

6. SAFEGUARDING POLICY FOR APPRENTICESHIP TRAINING

1 Policy Statement

Park Education and Training Centre Limited (PETC) has a statutory and moral duty to safeguarding and promoting the welfare of employees and apprentices receiving training from us. Park Education Training Centre Limited is strongly committed to providing a safe and supportive learning environment that promotes wellbeing and security for all apprentices and employees.

It recognises its role, along with local services, in facilitating the well-being of apprentices and employees. Our staff recognise and accept their responsibility to develop awareness of the risks and issues involved in safeguarding and will champion practices to protect apprentices and employees at risk from abuse, neglect or significant harm.

As part of assessment activities employees may come into contact with those who are vulnerable, perhaps because of their age, physical or mental ability or ill health. We are all (staff and learners) responsible for ensuring that children and other vulnerable adults are not harmed in any way through that contact. We must, at all times never tolerate abuse, bullying, neglect and violence.

Park Education recognises the current threat from extremism and terrorism in the UK is real and severe and can involve the exploitation of vulnerable people. As part of our safeguarding duty, we will provide a clear framework through our prevent policy and strategy to inform and structure our response to safeguarding concerns for those who may be vulnerable to the messages of extremism.

Park Education embraces and will promote the British Values of:

- Individual Liberty
- Democracy
- The rule of Law
- Mutual Respect
- Tolerance of those with different faith and different beliefs

We will also promote the five expected outcomes for apprentices and employees as set out in the Ofsted Common Inspection Framework.

- Enjoying a healthy lifestyle
- Staying safe
- Enjoying and achieving
- Making a positive contribution
- Achieving economic well being

Park Education is committed to ensuring that it:

- Provides a safe learning environment
- Identifies apprentices, staff and other employees they come into contact with through their activities who are suffering, or likely to suffer, significant harm
- Takes appropriate action to help ensure that such individuals are kept safe, both at work and at the centre

- Raises awareness of issues relating to the welfare of, apprentices and employees
- Establishes procedures for reporting and dealing with allegations of abuse against members of staff
- Aids the identification of apprentices and employees at risk of significant harm and provides procedures for reporting concerns

Park Education has a duty to promote safeguarding issues and measures to staff in order to ensure that they:

- Recognise concerns as they are identified
- Report concerns to safeguarding lead or officer on the same day.
- Refer to appropriate authorities on the same day.
- Record incidents to facilitate investigations.
- Respond to requests for information and involvement in case reviews.

Staff Recruiting and Vetting

All office and delivery staff must go through the DBS and Barring Service Checks in accordance with the HMG Baseline Personnel Security Standard.

2. Purpose

Learners have the right to access the Centre free from fear of harm and to be protected from mistreatment and abuse. In addition, adults at risk should be able to access learning with as much independence as is appropriate

and within their capabilities to make choices, even if those choices involve a degree of risk. Where a risk is identified, a risk assessment will be completed.

3. Scope

This policy is about safeguarding apprentices and employees with whom employees of Park Education and Training Centre or those acting on our behalf, come into contact.

Definitions:

For the purposes of this policy and procedure,

Children are defined in the Children Act of 1989 as a person under the age of 18 years.

An 'adult at risk' previously known as a 'vulnerable adult' is defined as an any person 18 years or over who is or appears to be eligible for assistance by reason of mental ill health, physical or learning disability, illness or age related frailty and/or; may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation

The Care Act 2014 defines adult safeguarding as protecting an adult's right to live in safety, free from abuse and neglect.

It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, Safeguarding balances the right to be safe with the right to make informed choices, while at the same time making sure that the adult's wellbeing is promoted

including, taking into consideration their views, wishes, feelings and beliefs in deciding on any action
In the Care Act 2014 'wellbeing' is described as relating to: a person's physical and mental health as well as emotional wellbeing.

Our Responsibility

As a staff of Park Education, it may be thought of as abuse or neglect if you cause harm to someone or do not do the things you should to prevent harm. It is important that we know the ways of working to safeguard apprentices and employees

We will always make sure that your actions or omissions do not harm an individual's health or wellbeing. We never abuse, neglect, harm or exploit those who use Park Education and Training Centre services or your colleagues'.

Harm

An adult at risk of harm is defined as someone who has needs for care and support, and is experiencing, or at risk of, abuse or neglect and is unable to protect themselves.

Types of Abuse:

The ten types of abuse and neglect that cause harm identified in the Care Act 2014 are: physical, sexual, psychological, discriminatory, organisational, domestic violence, modern slavery, financial and material, neglect and acts of omission and self-neglect.

Signs and indicators:

We will be able to identify the different types of abuse and neglect and the signs or 'indicators' that they are happening. The more we are able to get to know someone the more we are likely to notice any changes. We will look out for any signs or indicators of the ten main types of abuse or neglect. Incidents may be one-off or multiple, and affect one person or more.

Type of Abuse	Signs/Indicators
Physical abuse is an individual's body being injured or hurt due, for example, to assault, hitting, slapping or pushing. It can also be the wrong use of restrictive practices. Examples could be the misuse of medication or using inappropriate restraint such as locking someone in a room, tying them to a chair or using inappropriate physical sanctions.	Injuries that are unexplained or haven't been treated. There could be a number of injuries of different ages and in different places. Examples include: Broken bones Bruises Unexplained loss of clumps of hair Bite, burn or scald marks.
Domestic violence is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality. It includes psychological, physical, sexual, financial	Signs of domestic violence can be any of those relating to the different types of abuse or neglect that can occur in any incident.

and emotional abuse, and so-called 'honour-based' violence.	
Modern slavery – this encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.	Signs of physical or psychological abuse, malnourished or unkempt, appearing withdrawn Rarely allowed to travel on their own, seem under the control and influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work Few or no personal belongings or documents They avoid eye contact, appear frightened or hesitant to talk to strangers and law enforcers
Financial or material abuse is the use of a person's funds and belongings without their permission. This could be theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.	Bills not being paid Loss of assets such as a house being sold and the money from the sale disappearing Expenditure higher than the living conditions suggest Not having enough food or clothing
Sexual abuse is when a person becomes involved in sexual relationships or activities that they do not want to be involved in. They may have said that they do not want to be involved or they may be unable to give consent. Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting to.	Pain, sores and bruising around the inner thighs and genital, anal or breast areas Bloodstained underwear Pain and discomfort when walking or sitting Sexually transmitted infections and pregnancy are indicators for sexual activity and can indicate abuse if the person does not have the capacity to provide consent
Neglect is also known as the 'omission to act' or 'failure to act'. It is a failure to meet the basic needs of the individual. It includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services and the withholding of the necessities of life, such as medication, adequate nutrition and heating.	Indicators of neglect by others and self-neglect are similar. They include: Malnutrition Dehydration Bedsores Dirty clothing and bedding Taking the wrong dosage of medication.
Self-neglect is the term used to refer to those who fail or refuse to take care of their own basic needs. Neglecting to care for	Indicators of neglect by others and self-neglect are similar. They include: Malnutrition Dehydration Bedsores Dirty

one's personal hygiene, health or surroundings can include a wide range of behaviours such as hoarding	clothing and bedding Taking the wrong dosage of medication
Psychological abuse results in a person feeling worthless, unloved or uncared for. It includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	Anxiety Lack of confidence Low self-esteem Disturbed sleep
Organisational abuse happens where services provided are focused on the needs of the organisation. For example, not providing choice over meal times or when someone can go to bed because this is easier for the organisation. It includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, processes, policies and practices of the organisation.	Poor care standards Rigid routines Lack of staff learning, development and support

4 Accountability and Responsibility

The Centre Managers have responsibility to:

- Embrace a whole Company approach to promoting and safeguarding the welfare of adults at risk.
- Ensure staff are aware of the policy and procedures and that they receive appropriate training and support to undertake their roles effectively.

The designated employees responsible for safeguarding issues are the Safeguarding Lead and Safeguarding Officer

The Safeguarding Lead and Safeguarding Officer coordinate the day to day safeguarding activity:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies

- Providing advice and support to other staff on issues relating to children and young people, apprentices and/or vulnerable people's protection
- Maintaining a record of any referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with employers and training organisations that receive apprentices and/or learners on placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive training in protection issues and are aware of the centre protection procedure

The Internal Quality Adviser is the Designated Safeguarding Lead: Julie Okpala

The Designated Safeguarding Officer is Winnie Emelugo

5. Safeguarding Code of Behaviour

We will not :

- Spend excessive amounts of time alone with children or adults at risk away from others.
- Make unnecessary physical contact with children and adults at risk.
- Take apprentices and employees at risk alone in a car, however short the journey, unless absolutely unavoidable.
- Meet children and adults at risk outside the work or learning environment
- Start an investigation or question anyone after a concern, allegation or disclosure has been raised. This is the job of the authorities.
- Show favouritism to any apprentice or employee, nor should they issue or threaten any form of physical punishment.
- Staff should never (even in fun) –
- Initiate or engage in sexually provocative conversation or activity.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for apprentices and employees at risk that they can do themselves.
- Allow any allegations made by a apprentices and employees at risk go without being reported and addressed.
- Trivialise or exaggerate apprentice or employee at risk abuse issues.
- Make promises to keep any disclosure confidential from relevant authorities.

We will :

- Respect apprentice's and employee's at risk's right to privacy, and encourage children and adults at risk to feel comfortable enough to report attitudes or behaviour that they do not like.
- Act with discretion with regards to their personal relationships.
- Be aware of the procedures for reporting concerns, allegations or disclosures, and should familiarise themselves with the contact details of the Safeguarding Lead /Officer.
- If a member of staff finds himself or herself the subject of inappropriate affection or attention from an apprentice or employee at risk, they should make other members of their delivery team aware of this.
- If a member of staff has any concerns relating to the welfare of a apprentice or employee at risk in their care, be it concerns about actions/behaviours of another staff member or concerns based on any conversation with the apprentice or employee at risk (particularly where the apprentice or employee at risk makes an allegation), they should report this to the Safeguarding Lead/Officer.

Procedure for Responding to a Concern, Allegation or Disclosure

- Do not make promises about confidentiality.



- Explain to the person at the outset that you will need to report concern, allegation or disclosure and share the information with the Safeguarding Lead/Officer
- The member of staff who has concerns about possible abuse or neglect must contact their Safeguarding Lead/Officer or, if not available, their Team Manager as soon as possible for advice and support.
- If the complainant is the apprentice or employee at risk concerned, questions should be kept to a minimum and leading questions should be avoided.

How we will promote this policy

This policy will be reviewed and updated regularly to ensure it reflects changes in legislation, regulations, national and local policies or changes within Park Education Centre,

We will involve the apprentices and employers in this process

During induction of new staff we will explain the policy and make sure new staff are aware and familiar with this policy and procedures. We will provide all staff a copy of the policy and make sure they sign for it, read and truly understand the safeguarding policy and procedures. Updated and amended procedures are disseminated and reinforced in training sessions, staff meetings and via email communications. Employees and apprentices have access to this policy on the Centre's intranet

This will help ensure the centre safeguarding policy and procedures are being adhered to – after all, a safeguarding policy is useless if there is no commitment to it and it isn't being put into practice!

It is mandatory for new members of staff to undertake a safeguarding **training** and hold a safeguarding training certificate. A refresher training must be undertaken within one year and every yearly thereafter to keep the policies and procedures fresh in everyone's minds.

This will also give an opportunity to update staff on any changes to the policy or legislative developments.

All volunteers receive the same safeguarding training as employees

Similarly, during induction of apprentices, the safeguarding policy and procedures are explained and a copy is given to them to put in the first section of their portfolio. At every review meeting, the apprentices are asked areas of the policy to ensure they read and understand the policy. If the vulnerable people we work with know what we expect from our staff, it will be easier for them to identify any concerns or issues.

All staff and volunteers should be aware of what they need to do if they have a safeguarding concern as stated in the policy but will be taught during the safeguarding training to ensure they are not in doubt

The Centre carries out full DBS checks on all employees and agency staff. It ensures contractors working with the Centre are DBS checked and also, ensures apprentices working within healthcare, social care, childcare, education professions are DBS checked

The above measures will ensure commitments and implementation of the policy

How we will ensure protection of apprentices and prevention of abuse

Park Education Centre aims to ensure all apprentices are safeguarded by:

Prevention and Promotion

- Robust staff recruitment
- Policies and procedures that support safeguarding and the promotion of Fundamental British Values: the values of democracy, rule of law, individual liberty, mutual respect and tolerance
- Close working relationships with partners who share a common purpose regarding safeguarding; Social Care; Police; Local Authority Safeguarding team; colleges and schools; health services
- Staff awareness – how to promote the welfare and safety of young people and vulnerable adults, inclusive of the Centre being free from bullying and discrimination
- Implementation of the Centre's Prevent Strategy, including ensuring staff are aware of their roles and responsibilities in preventing violent extremism, supporting those who may be at risk of radicalisation
- Implementation of the Online Safety Policy
- Actively promoting equality, inclusiveness and diversity

Protection and Support

- The Centre will identify young people and adults who are suffering or likely to suffer significant harm, including those at risk of radicalisation. The Centre will ensure all staff understand their role in identifying those at risk. Definition of abuse and signs of abuse be part of the safeguarding training staff undertake at the start of employment
- The Centre carries out risk assessments of apprentices who declare a prior criminal conviction as outlined in the Criminal Conviction Policy
- Where a young person or vulnerable adult is suffering significant harm, immediate action will be taken in accordance with the Children Act 1989 The Children Act 1989; and the statutory guidance within the DfE Working Together to Safeguard Children DfE Working Together to Safeguard Children

- Action will also be taken to promote the welfare of apprentices where it is recognised that additional support is needed, even if the student is not at immediate risk of harm.
- The Centre carries out full DBS checks on all employees and agency staff. It ensures contractors working with the Centre are DBS checked and also, ensures apprentices working within healthcare, social care, childcare, education professions are DBS checked

Processes for raising, recording and investigating Concerns

Recording and Investigating Concerns

Information regarding a concern, allegation or disclosure is to be recorded on the Safeguarding Adults at risk and Children Reporting Form (Appendix A). Completion of this form should be initiated as soon as possible by the person who has first-hand information. Information can be progressively added as more information is gained. The report should be brought to the attention of the Safeguarding Lead/Officer as soon as possible. The Lead/Officer is responsible for advising the Managing Director and also passing information regarding the report to local or appropriate safeguarding agencies or the Police.

Immediately afterwards, if the reporter is a Delivery Team member, the reporter must inform their Team Manager that a "Safeguarding Report" has been made to the Safeguarding Lead/Officer and, without giving any detail of the concern or allegation, indicate whether the delivery team needs additional support or not. The words "Safeguarding Report" are all that is required by the Team Manager; confidentiality must be preserved wherever possible.

Learners working with PETC's sub-contract delivery partners are entitled to safeguarding and protection of the same standard as PETC's direct learners. The Safeguarding Lead has responsibility for ensuring that the standards embodied within this document are applied by sub-contract delivery partners

Park Education will keep accurate records of any allegations. Records of any investigations will be retained in a secure place together with a written outcome and details of any action taken. Support and counselling will be offered where appropriate. Staff, the alleged victim and or family members will be informed of the progress throughout any investigation.

These procedures apply to all staff whether teaching, administrative, management or support as well as to volunteers.

Park Education and Training Centre, wants you to be safe and takes seriously its responsibility to provide a safe environment where all can study and work together. Through our Safeguarding policy Park Education supports the Government's 'Prevent' strategy which aims to stop people being radicalised and covers a broad range of activities and initiatives. All staff is required to complete Channel General Awareness course. At the beginning of every course, learners are informed of the 3 steps to keeping safe – Prevent, Be SMART and E-Safety- and are given handouts.



How to report a safeguarding concern

During Centre opening hours (9am- 5pm Mon-Fri)

If you study with us, or if you are the employer/ parent/carer of an apprentice at Park Education Centre you can contact a member of the Safeguarding Team on:

Tel: 020 8200 2328

Email: info@parkeducation.co.uk

Outside of Centre opening hours

If you have any concerns when the Centre is closed you should



Contact the **Brent Family Front** door on **020 8937 4300** to discuss your concerns.

If you wish to raise a safeguarding concern [complete this safeguarding form](#) (.docx, 111.3kB) and email it to safeguardingadults@brent.gov.uk. If you have any trouble completing the form, please contact the Duty Team at safeguardingadults@brent.gov.uk and they will help you

Alternatively, if you feel that a child or young person or any other apprentice is at immediate risk and in need of protection you should contact the police (999 for emergencies and 101 for non-emergencies).

Further support and advice

The Brent Safeguarding Adults Board (BSAB) is a partnership board responsible for the adult safeguarding processes in Brent. BSAB website provides important safeguarding information for the public, children/young people, parents/carers, school staff and other professionals.

In addition, you can also anonymously contact the [NSPCC](#) via text on 88858 and they will send an automated confirmation response, followed by a specific response from a Helpline practitioner within three hours.

If you are experiencing online bullying, or if something else is worrying you, please speak to an adult you trust. You can also speak to [Childline](#) at any time by calling 0800 1111.

Appendix A

Safeguarding Concern Form

Please use this form to record disclosures, incidents or concerns of abuse or neglect of children and adults at risk including any concerns relating to the Prevent Agenda. It is important that we at Park Education Centre maintain local and national records to pass to local Safeguarding agencies, such as the Multi Agency Safeguarding Hubs.

This report form must be passed directly to the Parke Education Centre Safeguarding officer (who is Winnie Emelugo and whose contact details are winnie@parkeducation.co.uk

Name of Child or Adult (full contact details if possible):
Concern or Incident
Date, Time and Location
Action Taken
Follow Up from Safeguarding Officer

Concern/Incident Reporter Name:Signature: Date:

Safeguarding Officer Name:Signature:Date;



COMPLAINTS FORM

Please use this form to record any complaint you have against the action or attitude of any person(s) employed by Park Education.

Date:
Name of complainant:
Details of complaint: (copies of letters or emails can be attached)
Signature :