



assessu

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Safeguarding Policy

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1. Scope

Safeguarding means:

- Protection from abuse, neglect and radicalisation
- Promotion of health and development
- Ensuring safety and care
- Ensuring optimum life chances

Assessu recognises that colleagues and employers have a role to play in safeguarding the welfare of young people and at risk adults, and preventing their abuse. This policy focuses on protection from abuse and neglect and is designed to provide a basic procedure which should be followed in the circumstances defined below.

2. Policy Statement

This policy is informed by, and adheres, to the requirements of *Department for Education's Keeping Children Safe in Education* statutory guidance (published April 2014 and revised in September 2016). It applies to all colleagues employed by Assessu including temporary, freelance, agency, partners and sub-contractors. All have a legal responsibility to take seriously any concerns about neglect or abuse that come to their attention and to follow the procedures set out below.

Employers who have concerns about their apprentices' behaviour or the behaviour of adults towards them can use this policy to ensure they are taken seriously.

It is not Assessu's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action. Any suspicion, allegation or incident of abuse must be reported to the Designated Persons as soon as possible and in any event within 2 hours.

Assessu will appoint a member of the Management Team to lead on Safeguarding. This person is one of the Designated Persons. Assessu will also appoint at least one deputy Designated Person to ensure that adequate cover in the event of holiday, sickness or absence.

The Lead Designated Person is responsible for ensuring that:

- There are a sufficient number of trained and competent colleagues with designated responsibility for safeguarding
- All colleagues receive adequate training in order to identify potential safeguarding issues and to respond appropriately to disclosures
- Robust policies are maintained, and all other relevant information and material is effectively communicated to colleagues
- Adequate cyber security measures are in place where suitable monitoring and filters are used to protect apprentices on Assessu technical equipment
- Record keeping is accurate and secure
- Assessu operate safe recruitment procedures and ensure that appropriate checks are carried out on all new colleagues

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3. Definitions

3.1. What is Abuse?

Abuse is behaviour towards a person that either deliberately or unknowingly causes a person harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated.

Abuse can be:

- Physical;
- Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition;
- Sexual;
- Financial;
- Psychological/emotional (including the use of text, social networks and email)
- Violation of rights e.g. preventing an individual speaking his/her thoughts and opinions
- Institutional e.g. failure to provide a choice of meals or failure to ensure privacy or dignity; or
- Discriminatory in nature e.g. racial, sexual or religious harassment
- On-line abuse: cyberbullying/intimidation/exploitation/grooming/radicalisation.

In the case of at risk adults it may also include:

- Physical abuse such inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment;
- Financial abuse such as exerting improper pressure to sign over money from pensions or savings etc.

3.2. What is Bullying?

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional - being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures)
- Physical - pushing, kicking, hitting, punching or any use of violence
- Racist - racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of, or focussing on the issue of sexuality
- Verbal - name-calling, sarcasm, spreading rumours, teasing
- Cyber - all areas of internet, such as email and internet chat room misuse
- Mobile threats - by text messaging and calls
- Misuse of associated technology, i.e. camera and video facilities

3.3. Specific Safeguarding Concerns

The Statutory Guidance highlights certain issues as specific Safeguarding issues where expert and professional organisations are best placed to provide guidance and practical support. Where these issues are identified, colleagues should follow the same process of referral to the Designated Person who will contact agencies on behalf of the Learner.

Specific Safeguarding concerns include:

- Child Sexual Exploitation
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital mutilation
- Forced Marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Mental Health
- Private fostering
- Radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking
- Radicalisation
- On-line safety

3.4. Prevent Duty and British Values

The Prevent Duty is a section of the Counter-Terrorism and Security Act (2015) which places a duty on certain bodies, listed in Schedule 3 to the Act, to have "due regard to the need to prevent people from being drawn into terrorism".

The government has defined extremism in the Prevent Duty as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs." This also includes calls for the death of members of the British armed forces.

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs". Colleagues are expected to exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice. They are required to develop learner awareness to help apprentices become more resilient to the threat of being drawn into terrorism. This is delivered by relevant learning explored by apprentices and other stakeholders during each visit. Colleagues are expected to encourage apprentices and employers to respect other people, especially those very different to themselves, with particular regard to the protected characteristics set out in the Equality Act 2010. In addition to British Values, both safeguarding learning and equality and diversity learning should be achieved regularly throughout the learner journey in order to protect apprentices and prepare them for future life in their communities.

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All colleagues, field, home and office based, will complete training on the Prevent Duty. This is in addition to the comprehensive safeguarding induction training that thoroughly explores safeguarding so that that colleagues are aware of the signs of a concern and how the referral process works to raise concerns with a Designated Person.

Any colleague who has concerns that a learner is becoming radicalised or is vulnerable to becoming radicalised should raise their concerns with one of the Designated Persons, following the same procedures as for any other safeguarding concern.

3.5. Children and Young Persons

In terms of this policy, “child, children and young people” mean those under the age of 18 as Defined by The Children Act 1989.

3.6. Vulnerable Adults, ‘at risk’ Persons

A vulnerable adult or person at risk is a person over 18, who is or may be in need of community care services (whether or not these needs are being met by the local authority) by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation (Department of Health)

This **may** include a person who:

- is elderly and frail
- has a mental illness including dementia
- has a physical or sensory disability
- has a learning disability
- has a severe physical illness
- is a substance misuser

This also applies to temporary conditions.

4. Signs and Symptoms

A person **may** indicate by signs or behaviour that they are a victim of some kind of abuse. Colleagues should be aware of these possible signs and that they should consider reporting if anyone exhibits:

- Nightmares or other sleep problems without an explanation
- Seems distracted or distant at odd times
- Has a sudden change in eating habits
- Sudden mood swings: rage, fear, insecurity or withdrawal
- Leaves “clues” that seem likely to provoke a discussion about sexual issues
- Develops new or unusual fear of certain people or places
- Talks about a new older friend
- Suddenly has money or other gifts without reason
- Thinks of self or body as repulsive, dirty or bad
- Reluctance to talk openly
- Loss of jewellery and personal property
- Lack of money to purchase basic items

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- Inadequate clothing
- Infections
- Malnutrition
- Hypothermia
- Is nervous & jumpy when a cyber message is received
- Self-injury (cutting, burning)
- Inadequate personal hygiene
- Drug and alcohol abuse
- Sexual promiscuity
- Running away from home
- Depression, anxiety
- Suicide attempts
- Fear of intimacy or closeness
- Compulsive eating or dieting
- Goes missing from work and home and cannot be contacted

This list is not exhaustive. If anyone is unsure about any signs or changes in behaviour they should contact a Designated Person for advice. These signs and behaviours could indicate other problems, but bullying, abuse or radicalisation should be considered a possibility and should be reported immediately to a Designated Person.

5. Procedures

6.1. General

Assessu takes seriously its duty of pastoral care and will be proactive in seeking to prevent young persons and at risk adults becoming the victims of abuse, neglect or radicalisation. It will do this in a number of ways:

- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds.
- By identifying a member of the Management Team who will lead and have overall responsibility for safeguarding all apprentices, young people and at risk adults.
- By informing all apprentices of their rights to be free from harm and encouraging them to talk to the Designated Person or their assessor if they have any concerns and issuing them with the 'Safeguarding Hotline' number.
- To ensure apprentices are aware of how to stay safe on line.
- To support employers in keeping apprentices safe.
- To complete a Prevent risk assessment to identify risks of radicalisation and highlight actions taken to protect apprentices.
- To adhere to robust IT security policies and practices and to monitor and review activity regularly to encourage safe working practices for all.

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6.2. Reporting Procedures

If an allegation or suspicion of abuse is discovered or disclosed by an employer, colleague or apprentice they should inform a Designated Person immediately, in any case within 2 hours, using the company's safeguarding form.

A colleague discovering an allegation or suspicion of abuse will, similarly, report it to a Designated Person immediately.

The colleague should make a written record of the allegation or suspicion of abuse immediately, using the company's safeguarding form, taking care to only write the facts, preferably in the learner's own words, taking care not to assume anything, and then to discuss the situation with a Designated Person, who will assess the situation and where necessary refer out of the organisation to an appropriate agency.

If a learner/colleague has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the apprentice to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to:

- the scale of the abuse
- the risk of harm to others, including whether minors are at risk such as siblings and offspring
- the capacity of the learner to understand the issues of abuse and consent
- in emergency situations (e.g. where there is the immediate danger to the victim or others around them), immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted immediately
- where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately

If, at any point, there is a risk of immediate serious harm a referral should be made to the police or social services immediately. Anybody can make a referral. If the apprentice's situation does not appear to be improving the colleague with concerns should press for re-consideration.

6.3. Allegations Against a Colleague

Allegations about a colleague should be recorded in full, as soon as possible and should include the nature of the allegation and any other relevant information using the company's safeguarding form.

The allegation must be reported to one of the Designated Persons and Human Resources as soon as possible and within 2 hours.

A Designated Person, in conjunction with the HR Director, will assess the allegation and identify next steps, including, where appropriate a referral to an external agency. Consideration will be given on whether the colleagues should be suspended on full pay pending the investigation. The Designated Person in conjunction with the HR Director will be responsible for any decisions on suspension. Any suspension will follow Assessu procedures. The length of any suspension will be in line with Assessu policies and will be as short as is possible while ensuring the safety of the alleged victim.

6.4. Allegations Against an Employer of an Apprentice/Workplace

Allegations about an Employer should be recorded in full, as soon as possible using the company's safeguarding form, and should include the nature of the allegation and any other relevant information.

The allegation must be reported to one of the Designated Persons as soon as possible and within 2 hours.

Ensure the safety of the apprentice in question and any others who may be at risk. If necessary, visit the workplace and take the learner out of the workplace.

The Designated Person, in conjunction with the HR Director, will assess the allegation and identify next steps, including, where appropriate a referral to an external agency. The Designated Person in conjunction with the HR Director will be responsible for any decisions on whether the learner is removed from the employer and whether Assessu will continue to work with the company. All decisions will follow Assessu procedures.

As per the Employer Agreement the Employer is to be aware that Assessu take cases of bullying, emotional, verbal and physical abuse very seriously and will inform the police and any other relevant authorities in any cases of abuse.

6.5. Residential apprentices

Apprentices attending residential assessment will be supported by centre colleagues and hotel employees. The specified hotel will take part in bespoke safeguarding training provided by Assessu. Apprentices who are under 18 will only attend with the express permission from a parent or carer via a parental consent form received by the centre in advance of the course. Specific risk assessments will also be completed for a) young apprentices under the age of 18, b) lone female apprentices, c) apprentices with disabilities, learning difficulties or health issues. All residential apprentices will receive advice and training on staying safe whilst away from home during their first day and will take part in a 'welcome meeting' upon arrival where safety and protection issues will be covered.

6.6. DBS Checks

All existing and newly recruited colleagues (including temporary, freelance and the sub-contracted provision) who carry out regulated activity have enhanced DBS checks. All other colleagues, those not carrying out regulated activity, will have basic DBS checks. A monthly review of DBS records is undertaken by HR to ensure checks are valid and in date. In the event that a current DBS is not registered, for example when awaiting confirmation for a new colleague, the colleague will be withheld from all learner-facing activity or, will receive 100% supervision of learner-facing activity until the DBS is in place. Any freelance arrangements, whether in regulated activity or not, will require the DBS tracking service to be in place. DBS renewal requests are sent 2 months in advance of individual renewal dates.

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6.7. Responding to an Allegation

Any suspicion, allegation or incident of abuse must be reported to a Designated Person as soon as possible and in any event within 2 hours. If, after careful assessment, the Designated Person considers that there is reasonable cause to suspect abuse they must, as a matter of urgency, refer out of the organisation to an appropriate local outside agency. An appropriate outside agency may include the Police, local Social Services, the NSPCC, Prevent/Channel panel or the Local Safeguarding Board. Where appropriate, other external agents may be referred to in order to access specialist advice and support.

In exceptional circumstances, where a colleague deems there to be an immediate risk to a learner and it is not possible to contact a Designated Person within the same day, they shall report the matter -normally by telephone - directly to the local Social Services Department, Duty Social Worker or Police Service Child Protection Unit. The colleague shall notify a Designated Person as soon as possible and normally within one working day of the action taken and submit a written report using the company's safeguarding form of what action was taken and the circumstances leading to it.

6.8. Written Records

The relevant Designated Person shall retain a copy of the report; any notes, memoranda or correspondence dealing with the matter; and any other relevant material. Copies of reports, notes etc. should be kept secure at all times.

The colleague who has cause for concern shall make a full record as soon as possible. The record should include the nature of the allegation and any other relevant information including:

- The name, age and location of the person(s) of concern
- Date, time and place where the alleged abuse occurred;
- Names of others present;
- Names and ages of anyone at risk or any children the incident could have impact on
- Description of the incident in the person's own words and their account of the allegation
- Any action taken at this stage

A copy of all documentation is to be held centrally by the safeguarding team via a Designated Person.

6. Confidentiality

Colleagues must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy. Colleagues should never promise confidentiality and apprentices should understand when we need to share information to protect them or access support. Where reports have been made via the safeguarding email inbox, the email thread should be deleted from personal and/or business computers to safeguard the sensitive information.

7. Training

The Lead Designated Person is to ensure that a programme of training and colleague development is in place to support colleagues in identifying apprentices who may be at risk and responding to disclosures of abuse. This includes a comprehensive induction, online training programmes and annual updating as a minimum.

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Appropriate Designated Person training must be completed by each member of the safeguarding team within one month of joining the team and updated annually.

8. Responding to public events

Assessu will respond to incidents in the press that may cause our apprentices concern, and which pertain to any aspect of safeguarding by ensuring that concerns are explored with our apprentices. This will happen during assessments and will be supported by a response via social media.

9. Professional Boundaries

It is essential that colleagues are aware of professional boundaries when interacting with apprentices;

- 1-2-1s – diaries must be kept up to date with details of colleague whereabouts
- Ensure there is an appropriate environment with apprentices e.g. in their workplace, a busy public area
- In the workplace, work from a room with the door open or that is in the view of other people i.e. assessing alone with an apprentice
- Never use inappropriate language with a learner e.g. swearing, over familiar, abusive, rude, explicit
- Never touch an apprentice
- Never buy a gift for an apprentice
- Never accept gifts from apprentices
- Never give apprentices a personal mobile number or e-mail address or detailed information regarding one's personal and work life.
- Review the Social Media Policy for further information regarding professional boundaries when using social media such as Facebook, Twitter and Linked In.
- Specific guidance is available for isolated occasions where it may be necessary to transport apprentices. This should be reviewed prior to transporting apprentices and appropriate action should be taken as per the guidance.
- A Designated Person will support any risk assessment if there are any situations colleagues are uncertain about.

10. Summary – The 5 Rs

This procedure must be followed whenever a colleague hears an allegation from an apprentice, that a risk has, or may have, occurred or where there is a significant concern that there may be a risk of any form of abuse.

Receive

- What is said;
- Accept what you are told – you do not need to decide whether or not it is true; and
- Listen without displaying shock or disbelief.

Reassure

- The apprentice;
- Acknowledge their courage in telling;
- Do not promise confidentiality;
- Remind them they are not to blame – avoid criticising the alleged perpetrator;
- Do not promise that “everything will be alright now” (it might not be).

React

- Respond to the apprentice but do not interrogate;
- Avoid leading questions but ask open ended ones;
- Clarify anything you do not understand;
- Check to see if others may be at risk (i.e. younger siblings)
- Explain what you will do next, i.e. inform a Designated Person

Record

- Make notes as soon as possible – during the interview if you can
- Use the apprentice’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Include: time, date, place
- Describe observable behaviour and appearance factually
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

Refer

- In most incidences, a Designated Person will make a decision as to if the concern requires a referral to an outside agency.
- **If, at any point, there is a risk of immediate serious harm to an apprentice a referral should be made to the police or to social services immediately and can be made by any colleague.**
- If a colleague feels that the concern raised has not been dealt with appropriately they should press for reconsideration. If after this they do not feel like the concern has been dealt with appropriately, any colleague with a concern is able to refer to an appropriate outside agency such as the NSPCC, the Police or Social Care.

Support

- Consider what support is needed for the apprentice– you may need to give them a lot of your time or they may need to be referred to the external, professional help
- Ensure you are supported – such situations can be extremely emotive and stressful.
- Once reported to them, a Designated Person will take responsibility for the matter and will take all of the necessary actions. However, if you have questions or need additional support then do ask.