanyards. ECL learners aged 14-17 will have different coloured lanyards to those aged 10-13 and to adults. All TET learners wear visitor badges and sign in at reception. All learners have an ID copy on file.

4) TET tutors
All TET trainers/ Advisors are DBS checked. All undergo safeguarding training which specifically refers to all measures outlined above and appropriate adult/ junior interaction.

5) TET learner induction
The TET learner induction includes specific guidance regarding interaction with U18s.