

## **Safeguarding Policy**

### **Introduction**

DRL Services are a training provider dedicated to making a positive contribution to a strong and safe community. We recognise the right of every individual to stay safe and we are committed to safeguarding any child or vulnerable person and to provide a safe learning environment to all apprentices. We have a duty of care when they are in our charge, and we will do everything we can to provide a safe and caring environment whilst they attend our facilities.

All vulnerable groups, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

### **Definition of a child/young person**

The definition of 'a child' in child protection guidance is "anyone who has not yet reached their 18th birthday. There is no single law that defines the age of a child across the UK. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child "means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier"

### **What is a vulnerable person?**

This is defined as an adult over 18 years of age; "Who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation". Vulnerable adults aged 19-25 will be classed as high need apprentices.

### **What is Abuse?**

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering. Abuse can consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act and can occur anywhere.

### **Types of abuse to recognise.**

- Alcohol and Substance misuse
- Bullying and cyberbullying
- County Lines
- Concealed pregnancy
- Discriminatory
- Domestic violence, including "honour" based violence.
- Emotional
- Exploitive use of technology
- Female Genital Mutilation (FGM)



- Financial or material abuse
- Faith abuse
- Gambling
- Hate and "mate" crime.
- Misuse of technology
- Modern slavery
- Neglect and acts of omission
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Sexual Exploitation
- Spiritual abuse
- Substance misuse
- Trafficking
- Peer on per abuse
- Serious Violence

## **Scope**

This policy covers safeguarding and applies to all staff, apprentices, children, vulnerable persons and other people working on behalf of DRL or involved withing the company. The aim of the policy is to ensure everyone is aware of and understand their responsibilities, signs that there may be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

There is a responsibility to follow the guidance laid out in this policy, and to pass on any welfare concerns using the required procedures. It is inclusive of specific highlighted safeguarding agenda areas – as defined by law, and in the wider context all our apprentices. This policy also aligns our compliance with the Government Prevent strategy and runs alongside our prevent policy.

We expect all staff, and other people working on behalf of DRL, to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices, we will make sure that all children, young people and adults have the same protection regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

## **Data Protection**

We will treat any personal information by which an individual can be identified (i.e., name, address, email etc.) in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the General Data Protection Regulation (GDPR) and will not share information with any third party, except where required by law.

## Policy

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against you.

All staff are committed to safeguarding and protecting children and vulnerable adults against potential harm or actual harm.

This strategy defines the way DRL will meet its duty of care to safeguarding. It states the commitment DRL have made to furthering lifelong learning opportunities at all levels of work-based learning.

All organisations that work or encounter children, young adults and/or adults at risk need to have safeguarding policies and procedures in place. We therefore adhere to Keeping Children Safe in Education 2023 and all employees receive training annually.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people, and adults at risk can also abuse and that such incidents fall into the remit of this policy.

Safeguarding issues are everyone's responsibility we believe everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. All staff of DRL will follow and implement the safeguarding policy, staff will sign an induction form to acknowledge they have fully read and understood the policy, employees are reminded that it is the welfare of the under-18, apprentices or vulnerable adults is of a primary concern, and it is their duty to report any concerns. If any staff or other people working on behalf of DRL, have an under-18 or vulnerable adult protection issue brought to their notice, observe an incident of abuse, or have cause for concern, they must treat this as a priority over other work and address the issue immediately.

Safeguarding relates to the action taken to promote the welfare of children and vulnerable adults and to protect them from harm. All staff should have a basic awareness of safeguarding issues. This includes:

- Being alert to the possibility of abuse and neglect
- Having enough knowledge to recognise an abusive or potentially abusive event or set of circumstances
- Knowing who in the organisation to raise concerns with
- Being competent to take the appropriate immediate or emergency action.

DRL are committed to safeguarding our apprentices by ensuring that:

- We listen to people and respect them.
- Valuing them, listening to and respecting them
- The welfare of the child or vulnerable adult is paramount



- All children and vulnerable adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse.
- Recruiting staff and volunteers safely ensuring all necessary checks are made.
- Appointing a nominated safeguarding lead – Safeguarding lead is the designated safeguarding lead, and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated every two years.
- In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.
- By making sure all staff and volunteers follow the safeguarding and child protection procedures.
- That all staff are aware that children can abuse other children (often referred to as peer-on-peer abuse).
- That all staff understand the importance of challenging inappropriate behaviours between peers.
- We increase awareness of the issues involved.
- Reviewing our policy and good practice annually or dependent of any lawful changes in between annual reviews.
- We support all apprentices in accessing support so they can learn and work safely and are aware who they need to report to if there are any issues or concerns.
- We work in an open environment, avoiding private or unobserved situations and encouraging open communication.
- We will prioritise the welfare of the under-18 and/or vulnerable adults
- We are proactive in action when abuse is suspected.
- Working in partnership with children, vulnerable adults, their parents, carers and other agencies is essential in promoting young people's welfare.
- Providing effective management for staff through supervision, support and training
- During induction and training of staff and apprentices we will have the Safeguarding policy explained and reinforced and made available to all. A copy of the policy is always available on the internal cloud-based system, learner portals, by calling the office on 01375 488 008 or Karen.Long@drlservices.co.uk.

By implementing this safeguarding policy DRL Services Ltd will ensure

- that all workers understand their legal and moral responsibility to protect children and young people from harm, abuse and exploitation, training on Child. Protection will be provided in their induction and in subsequent training that is undertaken.
- that all workers understand their responsibility to work to the standards that are detailed in the organisation's safeguarding policy working at all times towards maintaining high standards of practice.
- All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.
- that all workers understand their duty to report concerns that arise about a child or young person, or a worker's conduct towards a child/young person, to the organisation's named designated person for safeguarding.
- that any procedures relating to the conduct of workers are implemented in a consistent and equitable manner.
- that all workers understand their obligations and responsibilities under Prevent as part of Safeguarding and have appropriate training to support them in their responsibilities.
- Opportunities are provided for all workers to develop their skills and knowledge, particularly in relation to the welfare and protection of children and young people.
- Staff will be fully aware how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and social care. Staff should never promise a child or young person that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.
- that children, young people and vulnerable adults are enabled to express their ideas and views on a wide range of issues and will have access to the organisation's Complaints Procedure.
- We endeavour to keep up to date with national developments relating to the welfare and protection of children and young people.



- that appropriate background checks are undertaken when anyone joins the organisation and before they start working directly with children and young people.
- that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters.
- that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- all records are stored securely and in accordance with the Data Protection Act 2018 and the GDPR.
- Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children/adults who may need help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).
- When consent is required for any care, activity, or intervention we will, unless it is an emergency, obtain consent from the individual if of sufficient age and understanding. Consent will be requested from a parent/carer or relative for a child, young person or an adult at risk as defined within the relevant Regulatory Authority guidance e.g., Ofsted, ESFA.

We will ensure that no individual with additional learning needs or disabilities do not face any further safeguarding issues i.e.: peer group isolation, bullying, facing communication difficulties. Regular checks and assessments will take place if we feel there are additional safeguarding issues.

For further guidance [SEND Code of Practice 0 to 25 years](#)

Lone working/one to one working whenever possible to protect both individuals will be avoided if possible. If lone working is unavoidable a documentation will always be undertaken to ensure:

- the care or activity provided is suitable for one-to-one working.
- the lone worker has been recruited, trained, and supervised to undertake this role,
- that health and safety issues have been identified and recommendations followed,
- safeguards are in place to protect individual's rights to safe working practice,
- safeguards are in place in relation to strategies for emergency situations,
- accurate and relevant written recording is maintained following any care and activity.

It is important to be observant at all times.

There may also be issues that may arise that would be classed as low-level concern, this would mean that the issues may not necessarily meet harms threshold and it does not pose a significant risk, all concerns are still shared responsibly. The interests of all are paramount irrelevant of circumstances. All are treated consistently and fairly.

Anybody who may wish to raise a concern does not need to determine if it meets harm or determine a level of risk, but they do have an obligation to raise any safeguarding observation as part of our proactive safeguarding culture. Safeguarding breaches can occur in any organisation and escalating low level behaviour concerns for discussion is

important to our duty of care. This reporting would include a discussion on concerns that have been brought to our attention.

Concerns should be submitted in writing detailed within our discussion form. The person raising the concern should:

- provide a concise record including a brief context in which the low-level concern arose.
- include details which and as precise and accurate as possible of any such concern and relevant incident(s)
- the record should be signed, timed, and dated.

All concerns should be forwarded to the safeguarding lead or deputy at the below contact details.

Safeguarding leads will follow up with the individual no matter how low level the concern may be perceived to be, to gain their account and to make appropriate records.

Any referrals should be noted on the safeguarding log.

**Lead Designated Officer – Karen Long**

[safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk)

**Deputy safeguarding officer - David Jamieson**

[safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk)

01375 488008

The designated safeguarding lead has the responsibility to oversee and ensure that our safeguarding policy, which includes e-Safety, is fully implemented and that we attain safeguarding standards. She has a key responsibility for raising awareness of any issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for learning.

Their responsibility is:

- monitoring and recording concerns
- overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agency
- providing advice and support to other staff on issues relating to child protection
- making referrals to social care, or police, as relevant, without delay
- maintaining a proper record of any protection referrals, complaints or concerns (even where that concern does not lead to a referral)
- liaison with other agencies
- arranging training for all staff ensuring all safeguarding arrangements as detailed in this policy are current, fit for purpose, circulated to all personnel, and implemented.
- ensuring apprentices are aware of these safeguarding arrangements.

- monitoring to ensure concerns and subsequent actions are recorded.
- acting as the main safeguarding contacts for all personnel and make referrals to social care, or police, as relevant, without delay
- liaison, and building links, with external agencies and other stakeholders.
- audit and review this policy and procedures.

## **E-Safety**

All apprentices should be able to use the internet where applicable for any education development, whilst ensuring that safeguarding measures are also in place at all times. The internet provides many useful opportunities yet can also present risks, we have a duty to all to protect from any potential harm.

DRL will ensure.

- the safety and wellbeing of children, vulnerable adults and adults are using the internet, social media or any mobile devices.
- ensure we operate in line with our values and within the law in terms of how we use online devices.
- ensure that all staff follow the correct approach to online safety.
- supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others.
- ensuring that usernames, logins, email accounts and passwords are used effectively.
- ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate.
- ensuring that images of apprentices are used only after their written permission has been obtained, and only for the purpose for which consent has been given.
- that all staff are aware of any safeguarding issues such as sharing of unwanted images / videos and notice any signs of this abuse.
- When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures.
- That we have appropriate filtering and monitoring systems in place where appropriate via our IT department. All staff will be regularly trained where appropriate.
- Filtering and monitoring will be annually reviewed.
- All staff will be made aware of any filtering and monitoring provisions made, their roles and responsibility regarding this and how to escalate any concerns.
- Management and safeguarding lead will consider the number of and age ranges of apprentices that are at a greater risk of harm.
- providing supervision, support and training for staff and volunteers about online safety
- examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

## **Cyber Bullying**

Staff at DRL will educate all apprentices of the importance and seriousness of cyber bullying by encouraging the correct use of any technology.

All staff are trained to respond effectively to any reports of cyber bullying or harassment. DRL endeavours to block access to inappropriate web sites, using firewalls, antivirus protection and filtering systems and no person is allowed to work on the internet in any location without a member of staff present. DRL ICT communications will regularly review the security arrangements.

DRL will not always take action against those who are taking part in cyber bullying as some may be classed as a criminal activity.

- All bullying is damaging but cyber-bullying and harassment can be invasive of privacy at all times. These acts may also be criminal acts.
- We will support victims and, when necessary, will work with the Police to detect those involved in criminal acts.
- We may use, as appropriate, the full range of sanctions to correct, punish or remove apprentices who bully fellow apprentices or harass staff in this way.
- We will use our power of confiscation where necessary to prevent apprentices from committing crimes or misusing equipment.
- All staff are aware they have a duty to bring to the attention of Senior staff and Managers any example of cyber-bullying or harassment that they know about or suspect.

## **Learners with prolonged absence**

Any learners being absent for a prolonged period of time could be a vital sign of a safeguarding issue, these could include neglect, sexual and criminal exploitation. It is of high importance for us to identify any regular absence and act accordingly and prevent them from becoming a child missing in education.

We will reach out and continue to be in regular contact, if we suspect any sign of a safeguarding issue, we will report in a correct manner according to this policy.

General information and advice can be found at [Missing Children and Adults Strategy](#).

## **Peer-on-Peer abuse**

It is important to DRL that all our staff understand the importance of challenging inappropriate behaviours between peers. DRL values and ethos provide the platform for staff and apprentices to clearly recognise that abuse is abuse and it should never be tolerated or diminished in significance.

As a result of Ofsted's review into sexual abuse in schools, additional training for apprentice facing employees is planned for 2021 related to identification and action required for incidents of this nature including presence of accepted norms and the need to change this and making apprentices aware of what constitutes sexual harassment and abuse both face-to-face and online. This will include peer-on-peer abuse in the workplace.

If the apprentice is employed or in the workplace at the time, the overall responsibility to

investigate lies with the employer, DRL will always investigate the incident. If out of the workplace whilst under supervision of DRL, DRL will have the overall responsibility to investigate.

Peer abuse is behaviour by an individual or group, intending to physically, sexually, or emotionally hurt others.

All staff should recognise that individuals are capable of abusing their peers. All staff should be aware of safeguarding issues from peer abuse including:

- bullying (including online bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

This abuse can:

- Be motivated by perceived differences e.g., on grounds of race, religion, gender, sexual orientation, disability or other differences.
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm.

Children or young people who harm others may have additional or complex needs e.g.:

- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse.
- Educational under-achievement
- Involved in crime.

Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical. Staff, alongside their Designated Safeguarding Lead and/or Deputy, have to make their own judgements about each specific case and should use this policy guidance to help.

### **Responding to peer-on-peer abuse**

All reports of peer-on-peer abuse will be made on a case-by-case basis with the designated safeguarding lead or their deputy taking a leading role using their professional judgement and supported by other agencies if needed.

We will take all reports seriously and will reassure the victim that they will be supported and kept safe.

Staff will not promise confidentiality as the concern may need to be shared further (for example, with the designated safeguarding lead and possibly external agencies). Staff will only share the report with those people who are necessary to progress it.

Where the alleged incident includes an online element, we will follow advice on searching, screening and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present.

When there has been a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs' assessment. Where there has been a report

of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs' assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator; and
- All the other individuals (and, if appropriate, staff) especially any actions that are appropriate to protect them. Risk assessments will be recorded, and they will be kept under review. The designated safeguarding lead (or a deputy) will engage with outside agencies concerning any allegations.

Following an incident, we will consider the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. We will also consider the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. We will also consider the ages and developmental stages of the individual(s) involved. We will also consider any power imbalance between the individuals. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty? We will also consider if the alleged incident is a one-off or a sustained pattern of abuse. We will also consider if there are ongoing risks to the victim, other individuals, or staff. We will also consider any other related issues or wider context that may be relevant.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Sexual Exploitation (CSE)**

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are:

- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part in education
- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation.
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections
- mood swings or changes in emotional wellbeing
- drug and alcohol misuse and displaying inappropriate sexualised behaviour.

## **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence.

CCE can include:

- children being forced to work in cannabis factories.
- being coerced into moving drugs or money across the country (county lines)
- forced to shoplift or pickpocket.
- to threaten other young people
- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol

## **Reporting of safeguarding incidents**

Anyone working in direct contact with under-18's or vulnerable adults on a day-to-day basis, e.g., Trainers/Assessors involved in teaching or assessing, may come across signs of harm and/or abuse. If you suspect someone is being abused, you should communicate your concerns with your line manager in the first instance and or the safeguarding officer.

We will treat any personal information by which an individual can be identified (i.e., name, address, email etc.) in accordance with the provisions of Data Protection Act 2018, and the General Data Protection Regulation (GDPR) we will not share information with any third party, except where required by law.

Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse. Staff might also overhear conversations that suggest a child has been harmed or might receive a report from a friend of the child.

If any of the following occurs, you should report this immediately to another colleague, line manager or designated safeguarding lead and record the incident on an incident form. You should ensure you inform the Safeguarding Officer.

- If you accidentally hurt a child or young person.
- If he/she seems distressed in any way
- If a child misunderstands or misinterprets something you have done.
- You are concerned that the child or vulnerable adult is being abused.

When handling any disclosures that are made it is important to always remember to take what is being said seriously and do not investigate, stay calm. Any child or vulnerable adult should never be made to feel ashamed or that they are creating a problem.

All disclosures should not be delayed, and careful and precise information recorded within the safeguard record form whilst seeking further information from the safeguarding lead.

For all incidents or concerns involving a vulnerable adult or child follow the current safeguarding procedures and guidelines including where an apprentice raises concerns or

accusations, record the facts reported and or observed, and report them to the Safeguarding and Prevent Officer. It is the Safeguarding Officer's responsibility to investigate and report any Safeguarding issue to appropriate external organisations if required.

All staff and other people working on behalf of DRL should note that it is not their responsibility to try to resolve the issues, but significant concerns for the wellbeing of an under-18 or vulnerable adult or any other apprentice are reported as quickly as possible. You can raise a 'Safeguarding Alert' by telephoning your local Safeguarding Board at your local council. A decision will then be taken about what to do next.

When any concern or allegation of abuse is made and notified to the local authority, social care or police DRL must notify the ESFA helpdesk on 08000 150600 or [helpdesk@manage-apprenticeships.service.gov.uk](mailto:helpdesk@manage-apprenticeships.service.gov.uk) within 24 hours. When notification to the ESFA is made the details provided must include the name of the training provider, a high-level summary of the incident whilst not disclosing personal information and also giving confirmation if it is to be investigated by the local authority or the police.

If any apprentice needs to speak to someone regarding any concerns, please contact your Trainer/Assessor or call the training manager on 01375 488 008, we will always listen and act accordingly to apprentices' concerns. We do not want any apprentice to feel they are alone or unable to voice their concerns.

The local authority hub can be contacted on:

[Thurrock MASH | Children's care professionals services | Thurrock Council](#)

[thurrockmash@thurrock.gov.uk](mailto:thurrockmash@thurrock.gov.uk)

01375 652802

[thurrock.first@thurrock.gov.uk](mailto:thurrock.first@thurrock.gov.uk)

01375 511 000

24-hour protection line for children and vulnerable adults: 0345 603 7634

Concerned about an adult? Essex social care direct: 0345 603 7630

[Report a concern about a child](#) – Essex County Council

Report a concern about a child to the Children and Families Hub on 0345 603 7627

Out of hours or bank holidays, call the emergency duty team on 0345 606 1212.

Email: [initialresponseteam@essex.gcsx.gov.uk](mailto:initialresponseteam@essex.gcsx.gov.uk)

The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number. This should be used for any concerns out of our local area.

Organisations such as the NSPCC and Safe Network have a range of useful information on their web pages, including guidance on minimum levels of supervision for children.

**NSPCC Child Protection Helpline: 0808 800 5000**

**Childline: 0800 1111**

## Records

DRL are committed to keeping records which are:

- recorded on a safeguarding incident form.
- of sufficient details of young person, or adult at risk to identify individual who is subject of concern and any significant others.
- accurate and factual/based on fact, as a true record of what has been monitored/observed, has been said and by whom has given cause for concern action has and/or will be taken including the reason for those actions and the reason stated for no action being taken and by whom.
- non judgmental
- timely within 24 hours
- signed and dated by the writer and co- signed by the Lead or Deputy.
- shared as appropriate by the Lead or Deputy for Safeguarding
- paper copies will be stored safely and securely by the Lead or Deputy for Safeguarding

## Referral to police

Where the safeguarding concerns arise from abuse or neglect deliberately intended to cause harm, as well as considering what steps are needed to protect the person at risk, it may need to be reported as a crime. Where information is being shared with the Police without the consent of the individual, the organisation should evidence their decision-making process. Where a safeguarding concern has been raised with social care, the referrer should not assume that social care or other agencies will contact the police. Early engagement with the police is vital to support the criminal investigation.

In an emergency always dial 999.

Non-emergency crimes can be reported on the phone using 101 or via the police online portal<sup>24</sup>. Online reports will be reviewed within 24 hours.

Police investigations should be coordinated with the local authority who may support other actions but should always be police led. Where the police are investigating a potential crime, social care should still make early safeguarding interventions to keep the person safe. Close liaison with the police is important to inform them what is being done to reduce the risk.

## **Allegations or suspicions of abuse against any staff and/or other people working on behalf of DRL.**

When a concern arises, there are three processes that may need to take place.

These are:

- An under-18 or vulnerable adult protection investigation.
- A criminal investigation.
- Action by DRL.

It is important that the above actions are managed in the right order. It may also be that the behaviour that causes concern is bad practice rather than abuse.

DRL will take no direct action against any staff or other people working on behalf of DRL without the advice and agreement of the relevant investigating agencies (e.g., the police or local social care team), except where such action is immediately necessary to protect an under-18 or vulnerable adult. When allegations of abuse or concerns raised against staff members these will always be treated seriously, depending on the case and seriousness the member of staff may be suspended pending investigation, the suspension is on the basis of an allegation and therefore a neutral act without prejudice.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and know that such concerns will be taken seriously by the senior management team.

Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the company senior management team.

DRL encourage the sharing of any concerns regarding the safeguarding of children, young people, and adults at risk as soon as possible with the Lead or Deputy for Safeguarding.

If individuals reporting their concerns within our organisation do not feel they have been acted upon then we support their right to report these concerns to social care services, the police, and /or the relevant regulatory authority e.g., Ofsted, ESFA

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- the NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. NSPCC also offer further guidance and training resources.

[NSPCC Learning homepage - safeguarding training and resources](#)

Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### **Safer Recruitment**

Safe recruitment is important to the safeguarding of children and young people. As we employ staff or volunteers to work with children and young people, we have a duty to safeguard and promote their welfare. This includes ensuring that we adopt a safe recruitment and selection procedures which prevent unsuitable persons from gaining access to children.

DRL Services will take all possible steps to prevent unsuitable persons working with apprentices young or vulnerable people and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education.

We are committed to safer recruitment in line with the relevant legislation and guidance from the government: Keeping children safe in education 2023 and office for standards in education, children's services and skills for recruiting all personnel. When interviewing potential staff, we will ensure that:

- there is an open recruitment process.
- advertising vacancies with a clear commitment required to safeguarding.
- obtaining full personal details including fitness to work with children, young people, and adults at risk by application form with relevance to previous work with children, young people and adults at risk.
- there is a rigorous interview with specific questions relating to safeguarding.
- applicants' identity and claims to academic or vocational qualifications will be verified.
- qualifications copies taken.
- references will be taken up by direct contact with referees.
- evidence of the date of birth and address of the applicant will be obtained to confirm right to work within the UK.
- enhanced Disclosure and Barring Service Check will be conducted, notification of Enhanced DBS check this will be made clear on the job advert and application form and a statement explaining DRL Services Ltd commitment to safeguarding will be documented.
- ensuring at least one person on each interview panel will have undertaken safer recruitment training, in line with the relevant Regulatory Authority's, e.g., Ofsted's safe recruitment guidelines.
- no person is subject to prohibition order within section 141b of the Education act 2011.

We will expect each candidate to declare any criminal record or information that may make them unsuitable to work with DRL, all who are shortlisted will be entitled to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history. We would support this by asking for an up-to-date enhanced DBS or applying for an enhanced DBS. We may also as part of our short-listing process complete online checks that may identify any incidents or issues that are publicly available. All shortlisted candidates will be informed if any online checks are to take place.

Any appointment will only be confirmed subject to:

- a satisfactory DBS check at the appropriate level
- a follow up of written references by telephone if relevant to vacant post
- a check of essential qualifications
- confirmation of the right to work in the UK where relevant.
- fitness to work as relevant.
- Suitable online checks
- checks for UK nationals or those who have lived in the UK previously International Child.
- Protection Certificate (ICPC) if they work with under 18s and Certificates of good conduct for foreign national applicants.
- completion of a satisfactory probation period



DRL provide an induction and training strategy with clear job descriptions and responsibilities and all relevant procedures. All new staff, paid and unpaid, will receive induction training as soon as possible and sign to record they have:

- received and understood this policy.
- been given any relevant resources.
- understood the commitment to safeguarding training - read, understand, and agree to abide by Part One of Keeping Children Safe in Education 2023

Staff will receive further safeguarding training, at the appropriate level, as soon as possible. The training received is continually reviewed to ensure most appropriate and up to date training is given. We also agree a probationary period of 6 months with clear goals and then provide one to one meeting at quarterly intervals with direct Line Manager. Updated training is normally required every 2 years (online) or three years (face to face). We will annually review all training via our training matrix.

Staff will also undertake the online government training for prevent.

Recruitment and selection procedures will be reviewed on a regular basis to ensure that they reflect safer recruitment procedures.

### **Disclosure and Barring Service Checks**

The Disclosure and Barring Service (DBS) are an executive agency of the Home Office, and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk. We will ensure that all staff have an enhanced DBS, we may seek to complete a new DBS if we feel unsatisfied with any personal changes. Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiries about the applicant's criminal record and seek a disclosure through a DBS.

### **Keeping Yourself Safe**

To maintain yours and the apprentice safety, the following are strictly prohibited:

- Befriending apprentices on personal social media sites
- Distributing personal telephone numbers
- Visit apprentices at home or transporting apprentices to and from locations (this includes travelling in the car with an apprentice driving)
- Do not use sarcasm, insults, or belittling comments towards apprentices.
- Personal relationships with apprentices

It also important to be mindful of the following when conducting yourself.

- Locations of one-to-one meeting with colleagues. These should take place at a neutral location
-



- You will naturally build a rapport with apprentices through the apprenticeship contact, and the apprentices may see you as a confidante and support but be sure to maintain professional boundaries whenever carrying out work on Lifetime's behalf.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We can listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with apprentices in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff is aware where you are and monitors this.
- Be mindful of any apprentice you acquire that by default creates a conflict of interest i.e., a partner or friend becomes an apprentice. Discuss appropriateness/ alternative assessor arrangements with your line manager.
- If at any point you feel unsafe in a apprentice company inform the site manager, your line manager, the designated safeguarding officer and leave the premises.

### **Keeping apprentices safe**

DRL offer an apprenticeship service, which places potential apprentices into employment. It is recognised that this creates a greater duty of care, and in order for DRL to ensure that employers are suitable to receive an apprentice, a service level agreement is undertaken prior to apprentice commencing employment in order to clarify expectation in relation to basic health and safety, and employment requirements for the apprentice. A risk assessment of employer sites will be performed, and any issues actioned.

Health and safety vetting and monitoring is carried out during apprentice induction, this involves a discussion between the Trainer, employer and apprentice and allows for the trainer to be confident in the employer's ability to keep the apprentice safe during their employment and also to help educate the apprentice in looking after their own welfare and that of others while at work.

Apprentices are made aware of all DRL relevant policies, who the designated persons are and how to report a concern during their induction to the programme. and a direct email address to allow the apprentices to access support from the designated safeguarding officer confidentially is provided to all apprentices.

If staff feel there maybe any mental health issues relating to a child, vulnerable adult or other staff members please seek immediate action and notify your safeguarding lead.

The below links give further information for staff regarding mental health.

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

## Legal framework

The Legal Framework for safeguarding is very important and supports staff to create a safer learning environment.

The Children Act 1989 sets out that the child's welfare is paramount and that safeguarding and promoting it is the priority. The Children Act 2004 set out a duty on Local Authorities to work closely with those providing services to children and young people. Safer Recruitment and Safeguarding Children in Education and Keeping children safe in education 2023.

Working Together to Safeguard Children 2018 sets out how organisations and individuals should work together to safeguard and promote the welfare of children and how practitioners.

should conduct the assessment of children: 'Safeguarding children - the action we take to promote the welfare of children and protect them from harm - is everyone's responsibility. Everyone who will meet children and families has a role to play. The UN Convention on the Rights of the Child sets out key principles which are enshrined within these acts and the statutory guidance. From 15 January 1992, when the treaty came into force, every child in the UK has been entitled to over 40 specific rights.

These include:

- The right to life, survival and development
- The right to have their views respected, and to have their best interests always considered.
- The right to a name and nationality, freedom of expression, and access to information concerning them.
- The right to live in a family environment or alternative care, and to have contact with both parents wherever possible.
- Health and welfare rights, including rights for disabled children, the right to health and health care, and social security.
- The right to education, leisure, culture and the arts
- Special protection for refugee children, children in the juvenile justice system, children deprived of their liberty and children suffering economic, sexual or other forms of exploitation the rights included in the convention apply to all children and young people, with no exceptions.

Summarised below are the key pieces of legislation of particular relevance to safeguarding:

- **Rehabilitation of Offenders Act 1974 ((Exceptions) Order 1975 as amended):** Makes certain regulated activity (i.e., work with children) exempt from the ROA and therefore requires an individual to be subject to an Enhanced Disclosure and Barring Service Check.
- **Children Acts 1989 and 2004:** Places a duty on local authorities to make arrangements with relevant agencies to co-operate to improve the well-being of children; gives a range of organisations the duty to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children.
- **Education Act 2002:** Places a duty on FE institutions to carry out their function with a view to safeguarding and promoting the welfare of children and young people.
- **Safeguarding Vulnerable Groups Act 2006:** Provides the legislative framework for the introduction of the new Vetting and Barring Scheme for those working with

children and vulnerable adults (in response to the Richard Enquiry 2004). The aim of the scheme is to bar individuals from working in situations where evidence suggests that they present a risk of harm to children and vulnerable adults.

- **Working Together to Safeguard Children 2018:** States that 'all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced'.
- **Safeguarding Children and Safer Recruitment in Education:** Covers recruitment and selection processes, recruitment and vetting checks and duties for safeguarding and promoting the welfare of children in education.

## Compliance

Regular evaluations and reviews of this policy including reporting procedures and concerns monitoring will be undertaken to ensure compliance of the act throughout DRL. Also, to ensure the policy accurately reflects the practices of DRL and staff will subject to DBS checks.

## Further Staff Guidance

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Guidance overview: Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Guidance overview: Advice to schools and colleges on gangs and youth violence - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Guidance overview: Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Policy Record Details	
<b>Policy Owner</b>	DRL Services Ltd
<b>Version</b>	V2
<b>Approved Date</b>	20 <sup>th</sup> June 2015
<b>Signed By</b>	David Jamieson 
<b>Last Reviewed Date</b>	01 <sup>st</sup> September 2023
<b>Amendment Date:</b>	13 <sup>th</sup> September 2023 Low level
<b>Next annual review date</b>	01 <sup>st</sup> September 2024