

# **SAFEGUARDING POLICY**



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# Introduction

The partnership between the Institute of School Business Leadership (ISBL) and Serco Education has a primary responsibility for the care, welfare and safety of everyone connected with the Partnership's End Point Assessment Service.

It is always unacceptable for anyone to experience abuse of any kind, and we recognise our responsibility to safeguard the welfare of all Apprentices undertaking EPA, by commitment to practice that protects them and looks to minimise potential harm. We are committed to safeguarding and promoting the welfare of Apprentices undertaking EPA and expect all Apprentices and all staff involved in EPA to share this commitment.

This policy provides core information to support our EPA team in providing the End Point Assessment Service, to navigate their way through what can feel like a daunting and difficult process.

We will have a named safeguarding officer who will be available to provide one-to-one support as needed.

## Safeguarding principles

- The best interest of the Apprentice undertaking the EPA are paramount and shall be primary consideration in our approach.
- Equality of protection to ensure that all Apprentices undertaking EPA have the same positive opportunity and engage in our EPA activities regardless of their gender, ability, race, sexuality, ethnicity, circumstances or age.
- Children and vulnerable adults require particular attention in order to optimise their safety needs whilst undertaking EPA activities.
- We take responsibility to meet our obligations regarding our duty of care to all Apprentices undertaking EPA activities.
- We reject the use of child or forced labour in our business activities and in our business relationships.
- We make clear our standards to all Independent Apprentice Assessors and will provide initial Safeguarding training, in particular to concerns in relation to children and vulnerable adult protection risks and incidences. We will provide annual refresher training.
- All Independent Apprentice Assessors and Invigilators engaged by ISBL will be DBS-checked prior to commencing EPA services on our behalf.
- We will take prompt action where we believe that a child or vulnerable adult is at risk or abuse or harm or has been harmed.
- We recognise and acknowledge an element of risk can exist in many learning situations, and while we may never be able to eliminate this completely, we will do all we can to reduce or limit its impact.
- We are honest and transparent in our approach and publicly disclose both this Policy and the way we work to try and protect all of our apprentices and in particular young people and vulnerable adults.

- We will work with others to protect children and vulnerable adult. This could include law enforcement or child welfare agencies where necessary.
- We require incidents relevant to this policy in respect of all Apprentices undertaking EPA to be reported in a timely way both internally and to the appropriate authorities, linked to proper recording of the relevant details.
- All apprentices undertaking EPA have the right to be assessed in a safe and caring environment and where their welfare is paramount
- Bullying in any form is strictly unacceptable.
- Racist, homophobic and sexist language or behaviour is strictly unacceptable.
- Any form of discrimination is strictly unacceptable.
- Adopting robust safeguarding guidelines through procedures and a code of conduct for Apprentices staff and volunteers.
- Sharing information about concerns with agencies that need it and involving Apprentices appropriately.
- Ensuring all Apprentices have a ready point of contact, referral or support, such as the designated lead and their main advisor / colleague.

## Purpose

The purpose of this policy is:

- to provide a framework for protecting apprentices undertaking EPA (particularly children and vulnerable adults) from abuse of any kind;
- to provide a safe environment for apprentices using our End Point Assessment Service;
- to ensure our EPA team recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations where abuse or neglect might be alleged;
- to ensure our EPA team are clear that they are responsible for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- to provide our EPA team with guidance on procedures to adopt in the event that they suspect an apprentice may be experiencing, or be at risk of, harm;
- to provide staff with training, guidelines and a code of conduct.

# Aims

We will endeavour to safeguard apprentices undertaking EPA by:

- valuing them, listening to and respecting them;
- adopting safeguarding guidelines through procedures and a code of conduct for our EPA team including assessors;
- recruiting staff and contractors safely ensuring all necessary checks are made;
- sharing information about safeguarding and child protection and good practice with apprentices, staff and contractors involved in the End Point Assessment Service;
- sharing information about concerns with agencies who need to know and involving parents and apprentices appropriately;
- providing effective management for our EPA team and contractors through supervision, support and training;
- committing to reviewing our policy and good practice annually.

# Scope

This procedure and associated guidelines apply to all of our End Point Assessment staff, contractors or anyone working on behalf of our EPA Partnership.

# Responsibilities

The EPA Programme Manager is responsible for ensuring the requirements of the safeguarding policy and procedures are communicated to all staff through induction and ongoing training as necessary. They are also responsible for appointing a Lead Safeguarding Officer.

The Lead Safeguarding Officer will ensure the requirements of the Safeguarding Policy and procedures are met.

All staff involved with our EPA are responsible for complying with the Safeguarding Policy and procedures.

# Definition

*To ensure a common understanding, our EPA Team proposes the following definitions:*

Child Protection looks at recognising abuse or neglect and acting on it, so is a reactive approach. Safeguarding is everything that our partnership EPA does to keep all children, apprentice and vulnerable adults safe. (N.B. throughout this document, this group of people will be referred to collectively as 'Apprentices') It looks at preventative action and covers the full range of measures in place to protect apprentices from potential dangers, including the safer recruitment of staff, and is therefore a proactive approach.

*Safeguarding is intended to keep children safe from a range of potential harm and looks at preventative action, not just reaction. It is protecting children from maltreatment; preventing impairment of children's health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (Keeping Children Safe in Education 2015).*

The ISBL End-Point Assessment Service extends its responsibilities to vulnerable adults.

A **child** is legally defined as "a person who has not attained the age of 18 years" (Education Act 2002).

The broad definition of a **vulnerable adult** is "a person who is 18 years of age or over, and who is 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/herself, or unable to protect him/herself against significant harm or serious exploitation" (Safeguarding Vulnerable Groups Act, 2006).

The main categories of people covered by this definition of vulnerable adult include people:

- who have a learning disability
- who have a physical or sensory impairment
- who have a mental illness including dementia
- who are old and frail
- detained in custody or under a probation order
- who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or are vulnerable due to other circumstances such as being an asylum seeker)

Safeguarding defines how we will respond to:

- Child and vulnerable adult protection
- Protection from maltreatment (abuse, neglect, exploitation or victimisation) or risk of harm where the perpetrator is a member of the Apprentice's family, the wider community, another Apprentice or a member of ISBL staff
- Welfare support needs

- Responding to an Apprentice via either direct intervention, advice and guidance or signposting where an issue exists within their day to day lives (including the workplace) which could impact upon their ability to complete the EPA.

## What are we safeguarding against?

In line with [Working Together to Safeguard Children 2015](#), safeguarding is defined as:

- Protecting children from maltreatment
- Preventing impairment of a child's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care

The following should therefore be considered when delivering EPA to Apprentices:

- Sexual abuse or inappropriate relationships
- Physical and emotional abuse or neglect
- Exploitation, e.g. financial, sexual, forced marriage
- Neglect
- Grooming behaviour
- Domestic violence
- Bullying including cyber bullying, bullying in the workplace
- Victimisation (race, sexuality, gender, disability, etc.)
- Accidents (road, home, in the workplace)
- Self-harm
- Unsafe activities and environments
- Crime
- Unsuitable housing/homelessness
- Extremism/Radicalisation – please refer to our Prevent Agenda Policy

## Confidentiality

Members of staff may have access to confidential information about apprentices in order to undertake the EPA. In some circumstances, staff may be given highly sensitive or private information. They should never use confidential or personal information about an apprentice for their own or others' advantage (including that of partners, friends, relatives or other services). Information should never be used to intimidate, humiliate, or embarrass the apprentice. Confidential information about an apprentice should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the apprentice's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which members of staff may be expected to share information about an apprentice, for example when abuse is alleged or suspected. In such cases, individuals have a duty, following outlined guidance and procedure, to pass information on without delay, but only to those with designated child protection responsibilities. Staff are expected to treat any information they receive about apprentices in a discreet and sensitive manner. If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from the EPA Programme Manager. The storing and processing of personal information about apprentices is governed by the Data Protection Act 1998 and General Data Protection Regulation 2018.

## Staff recruitment

The appointment of assessors will be made following a face-to-face interview that explores attitudes, motivation, temperament and personal qualities as well as experience relevant to the role. Also:

- All offers of employment/work are made conditional to satisfactory references and a DBS check, dependent on the nature and responsibilities of the post.
- All appointments are subject to the partnership's recruitment policy and process.
- All staff/workers are subject to a DBS check at the relevant level. For all staff working directly with apprentices, this will be at basic level.
- If it is necessary for someone to start work at short notice, before checks are completed, a risk assessment is carried out, documented and kept confidentially. Until their DBS disclosure is received by the partnership, the individual is supervised by a DBS-checked member of staff.
- All staff/workers are made aware of the Safeguarding Policy and procedures and their obligation regarding child protection, as part of their induction. Staff/workers with face-to-face access to learners will receive additional and ongoing training as appropriate.

## Key safeguarding incident procedures

Safeguarding is the informed responsibility of all staff, directors, volunteers and partners. They have the responsibility actively to make the EPA process safe and secure for all. To do so, we will follow 6 key principles of safeguarding:

- Resilience
- Recognition
- Response
- Reporting
- Recording

- Referral

## Resilience

The self-generated, learned, flexible capacity to respond to unpredictable events and situations in ways to maximise personal, organisational and societal safety and integrity.

## Recognition

The ability to recognise possible indicators of abuse is of fundamental importance. All those playing a role in meeting the apprentice's needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively.

## Response

Appropriate response is vital. No report of or concern about possible abuse should be ignored. To determine the most appropriate response, find out where you are dealing with an allegation from an apprentice against a member of staff or a fellow apprentice or another: Is this a disclosure from an individual alleging abuse to themselves or to another? Is the reporting of concern or suspicion? What precisely is alleged to have happened? Detailed clarity is vital. Do not lead or probe with questions; remain calm and demonstrate interest and concern while investigating.

Listen well; inform the person sharing a concern with you that what they have raised must be recorded and passed on so that possible abuse can be dealt with, and this will be done on a limited, "need-to-know" basis with as few others as possible knowing the identity of the complainant and all in the chain of reporting will respect confidentiality.

Reassure them that they have done the right thing in reporting their concerns and that you will do everything you can to help. Do not make unrealistic promises. Ensure that testimony is recorded and reported and that the complaint and the subject of the complaint are treated in line with ISBL's safeguarding policy and procedures.

## Reporting

Report your concerns to the EPA Programme Manager, who will carefully record your testimony and will deal with the report themselves. Once you have reported the cause for concern, the responsibility resides with the EPA Programme Manager.

## Recording

You should record precisely what has been alleged, using the words of the complainant. Your record should use accurate quotation. It should also, if felt appropriate, include factual observations about the physical and emotional state of the individual sharing their concerns with you. This information should be recorded and stored securely in line with confidentiality policy and should be accessible only to those who need to access it as part of the action taken.

## Referral

It is the EPA Programme Manager who can make decisions to refer a complaint or allegation, having gathered and examined all relevant testimony and information.

*However, in the case of exceptional circumstances where people are at immediate risk of harm*

*OR a team member is acting inappropriately, anyone can make this referral. If a member of staff does make the referral, then they need to ensure they still report this to the EPA Programme Manager.*

Only the safeguarding officer or deputy should mount an enquiry into complaints, allegations or suspicion of abuse. An enquiry may include questioning colleagues, learners, carers, parents assessors or partners. Actions of these sorts carried out by someone other than the designated safeguarding officer or deputy could be construed as unjustified interference, which could jeopardise an enquiry and any possible subsequent actions.

### Further action:

If an apprentice undertaking EPA, discloses abuse, or risk of abuse, to a member of staff, he or she must take the following action. First of all, it should be established whether the apprentice is legally a child (someone under 18 years old) or a young adult.

### If the person is legally a child, the staff member should:

Listen carefully to what the apprentice is saying.

Explain that because this is a serious matter, it cannot remain confidential between the staff member and the apprentice. The staff member should inform the young person that she/he will need to inform their line manager and to talk to a Designated Safeguarding Officer. They must do this before they can decide on what action may be necessary to ensure that the apprentice is safe in the future and ensure the safety of any other apprentice who may be in contact with the alleged abuser.

Undertake to keep the apprentice informed as to any action that is proposed and to support the apprentice through this.

The staff member must inform the EPA Programme Manager as soon as possible. If the programme manager is unavailable, then the Lead Safeguarding Officer (LSO) should be contacted as soon as possible.

The LSO will decide whether or not to make a referral to local Children's Services and/or the police. All serious allegations of abuse should be referred to Children's Services; however, if in any doubt, a consultation should take place with the relevant Children's Services duty team. This is not only to protect the young person themselves but also any other child or apprentice that the alleged abuser may be in contact with. If the situation arises out of office hours, the EPA staff member should contact the LSO via the safeguarding emergency telephone number, and appropriate steps to escalate will be taken.

If the concern arises out of office hours and it is not possible to contact the LSO or safeguarding support, and where an apprentice has disclosed serious abuse, then a referral should be made directly to local Children's Services or police. In the event that it proves difficult to make contact with the relevant Children's Services, to avoid delay and the risk of placing an apprentice at risk, contact with the police locally (ideally via a non-emergency number) should be made. Contact

with the duty officer of the Child Protection Team should be requested.

When making the referral, the EPA Programme Manager or safeguarding support staff should note the name of the person in Children's Services who they have contacted and the time and date when the referral was made. They will also need to clarify what action Children's Services are proposing to take and the timescale for this. They should also establish how the child/young person's immediate safety is to be ensured. Telephone referrals should be followed up in writing within 2 working days. All incidents, concerns and referrals in relation to children and apprentices and the action that results from these should be recorded'.

### If the Person is a vulnerable adult, the staff member should:

Listen carefully to what the apprentice is saying.

Explain that because this is a serious matter, it cannot remain confidential between the staff member and the apprentice. The staff member should inform the apprentice that she/he will need to inform their line manager and to talk to a Designated Safeguarding Officer. They must do this before they can decide on what action may be necessary to ensure that the learner is safe in the future and ensure the safety of any other apprentice who may be in contact with the alleged abuser.

Undertake to keep the apprentice informed as to any action that is proposed and to support the apprentice through this.

The staff member must inform the EPA Programme Manager as soon as possible. If the programme manager is unavailable, then the LSO should be contacted as soon as possible.

At this stage, any disclosure that may constitute a criminal offence should be referred by the EPA Programme Manager/LSO to the police. If necessary, the EPA Programme Manager/LSO should inform and liaise with relevant local authority designated officer. If the apprentice is at immediate risk then the staff member, Programme Manager or LSO should contact the police immediately.

## Safeguarding responsibilities

The EPA Programme Manager is responsible for:

- ensuring effective policies, procedures and systems are in place in accordance with legislation, government and other agency guidance
- sufficient resources, time and training are allocated to ensure safeguarding responsibilities are effectively carried out.

Lead Safeguarding Officer responsible for:

- developing and updating policies, procedures and systems in accordance with legislation, government and other agency guidance

- ensuring safeguarding resources are up to date
- the reporting of suspected abuse in an employer, training or other setting to the appropriate authorities
- ensuring that all EPA team members who get involved in reporting and escalating safeguarding incidents feel suitably equipped and able to support our apprentices and act in their best interest
- ensuring all EPA staff adhere to responsibilities and commitments contained in this and other policies
- developing up-to-date Policies and procedures to implement the Prevent Duty
- responsible for managing the safeguarding hotline 24hrs
- ensuring that training is completed and logged for assessors.

### Designated Safeguarding Officers responsible for:

- ensuring that procedures are followed, and in particular informing the LSO about the concerns raised or disclosed by any apprentice or member of staff
- ensuring arrangements are in place for inducting and training all EPA staff in safeguarding practices, policies and procedures, ensuring a formal external safeguarding programme is undertaken.

### All Staff responsible for:

- ensuring they have undertaken training in the Prevent Duty
- ensuring they are aware of when it is appropriate to refer concerns about apprentices or colleagues to the EPA Programme Manager or safeguarding officer
- ensuring they report concerns where these arise
- ensuring they exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice as part of their professional behaviour in order to comply with professional standards
- ensuring they complete the requirements during their induction to acquire the necessary foundation to develop a working knowledge of their contractual, legal, administrative and pastoral responsibilities
- ensuring they (all EPA staff and sub-contractors) complete a formal Safeguarding Programme and other mandatory safeguarding training
- ensuring they familiarise themselves with and become aware of the importance of Safeguarding and associated policies
- ensuring they adhere to the Safeguarding policies, procedures and systems and know what to do in dealing with concerns and disclosures.

## Contacts

### EPA Programme Manager

Paul Robertson  
T: 024 76 231221

E: [epa@isbl.org.uk](mailto:epa@isbl.org.uk)

### Designated Safeguarding Officer

Shona Kelly  
T: 01452 930300  
E: [epa@serco.com](mailto:epa@serco.com)

### Leading Safeguarding Officer

Tara Marciniak  
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E: [epa@serco.com](mailto:epa@serco.com)

24hr Safeguarding Hotline: 07718 095158

## Glossary

LSO	Lead Safeguarding Officer
DSO	Designated safeguarding Officer

## Relevant legislation

This document reflects the following key pieces of legislation:

- Keeping Children Safe in Education (2015)
- Working Together to Safeguard Children (2015)
- Education Act (2002)
- Children Act (1989)
- Children Act (2004)
- Safeguarding Children (2006)
- Information Sharing (2015)