

Alchemist Consultants

Developed by: M Bainbridge

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Safeguarding & Prevent Policy

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# Alchemist Consultants

## Safeguarding and Prevent Policy

December 2021



## **Purpose**

Alchemist Consultants have devised this policy in line with government legislation and statutory guidance. We are committed to ensuring that all learners are kept safe so they can enjoy and achieve while participating in learning. It is our belief that no child or adult should experience abuse or discrimination of any kind. This policy set out our responsibilities in relation to the protection of children, young people, and vulnerable adults in response to:

The Children Act 2016.

- Un Convention on the Rights of the Child 1991
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Sexual Offences Act 2003 (Revised Nov2021)
- Protection of Freedoms Act 2012
- Education Act 2005
- Human Rights Act 1998
- Health and Social Care Act 2008
- Domestic Violence, Crime and Victims Act 2012
- Statutory guidance Working Together to Safeguard Children 2018 (previous versions: 1999, 2006, 2010, 2013,2014 and 2015)
- Keep Children Safe in Education 2021 (this replaces previous versions: 2014, 2015, 2018 and the Safeguarding Children and Safer Recruitment in Education 2006)
- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2018.
- The Care Act 2014 • The Mental Capacity Act 2005
- The “No Secrets” guidance, which sets out a code of practice for the protection of vulnerable adults.
- Counter Terrorism and Boarder security Act 2019
- Contest 2018
- Workbased learners and Prevent Statutory Duty guidance for providers 2018. Equality Act 2010
- Modern Slavery Act 2015
- Mandatory reporting of FGM (Nov 16)
- Prevent Duty 2019 update • Coronavirus (COVID-19) – Safeguarding in schools, colleges and other providers 2020

## **Scope**

Alchemist Consultants holds safeguarding as one of its highest priorities, the health, safety and welfare of all children, young people and vulnerable adults involved in courses or activities which come under the responsibility of the Company.

Throughout this policy and related procedures reference is made to “children”. This term is used to mean “those under the age of 18”. Alchemist Consultants recognises that some adults are also vulnerable to abuse; accordingly, the procedures may be applied to the protection of vulnerable adults. A vulnerable adult is defined as a person ‘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 or herself, or unable to protect him or herself against significant harm or exploitation'

## **WHAT IS ABUSE?**

Abuse and neglect are forms of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm, or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them, or more rarely by a stranger. The fact that the abuser is usually someone they know can make it more difficult to talk; it also makes it more important to talk to someone who can be trusted.

Abuse can be:

### **Physical Abuse**

Physical abuse causes harm. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### **Neglect**

Neglect is the persistent or severe failure to meet an individual's basic physical and/or psychological needs, likely to result in serious impairment of their health or development. Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment
- Protect from physical and emotional harm or danger
- Ensure adequate supervision
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Self-Neglect** is different from other forms of abuse due to the fact it does not involve a perpetrator. Self-neglect can be life threatening to an individual. It is a behavioural condition whereby an individual neglects to attend to their basic needs, which includes personal hygiene, appropriate clothing, adequate food and medical care. Extreme self neglect is known as Diogenes Syndrome (also known as senile squalor syndrome) which is a disorder characterised by extreme self-neglect, domestic squalor, apathy, compulsive hoarding of rubbish and lack of shame.

Signs and symptoms of Self-Neglect:

- Dehydration, malnutrition, untreated or improperly attended medical conditions and poor personal hygiene.
- Hazardous or unsafe living conditions/ arrangements for example, improper wiring, no indoor plumbing, no heating or running water.
- Unsanitary or unclean living quarters for example animal/insect infestation, no functioning toilet, faecal or urine smell
- Inappropriate and/or inadequate clothing, lack of necessary medical aids such as glasses, hearing aids.
- Grossly inadequate housing or homelessness
- Lacks mental capacity.

- Evidence of physical, mental or learning disability or illness
- Substance misuse, heavy use of drugs or alcohol or both
- No support from family or others- very isolated
- Victim of crime or anti-social behaviour or abuse
- Perpetrator of crime or anti-social behaviour Safeguarding & Prevent Policy – V4 March 2021 10
- Risk of fatality or serious harm
- Fire Risk

### **Sexual Abuse**

Sexual abuse involves forcing or enticing an individual to take part in sexual activities, including prostitution, exploitation, whether or not they are 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, involvement in looking at, or in the production of, sexual online images, watching sexual activities, or encouragement to behave in sexually inappropriate ways.

### **Psychological/Emotional Abuse**

Psychological abuse may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

### **Controlling Behaviour**

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

### **Coercive Behaviour**

Coercive behaviour is an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim. Signs and Symptoms of Domestic Violence/ Abuse in children and Young People:

- Presenting as withdrawn
- Sudden changes in behaviour
- Aggressive behaviour
- Anxiety
- Clingy
- Depressed Safeguarding & Prevent Policy – V4 March 2021 17
- Problems sleeping
- Eating disorders
- Bed Wetting
- Soiled clothes
- Takes risks.
- Misses school
- Changes in eating habits.
- Obsessive behaviours
- Nightmares Signs and Symptoms of Domestic Violence/ Abuse Adults
- Bruises or injuries that look like they may have been caused by choking, punching or being thrown.
- Black eyes
- Red or purple marks at the neck

- Sprained wrists
- Attempting to hide bruises with clothing or makeup.
- Excuses made for example being clumsy, tripping and/or being accident prone and where the seriousness of the injury does not tally with the explanation.
- Social Isolation – having few close friends and being isolated from relatives and colleagues.
- Asking permission to: meet, talk and/or do things with other people.
- Financial dependency – little money of own and not able to have access to their own finances.

### **Modern Slavery**

In accordance with the Modern Slavery Act 2015 which states this is ‘An act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-Slavery Commissioner; and connected purposes’ (Modern Slavery Act 2015, 26th March 2015) Modern slavery is an international crime, it is a global problem that transcends age, gender and ethnicity and is occurring not only on an international level but also within the UK. It can include those victims who have been brought from overseas (trafficking) and vulnerable people within the UK who are forced to illegally work against their will in places such as brothels, cannabis farms, nail bars and agriculture. Modern Slavery victims found within the UK are from countries such as Romania, Albania, Nigeria, Vietnam and the UK. Some of the key factors that contribute to human trafficking are issues such as poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances and war. Victims can often face more than Safeguarding & Prevent Policy – V4 March 2021 18 one type of abuse within slavery, for example a victim is sold to another trafficker and subsequently forced into another form of exploitation.

The term ‘vulnerable’ is defined as a person ‘who is or may need community care services by reason of mental or other disability, age or illness: and who is or may be unable to care for him or herself, or unable to protect him or herself against significant harm or exploitation’ (Department of Health 2000).

The term ‘vulnerable’ may also apply to those who are at risk of abuse due to the following:

- Lack of mental capacity
- Increasing age
- Being physically dependent on others
- Low self –esteem
- Previous history of abuse
- Negative experiences of disclosing abuse
- Social Isolation
- Lack of access to health and social services or high-quality information

### **Female Genital Mutilation (FGM)**

Female genital mutilation (FGM), which is sometimes referred to as female circumcision refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM is illegal, even if it is carried out by a healthcare professional or if it takes place outside of the UK (on a UK national or UK resident).

Some of the reasons given for the practice of FGM are.

- Protecting family honour
- A passage into womanhood
- A condition of marriage
- Preserving tradition
- Cleanliness
- Ensuring a woman’s chastity FGM can lead to serious health problems and in some cases death, it can also cause:

- Psychological trauma/depression
- Problems with pregnancy and childbirth

FGM is illegal, under The Female Genital Mutilation Act 2003 it is an offence in England, Wales and Northern Ireland for anyone (regardless of their nationality and residence status) to.

- Perform FGM in the UK
- Assist in the carrying out of FGM in the UK.
- Assist a girl to carry out FGM on herself in the UK and
- Assist from the UK a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean. Non-African communities that may also practice FGM include Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

### **Honour based abuse (HBA)**

HBA is a violent crime or incident that has occurred to protect or defend the honour of the family and/or community. It is often committed as a result of family members who mistakenly believe someone has brought shame to their family or community that is not keeping with their traditional beliefs of their culture.

#### **HBA might be committed against people who:**

- Have a boyfriend/ girlfriend who is from a different culture or religion.
- Wear inappropriate make-up or dress.
- Take part in activities that may not be considered traditional within a particular culture.
- Marital infidelity
- Are gay.
- Are misconstrued as flirting.
- Refuse to agree to an arranged marriage.
- Are raped.

Common practices carried out in the name of honour include.

- Forced Marriage
- Child Marriage
- Honour Killings
- Female Genital Mutilation
- Domestic Abuse
- Child Abuse
- Vulnerable Adult Abuse
- Bride Price
- Dowry Abuse
- Suicide
- Self-harm
- Acid Attacks
- Rape
- Blood Feuds
- Male Child Preference

Acts carried out in the name of honour such as violence, forced marriage and female genital mutilation is illegal in the UK.

### **Forced Marriage.**

Forced marriage is when someone is made to marry another person who they don't want to. Forced marriages can happen in secret and can also be planned by parents, family or religious leaders. It may involve.

- physical abuse
  - sexual abuse or
  - emotional abuse
- Forced marriage is illegal in England and Wales.

This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

A Forced Marriage Protection Order can be accessed if one of the following applies:

- the individual or someone else is being threatened with a forced marriage.
- the individual is in a forced marriage.

The order is designed to protect an individual according to individual circumstances, e.g., to stop someone taking an individual out of the UK.

### **Hate Crime**

A hate crime or incident is any incident that may or may not be a criminal offence which is perceived by the victim or any other person as being motivated by prejudice or hate.

The prejudice or hate can be based on a number of factors including:

- Disability (including learning disabilities)
- Race/ ethnicity
- Religion or belief (including no belief)
- Sexual orientation
- Gender identity.

Hate Crime can take many forms including:

- Verbal abuse or insults, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes and bullying in the school or workplace.
- Threat of attack-including offensive letters, abusive obscene telephone calls and offensive comments on social networking sites
- Physical attack-such as physical assault, damage to property, offensive graffiti, neighbour disputes and arson
- So called 'mate crime' could also come under Hate Crime. 'Mate crime' is when somebody befriends a vulnerable person to take advantage of that vulnerability.

When such issues arise Alchemist Consultants is committed to ensuring that we:

- Provide a safe environment for children, young people and /or vulnerable adults to learn in.
- Identify children, young people and/or vulnerable adults who are suffering, or likely to suffer significant harm.

- Take appropriate action to see that such children, young people and/or vulnerable adults are kept safe while undertaking training

## **Prevent Implementation Policy**

To provide guidance relating to the government prevent strategy and how Alchemist Consultants should respond to the implementation.

### **Scope**

Alchemist Consultants Prevent Policy is designed to enable our staff to recognise, respond and reduce the threat to the UK from terrorisms. Using the counter-terrorism strategy first published in 2011 and information from the Guidance for Further Education 2015 CONTEST, we have aligned our policy to meet these objectives.

- PURSUE; To stop terrorist attacks
- Prevent; To stop people becoming terrorists or supporting terrorism
- Protect; To strengthen our protection against a terror attack
- PREPARE; To mitigate the impact of a terrorist attack

The Prevent strategy has three specific strategic intentions

- Respond to the ideological challenges of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutes where there are risks of radicalisation that we need to address

The definition of extremism as laid out in the Prevent Strategy;

*“Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for death of members of our armed forces “*

### **Definitions;**

- An ideology is a set of beliefs
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism
- Safeguarding is the process of protection vulnerable people
- Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation



- Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of British armed forces is also included.

## **Statement**

Alchemist Consultants adopt a risk-based approach to the Prevent duty.

In complying with the duty all specific authorities, as a starting point, should demonstrate an awareness and understanding of the risk of radicalisation. They should also be aware that no area, institute or body is risk free and the risk varies greatly and can change rapidly.

All Alchemist Consultants staff will undertake regular professional development in Prevent to ensure all our learners and staff are adequately informed of the risks of radicalisation and the process to follow should they feel susceptible to this. By embracing a consistent methodology to the fundamental British values, the staff at Alchemist Consultants may support and guide all learners to encourage the appreciation of others.

## **Recruitment, Selection and Training**

Alchemist Consultants carry out a rigorous recruitment and selection process, where evidence of a DBS certificate is required along with prior training in Safeguarding. All interviewees are trained to level 3 standard in Safeguarding. On successful selection of the candidate, a full induction process takes place with the company's safeguarding policies and procedures discussed and any training requirements identified and action plan to meet the company's standards. All staff are given annual Safeguard accredited training to maintain awareness and remain up to date with policies and procedures. Regular Team meetings agenda Safeguarding as well as performance reviews to allow for confidential discussions and highlight any concerns. All assessors working for company should hold "Raise safeguarding Concerns" via local care alliance and completed their CHANNEL training.

## **Responsibility**

It is the responsibility of all employees at Alchemist Consultants to identify anyone at risk and raise any concerns to the designated lead within our company. The designated lead will then alert authorities to ensure the appropriate course of action is implemented. The managers and director at Alchemist Consultants are committed to ensuring that the Company: provides a safe environment for children, young people and vulnerable adults to learn in, identifies children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and takes appropriate action to see that such children, young people and vulnerable adults are kept safe

## **Designated Senior Staff**

The designated senior member of staff with strategic responsibility for safeguarding is:

**Libby Halliday – Operations/Quality Manager**

**Contact details**

e-mail – [libby@alchemist-consultants.co.uk](mailto:libby@alchemist-consultants.co.uk)

telephone number – 07920066116

## **Designated Safeguarding Officer**

**Viv Calvert – Training Coordinator**

**Contact Details**

e-mail – [viv@alchemist-consultants.co.uk](mailto:viv@alchemist-consultants.co.uk)

As key members of the Company's Safeguarding and Prevention Team, they have a fundamental duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of a safe environment for learners within the Company.

Ensuring that all staff receive basic training in safeguarding issues and are aware of the Company's safeguarding procedures. Ensure that other staff receives training as appropriate to their needs and responsibilities.

Providing an annual report to the Company Director, setting out how the Company has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified at the earliest opportunity providing advice and support to other staff on issues relating to safeguarding establishing a system for the safe, confidential storage of records maintaining a proper record of any safeguarding concerns (even where that concern does not lead to a referral) ensure that systems are in place to ensure that appropriate safeguards are put in place for children, young people and vulnerable adults.

## **What to do if alerted to or have concerns about the welfare of a learner.**

Alchemist Consultants recognises its responsibilities to safeguard the welfare of all young people, particularly minors and/or vulnerable adults who study with the Company by protecting them from physical, sexual, emotional harm and neglect. All staff, in particularly assessors/tutors, are expected to be alert for the outward signs of abuse, neglect, exploitation, changes in behaviour and take the appropriate action.

- Stay calm
- Provide a listening ear and an open mind
- Record the information you have been provided with
- Report directly to Libby Halliday, on 079020066116

**Please note that non-action is not an option.**

## **Reporting and Dealing with Allegations of Abuse against Members of Staff:**

We recognise that an allegation of abuse made against a member of staff may be made for a variety of reasons and the facts of the allegation may or may not be true. It is therefore imperative when dealing with an allegation that an open mind is maintained, and the investigations are thorough and not subject to delay.

We recognise:

- The welfare of the individual is the paramount concern.
- Making hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the organisation will do so with sensitivity and will act in a careful, measured way.

**If an allegation is made or there is a concern that a member of staff is abusing a learner or another adult, you must discuss this immediately with your line manager.**

### **Receiving an allegation from a child, young person or vulnerable adult:**

A member of staff who receives an allegation about another member of staff should report the allegation immediately to the Operations/Quality manager unless said manager is the person whom the allegation is made. In this case the report should be made to the Company Director the Designated Safeguarding Officer.

The Manager (or designated person) should obtain written details of the allegation from the person who received it; this must be signed and dated. Then written details should be countersigned and dated by the Line Manager (or designated person).

Information should be recorded on times, dates, locations and names of potential witnesses.

### **Initial Assessment by the Operation/Quality Manager (or designated person)**

The Operation/Quality Manager (or designated person) should make an initial assessment of the allegation, consulting with the Safeguarding Officer with lead responsibility.

**Where the allegation is either a potential criminal act or indicates that the young person/vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the police/social services. All allegations against people who work with children, young people and/or vulnerable adults which meet the following specific criteria should be reported by the employer within one working day to the Local Authority Designated Officer (LADO) via the Local Safeguarding Children's Board.**

- Staff who have behaved in a way that has harmed a child, young person or vulnerable adult.
- Staff who have possibly committed a criminal offence related to a child, young person or vulnerable adult.
- Staff who have behaved towards a child/children, young person/s and vulnerable adult/s in a way that indicates that he/she is unsuitable to work with children.

It is important that the Operation/Quality Manager (or designated person) does not investigate the allegation. The initial assessment should be based on the information received and is a decision whether or not the allegation warrants further investigation.

**Other potential outcomes are:**

The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime or a cause of significant harm to the child, young person or vulnerable adult. The matter therefore will be addressed in accordance with internal disciplinary procedures.

**Enquiries and Investigations Safeguarding & Prevent Policy –**

Alchemist Consultants shall hold its own internal enquires while the formal police or social services investigations proceed. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example, the police, the Line Manager or lead designated person may be involved in and contribute to investigatory discussions. The Line Manager or lead designated person is responsible for ensuring that the organisation provides every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries in the interests of the member of staff about whom the allegation is made. The Line Manager or lead designated person shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the Operation/Quality Manager or designated person shall:

- Inform the individual alleging that the investigation is taking place and what the likely process will involve.
- Ensure the parents/carers of the child, young person/vulnerable adult making the allegation have been informed that an allegation has been made and inform of the process involved.
- Inform the member of staff against whom the allegation was made of the fact an investigation is taking place and advised what the likely process will involve.
- Inform the Company Director (if this has not been undertaken) of the allegation and the investigation.
- The Operation/Quality Manager or designated person shall keep a written record of the action taken in connection with the allegation.

**Suspensions of Staff:**

Suspensions should not be automatic. In respect of staff, suspension can only be carried out by the Company Director.

Suspension may be considered at any stage of the investigation. It is a neutral not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g., paid leave of absence; agreement to refrain from attending work; change of or withdrawal from specified duties.

Suspensions should only occur for a good reason: For example:

- Where a child, young person/vulnerable adult is at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of misconduct.
- Where necessary for the good and efficient conduct of the investigation

If suspension is being considered the member of staff should be encouraged to seek advice, for example a trade union

Prior to making the decision to suspend, the Senior Management Team should interview the member of staff. This should occur with the approval of the appropriate agency, if the police are engaged in an investigation, the officer in charge of the case should be consulted.

The member of staff should be advised to seek advice and/or assistance of his/her trade union (if any) and should be informed that they have the right to be accompanied by a friend.

The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be provided with as much information as possible, in particular the reasons for any proposed suspension, provided that in doing so it does not interfere with the investigation into the allegation.

The interview is not intended to establish the member of staff's innocence or guilt but to provide the opportunity for the member of staff to make representations about possible suspensions. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response.

**If the Company Director considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension with reasons shall be despatched as soon as possible, ideally within one working day.**

The parents/carers of the child, young person or vulnerable adult making the allegation should be informed of the suspension. They should be asked to treat the information as confidential.

The Company Director is required to be informed for the reason for suspension and are to maintain confidentiality regarding the allegations. The Operations/Quality manager shall consider carefully and review the decisions as to who is informed of the suspension and investigation. External investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension will remain under review in accordance with internal disciplinary procedures.

## The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

The member of staff will be informed of:

- The disciplinary charge against him/her
- His/her entitlement to be accompanied or represented by a trade union or a friend.

**Where the member of staff has been suspended and no disciplinary action is to be taken the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.**

The individual making the allegation and /or their parents and carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return of the member of staff if suspension has occurred.

Consideration to what information should be made available to the general population of the centre should be made by the Company Director.

### **Allegations without foundation:**

**False allegations may be indicative of problems of abuse elsewhere.** A record should be kept, and **consideration given for a referral to be made to external safeguarding authorities** so they may act upon it.

Further to this:

- The member of staff against whom the allegation is made is to be informed orally and in writing that no further disciplinary or child protection action will be taken. It may be appropriate to offer counselling.
- The parents/carers of the alleged victim are to be informed that the allegation has no foundation and advise of the outcome.
- A report is to be prepared outlining the allegation and giving reasons for the conclusion that the allegation had no foundation and confirming the above action has been taken.

### **Recording, Sharing of Information and Consent Issues:**

- Documents relating to an investigation will be retained in a secure place, together with a written record of the outcomes and if disciplinary action is taken; details will be retained on members of staff and confidentially filed.
- **If a member is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the organisations statutory duty to inform the Disclosure and Barring Service (DBS).**
- Records will be kept updated as and when information is received, including action taken, as a young person/vulnerable adult can request their records, until official consent has been sought, we need to be sensitive as to what we record
- All written records which may need to be referred to at a later stage, or to be kept as evidence, are to be locked away in a secure designated location.

- Consent to share information should not be sought under the following specific circumstances:
  1. If this would put the child, young person or vulnerable adult at greater risk of significant harm.
  2. Interfere with criminal enquiries.
  3. Raise concerns about the safety of staff.

### **Monitoring Effectiveness:**

When an allegation has been made against a member of staff, at the conclusion of the investigation and any disciplinary procedures, consideration will be given to any improvements required in Alchemist Consultants, including the training needs of staff.

### **DBS Disclosure Policy and Procedure:**

We adhere to strict government legislation following the procedures as outlined by the Disclosure and Barring Service (DBS) which states:

- Any person barred from working with children and vulnerable adults is breaking the law if they work or volunteer or try to work or volunteer with those groups. An organisation which knowingly employs someone who is barred to work with these groups will also be breaking the law.
- Alchemist Consultants abide by the legislative requirements (as stated by DBS) that if we (an organisation) work with children, young people or vulnerable adults and dismiss a member of staff because they have harmed a child, young person or vulnerable adult, or would have done so if they had not left, will by law inform the Disclosure and Barring Service.

In the instance of a disclosure that does not involve a person barred with said groups the following process will be adhered to:

- The Company Director will be notified immediately to confidentially discuss the issues raised.
- The Company Director will confidentially discuss with the individual the issues raised.
- A confidential record of discussion will be kept and held securely.
- The situation will be monitored on an on-going basis for a reasonable period as advised and arranged by the Company Director.
- In the result of an incident in relation to the individual, the staff disciplinary procedure will be implemented by the Company Director to address the incident/issues.
- Operation Manager and in consultation with the company Director will be responsible for all matters relating to disclosure issues and any subsequent suspension or termination of contract relating to the individuals(s) employment at Alchemist Consultants

### **Statement of Policy**

The Company has a duty to ensure that their staff fulfil their responsibilities in safeguarding

children, young people and vulnerable adults. The Company recognises that any learner can be subject to abuse and all allegations of abuse will be taken seriously and treated in accordance with the Company's procedures

The Company will provide a safe and secure environment for learning with appropriate supervision and support of staff.

The Company will work with appropriate agencies, and in particular the local Safeguarding Children's Boards to ensure that learners are safeguarded through the effective operation of the Company's safeguarding children, young people and vulnerable adults' procedures. These agencies in turn will be responsible for advising the Company in any issues relating to learners

The Company's Safeguarding Children, Young People and Vulnerable Adult Policy and procedures shall be made available to all parent(s)/carer(s) upon request

The Company requires all staff to familiarise themselves with the Safeguarding Children, Young People and Vulnerable Adult Policy and Procedures. The Company recognises that it is the responsibility of all staff to act upon any concern no matter how small or trivial it may seem in accordance with this policy and procedures

The Company has established and will regularly review procedures for reporting suspected abuse taking account of any new Government legislation, regulations or best practice documents to ensure staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children

Company staff are in regular and frequent contact with learners and are particularly well placed to observe outward signs of abuse, or unexplained changes in behaviour or performance which may be indicative of abuse. All staff will be made aware of the signs of abuse and the procedures for reporting abuse to the nominated person

The Company operates safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with children, young people or vulnerable adults. All staff will be DBS checked in accordance with current operating procedures as well as obtaining two references from previous employers – one of which is their last employer prior to commencing their employment with Alchemist Consultants Ltd

The Company will deal with allegations of abuse by staff or students according to the Company Disciplinary Procedures as appropriate

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the learner is the overriding concern. The degree of confidentiality will be governed by the need to protect the learner

The Company will reserve the right to refuse admission to any person who may pose a risk to learners

The Company will provide a caring, supportive environment which will enable young people and vulnerable adults to speak out

The company will support young people and vulnerable adults who may have been abused and support those working with them

### **Records**

Alchemist Consultants will keep clear, comprehensive records of any disclosures and/or allegations of abuse.



The Company will comply with the requirements of the Data Protection Act 2018, which allows for disclosure of personal data where this is necessary to made to protect the interests of a learner

### **Review and Evaluation**

The policy will be reviewed annually by the Operations/Quality manager and presented for agreement to the Company Director and The Board