

Safeguarding Policy

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Last Reviewed By:	4 April 2022, David Hampton

Purpose

We train, coach and evaluate young people as part of our activities, including participants in the UK Apprentice scheme. We acknowledge our duty of care to safeguard and promote the welfare of all learners and staff and are committed to ensuring that our safeguarding practice reflects statutory responsibilities, government/regulatory body guidance and best practice generally.

The policy describes our approach to protection for Apprentices, who may include young or vulnerable people. The welfare and interests of all apprentices and staff are paramount in all circumstances, and we have a responsibility to promote this. We will ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex, sexual orientation or socio-economic background, all people have a positive and enjoyable experience in a safe environment.

We accept the responsibility to take reasonable and appropriate steps to ensure the welfare of apprentices in our care.

Definitions

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, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyber bullying
- Domestic abuse
- Substance misuse
- Fabricated or induced Illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation

- Sexting
- Teenage relationship abuse
- Trafficking and modern slavery
- Mental health concerns

A Child is defined as anyone under the age of 18. An adult at risk (previously 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. Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service in order to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service

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, examples:

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

Applicability

This policy is applicable to all employees, associates and partners. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

This policy covers safeguarding of Children and Adults at Risk, both our learners and those persons in settings in where we practise which fall into the category of child or adult at risk. It is inclusive of specific highlighted safeguarding agenda areas – as defined by law, and in the wider context all of our learners. This policy also aligns our compliance with the Government Prevent strategy.

As Part of our Safeguarding Policy we will:

- Promote and prioritise the safety and wellbeing of Apprenticeships
- Create a safe physical environment for Apprentices, employees and associates by applying health and safety measures in accordance with the law and regulatory guidance
- Create and maintain an anti-bullying environment in all our interactions with Apprentices, and ensure appropriate action is taken in the event of incidents/concerns of abuse, and provide support to the individual/s who raise or disclose the concern.
- Ensure robust safeguarding arrangements and procedures are in operation.
- Ensure that concerns can be raised without fear
 - Each Apprentice will be provided a Welcome Pack to orient him/her on what to expect from their experience, and this pack will contain our Safeguarding policy and our website address plus email/mobile phone contact details for our Partners and selected employee contacts, with an assurance that complaints and concerns will be dealt with in a sensitive and confidential manner.
 - Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
- Provide safe and confidential treatment of any concerns or allegations raised by any employee, associate or business partner.
- Prevent the employment/deployment of unsuitable individuals, ensuring that all necessary checks are made.

Handling Incidents of Suspected Abuse

- Anyone who suspects that an Apprentice is experiencing abuse, or to whom an Apprentice discloses issues relating to safeguarding, should contact the Designated Safeguarding Lead immediately.
- Taking into account all the information available, the DSL will decide on the next steps, which may include taking no further action. In most cases the DSL will seek advice from the employer's Human Resource department and agree what further action is necessary, which may include:
 - Seek further advice
 - Undertake further investigation
 - Make a referral to the appropriate agency
 - Report the incident to a designated Social Worker
 - 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 and Human Resources Department may consider that those involved may require counselling. Where it is felt there is a need for counselling the employer and/or DSL will make the necessary arrangements.

- All staff to whom an Apprentice discloses issues that may be related to safeguarding must keep a written records of the concern using the template in Appendix 1. Such records must be kept securely, separate from other Apprentice records and in locked locations.
- The Designated Safeguarding Lead will co-ordinate activities with relevant agencies and co-operate as required with any enquires regarding Apprentices, including attendance at case conferences.
- Staff working in direct contact with young people and/ or vulnerable individuals on a day-to-day basis may come across signs of harm and/or abuse. Staff need to ensure that any concerns for the wellbeing of a young person or vulnerable adult are reported to the DSL as quickly as possible (at most, within 24 hours). The DSL will invoke the appropriate procedures to protect the young person or vulnerable adult, involving Social Services and the Police if appropriate.
- Where staff members are unsure and need guidance about safeguarding issues, they must seek guidance from the DSL.
- If there is an emergency Safeguarding incident the police will be called immediately.
- Where an allegation of abuse or inappropriate behaviour is made against a member of staff the DSL reserves the right to suspend the member of staff while investigations are made.

Confidentiality

- Confidentiality and trust are a very high priority, but the Apprentice's safety is the overriding concern.
- The degree of confidentiality will be governed by the need to protect the Apprentice, who should be informed at the earliest possible stage of their disclosure that this will then be escalated as required.
- All conversations regarding an Apprentice should be held in private.
- We will always be open and honest with the Apprentice if we intend to take the case further.
- Employees must not discuss the case with anyone other than the DSL and those involved in the case.

IT Policies

- All company-issued devices (phones, tablets and laptops) will have family-safe settings enabled to prevent access to inappropriate content
- Employees provided with company-issued laptops will not have administrative rights and so cannot install unauthorized software.
- We will use ActiveTrak Invisible Agent to monitor our laptops for inappropriate usage.

Communication of the Safeguarding Policy

- We ensure everyone (every employee, associate and business partner) understands their role and responsibility in respect of safeguarding through:

- Providing everyone with a copy of this policy as part of their Consultant's Handbook
- Providing everyone with training that covers this policy, with particular emphasis on:
 - How to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to young people.
 - Their responsibility to conduct themselves in a manner that helps the organisation prevent bullying, harassment, victimisation or other harm to young people in our charge.
 - The harm that can be caused if they are not vigilant, with examples.
 - Our training takes place through an individual or group discussion of this document, with additional resources as required (we do not believe that e-learning is particularly effective for this purpose). We use this in-person approach to gain personal commitment from everyone to be a role model in their conduct in safeguarding Apprentices.
- Including a review of our performance in safeguarding Apprentices in every formal review of the progress of our client engagement

Designated Safeguarding Leads (DSLs)

Our Designated Safeguarding Leads are:

- Michael Akers: michael.akers@advancedanalyticssolutions.co.uk +44 7986 157649 (M) +44 1227 459007 (H)
- David Hampton: david.hampton@advancedanalyticssolutions.co.uk +44 7917 71740 (M) +44 1732 464704 (H)
- Both are fully available outside office hours.

Our Designated Safeguarding Leads have a specific responsibility for championing the importance of safeguarding and promoting the welfare of Apprentices. They will:

- Act as the first point of contact with regards to all safeguarding matters.
- Attend up-dated training every three years.
- Ensure that our policy is updated as required
- Manage and keep secure all safeguarding incident forms
- Provide our policy plus training and support for employees, associates and business partners, ensuring that they understand the reporting and recording procedures and are clear about what to do if they have a concern about an Apprentice.

Monitoring

The policy will be reviewed by a DSL every year, or in the following circumstances:

- Changes in legislation and/or government guidance.
- As required by the appropriate regulatory body.
- As a result of any other significant change or event.

Appendix 1: **Welfare Incident/ Concern form**

Advanced Analytics Solutions

(Employer Name)

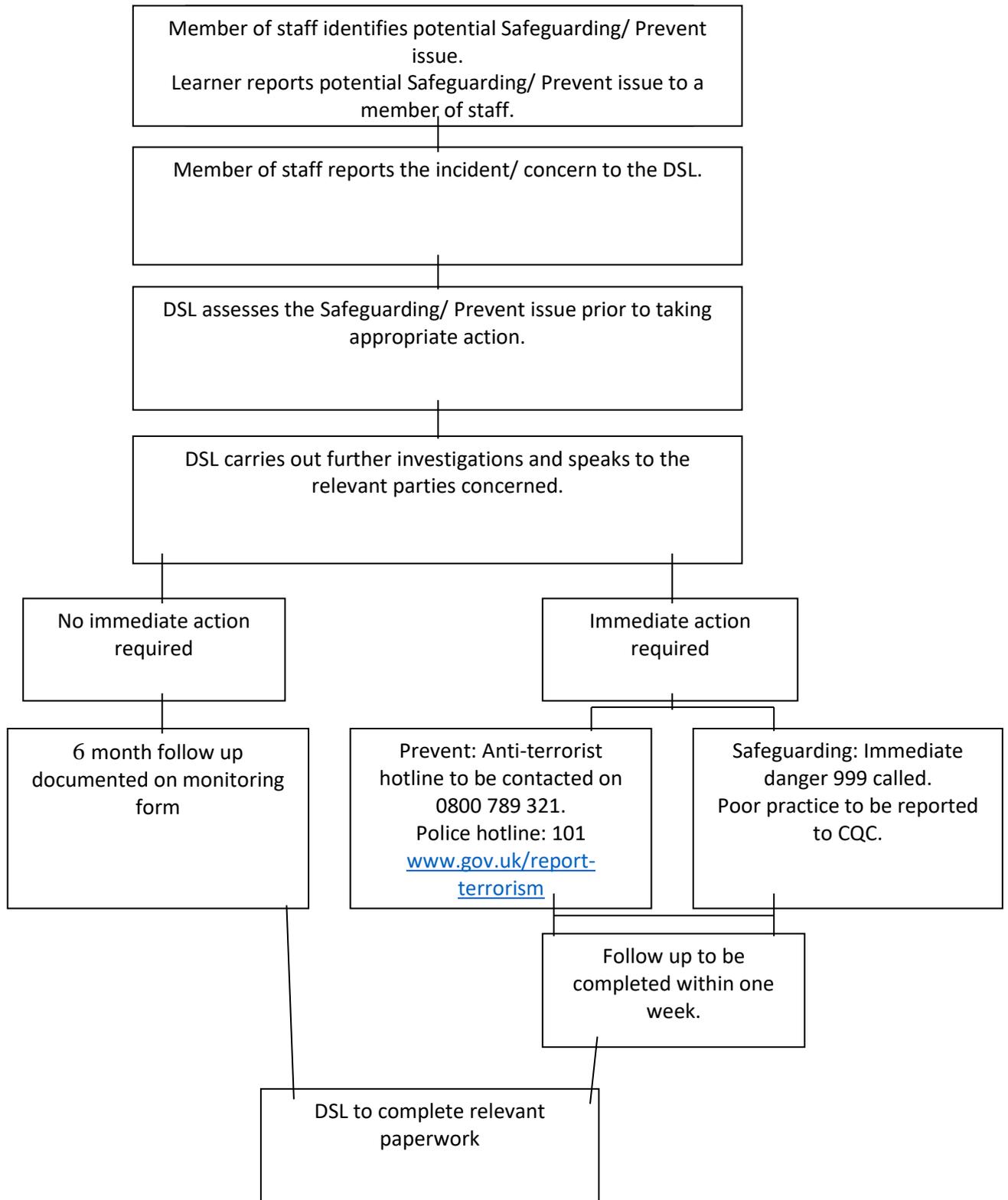
SAFEGUARDING INCIDENT / CONCERN FORM

Person completing the form	
Name:	Position in relation to apprentice:
Phone:	Email:
Are you reporting on behalf of someone else? (Y/N)	If yes, provide full details of the other person
Designated Safeguarding Lead	
Name:	Position in relation to apprentice:
Phone:	Email:
Apprentice Details	
Name	Date of birth
Phone:	Email:
Gender	Ethnicity
Apprentice's Manager Details	
Name:	Position in relation to apprentice:
Phone:	Email:
Has the manager been informed of the incident/concern? (Y/N)	Additional information
Details of incident /concern	
Date and time of occurrence	Date reported:
Incident / concern (who what where when)* - be clear which details are fact and which are speculation; record any injuries	
Details of who was involved (include any witnesses and any people who are allegedly involved in the abuse/harm)	

What the apprentice said, if applicable (use their exact words)	
Any other relevant information (background context, witnesses, immediate action taken)*	
Actions already taken and by whom (include details of who else has been involved, with relevant contact details):	
Signature:	Date form completed (DD MM YY):
Role:	
For completion by a Designated Safeguarding Lead: Action to be taken (including reasons for decisions) and Outcomes*	
Signature of DSL	Date (DD MM YY)

*Continue on a separate sheet if necessary

Flowchart Procedure



Control Measures/ Procedures

Learners

- All learners are to receive training on Prevent.
- All learners are issued with a safeguarding procedure to follow at their induction.
- Risk assessments for Young People will be completed alongside Health and Safety reviews for their workplace to ensure that they are working in a safe and secure environment.

Staff

All staff will receive training on Safeguarding, Channel Awareness and WRAP Training; this training will be updated every two years.

We will ensure all employees have a suitable DBS check and reserve the right to refuse employment to individuals where DBS checks suggest that they may pose a danger to other staff or to learners.

We reserve the right, in accordance with its employment procedures, to suspend and/or dismiss staff members from employment or from undertaking a specific role with respect to that employment. This may be in circumstances where the individual acquires or extends a relevant criminal record, or where they have withheld information about their criminal record at the point of employment. Disciplinary action may also be taken against staff, in accordance with the organisation's employment procedures, for a failure to comply with this policy.

We obtain DBS disclosures for all staff and volunteers working in 'regulated positions' as defined by the Criminal Justice and Court Services Act 2000 and further widened in 2009. DBS checks will be renewed every three years.

We will evaluate information about any staff member's criminal record and make sensible, fair and consistent judgements about whether the individual is safe to engage (or remain engaged) in the employment role.

Disclosure and Barring Services (DBS)

The Disclosure and Barring Service (DBS), an Executive Agency of the Home Office, provides access to criminal record information through its Disclosure service. This service enables organisations in the public, private and voluntary sectors to make safer recruitment decisions by identifying candidates who may be unsuitable for certain work, especially that which involves individuals or vulnerable adults. There are two types of DBS, Standard and Enhanced. For those positions where a disclosure is required, this will be stated clearly in recruitment information.

We are committed to the fair treatment of our staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

We are committed to best practice in staff recruitment to ensure the best possible use of the information provided by the Disclosure and Barring Service (DBS) to encourage safer recruitment but to also ensure that people who have been convicted are treated fairly and are given every opportunity to establish their suitability for positions. Use of the DBS will not however be regarded as a substitute

for any of the full range of existing pre-appointment checks, including taking up references and enquiring into the person's previous employment history. Disclosures will be seen as complementary to existing recruitment practice and will only be sought after a candidate has been provided with a provisional offer of employment or a voluntary position.

All applicants called for interview are asked to provide details of their criminal record at the application process if the role requires them to deal with or potentially come in contact with vulnerable adults. We request that detailed information is sent under separate, confidential cover, to the Partner handling the recruitment process and we guarantee that this information is only seen by those who need it as part of the recruitment process.

We ensure that everyone involved in the recruitment process has been suitably trained to identify and assess the relevance and circumstances of offences.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to termination of employment. We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before, if necessary, terminating employment. Having a criminal record will not necessarily bar any individual from working with us. This will depend on the nature of the position and the circumstances and background of the offences.

Insurance

We have a duty of care to all staff, learners and visitors and have in place, both Employer's Liability and Public Liability covers for our legal liability.

Policies and Procedures

Relevant policies that relate to Safeguarding are:

- Equality and Diversity
- Health and Safety Policy
- Whistle Blowing Policy
- Malpractice and Plagiarism Policy
- Policy to Support the Prevention of Extremism and Radicalisation (PREVENT)
- Promoting Fundamental British Values Policy
- Internet Safety Policy
- Child Sexual Exploitation Policy

Relevant Legislation

- Safeguarding Vulnerable Groups Act 2006
- The Care Act 2014
- Sexual Offences Act 2003
- Public Interest Disclosure Act 1998
- General Data Protection Regulations 2018

- Human Rights Act 1998
- Freedom of Information Act 2000
- Crime and Disorder Act 1998
- Children Act 1989
- The Children Act 2004
- Education Act 2002
- Children (Leaving Care) Act 2000
- Care Standards Act 2000
- Criminal Justice Act 2003
- Safeguarding Vulnerable Groups 2006
- Protection of Freedoms Act 2012
- Police Act 1997
- Working Together to Safeguard Children 2015
- Forced Marriage (Civil Protection) Act 2007
- Anti-social Behaviour, Crime and Policing Act 2014
- Female Genital Mutilation Act 2003
- The Prevent Duty Guidance for England and Wales 2015

Code of practice for safeguarding children, young people and vulnerable adults.

The following code of practice applies to all our Partners, employees and contractors

- Avoid unnecessary physical contact.
- Avoid taking a child, young person or vulnerable adult alone in vehicle on journeys, however short.
- Unless circumstances make it impossible to comply, do not take a child or vulnerable adult to the toilet unless either (a) another adult is present or (b) another adult is aware (this may include a parent or group leader).
- If you find you are in a situation where you are alone with a child, young person or vulnerable adult wherever practicable make sure that others can clearly observe you.
- Avoid close personal relationships with a child, young person or vulnerable adult in relation to whom you are in a position of trust.
- Do not make suggestive or inappropriate remarks to or about a child, young person or vulnerable adult, even in fun, as this could be misinterpreted.
- If a child, young person or vulnerable adult accuses a member of staff of abuse or inappropriate behaviour, you should report this immediately to the relevant person.
- The duty to report applies equally to complaints or accusation of historic, and not just recent, abuse/inappropriate behaviour.
- If you are the recipient of any complaint or accusations from a child, young person or vulnerable adult, it is important to listen without making or implying any judgement as to the truth of the complaint or accusation.
- If a child, young person or vulnerable adult makes a complaint, or if there are other reasons for suspecting abuse, you should not attempt to investigate this yourself, but should report your concerns to our Designated Safeguarding Lead.
- Participate in the training available to you to support you in your work with children, young people and vulnerable adults.
- Participate in the training available to you to support you in your work with children, young people and vulnerable adults.
- Remember that those who abuse children, young people and vulnerable adults can be any age (even other children and vulnerable adults), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.
- Good practice includes valuing and respecting children, young people and vulnerable adults as individuals, and the adult modelling of appropriate conduct- which would exclude bullying, aggressive behaviour and discrimination in any form.
- Those dealing with any allegations of abuse or misconduct should adhere to the principles set out in the policy. Any information received should be acted upon sensitively, effectively and efficiently. Wherever possible, those making allegations should be given the information about the outcome.
- Although allegations should be reported only on a “need to know” basis, staff and students making allegations need to be concerned that they will be breaching confidentiality or the General data protection act, as complying with the policy overrides such obligations. If the person making the allegation feels they need counselling or other appropriate support from us they are encouraged to seek it.
- Ensure that you comply with appropriate licensing laws.



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A handwritten signature in black ink that reads "D Hampton".

David Hampton
Partner
4 August, 2021