

# SAFEGUARDING POLICY

## 2019 - 2020



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### Our Mission Statement

Aim to deliver an engaging, positive learning experience every time.

### Our Values

Our values encompass the achievement of all of our learners. Our values are HONESTY, INTEGRITY, SUPPORT, ETHICAL BUSINESS AND EQUALITY OF OPPORTUNITY FOR ALL. We support PREVENT, SAFEGUARDING, BRITISH VALUES, EQUALITY, DIVERSITY & INCLUSION and this policy is at the heart of and supports these core values in aiming to safeguard staff and learners.

### Our Vision

To be the provider of choice for apprentices and clients, creating bespoke education and training that maximizes opportunity and investment, both for now and in the future.

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## 1 - Introduction and Overview

Our centre is committed to protecting all persons who come into contact with our staff directly or who attend our courses. The welfare of children, young people and vulnerable adults is of primary concern.

Our Safeguarding Policy is designed to meet all legal requirements and is supportive of our commitment to Equality and Diversity reflected in our policies on this.

## 2 - Rationale and Scope

This policy applies to all children, young people and adults, regardless of age, class, ethnicity, gender, religion, disability or sexual orientation, who may be participating in training, courses or other activities provided by the centre.

The policy is applicable to all staff . this being defined for the purpose of this policy as all employees, sub-contractors and anyone in part or un-paid work on behalf of the centre.

This policy covers The NVQ Training Centre Ltd, The Apprenticeship Centre Ltd and Apprenticeship EPA Centre.

## 3 - Roles and responsibilities

Our SMT (senior management team) take overall responsibility for the provision of all policies within the centre. The directors, Mark Webber and Peter Carey, take overall responsibility for this policy, its application and sharing of appropriate information.

Our Safeguarding Lead and Deputy also have responsibilities to ensure learners are safeguarded and policies are adhered to. All staff have a responsibility for supporting the safeguarding and the welfare of staff and students they work with, to the best of their ability.

## 4 - How this Policy will be Communicated

- Our SMT will review policies and update as required
- Our policy will be made available on our website if applicable
- Our policy documents will form part of the induction for all staff to the centre
- When suitable, policies will be uploaded to OneFile resources for access by all appropriate users
- We may email policy updates to staff as required or use OneFile system announcements

## 5 - Complaints

Any complaints in relation to this policy or relating to this policy or conflicts of interest should be made to the SMT or the Directors, who can be contacted via our Head Office on 08452235020 or email [info@apprenticeship-centre.co.uk](mailto:info@apprenticeship-centre.co.uk).

## 6 . Our Aims

The purpose of this policy is to set out aims and objectives for the protection of children, young people and vulnerable adults involved in training and courses or other services that are provided by the centre.

To ensure the welfare of all persons who come into contact with our staff.

To increase staff awareness of the issues regarding children, young people and vulnerable adults.

Outline the procedures to follow in the event of any concerns or incidents.

## 7 . Safeguarding Policy

Managers have overall responsibility for ensuring that this policy is applied within their own area and ensuring that all employees are made aware of this policy.

The Quality Manager is responsible for ensuring that the management team are aware of relevant multi-agency procedures. Such multi-agency procedures will normally involve local Health Care, Police and Social Care organisations who have been given specific responsibility for dealing with complaints, or suspicions, of abuse of children, young people or vulnerable adults.

The Quality Manager is responsible for maintenance, regular review and updating of this policy. The policy will be reviewed at least on an annual basis.

All members of staff have a responsibility to comply with this policy, not just those who might specifically be working with children, young people or vulnerable adults.

### Definitions

1.1 **Child or Young Person** . a person under the age of 18 years. From here on referred to as ~~young~~ person+.

1.2 **Vulnerable Adult** - is described as someone who is unable to effectively protect him or herself from harm or exploitation. This is a person of 18 years and above who may have some sort of physical, mental or sensory disability.

1.3 **Abuse** . the misuse of power and authority by one person over another. Abuse may be:

- Discriminatory
- Physical
- Sexual
- Emotional/psychological
- Financial/material
- Neglect

## 8 . Patterns of Abuse

**Patterns of Abuse** - sometimes it is possible to identify a pattern of how the abuse is taking place, examples include:

- Serial abusing: in which the abuser seeks out and 'grooms' a young person or vulnerable individual. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse.
- Long-term abuse: in the context of an ongoing family relationship such as domestic violence between spouses or generations.
- Opportunistic abuse: such as theft occurring because money has been left around.
- Situational abuse: arising because pressures have built up in a relationship. This can sometimes be because of difficult or challenging behaviour or due to neglecting a person's needs because the carer has difficulties. These could be debt, alcohol or mental health problems.

This list is not exhaustive. If you are in any doubt of any instance of abuse you should seek advice from the Quality Manager or Safeguarding Lead.

## 9 . Alert Procedures

If you see something that concerns you or you are given information that causes you to be concerned about a young person or vulnerable person you should:

- Keep calm; this will help the person
- Make sure that the person is safe
- Listen carefully to what is said
- Reassure and take care of the person
- Get help as soon as possible

If a young person or vulnerable adult comes to you with a report of apparent abuse, you should listen carefully to him/her, using the following guidelines. When listening to the young person or vulnerable adult staff must:

- Allow the young person or vulnerable adult to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Never coach or lead the vulnerable adult in any way
- Reassure the young person or vulnerable adult, let them know you are glad they have spoken up and that they are right to do so
- Always ask enough questions to clarify your understanding, but do not probe or interrogate . no matter how well you know the young person or vulnerable adult . spare them having to repeat themselves over and over
- Be honest - let the young person or vulnerable adult know that you cannot keep this a secret, you will need to tell someone else
- Try to remain calm . remember this is not an easy thing for them to do
- Do not show your emotions . if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- Let the young person or vulnerable adult know that you are taking the matter very seriously
- Make the young person or vulnerable adult feel secure and safe without causing them any further anxiety.

## 10 . Reporting Abuse or Concerns

You must report your concerns if at any time you think that a vulnerable person is being abused or is at risk of abuse so that they can be looked into. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still raise your concerns.

- You must tell, so that others can help if you come across a situation where you think a young person or vulnerable person is at risk of abuse. You must not ignore the information. Do not assume that others know what you know.
- You have a duty of care to ensure the rights and needs of the young person or vulnerable person is your main consideration. Remember that young people and vulnerable adults have human rights. You should not try to investigate the matter on your own.
- You should call for an ambulance or arrange for a doctor to see the person at the earliest opportunity if at any time you feel the person needs urgent medical assistance.
- You should call the police if at the time you have reason to believe the vulnerable person is in immediate and serious risk of harm or if you suspect that a crime has been committed.
- You must record the facts of what happened. Remember you will need to record everything that you saw, heard and did and ensure that any evidence indicating that abuse is or may be occurring is preserved.
- You should inform the family and/or carers of the young person or vulnerable adult, where it is safe to do so (i.e. where they are not implicated in the abuse), of the incident.
- You must pass on any concerns immediately to your line manager or the Safeguarding Lead. The rights and needs of the young or vulnerable person are your main consideration.

## 11 . Sharing Information

People over the age of 18 years have the right to expect that information shared with a member of staff should be treated as confidential. However, it should be made clear that where the staff member has a reason to be concerned for the welfare of a vulnerable person and/or others they have to share the information with someone who is in a position to act or take responsibility.

The young person or vulnerable adult should be told with whom the information will be shared, and that their views and wishes will be considered.

Any views or wishes expressed by the young person or vulnerable adult should be recorded and reported with their concerns by the staff member.

Concerns should be reported at the earliest possible opportunity.

Our Safeguarding Lead can be contacted on:

Email [info@nvq-centre.co.uk](mailto:info@nvq-centre.co.uk) Telephone 0845 223 5020 Extn 790

## 12 . Confidentiality

All personal data will be processed in accordance with the requirements of the Data Protection Act 1998, and in line with the Data Protection Policy and GDPR.

Where under-18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people or children, this may include a duty to make a referral for example. Parents or legal guardians' permission should generally be sought before speaking to children, but not in circumstances that would either put a person at risk or compromise evidence.

When dealing with a child or young person if consent is refused, and it is decided that confidential information is to be shared without consent, it should be explained to the person withholding consent that the information will be shared and the reasons for the decision.

Unlike young people under the age of 18, adults can insist on confidentiality unless there are circumstances in which a vulnerable adult's wishes may be overridden. As a general principle you must act in accordance with the wishes of the vulnerable adult wherever possible.

As a matter of best practice, vulnerable adults should not be offered nor promised confidentiality by a member of staff. It is important for staff to be able to share concerns and seek help from others at least within the company and this must be explained to the learner.

Where there is reasonable suspicion of abuse and the adult has capacity to withhold consent and does not wish the information to be shared, then the adult must be offered all appropriate support from the centre.

If there is reason to believe a crime has been committed, seek the vulnerable adult's consent to inform the police. If the vulnerable adult gives permission, ensure the situation is discussed with your line manager, who may then contact the police.

If the vulnerable adult does not give permission to involve the police, this information should be passed on to your line manager as soon as possible and clearly recorded.

If the person lacks the capacity to give consent and there is reason to believe a crime has been committed, consult your line manager.

Other staff may need to be alerted to concerns in order to monitor concerns or gather further evidence or to assist with support. Any discussions must be kept confidential between those directly involved and only shared on a strict need to know basis and within a professional context.

### 13 . Record Keeping and Referrals

Any disclosure from a learner or another member of staff must be recorded. This will cover:

- Learner and staff details
- Reason for the concern
- Any apparent physical signs of abuse
- An account given to you of abuse by the learner concerned, as accurately as you are able to record it
- Dates and times of incident
- Date and time of when notes were made.

The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible and as accurately as you are able to record it. If you are unsure about what to write, you can get advice from the Quality Manager.

The report may, eventually, form part of a criminal investigation.

The report should be signed, dated and passed as soon as possible or at the latest within 24 hours to the Quality Manager, who will keep a copy stored in a secure place.

#### **Referral to external agencies**

When the Quality Manager receives a Concern Form, they will need to carefully consider the information contained on the form.

If no referral has already been made, (i.e. via use of hospital, GP or Police), the Quality Manager will need to consider the next appropriate step.

The decision to proceed with further action should take account of such factors as:



- The vulnerability of the person
- Who is the alleged perpetrator
- The nature and extent of the abuse
- The length of time it has been occurring
- The risk of repeated or increasingly serious acts involving other vulnerable people
- The wishes of the young person/vulnerable adult.

It is also important that an early decision is taken about which agencies should be involved, how and when. If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

Considering all the information available, the Quality Manager will decide on the next steps, which may include taking no further action. Where the Quality Manager decides that further action is necessary, this may be to:

- Seek further advice from Social Services
- Make a referral to Social Services
- Report the incident to a designated Social Worker
- Report the matter to the police if a crime is suspected.

#### 14 . Allegations Against Staff Members and Disclosures for Staff

There are occasions where a young person or vulnerable adult may accuse a member of staff of abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

In the event that any member of staff suspects any other member of staff of abusing a learner, it is their responsibility to bring these concerns to the attention of the Managing Director.

The decision to refer to outside agencies will follow the same process as any other disclosure or suspicion of abuse.

If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under The NVQ Training Centre Ltd.'s disciplinary procedures.

#### **Disclosures for staff**

All members of staff who will, or are likely to, come into direct contact with learners will be CRB checked on appointment.

1.4 Staff checks will be renewed every three years.

1.5 On receipt of a positive CRB check (i.e. one which indicates a criminal record) the Quality Manager will be responsible for completing a risk assessment . see Appendix 3 for further guidance.

## 14 . Delivery Partners

Delivery Partners will be required to comply with the contractual requirement to carry out CRB checks (at their own expense) in order to ensure that they have done everything reasonable within their powers to only employ suitable people to provide services on behalf of The NVQ Training Centre Ltd.

Delivery Partners will need to show they have policies or procedures in place to carry out CRB checks and that they use an appropriate umbrella body in this respect. The NVQ Training Centre Ltd is able to refer Delivery Partners to a suitable umbrella body on request.

- 1.6 Where a Delivery Partner is a sole trader or self-employed The NVQ Training Centre Ltd is able to manage the disclosure on their behalf.
- 1.7 We acknowledge that the CRB process can sometimes be a lengthy one. In this case the Delivery Partner may wish to give a start date before the CRB check is complete provided the following conditions are met when working with The NVQ Training Centre Ltd. learners:
  - Staff without valid CRB checks are supervised at all times by other staff
  - There is no one to one contact with any learner who is either under the age of 18 or known to be vulnerable.

## 15 . Radicalisation

The Counter-Terrorism and Security Bill, which is currently before Parliament, seeks to place a duty on specified authorities including schools, colleges and universities to have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism.

**Prevent guidance** . Providers must be able to "demonstrate an awareness and understanding of the risk of radicalisation in their area, institution or body" through clear and visible policies, robust sub-contracting procedures and staff training

All staff at The NVQ Training Centre Ltd, are required to complete suitable training due to the new counter-terrorism laws.

Our contact for Prevent can be contacted via . Email [Info@NVQ-centre.co.uk](mailto:Info@NVQ-centre.co.uk) Telephone 0845 223 5020 Extn 790

## 16 . Related Policies

The NVQ Training Centre Ltd will have regard to Safeguarding when developing other policies in particular:

- Staff Recruitment & Training
- Equality & Diversity
- Radicalisation
- Learner and Staff Codes of Conduct
- Data Protection
- Learner IAG
- E-Safety