Safeguarding Policy

General Policy Statement

Quest Training fully recognises its responsibilities for the protection of all staff and apprentices/learners.

Quest Training is committed to ensuring the rights of the young person and the rights of adults while also seeking to protect both groups in their association and work with each other. In promoting the development of our apprentices/learners we have a responsibility to ensure that they have sufficient knowledge and confidence to reject any behaviour from their peers or from adults, which may threaten them in any way.

Our Policy covers the following:

* Ensuring we practice safe recruitment in checking the suitability of staff – all staff are subject to an Enhanced Disclosure Barring Service check.
* Raising awareness of safeguarding issues to all apprentices/learners, employers and staff and equipping both employees and learners with the skills needed to keep them safe.
* Developing and implementing procedures for identifying and reporting any cases or suspected cased of abuse.
* Establishing a safe environment in which vulnerable groups can develop.

Commitment Statement

We recognise that because of the regular contact with apprentices/learners, Quest Training staff are well placed to observe any outward signs of abuse and have regular reviews with individual apprentices/learners, which provides a platform for them to discuss any possible issues they may have.

Quest Training will therefore: -

* Establish and maintain an environment where apprentices/learners feel secure, are encouraged to talk and are listened to.
* Ensure that all apprentices/learners know that there are designated staff within Quest Training to whom they can approach if they are worried.
* Include opportunities within the programme for apprentices/learners to develop the skills they need to recognise and stay safe from abuse or harm.

Quest Training recognise and adhere to the statutory requirements within the following important and relevant pieces of safeguarding legislation;

* Working Together to Safeguard Children (2010)
* Children’s Act (1989, 2004)
* Safeguarding Children and Safer Recruitment in Education (2007)
* Safeguarding Vulnerable Groups Act SVGA (2006 amended 2012)
* Protection of Freedoms Act (2012)
* Disclosure and Barring Service Code of Practice (2012)
* Sexual Offences Act (2003)
* Every Child Matters (2004)
* Equality Act (2010)

To support our commitment to the safeguarding and well-being of all of our apprentices/learners and with regard to the above legislation we will:

* Ensure we have a designated senior person for safeguarding and ensure that every member of staff know the name of the designated senior person and their role and responsibility for safeguarding.
* Ensure that all staff and learners are aware of our Designated Persons for Safeguarding.
* Ensure that all staff are aware and understand their responsibilities in relation to Safeguarding and in being alert to the signs and indicators of abuse and for referring any concerns directly to the Designated Person for Safeguarding.
* Ensure that effective Safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures are based on the 5R’s approach of Recognition, Response, Record, Report, Refer.
* Ensure that Quest Training develop links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters.
* Keep written records of any concerns about apprentices/learners, even where there is no need to refer the matter immediately. These concerns will be kept confidential in the appropriate file by the Designated Person.

Quest Training recognises its responsibility with regard to the safeguarding of young and vulnerable apprentices/learners from abuse and from inappropriate and inadequate care, and is committed to responding in all cases where there is concern.

Due to the nature of our work, Quest Training may be in the frontline of work with some children, young apprentices/learners, vulnerable learners and vulnerable adults. This may mean that we are the first to know that a child, young or vulnerable learner or adult is being abused or that we are concerned about a person’s well-being. Everyone has an equal responsibility to ensure that the individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact.

This responsibility not only rests with the Directors, Managers and Designated Person for Safeguarding but also with every individual member of staff employed within our organisation whilst at work, at an employer’s premises or place of work.

We will ensure that our Safeguarding Policy and Procedures are reviewed at least annually to ensure that they are still relevant and effective.

Understanding Safeguarding

**What is safeguarding?**

Safeguarding is a proactive process of protecting and ensuring the safety and well-being of young and vulnerable apprentices/learners. Safeguarding may involve instances in which a young or vulnerable apprentice/learner is suffering or likely to suffer from harm. Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

**What are the benefits of effective Safeguarding?**

* When apprentices/learners feel safe and secure they can concentrate on learning.
* Apprentices/learners can rely on those people in positions of trust.
* Staff are protected from malicious and misplaced allegations.
* Staff are clear about individual responsibilities, roles and boundaries.
* Apprentices/learners are appropriately protected and all issues are dealt with effectively.

**How do we define Young / Vulnerable apprentices/learners?**

Young apprentices/learners are defined as any apprentice/learner who has not yet reached their 18th birthday (Children’s Act 1989, 2004).

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered ‘vulnerable’ at that particular time.

**New definition of regulated activity relating to adults**

An adult is a person aged 18 years and over. There are six categories within the new definition of regulated activity.

1. Health care

2. Personal Care

3. Providing Social Work

4. Assistance with General Household Matters

5. Assistance in the Conduct of a Person’s own Affairs

6. Conveying

Safer Recruitment

**Interview process**

Quest Training Ltd will take all possible steps to prevent unsuitable persons working with young or vulnerable apprentices/learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007) and the Safer Practice, Safer Learning document produced by NIACE.

When interviewing potential staff we will ensure that:

* There is an open recruitment process.
* There is a rigorous interview with specific questions relating to Safeguarding.
* Applicant’s identity and claims to academic or vocational qualifications will be verified.
* References will be taken up by direct contact with referees.
* Evidence of the date of birth and address of the applicant will be obtained.
* Where appropriate, an Enhanced Disclosure and Barring Service Check will be conducted.

Where a position requires an Enhanced DBS check this will be made clear on the job advert and application form and a statement explaining Quest Training’s commitment to safeguarding will be documented. All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

During interviews the interviewer(s) will explore:

* The applicant’s attitude and demeanour towards young or vulnerable apprentices/learners.
* The applicant’s ability to support our commitment to safeguarding and promoting the welfare of young or vulnerable apprentices/learners.
* Any gaps in the applicant’s employment history.
* Any concerns or discrepancies arising from the information obtained

A Single DBS Central Record will be held for all staff employed by Quest Training and this will be updated on an ongoing basis.

**Post appointment**

All staff will take part in an induction programme, which will vary dependent on the nature of the role. The purpose of this will be to:

* Provide awareness and explanations of relevant policies and procedures.
* Provide support for the role in which they have been engaged.
* Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities.
* Enable individual line managers and colleagues to recognise any concerns about the person’s ability or suitability from the outset and address them if deemed appropriate.
* Ensure that individuals are aware of reporting concerns and who the Designated Persons for Safeguarding are.
* Ensure that individuals are aware of other relevant policies and procedures; i.e. disciplinary procedure, E&D Policy.

Reporting Apprentice/Learner Abuse and Neglect

**Procedure to undertake following a young or vulnerable apprentice/learner confiding about or suspecting a case of abuse or neglect:**

Where a young or vulnerable apprentice/learner seeks out a member of staff to confide in and share information about abuse or neglect or talks spontaneously individually or in groups, our staff will:

* Listen carefully to them, and not directly question him/her.
* Give them time and attention.
* Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events.
* Make an accurate record of the information given taking care to record the timing, setting and people present, the person’s presentation as well as what was said. Do not discard this as it may be later needed as evidence.
* Use the persons own words where possible.
* Explain that they cannot promise not to speak to others about the information they have shared.

Reassure the person that:

* You are glad that they have told them.
* That he/she has not done anything wrong.
* What you are going to do next.
* Explain that help will need to be sought to keep them safe.

The person should be asked NOT to repeat his / her accounts to anyone. **The Designated Person for Safeguarding must be informed immediately**, who will investigate the concern and take appropriate action, all records of the investigation, will be kept strictly confidential and stored in a secure place. Outside agencies and Resources on Child Protection can and will be used to assist the company.

Allegations against Staff

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:

* Behaved inappropriately in a way that has harmed or may have harmed an apprentice/learner.
* Possibly committed a criminal offence against or related to apprentice/learner.
* Behaved towards aa apprentice/learner in a way that indicates he/she is unsuitable to work with them.

The Designated Person for safeguarding should be informed of the matter immediately. (Where the Designated Person nominated for safeguarding is involved in the allegation, the most senior member of staff should be informed).

An investigation will take place which:

* Will determine if the police need to be involved immediately to protect the person further.
* Will record all details received and secure them safely.
* Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation.
* Will determine whether suspension is appropriate whilst undertaking the investigation.

All allegations will be acted upon, however due to the variance in the risk levels, all allegations will be treated individually and the appropriate actions assigned on a case by case basis.

Anonymous Allegations

Concerns raised anonymously tend to be far less effective, and depending on the level of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

* The seriousness of the matter.
* Whether the concern is believable.
* Whether an investigation can be carried out on the information provided.

Staff Code of Conduct

The code of conduct should guide all actions taken by staff and anyone else working on behalf of Quest Training. If it is necessary to act contrary to it (for example visiting an apprentice/ learner in their home) you should only do so after discussion and approval with your line manager.

* Place the safety and well-being of apprentices/learners first – before any organisational or personal goals and before any loyalty to colleagues and friends.
* Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been, inappropriate.
* Be committed to actively preventing the exploitation and abuse of young or vulnerable apprentices/learners.
* Respect all individual apprentices/learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual apprentice/learner with respect and dignity.
* Respect each apprentice/learner’s boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do, if they feel there is a problem.

The focus of your relationship with an apprentice/learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with apprentices/learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Facebook or Twitter.

* Do not take illegal drugs whilst at work, do not drink alcohol prior to or during contact with learners and do not smoke with or in front of apprentices/learners.
* Do not give apprentices/learners alcohol, tobacco products or any form of drug or medication. You should not assist apprentices/learners in anyway, in obtaining these items.
* Do not engage in or tolerate the bullying or harassment of any person.
* Never engage in or tolerate inappropriate physical activity such as ‘horse play’.
* Ensure all lone working with young or vulnerable learners is undertaken with caution and awareness in mind.

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

Maintain a safe and appropriate emotional and physical distance from young or vulnerable apprentices/learners do not:

* Make sexual or discriminatory comments of any kind.
* Engage in rough or sexually provocative games.
* Make sexual comments / innuendos.
* Lend or borrow money or property.
* Have exclusive or secretive relationships.
* Invite apprentices/learners into your home.
* Use inappropriate reading materials / internet use.
* Use unacceptable forms of restraint.

All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or vulnerable apprentices/learners. If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or vulnerable apprentice/learner who is upset or administering first-aid are examples of necessary and acceptable behaviour.

Employees should, however, endeavour to minimise any possible misunderstanding of their actions.

Definitions and Types of Abuse or Neglect

This section closely reflects the procedures and guidance in the Home Office document “Working Together to Safeguard Children” 2010.

‘Child abuse and neglect’ is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the persons health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young or vulnerable learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

Working Together to Safeguard Children (2010) sets out definitions and examples of the four broad categories of abuse:

* Physical Abuse
* Emotional Abuse
* Sexual Abuse
* Neglect

**Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

**Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed in them. These may include interactions that are beyond the person’s developmental capacity, as well as over-protection and limitation of exploration and learning, or preventing them participating in normal social interactions. It may involve serious bullying causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

**Sexual Abuse**

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

**Neglect**

Neglect involves the persistent failure to meet a person’s basic or physical and/or psychological needs, likely to result in the serious impairment of the person’s health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a person’s basic emotional needs.

Additional types of abuse and unsafe activities, which we recognise and which have become more prevalent in recent times are:

* + - Bullying and Harassment
    - Discriminatory Abuse
    - Financial Abuse
    - Domestic Violence
    - Alcohol and Drugs
    - Crime
    - Cyber-bullying

**Signs and indicators of possible abuse**

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, there are a number of possible indicators. However there may also be a perfectly reasonable explanation so it is important to remain vigilant but not be over zealous nor jump to conclusions. There may also be no signs or indicators or abuse, however this does not necessarily mean that a report of abuse is false.

**Signs suggesting physical abuse**

* Any injuries not consistent with the explanation given for them.
* Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because of playing a contact / rough sport etc.
* Injuries that have not received medical attention.
* Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food.
* Untreated illnesses, unkempt appearance, dirty clothes etc.
* Changes in routine.

**Signs suggesting sexual abuse**

* Any allegation made by an individual
* Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
* Sexual activity through words, play or drawing
* Individuals who are sexually provocative or seductive
* Severe sleeping disorders
* Eating disorders

**Signs suggesting emotional abuse**

* Changes or regressions in mood or behaviour
* Nervousness
* Obsessions or phobias
* Sudden under-achievement or lack of concentration
* Attention seeking behaviour
* Persistent tiredness
* Running away

Monitoring

The Managing Director and Lead IQAs are responsible for monitoring equality and diversity within their own area and for ensuring that the business is conducted in accordance with our safeguarding policies.

Overall responsibility for the monitoring, implementation and enforcement of our safeguarding policy lies with the Managing Director.

Safeguarding is a fixed agenda item on the Management meeting agenda.

General

This policy should not be read in isolation, but is designed to be read in conjunction with Quest Training’s Equality and Diversity Policy, Prevent and British Values Policy, Health and Safety Policy, Whistleblowing Policy and E-Safety Policy.

Appendix 1 - Useful Information

**Safeguarding Children and Safer Recruitment in Education**

<https://www.education.gov.uk/publications/eOrderingDownload/Final%206836->

[SafeGuard.Chd%20bkmk.pdf](https://www.education.gov.uk/publications/eOrderingDownload/Final%206836-)

**Working together to Safeguard Children**

<https://www.education.gov.uk/publications/standard/publicationDetail/Page1/DFE->

[00030-2013](https://www.education.gov.uk/publications/standard/publicationDetail/Page1/DFE-)

**Kent Safeguarding Children Board (LCSB)**

[Offers guidance, procedures and instructions in ensuring children’s well-being and welfare.](C:\\Users\\Paulh\\Documents\\Quest Training\\Procedures\\Offers guidance, procedures and instructions in ensuring children’s well-being and welfare)

[http://www.kscb.org.uk/about-kscb/contact-us](C:\\Users\\Paulh\\Documents\\Quest Training\\Procedures\\Offers guidance, procedures and instructions in ensuring children’s well-being and welfare)

**Safeguarding Vulnerable Groups Act**

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

**Protection of Freedoms Act 2012**

<http://legislation.gov.uk/ukpga/2012/9/contents/enacted>

**Kent and Medway Safeguarding Adults Board**

[www.kent.gov.uk/about-the-council/.../kent-and-medway-safeguarding-adults-board](file:///C:\Users\Paulh\Documents\Quest%20Training\Procedures\www.kent.gov.uk\about-the-council\...\kent-and-medway-safeguarding-adults-board)

**Safer Practice, Safer Learning**

<http://shop.niace.org.uk/media/catalog/product/S/a/SaferPractice_1.pdf>

**OFSTED – FAQs on Safeguarding**

<http://www.ofsted.gov.uk/adult-learning-and-skills/for-adult-learning-and-skillsproviders/>

[safeguarding-children-and-young-people](http://www.ofsted.gov.uk/adult-learning-and-skills/for-adult-learning-and-skillsproviders/)

**Central Referral Unit (CRU)**

Tel: 03000 411111

Appendix 2



**The seven golden rules to sharing information**

(Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers)

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.