



Safeguarding Policy

Policy Statement

The Real Apprenticeship Company Ltd is committed to ensuring that arrangements are in place to safeguard and promote the welfare of its learners. Further, for those learners aged 18 and under (young people), or in the case of adult learners with learning difficulties and disabilities, aged 25 and under, The Real Apprenticeship Company Ltd is committed to ensuring that it complies with its statutory duty under section 175 of the Education Act 2002 and the Children Act 2004.

In addition to this The Real Apprenticeship Company Ltd also has similar duties and commitments to our learners who fall under the Vulnerable Adults category as defined by the 'No Secrets' Government guidance 'a person aged 18 years or over, who is in receipt of or may be in need of community care services by reason of 'mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'

Reasons for the Policy

The policy exists to ensure that The Real Apprenticeship Company Ltd implements appropriate arrangements, systems and procedures to ensure that staff at The Real Apprenticeship Company Ltd have the right skills, means and resources to protect children and vulnerable adults from harm. Further The Real Apprenticeship Company Ltd recognises that learners who are abused or witness violence may find it difficult to develop a sense of self worth and that The Real Apprenticeship Company Ltd may be the only stable, secure and predictable environment in the lives of those learners at risk. The Real Apprenticeship Company Ltd will endeavour to support those learners through a range of mechanisms including a positive ethos, behavioural policies and procedures and liaison with external agencies and expertise such as Social Services and the educational welfare and psychology services.

Policy Objectives

- To ensure The Real Apprenticeship Company Ltd practices safe recruitment in checking the suitability of staff (consultants and volunteers if appropriate) to work with learners aged 18 and under.
- To raise awareness of child protection issues and to equip young people and vulnerable adults with the skills needed to make them safe.
- To develop and implement procedures for identifying and appropriately reporting or referring cases, or suspected cases, of abuse.
- To support young people and vulnerable adults who have been abused in accordance with his/her agreed child protection plan.
- To establish a safe environment in which young people and vulnerable adults can learn and develop.
- To enable students to:
 - Be healthy
 - Stay safe
 - Enjoy and achieve
 - Make a positive contribution
 - Achieve economic well-being



Policy

We recognise that because of their day to day contact with the learners, delivery staff, enrolment officers and support staff are well placed to observe the outward signs of abuse. The Real Apprenticeship Company Ltd will therefore:

- Establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Ensure that young people and vulnerable adults know that there are designated staff at The Real Apprenticeship Company Ltd whom they can approach if they are concerned or upset.
- Include opportunities in the learner review for learners to develop the skills they need to recognise and stay safe from abuse.

In order to achieve the above The Real Apprenticeship Company Ltd will:

- Ensure we have a designated lead professional member of staff responsible for child protection issues who has received appropriate training and support for this role.
- Ensure every member of staff and relevant external parties knows the name of the designated lead professional, how to contact this person quickly and is fully aware of their role.
- Ensure that all staff and relevant external parties understand their responsibilities in being alert to the signs of abuse and their responsibility for referring their concerns to the designated lead professional.
- Ensure that parents/carers/employers and learners have an understanding of the responsibility placed on The Real Apprenticeship Company Ltd and staff for child protection by setting out its obligations in the learner handbook.
- Notify Social Services and/or other appropriate agencies if there is an unexplained absence of a learner who is on the child protection register.
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep confidential written records of concerns about learners, even where there is no need to refer the matter immediately.
- Ensure that all records are kept securely; separate from the main learner files and in a locked location.
- Ensure strict adherence to procedures when an allegation of any kind concerning learners is made against a member of staff.
- Ensure safe recruitment practices are followed.

Definitions

'Child' is anyone aged 18 and under. (Please note that although our students aged between 14 and 18 are defined as children by law they are likely to prefer to be called 'young people'.)

'Vulnerable adult' is a person aged 18 years or over, who is in receipt of or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him- or herself, or unable to protect him- or herself against significant harm or exploitation

Related Policies

- Anti-harassment policy
- Customer Complaints Procedure
- Disciplinary policy and procedures for students
- Disciplinary policy and procedures for staff
- Health and Safety policy



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Procedures

Procedures for the implementation of this policy and the following contacts

Contacts

- CEO
- Operations Manager
- Performance and Compliance Manager

Who should know about this policy?

All staff and learners, particularly those learners under the age of 18 (25 for vulnerable adults) and their parents/carers and employers

Responsibility

Chief Executive of The Real Apprenticeship Company Ltd



APPENDIX A

Child Protection Procedures/Safeguarding Children and Vulnerable Adults

Child and vulnerable adult abuse of all kinds - physical, sexual, emotional, neglect, financial and discriminatory - has been increasingly detected in recent years. Adults working in a private training provider are well placed to notice signs of abuse or may be approached by a learner who wishes to make a disclosure. It is vital that all members of staff are aware of the appropriate way to respond to situations which may indicate that a child is being abused.

The Real Apprenticeship Company Ltd in the development of its safeguarding policy has taken account of local authority good practice procedures which state:

‘An abused child is any boy or girl, under 18 years of age, who has suffered from, or is believed likely to be at risk of, significant risk or physical injury, neglect, emotional abuse or sexual abuse.’

The Children Act of 2004 gives every child the right to protection from abuse and exploitation and the right to have enquiries made to safeguard his or her welfare.

What to do

If any member of staff has any concerns about a learner they consider to be suffering or to be at risk of suffering significant harm, he/she must immediately contact either:

The below staff are the designated lead professionals in charge of child protection.

- CEO
- Operations Manager
- Performance and Compliance Manager

What concerns should be passed on

Members of staff are sometimes unsure if a concern comes under the safeguarding procedures and the following may help with this:

- Any suspicion, allegation or incident of abuse must be reported to the Operations Manager of The Real Apprenticeship Company Ltd or in his absence the Performance and Compliance Manager or the CEO immediately.
- Operations Manager will discuss the situation with Social Services through the integrated team if appropriate. This will include advice and discussion as to whether to make a formal referral for child protection.
- The discussions will include advice regarding Social Services' contact with the young person's parents/carers. In support of this process, any contact with parents/carers by other members of staff MUST be referred CEO of The Real Apprenticeship Company Ltd or in his absence the Operations Manager.
- The CEO of The Real Apprenticeship Company Ltd or in his absence the Guidance and Information Manager or the Learning and Development Director will make a full and careful written record of the alleged abuse and the report must include the name and position of the person to whom the matter is initially reported. This should be done immediately or as soon as possible thereafter. The record must be kept secure and confidential. The relevant information should include:

- The date and time the allegation was made.

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- Staff name and the names of others present.
 - The place where the alleged abuse took place, date and time. The name of the complainant and, where different, the name of the child who has allegedly been abused.
 - A description of any injuries observed.
 - An account of the allegation.
 - Any telephone report must be confirmed in writing to Social Services department as soon as possible. The confirmation may be hand written, posted or faxed, but a copy must be kept securely on file.
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- The CEO of The Real Apprenticeship Company Ltd or in her absence the Operations Manager shall retain a copy of the written records and any other relevant material. These will be kept securely at all times.
 - Allegations against staff will also follow agreed Personnel procedures and will be referred to CEO of The Real Apprenticeship Company Ltd or in his absence Operations Manager or the Learning and Development Director or in their absence either the Chief Executive or the remaining director partner of The Real Apprenticeship Company Ltd.

What not to do

Staff should not:

- Promise confidentiality.
- Ask leading questions.
- Criticise or give their views.

Who should staff discuss their concerns with?

Staff should ONLY discuss their concerns with the Managing Director of The Real Apprenticeship Company Ltd or in his absence the Guidance and Information Manager or the Learning and Development Director if:

- A learner discloses that he/she has been sexually abused in the past or is now being sexually abused.
- A learner discloses that he/she has been physically abused in the past or is now being physically abused.
- Staff are told by another learner or parent/carer that they know a learner is being abused.
- Staff see bruises or cuts that lead them to be suspicious of physical injury.

Neglect or Emotional Abuse

Members of staff often find it more difficult to know what to pass on in these circumstances. Any concerns or worries about a learner's welfare should be discussed with the Managing Director of The Real Apprenticeship Company Ltd or in his absence the Guidance and Information Manager or the Learning and Development Director regarding:

- Lack of adequate food, clothes or hygiene.
- Loss of weight.
- Increase in apathy.
- Excessive attention-seeking behaviour.
- Unduly aggressive behaviour.

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Suspected abuse by a member of staff

In the rare event that a member of staff suspects that a learner is being abused by a person on the staff of the learner's workplace or at The Real Apprenticeship Company Ltd a report should be made in strict confidence to Guidance and Information Manager or the Learning and Development Director.



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If the Managing Director of The Real Apprenticeship Company is suspected of improper conduct this should be reported immediately in strict confidence to the Chief Executive or remaining director of The Real Apprenticeship Company

Suspected abuse by another student

Any form of inappropriate behaviour (i.e. bullying and harassment) towards students will be dealt with under The Real Apprenticeship Company's Disciplinary Procedures.

Responding to an Allegation – Guidelines

The guidelines on child protection emphasise the need for a careful and measured approach to reported or suspected child abuse, and the danger of precipitate action. Whether or not to make a referral, which could activate a child protection investigation, is a serious decision and will require careful judgement.

All complaints, allegations or suspicions of abuse must be taken seriously. Staff are required to respond with sensitivity to a young person who confides in them, recognising that it requires courage (and/or desperation) to share such painful and personal concerns.

The Guidance and Information Manager is also available to offer that young person support and advice and would also immediately refer any suspected cases of child abuse to the Managing Director of The Real Apprenticeship Company.

The procedures must be followed whenever an allegation is made that a young person/vulnerable adult has been abused or when there is suspicion that a young person has been abused.

Promises of total confidentiality cannot, and must not, be given. However, young people can be assured that as few people as possible will be involved. No one will be told more than they need to know. Information is shared only on a need to know basis.

The young person/vulnerable adult will be informed of all actions taken.

Young people with learning difficulties and/or disabilities may need a different approach than other young people. Staff must be aware of any special considerations with regard to communication difficulties and equal opportunities. This issue will be dealt with through staff training and development.

Abuse of a Position of Trust

The Sexual Offences Act sets out a series of occupations to which the abuse of position of trust laws apply, these include Educational Institutions.

The offences for those working in positions of trust cover the same kinds of behaviour as offences which apply to the general public – except that, where positions of trust are concerned, the offences apply where the young person is under 18, instead of under 16, even though they are over the age of consent, they are potentially vulnerable to sexual abuse from people in positions of trust or authority.

The Act sets down specific positions of trust to which offences relate. People who are in these positions of trust will normally have power and authority in a child's life, and may have a key influence on their future. This applies to all roles and responsibilities within The Real Apprenticeship Company

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Good Practice

The Real Apprenticeship Company must be aware of the need to adhere to recognised good practice in the protection of children. In accordance with such practice The Real Apprenticeship Company will take steps to ensure that:

- Promises of confidentiality are not given, as the matter may need to be taken further.
- Individuals feel secure that any information they give will only be used to improve their circumstances.
- As few people as possible are involved in the procedure.
- Staff act on the basis that the overriding concern is the safety of the young person/vulnerable adult.
- Where the complainant is a young person, questions are kept to a minimum necessary to understand what is being alleged and leading questions are avoided.
- The young person/vulnerable adult understand that external agencies may become involved.
- Particular attention is given to a young person/vulnerable adults with learning difficulties and/or disabilities.
- If a learner declares to staff that they were abused as a child and that learner does not wish further action to be taken, his/her wishes are respected.
- Conversations between staff and the discloser of abuse and (if different) the young person are recorded immediately and held in a confidential and secure place.

Physical contact with learners

As a general principal, staff should avoid all forms of physical contact with learners. Many learners dislike any form of physical contact and see it as intrusive, which can lead to aggressive or challenging responses. Physical contact which may be misconstrued by the learner, parent/carer or other observer should be avoided. This could include well intentioned informal gestures such as a hand on the shoulder or arm which some learners can misinterpret.

A distressed learner may need comfort or reassurance. The learner's agreement should be sought before any physical comforting is given.

Some staff are more likely to come into physical contact with learners on occasions e. g. demonstrating equipment or a piece of apparatus. On such occasions staff should be aware of the limits within which this contact should take place.

Staff administering first aid should also be aware of the appropriate limits to physical contact and it is advisable that another learner or adult is present if the first-aider is concerned as to the nature of the contact.

Staff who see learners individually should be aware of the potential issues which may arise from private interviews. Where possible, such interviews should be held in a room with visual access or with the door open, or in a room or area likely to be frequented by other people. It is always advisable to ensure another adult knows the interview is taking place.