
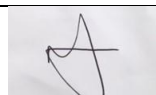




# apprentify

## SAFEGUARDING POLICY

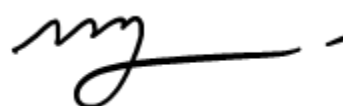
### 2022-2023

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<b>Date Sanctioned:</b>	31/07/2022
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<b>Date of next review:</b>	31/07/2023

#### Board Signatures



PAUL DREW



WARWICK NASH

## Introduction

The Safeguarding Policy for Apprentify reflects the importance of our responsibility to safeguard and promote the welfare of all our learners and staff by protecting them from physical, sexual, or emotional abuse, neglect, and bullying.

We are committed to providing a caring, friendly, and safe environment for all our learners, so that they can learn in a relaxed and secure atmosphere. We believe every learner should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

Apprentify have a statutory requirement to follow the guidance referenced in the following:

- The Children Act 1989 (as amended) - to assist the Local Authority Social Services Department acting on behalf of children in need
- The Children and Social Work Act 2017 – Safeguarding of Children (Chapter 2)
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018 - safeguard and promote the welfare of children
- Keeping Children Safe in Education 2022 - Safeguarding is Everybody's Responsibility
- Education and Training (Welfare of Children) Act 2021
- Human Rights Act 1998
- The Equality Act 2010

Our Adult learners will fall under the Care Act (2014) legislation and the Care and Support guidance (2014), with guidance from Keeping Children Safe in Education 2022.

The main aims of this policy are to ensure that staff are working together and fully engaged in being vigilant about raising awareness, embedding, and monitoring safeguarding; that they overcome professional disbelief that such issues will not happen at Apprentify and ensure that we work alongside other professional bodies and agencies to ensure that our learners and staff are safe from harm. All staff, employers and learners must understand that anyone is capable of abuse, and that abuse can be experienced in a variety of forms, often from someone known to the victim, including:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Apprentify will promote this policy through initial induction modules, which give an overview and understanding of the processes, regular updates through Development Days and Safeguarding Scenarios for staff, sharing resources about Safeguarding awareness and best practice on the Safeguarding Padlet, and linking examples and scenarios in sessions, as appropriate.

The policy will always be available to staff and promoted at induction, training and other via other communication channels. It is also clearly available on the Apprentify website. Learners will be informed via during the induction process and reminded of the policy whilst on-programme, and it will be referenced throughout the length of their programme.

All staff, learners and visitors have the responsibility to be vigilant in adhering to this policy and assessing the risks of their own work and/or activities.

Employers also have a responsibility to the learners they employ. We recognise that we have a duty to help the employers that we work with, our staff and our learners to recognise their responsibilities, through guidance, support, and training. As the employer of a learner, it is important that they understand their responsibilities to the learner and what safeguarding means to them.

The use of the word '**individual**' within the policy represents children and young people (under the age of 18), adults with a safeguarding need and adults with vulnerabilities. The use of the word "**victim**" within the policy represents refers to the person who has suffered abuse.

The use of the word "**perpetrator**" within the policy represents refers to the person who has initiated and carried out the abuse.

## Safeguarding is Everybody's Responsibility

### Scope of Policy

This policy covers all aspects of the work of Apprentify, including:

#### **Learners**

- Provision of a safe learning environment.
- Clear system of personal care where appropriate, and personal safety.
- Behaviour, discipline, and exclusions.
- Complete the recommended courses/training prescribed in our curriculum.
- Understanding Relationships, Sex and Health Education.

#### **Staff**

- Provision of a safe working environment.
- Regular review of systems and procedures to ensure they're appropriate and effective.
- Training and professional development.
- Wearing of Staff ID whilst on-site or in employer premises.
- Promoting understanding of Safeguarding, report making and disclosures.
- Having difficult and sensitive conversations.

#### **External Agencies**

- Actively seek support and advice.
- Collaboration with external bodies/stakeholders.
- Contracting and sub-contracting arrangements.

#### **Employers**

- Collaboration with Employers (nominated SPOC, recorded in Bud.)
- Training and Awareness.
- Promoting understanding of Safeguarding, report making and disclosures.
- Understanding that abuse can happen anywhere, including within their own organisation.

Apprentify staff, contractors, associates, and volunteers will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties.

## Responsibilities

Apprentify's Managing Director has overall responsibility for our Safeguarding Policy, notwithstanding all staff and volunteers' individual responsibility to ensure that this policy is strictly adhered to.

Apprentify's Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers (DSOs) will oversee safeguarding arrangements and take the Officer responsibility for dealing with safeguarding issues, providing advice and support for other staff, ensuring appropriate staff development, consulting with the authority, and working with other organisations, as necessary. Our Designated Safeguarding Team (DST) will have completed all relevant training, including achievement of a Safeguarding Designated Lead qualification at Level 3 (or equivalent.)

## Implementation

To implement this policy, Apprentify will ensure that:

- A comprehensive safer recruitment procedure will be in place and followed to help deter, identify, and reject applicants who might be unsuitable to collaborate with learners.
- All delivery staff (full-time, part-time, and associate) will have undergone an enhanced Disclosure and Barring Service, if collaborating directly with learners, check prior to starting work. All other staff will have basic DSB checks.
- All staff receive continuous CPD opportunities and updates from the Safeguarding Board, in both the Teams channel and Padlet, to help keep up to date and embed the latest information to support this policy.
- Online safety is embedded into our curriculum for all learners, staff, and employers.
- Education and understanding around RSHE is made available and clear for learners, staff, and employers.

In addition:

- A single central record (SCR) of staff checks will be kept up to date.
- All staff and volunteers having access to/collaborating with individuals, are required to supply a minimum of two references.
- Where relevant, an online presence check will be completed for applicants.
- In staff recruitment, our Safeguarding Statement from the Apprentify DNA will be made explicit in the job advertisement, as well at the interview stage.
- All staff and volunteers will receive (or have had) CIPD training in safeguarding awareness and receive regular updates.
- As part of Apprentify's Induction programme, delivery staff undertake the module 'Safeguarding in Education,' which covers both under 18s and vulnerable adults. All other staff complete the Level 3 Safeguarding Adults course.
- All premises or locations that learners may be placed to gain work experience provide a safe environment. Furthermore, always safe working practice will be promoted in training and at work.
- Apprentify will actively engage with external agencies in the interests of ensuring the safeguarding of learners. This may include the relevant Local Authority Designated Officer (LADO), NSPCC and Local Adults Safeguarding boards.
- A culture will be created to ensure that at any time staff with any safeguarding questions or concerns are aware of their responsibility to inform and report where appropriate.
- Significant and specific questions asked at the recruitment stage by our Recruitment Executives. Learners who are deemed at risk during enrollment are flagged and recorded under the Safeguarding Channel.
- Arrangements for safeguarding will be reviewed, risk assessed and reported as part of the self-assessment process.
- Ongoing quarterly, relevant Safeguarding Scenarios are made available for staff to complete and embed into practice; impact is monitored through feedback and assessment of responses.
- IT usage will be monitored in line with Apprentify's [IT Security](#) and [Online safety](#) policies.

- Make available an “appropriate adult” to support, advise and assist any learner under the age of 18 (or as required for an adult learner) during any safeguarding incidents.

**Apprentify will:**

- Put Safeguarding at the heart of everything we do.
- Risk assesses where the most vulnerable learners are and take safeguarding steps.
- Safeguard the general population of learners.
- Ensure that senior management examine arrangements for safeguarding and review regularly.
- DBS check all new staff joining the business.
- Ensure that all staff receive basic awareness training in safeguarding.
- Cooperate with external agencies to safeguard vulnerable learners.
- Take appropriate action when a disclosure is made.
- Provide learners with information and/or training on safeguarding, raise awareness and how to access help and advice.
- Seek learners’ views on safeguarding matters and act upon their feedback.
- Collaborate with the relevant safeguarding team for each employer we work with.
- Monitor learner attendance through the Attendance Tracker: any issues will be flagged at Progress Reviews.
- Learners identified as at risk will be referred to the DST; this process is also used in line with the Apprentify Recovery Process.
- When learners are ready to go to mock EPA, the DSL will be added to the Task to confirm that there are no ongoing Safeguarding concerns; this is also the procedure for any learner who leaves or withdraws.

## Peer on Peer Abuse:

As Apprentify caters to adult learners as well as under 18s, our scope includes children and young people, as well as adults. For this reason, we retain the term “peer on peer” abuse, due to its relevance to our learners.

Apprentify aims to create a healthy, safe learning environment based on equality and informed choice, allowing individuals to know their rights and responsibilities, what to do if they are unhappy with something, and what it means to give true consent. Staff and learners should feel able to openly discuss issues that could motivate peer-on-peer abuse. Following the findings of Ofsted’s review of Sexual Abuse in Schools and colleges, Apprentify have taken steps to highlight the importance of building positive relationships and establishing trust and confidence in staff to ensure open lines of communication.

This will be promoted in a variety of ways, including:

- Maintaining a culture of **zero-tolerance** for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment, underpinned by the Apprentify DNA values; harmful behaviours will not be passed off as ‘banter’, ‘just growing up’ etc.
- Develop staff knowledge and application in spotting signs and indicators of abuse.
- Train our staff in the importance of holding difficult conversations and, where appropriate, seek support from specialists to provide CPD opportunities.
- Ensure our reporting procedure is well promoted, easily understood and accessible.
- Show empathy and understanding that not every victim will feel ready or able to disclose, but be there to support and signpost them, nonetheless.
- Staff will recognise that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.
- Build relationships and understanding with all employers to model the understanding that abuse can happen anywhere, to anyone, and we must remain vigilant.
- Embed RSHE (Relationship and sexual health education) into our curriculum for all learners to help prepare them for life in modern Britain (British Values.)



## Evaluation of impact

To deliver on its commitment to safeguarding, Apprentify will demonstrate planning and analysis of impact by evaluating the following operating principles:

- How effectively Apprentify is meeting statutory requirements
- How effective is the awareness-raising of safeguarding issues for staff, Learners and partners.
- How effective are the referral arrangements.
- How effective are the consultations with learners and staff on safeguarding issues.
- How effective are the improvements following actions taken, to address safeguarding issues.

## Communication

Information about safeguarding and the process for learners and staff to make a disclosure will be on our website and explained to employers, applicants, and learners at all stages throughout the journey. Information, guidance, and documents for staff will be on the Apprentify shared area.

## What is Safeguarding?

Safeguarding regulations have been around for a while, across a wide range of legislation, including:

- The Children Act 1989 (as amended)
- The Children and Social Work Act 2017
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2022
- Education and Training (Welfare of Children) Act 2021
- Human Rights Act 1998
- The Equality Act 2010

This legislation provides definitions of individuals and sets out the legislative framework of measures to protect them from harm:

- Promotion of your health and development.
- Ensuring your safety and care.
- Ensuring you are offered the best life chances.
- Protection from abuse and neglect.
- Prevention of bullying and harassment.

The term 'safeguarding' embraces individual protection and preventative approaches to keep our Learners, staff, and employers safe. Safeguarding encompasses Learners' health and safety, welfare, and well-being.

Apprentify is committed to safeguarding and promoting the welfare of all individuals and expects all staff and employers to share this commitment. We have developed this Safeguarding Policy that aims to meet this commitment.

## Definitions

<b>Safeguard</b>	Protect from harm or damage with an appropriate measure
<b>Individual</b>	Within this policy, 'Individual' represents children (under the age of 18), adults with a safeguarding need and adults with vulnerabilities
<b>Safeguarding</b>	Is the process of protecting vulnerable people, whether from crime or other forms of abuse. Radicalisation and Extremism is addressed within our Prevent Policy
<b>Vulnerability</b>	Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack.

## Types of Abuse

<b>Physical abuse</b>	Is defined as the use of physical force that may result in bodily injury, physical pain, or impairment. Physical abuse may include but is not limited to such acts of violence striking, hitting, beating, pushing, shoving, shaking, kicking, pinching and burning.
<b>Emotional/psychological abuse</b>	A person subjecting another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.
<b>Financial abuse</b>	Tactic used by abusers to limit and restrict their victims' access to their finances. For example, a young adult having their benefits taken away from them.
<b>Neglect by others</b>	Where a parent, carer or guardian will actively and knowingly fail to care for or address the basic needs of a child or vulnerable adult. For example, not feeding a child and/or leaving them in the same

	clothes and not helping them wash for days on end.
<b>Self-neglect</b>	Is any failure of an adult to take care of themselves? It could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves. In this situation, family and carers would be expected to notice these signs and give or apply for appropriate care.
<b>Discriminatory abuse</b>	Is when you are picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.
<b>Organisational abuse</b>	Is where an institution fails to provide basic care. It is also related to gang culture where an individual is forced into committing crime for the financial gain of gang Officers.

Unfamiliar terms (2021)

<b>Online Safety</b>	In simple terms, online safety refers to the act of staying safe online. It is also commonly known as internet safety, e-safety and cyber safety. It encompasses all technological devices which have access to the internet from PCs and laptops to smartphones and tablets.
<b>Mental Health</b>	Mental health refers to cognitive, behavioral, and emotional well-being. It is all about how people think, feel, and behave.

<b>Peer-on-peer abuse</b>	Peer-on-peer abuse includes, but is not limited to: <ul style="list-style-type: none"> <li>• physical and sexual abuse</li> <li>• sexual harassment and violence</li> <li>• emotional harm</li> <li>• on and offline bullying</li> <li>• teenage relationship abuse</li> </ul> Staff should understand that even if there are no reports of peer-on-peer abuse in their school, this doesn't mean it is not happening.
<b>Sexual exploitation</b>	Child sexual exploitation (CSE) is a type of sexual abuse. When a child or young person is exploited, they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities.

Why is safeguarding necessary for employed learners?

Providers of government funded training have a duty to safeguard their Learners and to take such steps that try to ensure the safety of its learners always. As part of that duty, we will talk to you about what you can do to ensure that learners are not exposed to threats or dangers.

What are the responsibilities of an employer?

- To understand what is meant by safeguarding and promote the welfare of learners.
- Be aware of your statutory duties towards the welfare of individuals.
- Be familiar with our guidance the reporting arrangements.

It is the responsibility of the employer to ensure employees collaborating with Learners have had the relevant DBS checks and of sound character and judgement and will not pose as any threat or danger to learners.

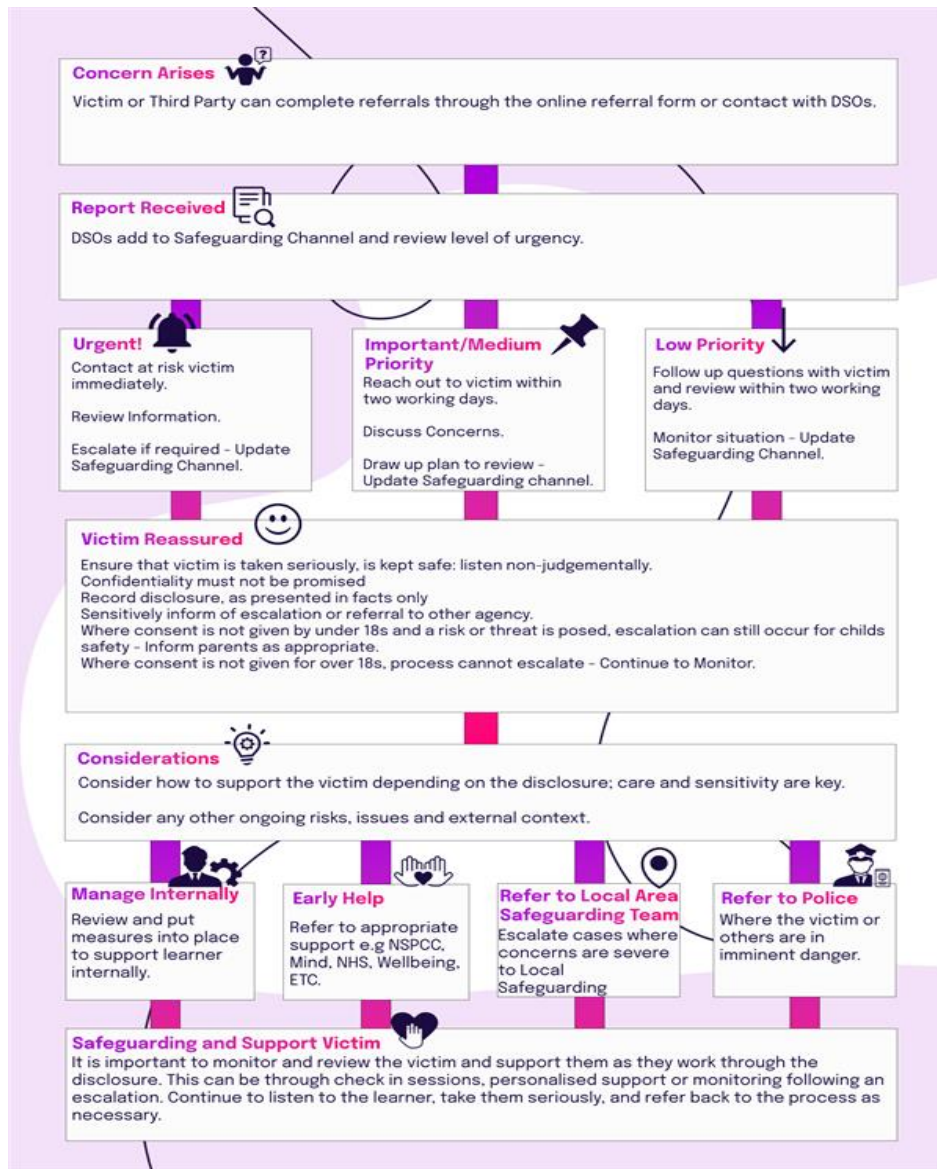
## Reporting an incident

All staff will adhere to the following guidelines:

- Following a disclosure, re-assure the learner that they have done the right thing.
- Record what the learner said, using their words where possible. Sign and date the record.
- Inform our DST as soon as possible and pass on the written record. The most efficient way to do this is to complete the [online form](#) via the website.
- Listen without making judgements.
- Stay calm.
- Try not to ask questions, unless necessary to safeguard the Learner, and make sure you ask open questions.
- Do not give an opinion or offer advice.
- Do not promise confidentiality - explain you may need to talk to a DSO.
- Do not add details of disclosure onto Bud or any other platform.

Employees collaborating closely with individuals should be alert to the possibilities of harm and they should follow the policy/process only and not investigate or offer advice. If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact our Designated Safeguarding Team. Any concern must be documented using the form on the website within 2 hours of the disclosure. Unless the individual is in immediate harm, where the relevant authorities will be contacted immediately. In this situation ensure that the individual is accompanied and kept safe, pending advice from the relevant authorities.

# Safeguarding Processes Flow Chart



## Apprentify Safeguarding Process:

- Safeguarding concern arises. Learner, DC, employer, or other concerned third-party report incident through the Apprentify online Safeguarding referral form or contact our Designated Safeguarding Team.
- The report is received and added to the Safeguarding Channel, with alerts set up for all DSOs.
- Level of urgency is reviewed by DSOs as follows:
  - **Urgent:** contact at risk victim immediately, review information and escalate if required
  - **Important/ Medium:** reach out to victim within two working days, discuss concerns and draw of plan of review
  - **Low:** follow up questions with victim within two working days, continue to monitor the situation
- Once above is complete, assigned DSO to update Safeguarding Channel.
- Reassure victim and ensure that they understand that they did the right thing, will be listened to non-judgmentally, and that we are working to keep them safe.
- **DO NOT PROMISE CONFIDENTIALITY.** Victim must be made aware that disclosures may need to be escalated.
- Record updates as facts.
- For under 18s, escalation can occur for the child's safety, and parent's must be made aware. Where escalation is required, consent is must first be obtained from over 18s. Where consent is not given, the process cannot escalate. Continue to monitor the situation.
- Consider how to support the victim with sensitivity and care. Consider any other ongoing risks, issues, and external context
- Disclosures may be managed in a variety of ways:
  - **Managed Internally:** identify support measures to put into place internally
  - **Early Help:** refer to appropriate support, such as NHPCC, Mind.org, local wellbeing services, etc.
  - **Referral to Local Authority Safeguarding Team:** severe and urgent cases should be reported to the Local Authority Safeguarding and Adult Social Services Teams.



- **Referral to Police:** where the victim or others are in immediate danger, contact the police
- **Monitor and check in** with victim, continue to listen and provide personalised support and care, as well as signposting to relevant support agencies.

If a learner has a concern/ allegation about a member of the Apprentify team:

- All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their tutor about, they are to contact Apprentify Designated Safeguarding Team.
- Designated Safeguarding Team can be contacted using the online form on the website.
- If a parent contact, you to report a concern about their child (Under 18) ensure you listen and record the details as per a learner reporting a concern to you.
- Ensure you have contact details for the parent. You must report the issue to the DST. The DST will then decide the appropriate course of action, and if a referral outside the organisation or to the LADO/LSAB is appropriate, consult with the parent as appropriate.
- Be mindful of confidentiality. No information should be passed to parents or carers without prior consent to do so from an adult learner.
- If you observe a safeguarding issue taking place within the working practices of an employer's setting, act to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager.
- Take any actions to secure the safety of the individual, this may involve staying with them until a responsible adult can be located. Inform the Designated Safeguarding Team. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately.
- If a learner reports unsafe practices or safeguarding issues to you within their working environment. Advise the learner to follow in-house reporting or whistle-blowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to the Designated

Safeguarding Team who will offer additional guidance and signposting for the Learner and will monitor.

- It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to the Designated Safeguarding Team as soon as possible.

### Keeping yourself safe

To maintain yours and the learner's safety, the following are prohibited:

- Befriending learners on personal social media sites.
- Sharing personal telephone numbers.
- Visit learners at home or transporting learners to and from locations (this includes travelling in the car with a learner driving.)
- Do not use sarcasm, insults, or belittling comments towards learners.
- Personal relationships with learners.

It is important to be mindful of the following regarding your personal conduct:

- You will naturally build a rapport with learners through contact during the learner journey, and the learners may see you as a confidante and support but be sure to maintain professional boundaries whenever conducting work on Apprentify's behalf.
- Be respectful of all individuals, and appreciate you are in a position of trust. We can listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice – as this is based on your opinion, focus support on information (facts) and guidance (signposting). However, it is good practice to challenge learner's views, not for the purpose of changing it but for consideration.

- If at any point, you feel unsafe in a learner's company inform the site manager, your line manager, the Designated Safeguarding Team and leave the premises.

## Whistle Blowing

It is acknowledged that there may be times where the staff 'witness' an incident, action or event that may give them cause for concern.

If any member of staff witnesses a potential safeguarding issue, they must treat it as a matter of urgency and contact one of our Designated Safeguarding Team. Any concern must be documented via the relevant form via the website within 2 hours of the disclosure, unless the learner is in immediate harm, where the relevant authorities will be contacted immediately. In this situation ensure that the learner is accompanied and kept safe, pending advice from the relevant authorities.

- We are committed to the safety and security of all learners – ALWAYS. Equally, we are committed to the safety and security of all staff whilst onsite.
- All staff are required to share any concerns regarding any staff practices that compromise the safety of the learners to the Designated Safeguarding Team.
- Failure to notify the Designated Safeguarding Team of any concerns regarding any incidents, events or practice by individual staff will result in referral to the safeguarding team, Ofsted and reviewed by senior management.
- Where external authorities are conducting their own enquiries, our own investigation will run in parallel without jeopardy to any official enquiries.
- Any staff member who discloses a concern will be given assurance of confidentiality as far as possible, without jeopardy to any investigations by external authorities or our own investigation
- Any staff member expressing a concern about their safety following a disclosure will be give all necessary support to enable them to continue in their role with security safely.

## Apprentify Internal Whistleblowing Process

1. Staff or employee has a concern about another member of the team.
2. Concern raised with Safeguarding Board via Online Disclosure Form.
3. Disclosure reviewed by Safeguarding Team and assigned to a Designated Safeguarding Officer.

### Urgency Levels:

1. **No Action Required:** Where the disclosure is considered not to be a concern, referral is logged, and the bucket is closed.
2. **Action Required:** Where concern is present, concern discussed with the Line Manager of the reported member of staff.
3. **Urgent Action Required:** Where particularly serious and urgent concern is present, relevant authorities to be contacted immediately.

Referrals to be managed by Paul Drew, or, in the event of an SMT disclosure, Emily Beddows. Buckets to be updated in line with actions

### Review

This Policy will be reviewed annually or earlier if deemed necessary.