

Safeguarding policy

Guidance for candidates, schools, and internal employees

1 September 2023

(Reviewed 1 September 2024)

**Head of Safeguarding and Audit:
Kamila Karnowska**

safeguarding@twrecruitment.com

kamila.karnowska@twrecruitment.com

Phone: 0207 845 5450

**Deputy Safeguarding Officer/Training and Audit Manager:
Poppy Franks**

safeguarding@twrecruitment.com

poppy.franks@twrecruitment.com

Phone: 0207 845 5450

Contents

Safeguarding Policy

Introduction	3
Our Commitment to Safeguarding.....	4
Relevant Legislation and Guidance	5
The role of the Head of Safeguarding and Audit	7
Definitions	8
Recruitment Selection and Vetting	10
Responding to Safeguarding Concerns	10
Dealing with allegations of abuse and concerns made against candidates	11
Duty to make a referral to the DBS/TRA	12
Whistleblowing	13
Summary	13

1. Introduction

Safeguarding is everyone's responsibility. Tradewind/Sanza/Accelerate acknowledges the duty to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

This policy applies to all internal staff and candidates and will be widely promoted and be mandatory for everyone involved in Tradewind/Sanza/Accelerate. Failure to comply with this policy and the company's safeguarding procedures may result in disciplinary action being taken, including termination of employment and/or cease in offering assignments.

All candidates placed by Tradewind/Sanza/Accelerate are expected to familiarise themselves with arrangements for safeguarding children in the organisation where they are placed and to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

Here at Tradewind/Sanza/Accelerate we expect all staff, and candidates to follow and promote good practice in safeguarding. In order to do so, they should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional code of conduct to maintain professional boundaries and safe working practices (within the schools and externally).
- Report any concerns or disclosures related to the protection and safety of children.
- Undertake safeguarding training and awareness sessions annually.
- You must read a copy of Keeping Children Safe in Education – Part 1 and Appendix Further information.
- Help educate learners/service users in placements regarding matters of keeping safe, including acting as a good role model.

- You must avoid putting yourself at risk of allegations of harmful, abusive or unprofessional conduct, for example you should not touch a child, use unprofessional or discriminatory language, be aware of the professional risks associated with the use of social media.
Full advice and guidance can be found in “Guidance for Safer Working Practice for Adults Who Work with Children and Young People in Education Settings’:
<https://www.guidanceforsaferworkingpractice.pdf>
- You must create a positive, inclusive and safe learning environment whilst setting high expectations which inspire, motivate and challenge pupils.
- You must ensure that you show tolerance of and respect for the rights of other members of staff and children. In line with the Equalities Act 2010 you must not discriminate on any grounds.
- You must read and follow all school policies and procedures. It is your responsibility to familiarise yourself with these policies and procedures and ask for them if you are not given them on arrival.

2. Our Commitment to Safeguarding

This policy is designed to meet the above principles by ensuring that:

- Tradewind/Sanza/Accelerate have robust safer recruitment processes that ensures that those who are known to be a risk to children do not gain access to them; those whose actions suggest that they are a risk to children are detected at the earliest stage and prevented from continuing to work with children; and that those who intend to do harm are prevented at every possible stage from entering the workforce.
- Staff and candidates understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children.
- There is an open and transparent culture which enables staff and candidates to raise concerns around children, those that work with children, and processes within Tradewind/Sanza/Accelerate.

- It is as simple as possible for an individual to report (to school's DSL and Tradewind/Sanza/Accelerate) concerns about harm or risk and clear procedures are implemented where safeguarding and child protection issues arise. Where concerns are reported Tradewind/Sanza/Accelerate will ensure that individuals are supported.
- Tradewind/Sanza/Accelerate have robust policies and procedures in place, which are reviewed and updated at least every 12 months.
- Tradewind/Sanza/Accelerate stays up to date with developments on safeguarding best practice, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- Tradewind/Sanza/Accelerate will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.
- Tradewind/Sanza/Accelerate will work in partnership with other services (including local authority children's social care and LADO) to ensure that those who are identified as being at risk of abuse are protected.
- Confidential, detailed and accurate records of all safeguarding concerns and low-level concerns are maintained and securely stored.

3. Relevant Legislation and Guidance

The principal legislation and guidance governing this policy is:

Keeping Children Safe in Education 2024

The Children Act 1989 and 2004

Working Together to Safeguard Children 2018

Disqualification under the Childcare Act 2006

Guidance for Safer Working Practice for Adults Who Work with Children and Young People 2022

Information Sharing: Guidance for practitioners and managers. HM Government 2018

The Human Right Act 1998 (HRA)

Equality Act 2010

Public Sector Equality Duty

Rehabilitation of Offenders Act 1974

Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')

The Prevent Duty, Departmental, Advice for Schools and Child Care Providers 2015

Modern Slavery Act 2015

Local Safeguarding Partners / Arrangements

Data Protection Act 2018 and the UK GDPR

This policy should be read in conjunction with our other relevant safeguarding policies, such as:

- Code of Conduct
- Incidents and Injuries
- Health and Safety
- Recruitment Selection and Vetting
- Complaints Policy
- Whistleblowing Policy
- REC Code of Professional Practice

4. The role of the Head of Safeguarding and Audit

The role of the Head of Safeguarding and Audit includes:

- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by staff members, partner agencies or candidates.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to candidates or children that they work with.
- Liaising with Designated Safeguarding Leads/Officers in partner organisations.
- Acting as a source of support, advice and expertise for staff and candidates with concerns and liaising with other agencies and professionals.
- Supporting staff and candidates involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Supporting and overseeing disciplinary process
- Referring any allegations of abuse or safeguarding concerns to the relevant children's social care and if relevant, the police. Further details on referral routes are located in Working Together to Safeguard Children (2018) and in Keeping Children Safe in Education (2024).
- Reporting concerns to the Disclosure and Barring Service (DBS), this may be where a staff member or candidate has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and the company believes they pose a risk to children. The Head of Safeguarding and Audit will complete the necessary referral documents to the DBS and liaise with them thereafter if they have any further questions regarding the staff member or candidate.
- Reporting concerns to TRA (Teaching Regulation Agency), when necessary.
- The role of the Deputy Safeguarding Officer/Training and Audit Manager includes supporting Head of Safeguarding and Audit and offering all relevant staff and candidates safeguarding training appropriate to their role and continue receiving training to enable the development of skills and good practice when working with children.

5. Definitions:

According to the Children Act 1989, a 'child' is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under current legislation.

In this policy, the terms 'child' and 'young person', or 'children' and 'young people', are used interchangeably to refer to any individual under the age of 18.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

The Children Act 1989 defines 'harm' as "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another".

Abuse may be perpetrated by an individual from the child's school, community, family, those in a position of trust or another child.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, up-skirting, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

Child abuse can be one of five different categories as set out in Keeping Children Safe in Education 2024:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 child 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 children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child 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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child 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, a child's basic emotional needs

For detailed guidance on the signs which may indicate abuse and neglect see:

[What to do if you are worried a child is being abused](#)

6. Recruitment and Selection Process

Tradewind/Sanza/Accelerate safeguarding procedure for supply workers is thorough and stringent. We are open and honest with our clients and supply workers, always working within the safer recruitment requirements of Keeping Children Safe in Education. This policy sets out the requirements of Tradewind/Sanza/Accelerate recruitment process, which identifies candidates who are unsuitable to work by carrying out all the necessary pre-employment checks. A candidate must produce all required documentation before they are offered any temporary or permanent work. Any information disclosed with the candidate's consent is presented to school, for the client to make the final decision on suitability to work with them. Our compliance procedure is stringent; no candidate will be considered should they pose a potential risk to working with children and vulnerable adults. All our schools will be informed by our consultants of any outstanding documents prior to placement. This allows all our clients to make an informed decision on whether to accept our candidates or not for placement.

Please find our detailed policy here: [Recruitment Selection and Vetting Policy](#)

7. Responding to Safeguarding Concerns

All staff have a responsibility to protect children. This includes:

- Familiarising yourself with all Tradewind/Sanza/Accelerate policies and processes including Code of Conduct
- Attending the recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date.
- Reporting any concerns arising from meeting candidates or carrying out vetting checks to the school DSL and to Compliance Managers/Head of Safeguarding and Audit without delay and making a clear written record of all relevant information to be passed to the school DSL and to Compliance Managers/Head of Safeguarding and Audit.
- Reporting any concerns arising from organisation visits/placements to the Designated Safeguarding Lead/Officer at the relevant organisation and confirming that this has been done to Tradewind/Sanza/Accelerate consultant / Head of Safeguarding and Audit.

- Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.

All candidates working through Tradewind/Sanza/Accelerate are expected to keep children safe by:

- Following all Tradewind/Sanza/Accelerate policies including the Code of Conduct.
- Following all the school's policies, including but not limited to Safeguarding Policy, Behaviour Management policy, Social Media policy, Health and Safety, Whistleblowing policy and Code of Conduct.
- Making the Designated Safeguarding Lead/Officer at the placement aware of any concerns regarding any children or any adults caring for or working with those children.
- Seeking advice and support from Tradewind/Sanza/Accelerate's consultant / Head of Safeguarding and Audit when they have reason to believe that their concerns have not been responded to appropriately or they have concerns about practice in the placement.

8. Dealing with allegations of abuse and concerns made against candidates.

All candidates placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, such as the Code of Conduct.

In accordance with Working Together (2018) and Keeping Children Safe in Education (2024), where an organisation has received an allegation that a volunteer, supply staff or member of staff who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

A referral should be sent to LADO **by the school** within one working day, giving as much detail as possible.

In line with Keeping Children Safe in Education guidance, “375. **The school will usually take the lead** because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. **Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college.**” “375. Agencies should be fully involved and co-operate with any enquiries from the school, LADO, police and/or local authority children’s social care.”

Details regarding allegations that meet the harms threshold and concerns that do not meet the allegations threshold (referred to as ‘low level concerns’) are set out in Tradewind/Sanza/Accelerate’s Incidents and Injury Policy which should be read alongside this policy:

[Incident and Injuries Policy](#)

9. Duty to make a referral to the DBS and / or TRA

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child, there is a legal duty on Tradewind/Sanza/Accelerate to report that person to the Disclosure and Barring Service. The DBS has statutory authority to bar a person from working in regulated activity with children and / or vulnerable adults in the UK.

In the event of an allegation being substantiated and,

- the person is dismissed; resigns, or otherwise ceases to provide his or her services, or
- the employer ceases to use the person’s services.

Tradewind/Sanza/Accelerate has a duty to inform the appropriate regulatory body such as the Disclosure and Barring Service (DBS) <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>, Teaching Regulation Agency (TRA) <https://www.gov.uk/guidance/teacher-misconduct-referring-a-case> when appropriate. Tradewind Recruitment and Sanza Teaching Agency will endeavour to assist the professional body with their formal investigation. We will comply with any recommendations from the appropriate regulators. All communication with the regulatory bodies when reporting an incident will be in writing.

Substantiated allegations should be included in employment references and prior to any placements – as per Keeping Children Safe in Education guidance. Disciplinary sanctions should also be disclosed in employment references and prior to any placements.

10. Whistleblowing

Candidates may find it difficult to raise concerns about colleagues, managers, people in placement or concerning how safeguarding concerns are responded to within a setting.

Candidates should follow school's Whistleblowing policy, where they have concerns related to staff working for or on behalf of the school. School's Whistleblowing policy can be found on school's website.

Candidates can also access NSPCC Whistleblowing Advice line available 8am-8pm Monday to Friday and 9am-6pm at the weekend. Call 0800 028 0285. You can also email help@NSPCC.org.uk at any time.

Tradewind/Sanza/Accelerate has a specific Whistleblowing Policy which encourages candidates who may from time to time feel that they need to raise certain issues relating to Tradewind/Sanza/Accelerate with someone in confidence. Tradewind/Sanza/Accelerate aims to have an open and honest culture where safeguarding is responded to effectively, and both staff and candidates feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to.

[Public Interest Disclosure \(Whistleblowing\) Policy](#)

11. Summary

Tradewind/Sanza/Accelerate will make clients and candidates aware of the Safeguarding Policy by making it available on our website.

All staff, temporary workers, candidates, and contractors must be aware that Tradewind/Sanza/Accelerate have a professional duty to share information with other organisations in order to safeguard children. The public interest in safeguarding children may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by Tradewind/Sanza/Accelerate



Tradewind

Tel: 0207 845 5450

Email: info@twrecruitment.com

SANZA Teaching Agency

Tel: 020 7845 6240

Email: info@sanzateaching.com