

SAFEGUARDING & PREVENT POLICY

Introduction

This policy sets out Estio Training's approach to protecting young people and adults at risk, whether from crime, other forms of abuse or from being drawn into terrorism-related activity. It applies to all aspects of our work and to everyone working for Estio, including employees, contractors, temporary workers etc. Hereinafter referred to as colleagues.

The policy covers both the preventive measures that Estio has in place and guidelines on responding to specific concerns or allegations.

Relevant Legislation & Related Policies

This policy has been written with due regard to relevant legislation including:

- The Care Act 2014
- The Equality Act 2010
- Mental Capacity Act 2005
- The Children's Act 1989 & 2004
- The Education and Skills Act 2008
- Counter Terrorism and Security Act 2015
- Keeping Children Safe in Education 2021
- Children missing from Education 2016
- Special Educational Needs and Disability Code of Practice 2015
- Safeguarding Disabled Children: Practice Guide 2009
- Working Together to Safeguard Children 2018
- Prevent Duty Guidance 2015 (updated 2019)
- Data Protection Act 1998 and 2018 (GDPR)
- Voyeurism (Offences) Act 2019
- Education and Training (Welfare of Children) Act 2021
- Departmental advice on Sexual Violence/Sexual Harassment between children in schools and colleges.

And with due regard to the following Estio policies and procedures:

- Health and Safety Policy
- Prevent Risk Assessment (National and Regional)
- Lockdown Policy
- SEND Policy
- Equality and Diversity Policy
- Disciplinary Policy
- Data Protection Policy
- Anti-Bullying and Harassment Policy
- E-Safety Policy
- Modern Slavery Policy
- Grievance Policy

- Whistleblowing Policy
- Safer Recruitment Policy

Legal Definitions

For the purpose of this policy:

- **Children or young person** applies to a person who is less than 18 years of age.
- **Adults at risk** includes those who, because of mental health difficulties and/or physical health conditions and/or personal circumstances, may be vulnerable to abuse, exploitation, or significant harm.
- **Safeguarding**: is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn in terrorism-related activity.
- **Radicalisation**: is the process by which a person comes to support terrorism and extremist ideologies. A vulnerable learner or colleague may be more susceptible to being drawn towards or being targeted by those involved in extremist ideology.

Commitment

We will seek to keep our learners safe by:

- Valuing them, listening to them and respecting them
- Appointing a Designated Safeguarding Lead (DSL), who will act as the Single Point of Contact (SPOC) for Prevent, as well as a team of Designated Safeguarding Officers.
- Adopting child protection and safeguarding practices, through procedures and a Code of Conduct for colleagues
- Ensuring that all colleagues are familiar with the policy and the procedures
- Developing and implementing an effective e-safety policy and related procedures
- Providing effective management for colleagues through supervision, support, training, and quality assurance measures
- Screen prospective colleagues carefully and ensuring all necessary checks are made via a thorough recruitment and screening process, in line with Safer Recruitment guidance.
- Ensuring that all colleagues complete online training courses on Safeguarding and Prevent, within the first five days of starting with the organisation and updating any further CPD at least annually
- Ensuring that all learners receive an induction and complete other mandatory online training within the agreed timescales
- Recording and storing information professionally and securely
- Ensuring that all Learners have 2 emergency contacts listed where reasonable
- Sharing information about Safeguarding, Prevent and good practice with our colleagues and learners
- Using our Safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving learners and their parents and carers appropriately
- Using procedures to manage any allegations against colleagues or employers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our learners and colleagues, by applying health and safety measures in accordance with the law and regulatory guidance
- Regularly review the policy, procedures and recording forms

Responsibilities

Colleagues

Adhering to this policy is mandatory and Safeguarding is the responsibility of all colleagues, those involved in working with young people and vulnerable adults.

To ensure the effective implementation of the Safeguarding and Prevent Policy, all colleagues must work in partnership to protect all young people and vulnerable adults engaged in Estio Training's recruitment, training, and support services.

It is the responsibility of each colleague to ensure they are aware of, and adhere to, this policy and the rules and procedures relevant to them.

Designated Safeguarding Lead

The Designated Safeguarding Lead has overall responsibility for Safeguarding and Prevent, including the following activities:

1. Ensuring that the policy and reporting procedure are monitored and reviewed in accordance with changes in related legislation and guidance.
2. Communicating the policy and reporting procedure to all colleagues and ensuring that they are provided with information, advice, and training on the protection of young people and vulnerable adults.
3. Acting as the main contact for the protection of young people and vulnerable adults.
4. Establishing and maintaining contacts with Local Authorities and the Police.
5. Completing risk assessments and ensuring these are signed off by the CEO.
6. Maintaining confidential records of reported cases and the action taken.
7. Maintaining up to date knowledge on Safeguarding and Prevent issues.
8. Managing the Safeguarding and Prevent Action Plan.

The Designated Safeguarding Lead is:

Lee Dale: Head of Internal Training & Health and Safety

Phone: 07458057051

Email: lee.dale@estio.co.uk

The Estio Executive Board oversees implementation of this policy and the Safeguarding and Prevent action plans.

Logging of Safeguarding Cause for Concerns

All cause for concerns received by the Safeguarding team will be recorded internally both on an individual tracking form in line with our internal process, as well as a Safeguarding Log. This is managed by the Designated Safeguarding Lead for audit and reporting purposes.

In order to raise a cause for concern with the Safeguarding team, a cause for concern form should be completed and sent to safeguarding@estio.co.uk. Learner's can also self-refer and request support via the safeguarding@estio.co.uk inbox or alternatively by calling a DSO directly via telephone. Where email correspondence is received, and risk factor is low or medium, a response will be received within 1 working day. In cases of high risk, communication will be established as soon as

possible, with the DSO/DSL picking up the case with immediate effect, then following the steps laid out below in the management of such a case.

In accordance with GDPR, information contained within this log and within individual cause for concern forms will only be accessible to those individuals actively involved with the Safeguarding Team operations, or with Governance over Safeguarding. However, this data is also handled with “Keeping Children Safe in Education 2021” guidance which stipulates that “Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children”. Therefore, should we be required to do so, the data contained within said documentation will be shared with relevant third parties such as LADO (Local Authority Designated Safeguarding Officer), Prevent Channel, the Police and any other organisations/parties that we are duty bound to report to in light of Safeguarding and Prevent concerns.

Escalation of “High Risk” Cause for Concerns logged

All Safeguarding cause for concerns are assigned a “Risk Factor” and recorded as Low, Medium or High-Risk cases. These are decided by the DSO (Designated Safeguarding Officer) and DSL (Designated Safeguarding Lead) for individual cases, and reviewed throughout, meaning that they can be subject to movement.

In the event that a “High Risk” cause for concern is logged, which indicates that an individual may be at serious risk of harming themselves or others, this will be immediately reported to the COO (Chief Operating Officer) and the Board. In the event this occurs, the following actions will take place:

- Accountable Designated Safeguarding Officer to inform Chief Operating Officer.
- Notification to be sent to Estio Training CEO and the appointed Palatine Private Equity LLP Executives immediately upon receipt of the cause for concern.
- Designated Safeguarding Officer / Chief Operating Officer to facilitate a conference call to discuss the matter in full and steps to be taken (if required) to be agreed.
- Accountable Designated Safeguarding Officer to document all actions and co-ordinate.
- Accountable Designated Safeguarding Officer / Chief Operating Officer to update CEO and Executives on actions appropriately until matter is closed.

Safeguarding Facets

The following aspects, but not exhaustive, of Safeguarding should be considered when working with learners:

- Sexual abuse or inappropriate relationships
- Physical and emotional abuse or neglect
- “Honour Based Violence” such as: Female Genital Mutilation and Forced Marriage
- Exploitation, including financial and sexual
- Online Safety
- Grooming behaviour
- Domestic violence
- Distribution of peer images/sexting
- Peer on Peer abuse
- Prevent Duty
- Bullying, including cyber bullying, bullying in the training centre or the workplace

- Victimisation
- Self harm
- Inappropriate taking of and/or sharing of unsolicited photographs (Up-skirting)
- Unsafe activities or environments
- Mental Health
- Serious crime, including knife crime and gang related activity
- Unregulated fostering arrangements and statutory requirements to inform authorities
- Child criminal and sexual exploitation
- County Lines
- Incel
- Trafficking
- Extremism.

Identifying Harm

Through our work with clients and learners, Estio colleagues are well placed to notice changes in behaviour and appearance which may be a result of harm. These could include:

- the learner discloses that they are being harmed or are at risk of harm
- absence from training or work
- behavioural problems
- change in dress or physical appearance
- rewards, including unaccounted for money, expensive clothing or footwear or devices such as mobile phones
- contact with risky adults or environments
- reduced contact with, or becoming withdrawn from, friends or family
- substance abuse.

Identifying Radicalisation

Colleagues should also be vigilant to the signs of radicalisation. Radicalisation can be difficult to spot, but signs that may indicate that a learner or colleague is being radicalised include:

- not adhering to/upholding the British Values of; Democracy, Rule of Law, Individual Liberty and Respect, Tolerance of different faiths and beliefs, and those with none
- isolating themselves from family and friends and learning groups
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secrecy, especially around internet use.

Safeguarding Preventative Measures

Colleague Recruitment:

- Estio Training applies 'Safer Recruitment in Education' to all appointments that involve regulated activity. Regulated activity includes unsupervised activities relating to children and adults at risk vulnerable adults (e.g., teaching, training, instruction, care or supervision) which is carried out

on a frequent basis and certain work which provides the opportunity for frequent contact with children or vulnerable adults.

- All applicants are therefore required to complete an application form. The application is included as part of the recruitment process as one of several safeguards, designed to prevent unsuitable persons from gaining access to children and vulnerable adults. Candidates may attach their current CV with their application form. However, CVs will not be accepted without a fully completed application form, to ensure that the recruiting manager has full visibility of the applicant's employment history, including any gaps.
- The application form requires applicants to self-declare any convictions and consider if any pending investigations should be disclosed if they appear on the list of offences relevant to safeguarding children and vulnerable adults.
The list is available at <https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>
- If an application is successful but a conviction or other sanction was not disclosed, it could result in dismissal or disciplinary action. Any information provided will be completely confidential and will be considered only in relation to the job for which the applicant is applying.
- A structured interview schedule is used at interview. A question on safeguarding is included in the interview schedule.
- Any offer of employment will be subject to a satisfactory disclosure certificate from the Disclosure and Barring Service (DBS) (previously known as CRB) and satisfactory references from the applicant's two most recent employers.
- All other processes can be found within the Safer Recruitment Policy

DBS checks

HR policies include appropriate safeguards including:

- DBS application form to be completed and submitted to HR with relevant supporting documentation prior to the employment or contract start date.
- Employment will not commence until all documentation required to complete a check has been submitted to HR and checked as complete.
- A risk assessment will be completed where the DBS contains disclosures.
- Ongoing checks will be completed on through the auto-renewal process, with a new check being completed every three years.

Colleague Training and Development

HR policies appropriate safeguards include:

- Inductions for new colleagues will include a session delivered by the Designated Safeguarding Lead or Deputy Lead. The session will cover an introduction to the policy, including definitions, responsibilities, the code of conduct, an introduction to the safeguarding team and the process to follow to report a concern.
- New colleagues will be required to complete an online learning module as part of the next stage of the induction process. The course should be completed and certificated within five days of the new colleague's start date.
- The Designated Safeguarding Lead and Deputy Lead will be required to complete certificated training for the role at least every two years. They will also be required to update their skills and

knowledge at regular intervals, but at least annually to keep up with any developments relevant to their role.

- Requirement for colleagues to complete CPD at least annually and when there are changes to legislation, guidance or best practice.

Off-The-Job Training

Safeguarding will be promoted throughout the apprenticeship, including through the following:

- Induction – learners will be introduced to Safeguarding and Prevent and how to recognise and report a concern at induction
- e-learning – learners will be targeted to completed relevant e-learning, such as the ‘Side by Side’ modules as part of their course
- Off-the-job lessons/online sessions – topics relating to Safeguarding, Prevent and British Values will be embedded within off-the-job training. Opportunities to embed relevant topics will be highlighted in lesson plans
- Curriculum wrap-around activities will be planned and implemented across provision.

Information

Learners will be provided with the Digital Apprenticeship Handbook at the start of their training. The handbook covers an introduction to Safeguarding, the Policy, Safeguarding team and how to report a concern, including through the safeguarding@estio.co.uk email address.

The handbook also contains signposting to organisations and support available for a range of situations, and how to access this support.

Remote workplace Visits and Reviews

Learner knowledge and understanding of issues relating to Safeguarding, the Prevent Duty and British Values will be covered as part of formal progress review process. The specific topics selected for discussion will be tailored to the life and work of the individual learner, so that these are covered in a way that is relevant to them. Objectives will be agreed to address any gaps in knowledge and understanding identified through the use of questioning or discussions about specific scenarios, case studies, topics or events.

Guidance and Support for Learners

Information relating to safeguarding is included in the Digital Apprenticeship Handbook and in induction materials. Advice and support are available through the Designated Safeguarding Lead or any of the Safeguarding Officers.

Use and Monitoring of IT

IT equipment provided to both colleagues and learners is subject to monitoring of its use. Filters will be applied to restrict access to harmful context and prevent people from being drawn into extremist behaviour. Inappropriate use of IT will be reported to a Safeguarding Officer.

Code of Conduct for Colleagues

Colleagues are expected to take the following steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- avoiding any unnecessary physical contact with learners
- avoiding unaccompanied journeys with learners
- avoiding inappropriate familiarity with learners
- always acting upon and recording allegations or reports made by learners
- always reporting potential concerns
- not inviting learners to socialise with them or visit them at home
- not engaging with learners on social media
- recognising that it is a criminal offence to engage in sexual activity with a person under the age of 18 when in a position of power.

Where colleagues are found not to be following the Code of Conduct further investigation will take place and the Disciplinary process will be initiated. Please refer to the disciplinary policy for further information.

In appropriate cases and in accordance with the law, Estio has the right to report to the appropriate authorities any concerns it has that a colleague or learner ought to be included in a list of people who should be restricted from working with children and vulnerable adults.

How to Respond and Report

If you are made aware of any concerns or allegations, the following process should be followed:

- Remain calm and reassure the person that they have done the right thing in speaking up.
- Listen carefully and give the person time to speak.
- Do not voice an opinion.
- Do not ignore the concern, be judgmental or dismissive
- Explain that only professionals that need to know will be informed, but never promise confidentiality.
- Act immediately and don't try to address the issue yourself.
- Report the concern - alert a Safeguarding Officer to the concern directly in person/by telephone and then formally report the concern by email to safeguarding@estio.co.uk. **Please note: if the Designated Safeguarding Officer is unavailable, then contact should be made with either the Deputy Designated Safeguarding Lead, or one of the Designated Safeguarding Officers.**
- Write a statement giving as much detail as possible, including date and time, what was said, any names or parties mentioned and how you responded.
- Do not make assumptions, consult with persons not directly involved in the situation or make promises.
- The Designated Safeguarding Lead will ensure that the relevant procedures are followed and will inform HR about any allegations.
- The Designated Safeguarding Lead will inform the Local Authority Designated Officer (LADO) in the first instance to determine if there is a genuine case for concern and a need for further action.
- In matters relating to radicalisation the Designated Safeguarding Lead will refer the matter (or seek advice from) the Prevent Lead, who in turn, may seek advice from the Local Authority's Channel Panel Chair or Police Prevent Lead.

- If the report is passed to authorities such as the Police for investigation, the Designated Safeguarding Lead will act as the main liaison officer and will ensure that relevant colleagues are kept informed, including the COO, and HR where a colleague is concerned.
- In the case of allegations against an Estio colleague, these must be reported to HR. Estio Training is required to report instances of misconduct or unsuitability to work with children or vulnerable adults to the Disclosure and Barring Service (DBS). This would generally apply when the colleague has been permanently suspended for reasons of misconduct or unsuitability to work with children or vulnerable adults, or would have been dismissed having met the harms test threshold.

Allegations against Estio Colleague

Allegations lodged against Estio Colleagues will be investigated and dealt with as per the above, in line with Keeping Children Safe in Education and associated governmental guidelines. The outcomes of any investigation will result in the below:

Substantiated: There is sufficient evidence to prove the allegation.

Malicious: There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation.

False: There is sufficient evidence to disprove the allegation

Unsubstantiated: There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt nor innocence.

Unfounded: To reflect cases where there is no evidence or proper basis which support the allegation being made.

Amendments

Estio reserves the right to alter the terms and conditions of this policy as required at any time in the future.

Monitoring and Version Control

Version:	Version 3
Version Date:	August 2021
Next Review Date:	August 2022
Distribution Date:	September 2021
Policy Owner	Designated Safeguarding Lead

APPENDIX

Main Contact Agencies

Local Authority Designated Officer (LADO):

Leeds:

Safeguarding:

Leeds Safeguarding Children Partnership

Telephone: 0113 378 9687

Make contact by telephone first to discuss any allegations or concerns

Complete Notification Form on website and email to LADO@leeds.gcsx.gov.uk

Prevent: prevent@leeds.gov.uk

Telephone: 0113 376 0336

Manchester:

Safeguarding

Telephone: 0161 234 5001

Email: mcsreply@manchester.gov.uk

Secure information: socialcare@manchester.gcsx.gov.uk

Prevent: see Divisional Contacts on Greater Manchester Police website www.gmp.police.uk

London:

Safeguarding:

Contact relevant Local Borough Safeguarding team.

Prevent:

City of London

Telephone: 0207 601 2442

Email: prevent@cityoflondon.police.uk

Birmingham:

Safeguarding:

Birmingham Safeguarding Children Partnership

Telephone: 0121 464 2612

Contact form: www.lscbbirmingham.org.uk/contact

Prevent Email: waqar.ahmed@birmingham.gov.uk

Department for Education Prevent Leads

Yorkshire & North West: chris.sybenga@education.gov.uk

London: Jennie.Fisher@education.gov.uk

Birmingham: hifsa.haroon-iqbal@education.gov.uk

Safeguarding Officer contact details

Safeguarding email:

safeguarding@estio.co.uk

Director Responsible for Safeguarding Governance

Name: Nichola Hay

Phone/text: 07802 411748

Email: nichola.hay@estio.co.uk

Designated Safeguarding Lead

Name: Lee Dale

Phone/text: 07458057051 Email: lee.dale@estio.co.uk

Manchester:

Designated Safeguarding Officer

Name Carley Perkin

Phone/text: 07951118975 Email: carley.perkin@estio.co.uk

Leeds:

Designated Safeguarding Officer

Name: Amy Smith

Phone/text: XXXX Email: amy.smith@estio.co.uk

Birmingham:

Designated Safeguarding Officer

Name: Mark Elson

Phone/text: 07458135704 Email: mark.elson@estio.co.uk

London:

Designated Safeguarding Officer

Name: Wayne Hunt

Phone/text: 07458113624 Email: wayne.hunt@estio.co.uk