

Apprenticeship Policy Safeguarding

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SAFEGUARDING CONTACTS

In the event of any safeguarding concerns, you must immediately contact:
Designated Safeguarding Lead (DSL)



Arlene Bulfin
arlene.bulfin@UKFast.co.uk

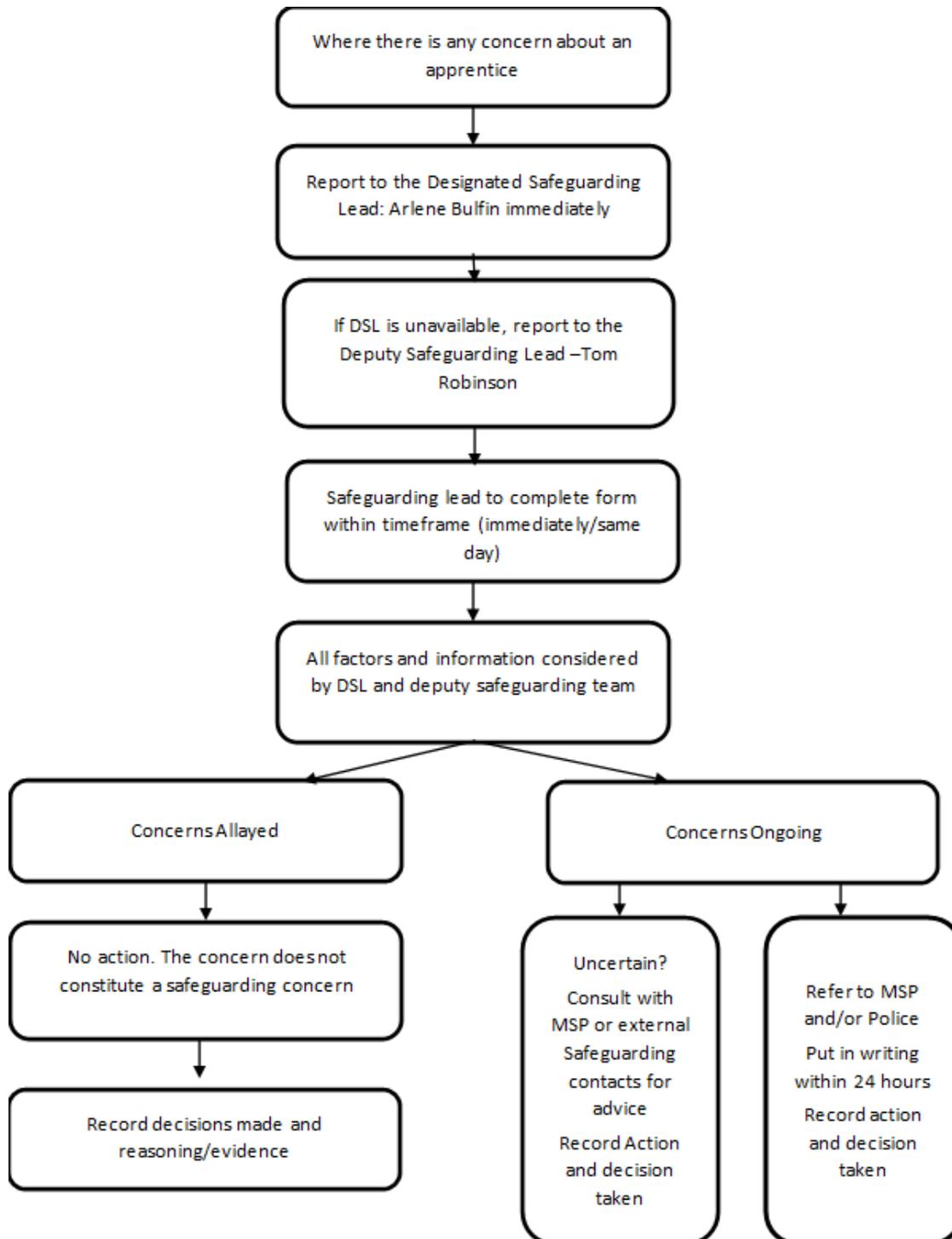
If the DSL is unavailable, you must contact our deputy:
Deputy Safeguarding Lead



Tom Robinson
thomas.robinson@UKFast.co.uk

Please also see: **APPENDIX D – IMPORTANT SAFEGUARDING CONTACT**

WHAT TO DO IF YOU SUSPECT A SAFEGUARDING ISSUE - APPRENTICE SAFEGUARDING PROCEDURE FLOWCHART



PURPOSE OF THIS POLICY

This policy sets out UKFast's approach to safeguarding and promoting the welfare of our apprentices, children, and vulnerable adults. It applies to all aspects of our work and to everyone working for UKFast, including permanent and temporary employees.

At UKFast, we take our responsibility to ensure the safety of our apprentices very seriously. We are committed to creating a fantastic learning experience, and to ensuring the highest levels of apprentice safety and wellbeing.

DEFINITIONS

UKFast uses definitions of the term 'safeguarding' from statutory guidance. Safeguarding children is defined in [Working together to safeguard children](#) (2018) as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

A 'child' is defined as anyone under the age of 18. An 'adult at risk' or 'vulnerable adult' is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors for example:

- Poor numeracy and literacy skill, or specific learning need
- Unsupportive home environment
- English not a first language
- Under-represented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

At UKFast all apprentices answer a confidential questionnaire during induction relating to the areas above and any apprentice deemed 'higher risk' will be documented and flagged to the appropriate member of the education team to add extra support and reassess in each monthly 'Progress Review'.

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WHAT IS SAFEGUARDING?

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The Safeguarding Agenda includes a wide range of potential risks:



- Abuse (physical, emotional, financial, institutional, sexual, organisational, neglect)
- Self-neglect
- Discrimination
- Child sexual exploitation (cse) and child criminal exploitation (cce)
- Peer on peer abuse
- Bullying
- Cyberbullying
- Domestic abuse
- Substance misuse
- Forced marriage
- Gang and youth violence
- Female genital mutilation (fgm)
- Gender based violence
- Radicalisation (appendix b)
- Teenage relationship abuse
- Trafficking and modern slavery
- MENTAL HEALTH CONCERNS
- Serious violence

SCOPE OF THIS POLICY

This policy applies to all staff working at UKFast including contactors and temporary staff members. This policy deals with the protection of apprentices, children, and vulnerable adults. Children are those under 18 years of age and will include those aged 16 - 18 on Apprenticeship courses.

CONTEXT OF THIS POLICY

The key pieces of legislation that form the context of this policy are:

THE CHILDREN ACT 1989 (AS AMENDED)

THE PROTECTION OF CHILDREN ACT 1999

KEEPING CHILDREN SAFE IN EDUCATION 2021

WORKING TOGETHER TO SAFEGUARD CHILDREN 2018

DFE'S SAFEGUARDING CHILDREN AND SAFER RECRUITMENT IN EDUCATION (2007)

THE CHILDREN AND FAMILIES ACT 2014

SECTION 26 OF THE COUNTER-TERRORISM AND SECURITY ACT 2015

THE PREVENT STRATEGY 2011

POLICY STATEMENT

UKFast holds as one of its highest priorities the health, safety and welfare of all apprentices, children and vulnerable adults involved in courses or activities which come under the responsibility of UKFast.

UKFast will carry out its responsibilities under all relevant legislation, regulations, and formal guidance for the protection of apprentices, children, and vulnerable adults.

UKFast has a designated safeguarding lead - arlene bulfin. Thomas robinson is deputy safeguarding lead to support the policies and procures in place.

These safeguarding leads are responsible for providing support, advice, and expertise on safeguarding concerns, and are responsible for the investigation and reporting of serious safeguarding issues. Arlene bulfin is always the point of first report in the case of any safeguarding concern.

UKFast has a designated contact for the safeguarding officers 'safeguarding@UKFast.co.uk'. This is communicated to all staff and will be displayed on the UKFast website page and moodle elearning platform for apprentices.

UKFast and its team have a collective and individual duty to ensure that its team fulfils their responsibilities to safeguard and promote the welfare of apprentices, children, and vulnerable adults, and to prevent child abuse and to report any abuse discovered or suspected.

UKFast will advise all staff about the standards of behaviour and conduct (appendix a) they are expected to always maintain when working with apprentices.

UKFast will work with appropriate local agencies, and in particular local safeguarding children's boards (lscbs), to ensure that apprentices are safeguarded through the effective operation of UKFast's safeguarding procedures.

UKFast recognises that any apprentice, child, or vulnerable adult can be subject to abuse and all allegations of abuse will be taken seriously and treated in accordance with UKFast's procedures.

UKFast recognises that it is the responsibility of all the team to act upon any concern no matter how small or trivial it may seem.

UKFast recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse.

UKFast is committed to supporting, resourcing, and training those who work with, or who encounter, apprentices, children, and vulnerable adults and to providing appropriate supervision.

UKFast will ensure that all members of staff are trained on the safeguarding processes during their induction. All team leaders that work with the learners will also complete training on safeguarding processes and an internal quiz.

UKFast has a duty to ensure children and vulnerable adults are safeguarded from potentially harmful and inappropriate material online. We therefore are ensuring where technically possible appropriate filters and appropriate monitoring systems are in place and children and vulnerable adults are taught about safeguarding including online safety.

UKFast staff and apprentices have access to the company wi-fi when onsite. Logs and archives of activity are taken continuously. If any issues arise in which this information needs to be reviewed, it can be accessed and actioned immediately. Access to all browsing, chat and email history is available to the DSL and deputy DSL upon request. All users must sign an acceptable use policy before accessing these services. Any breaches of conduct will be deemed misconduct and dealt with accordingly.

UKFast also recognises the importance for preventing radicalisation. On site we have 2 designate and trained prevent officers (arlene bulfin and t8om robinson) these prevent officers are responsible for managing any issues and forwarding them to the correct agencies.

The UKFast recruitment team have all attended safer recruitment training. This is also available to all relevant staff who are involved in the recruitment process, to ensure safeguarding is always a top priority when recruiting any permanent or temporary staff members.

Responsibilities

Ceo and leadership team will:

- Maintain own legal responsibility for safeguarding procedures and that the process is followed.
- Ensure acting designated & deputy safeguarding leads are in place and that they are fully qualified for the position.
- Ensure all safeguarding incidents are recorded and reported to board and that required measures are implemented.
- Ensure the leadership team are fully trained on the safeguarding processes.
- Ensure funding is provided for the correct training the apprenticeship team and wider business.

DSL & deputy DSL are to:

- Ensure training and records are kept up to for all staff within the provider
- To ensure training is delivered to employers on how to safeguard apprentices
- To ensure clear processes are outlined and this is shared with

- all staff.
- To ensure learners understand their responsibilities and that safeguarding training is mentioned in induction.
- To ensure that any reports of causes for concerns are logged and actioned in a timely manner

Provider staff will:

- Ensure their yearly training is complete on time and reported to DSL and/or deputy DSL
- To be always vigilant in their interactions with learners.
- To report any concerns, and ensure they have followed the correct process.
- Never try to solve the issue yourself without first contact DSL and deputy DSL.

WHEN TO TAKE ACTION AND HOW

Once you suspect or know of any abuse of any child or vulnerable adult, you should immediately inform the DSL in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the DSL to discuss your concerns. It is important to understand that your responsibilities extend to suspicion of abuse in any area of the child or vulnerable adult's life, not just onsite at UKFast Campus.

You must also contact the DSL if you know or suspect that a member of the team or student has a previous history of abuse of children and/or vulnerable adults. If you become aware of any allegations against a member of staff this must always be escalated to the DSL.

If a DSL is not immediately available, you should then contact the Education Team or a member of the HR team. You must not try to investigate the matter on your own. Not all employees are equipped or qualified to do so. Contact details for the DSLs can be found on page 2 of this booklet and on UKFast Moodle Apprenticeship policies and procedures page - [HERE](#).

If following your initial contact with a DSL, it is decided that the matter should be taken further, a written report must be prepared by you and the DSL. A written report is essential to prevent any misrepresentation of your findings. 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, including any apparent physical signs of abuse or other circumstances which led to suspicions, or the account given to you of abuse by the child or vulnerable adult concerned, as accurately as you are able to detail it. The report should be signed, dated and a copy stored in a secure place.

If a child or vulnerable adult comes to you with a report of apparent abuse, you should listen carefully to the child or vulnerable adult, using the following guidelines. When listening to a child or vulnerable adult employees must:

- Allow the child or vulnerable adult to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Never coach or lead the child or vulnerable adult in any way
- Reassure the child 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, do not probe or interrogate – no matter how well you know the child or vulnerable adult – spare them having to repeat themselves over and over.
- Be honest – let the child 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 child or vulnerable adult know that you are taking the matter very seriously
- Make the child or vulnerable adult feel secure and safe without causing them any further anxiety.

At the earliest opportunity involve the DSL. The DSL will be responsible for liaising with external agencies and recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be confined to the DSL, (if not involved in the allegations) and the Education Team and any external agencies the DSLs determine to engage. The Manager(s) and individuals reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis.

WHAT HAPPENS NEXT

Considering all the information available, the DSL will decide on the next steps, which may include taking no further action. In some cases, the DSL will seek advice from the MCC Designated Officer (formerly known as the LADO) and agree what further action is necessary, which may include:

- Seek further advice from the Manchester safeguarding partnership (MSP)

- Undertake further investigation under the direction of the mcc designated officer/LADO or support an investigation by the MSP
- Make a referral to the appropriate agency, as signposted
- Report the incident to a designated social worker, as signposted
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

The DSL may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the child, other students, staff, parents, or carers involved) the DSL will make the necessary arrangements.

Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the child and vulnerable adults is the overriding concern. The degree of confidentiality will be governed by the need to protect the child or vulnerable adults. The child or vulnerable adults should be informed at the earliest possible stage of the disclosure that the information will be passed on. All conversation regarding a child or vulnerable adults should always be held in private. UKFast complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of a child or vulnerable adult.

Whatever happens, you should always be open and honest with the child or vulnerable adult if you intend to take the case further.

Employees must not discuss the case with anyone other than those involved in the case. If employees have any concerns about the progress of the case or have any other concerns these must be discussed with the DSLs.

Allegations against employees

The primary concern of the organisation is to ensure the safety of the child and vulnerable adult. It is essential in all cases of suspected abuse by a member of the team that action is taken quickly and professionally whatever the validity. There are occasions where a child or vulnerable adult will accuse a member of the team of physically or sexually abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

Any instance of a child or vulnerable adult being abused by an employee is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career. If any employee suspects any other member of the team of abusing a student, it is their responsibility to bring these concerns to the DSL or HR Team immediately.

On being notified of any such matter the DSLs shall:

1. Seek and follow advice from the msp
2. Take such steps as they consider necessary to ensure the safety of the child or vulnerable adult in question and any other child or vulnerable adult who might be at risk
3. Ensure that a report of the matter is completed by the person who reported the original concern
4. Put in place the steps necessary to follow the advice of the msp

If the allegation concerns the DSL, the matter should be discussed with the HR Team, in addition to following the normal safeguarding procedures outlined in this document.

Should UKFast decide to suspend the employee due to a safeguarding concern, the company disciplinary policy will be utilised.

If the suspension is subject to external investigation, the UKFast representatives will be unable to discuss the details of any allegations made under the Protection of Children Act (1999).

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APPENDICES

APPENDIX A - SAFEGUARDING CODE OF BEHAVIOUR FOR UKFAST EMPLOYEES

UKFast recognises that it is not practical to provide definitive instructions that would apply to all situations whereby employees encounter children and vulnerable adults and to guarantee the safeguarding and protection of children and vulnerable adults.

However, below are the standards of behaviour required of employees to fulfil their roles and duty of care within the organisation. This code should assist in the safeguarding and promotion of the welfare of children and vulnerable adults and in the protection of both children and vulnerable adults and members of the team.

These guidelines also apply to volunteers who work in an unpaid capacity in UKFast premises.

Employees must: Implement the Safeguarding Policy at all times, including acting to promote children and vulnerable adults' welfare, prevent abuse and report any abuse discovered or suspected.

Employees must never:

- Engage in rough, physical games including horseplay with children and vulnerable adults/ students.

- Allow or engage in inappropriate touching of any kind. The main principles of touch are:
 - Touch should always be in response to the child or vulnerable adult's need
 - Touch should always be appropriate to the age and stage of development of the child or vulnerable adults
 - Touch should always be with a child or vulnerable adult's permission.
- Do things of a personal nature for children or vulnerable adult that they can do for themselves or that their parent can do for them.
- Physically restrain a child or vulnerable adult unless the restraint is to prevent physical injury of the child and vulnerable adults/other children/visitors/yourself.

In all circumstances physical restraint must be appropriate and reasonable; otherwise, the action can be defined as assault.

- Make sexually suggestive comments to or within earshot of a child or vulnerable adult
- Have children or vulnerable adults on their own in a vehicle. Where circumstances require the transportation of children or vulnerable adults in their vehicle, another member of staff/ volunteer must travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting children or vulnerable adults as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a child or vulnerable adult on their own, it is essential that another leader and the parent is notified immediately
- Take a child or vulnerable adult to the toilet unless another adult is present or has been made aware
- Where there is shared use toilet facilities all male apprenticeship employees should use the cubicles rather than urinals
- Spend time alone with a child or vulnerable adult on his/her own, outside of the normal tutorial/ classroom situation. If you find you are in a situation where you are alone with a child or vulnerable adult, make sure that you can be clearly observed by others.
- Engage in a personal relationship with a child or vulnerable adult/student, or a child or vulnerable adult who becomes a student, beyond that appropriate for a normal teacher/ student relationship.
- Give their personal contact details (personal mobile telephone number/home telephone number or personal email address) to a child or vulnerable adult

social networking



- Interaction with learners through a social networking site should be avoided unless this has been agreed by UKFast as part of a marketing role or for managing collaborative learning.
 - Collaborative learning must be done by setting up an 'invitation only' business/professional group discussion group for the course with appropriate privacy settings where the content can be monitored.
- Employees should only contact learners and parents using the company's mail, sms, telephone, and e-mail/intranet systems.
- Employees can make a judgment on whether to accept an invitation to connect on social media from a former learner, however no employee should instigate or make extra efforts to connect with these individuals.
- Acceptable reasons for connecting with apprentices would be for business or professional networking purposes.

It is unacceptable for employees to:

Post comments, photographs etc. Critical of the UKFast on any forum, website, social networking site, blog etc.

Post comments critical of any other employee or learner on any forum, website, social networking site, blog etc.

Post comments that run counter to the UKFast's equality and diversity policy

Post comments that recommend, or appear to endorse, law-breaking of any kind

Post comments that exhibit grossly irresponsible behaviour, or appear to endorse irresponsible behaviour, that could be argued to encourage "copycat" behaviour by learners. This would include, for example, dangerous driving.

Implications for employees

Employees who breach any of the above may be subject to the disciplinary procedure. If an allegation against a member of the team has occurred, then an investigation will be carried out.

UKFast reserves the right to suspend any employee under the Safeguarding Policy to protect young people and Vulnerable Adults whilst an internal and/or external investigation takes place. The organisation can implement its own internal investigation during any stage of this process. This may result in disciplinary action being taken against an employee.

APPENDIX B - RADICALISATION AND EXTREMISM

UKFast recognises the positive contribution it can make towards protecting its learners from radicalisation to violent extremism and is committed to fulfilling its duties under the Prevent Duty Guidance. UKFast will empower its students to create communities that are resilient to extremism and to protect the

wellbeing of students who may be vulnerable to being drawn into violent extremism or crime.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic, or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible behaviour indicators are below:

- Discriminatory language or actions towards specific groups or people with a particular protected characteristic
- Possession or sharing of violent extremist literature
- Showing or sharing online material of an extreme nature to others
- Behavioural changes (for example, becoming withdrawn)
- Expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

In respect of safeguarding individuals from radicalisation, UKFast works to the Prevent element of the Government's Counter Terrorism Strategy and where deemed appropriate seeks external support and training. This program aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions.

If you have concerns about a student, contact Arlene Bulfin or Thomas Robinson

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APPENDIX C - CATEGORIES OF ABUSE

- Physical abuse: may involve hitting, shaking, throwing, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child and vulnerable adult. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child and vulnerable adult who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'munchausen's syndrome by proxy'.
- Emotional abuse: is the persistent emotional ill-treatment of a child or vulnerable adult such as to cause severe and persistent effects on the child and vulnerable adult's emotional development. It may involve conveying to children or vulnerable adults that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally

inappropriate expectations being imposed in children and vulnerable adults. It may involve causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children and vulnerable adults. Some level of emotional abuse is involved in all types of ill-treatment of a child or vulnerable adult, though it may occur alone.

- Sexual abuse: involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether the child or vulnerable adult is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape) or non-penetrative acts. They may include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.
- Neglect: is the persistent failure to meet the child's or vulnerable adult's basic physical and / or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child or vulnerable adults from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or vulnerable adult's basic emotional needs.
- Significant harm: some children or vulnerable adults may be in need because they are suffering or likely to suffer significant harm. The children act v section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.
- Financial abuse: some children and vulnerable adults may be abused or exploited financially including fraud and extortion.
- Peer to peer abuse: abuse from a child to child. The abuse could be but not limited to bullying, cyber bully, physical abuse and sexual harassment.

APPENDIX D - IMPORTANT SAFEGUARDING CONTACTS

ROLE	NAME	CONTACT
HR Director - UKFast	Rebecca Crawford	Rebecca.crawford@UKFast.co.uk
CEO - UKFast	Paul Shannon	Paul.shannon@ansgroup.co.uk

Manchester Safeguarding Lead	Linda Evans	l.evans1@manchester.gov.uk 01612344960
Northwest Regional Coordinator	Nigel Lund	nigel.lund@education.gov.uk 07384452146
GMP Prevent Officer	Kim Parkinson	kim.parkinson@gmp.police.uk 07900709270
Local Authority Designated Officer	Majella O'Hagan	0161 234 1214. quality.assurance@manchester.gov.uk

Out of working hours:

GMP	Anti-Terror Line	0800 789 321
Manchester Safeguarding Children Board	0161 234 5001 924 (hours)	mcsreply@manchester.gov.uk