


SAFEGUARDING POLICY

Policy established:	19 th March 2018
Next policy review date:	3 rd January 2021
To be reviewed by:	Rendee Yule (Designated Safeguarding Lead)
Owned by:	Angela Loggie (Managing Director)
Signature:	
Revision History:	
20 th December 2019	Full policy update
3 rd January 2020	Sections reorganised
31 st January 2020	Process Map updated, 8.5 and 9.2 clarified

CONTENTS

1. COMMITMENT STATEMENT	3
2. SAFEGUARDING DEFINITION	3
3. THE BENEFITS OF SAFEGUARDING	3
4. SAFEGUARDING ADULTS – 6 PRINCIPLES	4
5. POLICY SCOPE	5
6. REGULATED ACTIVITY	7
7. STAFF CODE OF CONDUCT	8
8. PREVENTION	9
9. PROTECTION	12
10. SUPPORT FOR LEARNERS	14
11. UNDERSTANDING SAFEGUARDING AND HOW TO RECOGNISE CONCERNS	14
12. WHISTLEBLOWING	15
13. RECOGNISING SAFEGUARDING CONCERNS	16
14. THE NEED TO UNDERSTAND SAFEGUARDING LEGISLATION	26
15. PROCEDURES	27
16. THE PROCESS MAP FOR REPORTING A SAFEGUARDING CONCERN	29
17. PROCEDURE FOR ALLEGATIONS AGAINST STAFF	31
18. ADVICE FOR LEARNERS	31
19. OUR PREVENT DUTY (including British Values)	32
APPENDIX ONE – DEFINING VULNERABLE ADULT	34
APPENDIX TWO – RELEVANT SAFEGUARDING INFORMATION	35

1. COMMITMENT STATEMENT

- 1.1. Keystone Training Ltd is committed to protecting and promoting the safety and wellbeing of our learners. We will ensure that there are appropriate arrangements in place to help achieve safe and secure work environments for our learners. We will ensure that arrangements are put in place to promote the wellbeing of all learners, including the identification and support of those who may be at risk.
- 1.2. We recognise that it is everybody's responsibility to promote the safety and wellbeing of our learners, and this includes the provision of safeguarding and wellbeing training for employees, employers and learners. We are committed to ensuring a culture of PREVENTION, PROTECTION and SUPPORT.
- 1.3. We all have a responsibility to ensure that 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. Safeguarding and promoting the welfare of young people and adults at risk goes beyond implementing basic safeguarding procedures. It is an integral part of all activities, functions, culture and ethos of Keystone Training Ltd.

2. SAFEGUARDING DEFINITION

- 2.1. Proactively ensuring the safety and well-being of vulnerable persons.
- 2.2. Preventing vulnerable persons from suffering from harm or working to end harm in situations where wellbeing is already compromised.
- 2.3. Using safer recruitment practices to avoid hiring people who are unsuitable to work with vulnerable persons.

3. THE BENEFITS OF SAFEGUARDING

- 3.1. We recognise a number of benefits of safeguarding, including:
 - Being safe and secure allows learners to focus on learning.
 - Employees are clear about their individual responsibilities, roles and boundaries.
 - Learners are appropriately protected.
 - Any issues are dealt with effectively and promptly.

4. SAFEGUARDING ADULTS – 6 PRINCIPLES

- 4.1. **Empowerment:** We give individuals the right information about how to recognise potential harm or abuse and what they can do to keep themselves safe. We give them clear and simple information about how to report abuse and crime and what support we can give. We consult them before we take any action. Where someone lacks capacity to make a decision, we always action in his or her best interest.
- 4.2. **Protection:** We have effective ways of assessing and managing risk. Our complaints and reporting arrangements for recording harmful incidents, abuse and suspected criminal offences ensures we act quickly and appropriately. We take responsibility for putting them in touch with the right person.
- 4.3. **Prevention:** We train employees how to recognise signs and take action to prevent harm, abuse or crime occurring. In all our work, we consider how to make communities safer.
- 4.4. **Proportionality:** We discuss with the individual and where appropriate, with appropriate agencies what to do where there is a risk of significant harm before we take a decision. Risk is an element of many situations and should be part of any wider assessment.
- 4.5. **Partnership:** We network with other institutions and agencies to ensure we learn from other people's experiences and share our own. We work in partnership with employers and relevant agencies to ensure we are providing the best safeguarding approach for our learners.
- 4.6. **Accountability:** The roles of everyone in contact with learners are clear, together with the lines of accountability. Employees understand what is expected of them and others. We all recognise our responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

5. POLICY SCOPE

- 5.1. Safeguarding is everybody's responsibility
- 5.2. Our policy applies to all employees, learners, contractors, associates, clients, volunteers and visitors, and has the purpose of creating a safe environment for all learners, by educating both our learners and our employees so they are aware of safeguarding and have the right skills and knowledge to be safe and to hold a safe space for others, respectively. All have a legal responsibility to take seriously any vulnerable adult concerns that come to their attention and follow the procedures given. To this end, we ensure we comply with the principles outlined in "*1Working Together to Safeguard Children - A guide to inter-agency working to safeguard and promote the welfare of children - July 2018*" for safer recruitment and "*2Keeping children safe in education - Statutory guidance for schools and colleges - September 2019*".
- 5.3. Our policy sets out, for all employees, clearly defined procedures for identifying and handling cases or suspected cases of abuse.
- 5.4. All our employees who work with learners have a crucial role to play in shaping their lives. We have a unique opportunity to interact in ways that are both affirming and inspiring. A vulnerable adult, or adult at risk, is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, as in the examples below in 5.5 (a-l).
- 5.5. This policy covers the need to safeguard all learners. It is important to recognise the need for early identification of at-risk learners. We will ensure that there are policies and procedures which support us in our statutory duty to safeguard any learners

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/77940/1/Working_Together_to_Safeguard-Children.pdf

2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/83573/3/Keeping_children_safe_in_education_2019.pdf

deemed in ³'regulated activity' (see section 6) and to ensure that any at risk learners have individual risk controls in place to minimise the potential for harm. These learners include:

- a) All young adults aged 16 – 18 where there is a duty of care to safeguard through 'regulated activity' [footnote 3]
 - b) All adults who are 16 – 24 who may have been in care
 - c) Adults aged 19 – 24 who are in receipt of an Education Health Care Plan
 - d) Lone workers, or those working in a high-risk environment (e.g. building sites)
 - e) Learners with a disability or health problem
 - f) Learners where English is not their first language
 - g) Poor numeracy and literacy skill, or specific learning need
 - h) Unsupportive home environment
 - i) Under-represented groups
 - j) Acting as a carer for another family member
 - k) Background in offending
 - l) Learners who give cause for concern through disclosure, behaviour, patterns of absence or other factors which may give rise to concern.
- 5.6. Learners who have concerns about themselves, other learners, or the behaviour of employers or employees towards them can use this Policy to ensure that they are taken seriously.
- 5.7. It is not our responsibility to investigate abuse. Nevertheless, we have a duty of care to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.
- 5.8. We will take all necessary steps to identify and control any risks associated with working with a particular employer. We will ensure that employers are fully aware of their moral and legal obligations in ensuring the wellbeing of our learners.

3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

- 5.9. We recognise that in order to safeguard the wellbeing of our learners, responsibility for doing so should be fully shared between us, the employers and the learners.
- 5.10. In addition, statutory guidance issued under the Counter-Terrorism and Security Act 2015⁴ requires educational institutions to have “due regard to the need to Prevent people from being drawn into terrorism”. We recognise our duty under the guidance to help safeguard learners from being drawn into both violent and non-violent extremism. Further information about Prevent, the Government’s strategy to safeguard vulnerable people from becoming radicalised in such a way is provided in the footnote⁵.

6. REGULATED ACTIVITY⁶

- 6.1. Regulated activity refers to certain roles that involve working with children or vulnerable adults, such as social work and providing care. Anyone who is on the Disclosure and Barring Service (DBS) barred lists cannot work in these roles. Therefore, organisations who recruit people for regulated activities must legally carry out Enhanced DBS checks to check whether they are barred and to prevent them from accessing these roles.
- 6.2. Teaching children is regulated if the activity is carried out in a certain educational location (for example, a school) or if not in an educational establishment, by the same person frequently (such as once a week or more), 4 or more days in a 30-day period, or overnight (between 2am and 6am).
- 6.3. A child is anyone under the age of 18. An adult at risk, or vulnerable adult, is someone aged 18 or over who has needs for care and support (whether or not a local authority is meeting any of those needs), is experiencing or is at risk of, abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it⁷.

⁴ <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

⁵ <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739154/Regulated_Activity_with_Children_in_England.pdf

⁷ https://www.legislation.gov.uk/ukpga/2014/23/pdfs/ukpga_20140023_en.pdf

- 6.4. There are six categories of regulated activity in relation to adults⁸: providing health care, providing personal care, providing social work, assistance with general household matters, assistance in the conduct of a person's own affairs and conveying (transporting an adult because of their age, illness or disability to or from places where they have received, or will be receiving, health care, relevant personal care or relevant social work). Someone manages or supervises a person who is engaging in regulated activity on a day-to-day basis is also in regulated activity.
- 6.5. Regulated Activity excludes any activity carried out in the course of family relationships, as well as personal, non-commercial relationships.

7. STAFF CODE OF CONDUCT

- 7.1. We are striving towards a culture of respect and dignity. We expect employees and associates to familiarise themselves with our Equality, Inclusion and Diversity policy, based on the Equality Act 2010, and to be actively committed to safeguarding all learners, including vulnerable persons. It is essential to maintain professional rather than "friendship" relationships with learners and to avoid learner contact outside of the scope of normal duties.
- 7.2. We expect employees and associates to follow these simple, common sense guidelines to maintain an atmosphere of respect, fairness and transparency:
- Maintain a safe and appropriate emotional and physical distance from vulnerable persons.
 - Do not make sexual or discriminatory comments of any kind.
 - Do not engage in rough or sexually provocative games.
 - Do not make sexual comments or innuendos.
 - Do not lend or borrow money or property.
 - Do not have exclusive or secretive relationships with learners
 - Do not invite learners into your home.

⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf

- Do not provide or recommend inappropriate reading materials or engage in inappropriate internet use.
- Report all safeguarding concerns and disclosures to the DSL in the first instance
- Do not discuss a safeguarding concern or a disclosure of safeguarding concern with other employees, associates or learners, unless instructed to do so by the DSL as part of the action plan for managing the concern

7.3. Sections 8-12 below set out how we will safeguard our learners. Section 13 provides information about different safeguarding concerns, and how to recognise them.

8. PREVENTION

8.1. Clear communication of Policies and Procedures

8.1.1. We will ensure that all employees, learners and employers are fully aware of the 5 Rs [also see [section 15](#)]:



8.1.2. This is designed to be a memorable method for identifying those at risk of harm.

8.1.3. We will ensure that our policies and procedures are written in plain English to ensure that important information is clear. We will ensure that all employees, employers and learners have access to this policy and the procedure for reporting concerns.

8.1.4. We will carry out regular, systematic assessments of the awareness and knowledge of employees, learners and employers to test how well they understand safeguarding and the related policies and procedures for managing safeguarding. Any weakness will be actioned accordingly.

8.2. Training and updates (employees, learners, employers)

8.2.1. We will provide all employees with accessible, up to date and clear safeguarding training. All employees will be required to participate in this mandatory training, and this will be tracked.

- 8.2.2. We will provide learners and employers with accessible, up to date and contextualised safeguarding training.
- 8.2.3. We have identified a Designated Safeguarding Lead (DSL) and Deputy DSL. Both roles are required to be fully trained in appropriate 'regulated activity' training, and wider wellbeing management.
- 8.2.4. The DSL will be responsible for making sure that all employees are adequately trained.
- 8.2.5. All employees will be provided with Part 1 of the "***Keeping children safe in education Statutory guidance for schools and colleges Part one: Information for all school and college staff - September 2019***" accessed here:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836144/Keeping_children_safe_in_education_part_1_2019.pdf

8.3. Safer recruitment

- 8.3.1. We will do all in our power to recruit safe employees. We will hold a '*single central record*' log of the checks and training that we have carried out to ensure that our employees are fit to work with all learners to maximise their success potential and ensure their safety and wellbeing.
- 8.3.2. In order to do this, we will carry out basic DBS checks on all employees who have contact with apprentices. In addition, interviews will include scenario-based questions to assess the current skills and knowledge of potential employees which will form the basis for selection.
- 8.3.3. All employees will be required to complete mandatory training in Safeguarding and Prevent, and completion will be monitored.
- 8.3.4. All new employees will be provided with a handbook, containing the safeguarding policies and procedures. All new employees will have to complete mandatory safeguarding and Prevent training before work with learners commences.
- 8.3.5. We will ensure:
- 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.
- A basic DBS Check will be conducted for employees who have contact with apprentices.
- The applicant's attitude and demeanour towards young or vulnerable learners will be explored at interview.
- Any gaps in the applicant's employment history will be questioned and fully explored.
- Any concerns or discrepancies arising from the information obtained are questioned and fully explored.
- Employees receive a full and thorough induction appropriate to their role, including a briefing on safeguarding and their responsibilities under this policy.

8.4. Monitoring and contact

8.4.1. Learners on apprenticeships will have a designated Apprenticeship Coach who is able to provide unlimited coaching, tutorial support, advice and guidance.

8.4.2. Learners will have face to face visits by coaches. In addition, coaches will maintain frequent and regular contact with learners via the telephone and through email. Clear opportunities to disclose any concerns will be provided through the review process.

8.4.3. Learners who are deemed to be at greater risk of harm [see 5.5 above] will have more frequent face to face visits, as determined by their level of risk.

8.4.4. Although it is recognised that absence records are covered under the GDPR regulations, learners and employers will be encouraged to share this information with Coaches as sporadic or unaccounted for absence patterns can indicate a safeguarding risk.

8.5. Risk mitigation, including safe environment

8.5.1. We recognise, as per guidance from the Health and Safety Executive, that the employer has the "primary responsibility for the health and safety of the apprentice and should be managing any significant risks"⁹. We will take reasonable steps to satisfy ourselves that the employers who employ our apprentices are doing this. This will consist of a Health and Safety questionnaire,

⁹ <https://www.hse.gov.uk/youngpeople/apprentices.htm>

to capture relevant contacts and how the employer manages any risks in relation to the apprentices on our programmes, as well as a review of the policies and procedures in place related to the safety and wellbeing of our apprentices. These will be carried out prior to working with a new employer and will be reviewed once per year. Mitigations will be agreed in order to control any emerging risk.

- 8.5.2. Employers that are high risk, where these risks cannot be controlled, will not be engaged to work with us.
- 8.5.3. At the start of an apprenticeship, we will conduct a Health, Safety and Welfare assessment with each apprentice to identify any risk areas related to their work environment, job role and working practices, and agree mitigations where appropriate. This will be reviewed annually.
- 8.5.4. In addition to a safe workplace, it is important that the wider environment is safe. A safe environment is one in which learners *feel* secure, able to express their needs and wishes, knowing they will be listened to and respected.
- 8.5.5. We will support employers to achieve a safe environment by ensuring that all associates involved in apprenticeship programmes receive an induction session providing information on how to establish and maintain a safe environment. In addition, learners will receive induction sessions and programme handbooks which will include information on safeguarding and on the skills they need to stay safe.
- 8.5.6. We will effectively performance manage our employees so that compliance with the Safeguarding Policy is fully maintained. Any employee who violates the Safeguarding Policy will be subject to the company's disciplinary policy.

9. PROTECTION

9.1. Designated Safeguarding Lead (DSL) and Deputy DSL

- 9.1.1. We have identified a Designated Safeguarding Lead and Deputy. The Lead and Deputy will be fully trained to deal with and fully manage instances of disclosure, in line with legal and moral obligations. In addition, the Lead and Deputy will provide regular communications to employees to ensure that they have full awareness of their obligations to safeguard and to carry out their duties properly

where concerns are identified. The full Safeguarding Process Map can be found in [Section 16](#)

9.2. Working together (employers and other agencies)

9.2.1. Effective safeguarding happens when providers work together. As noted in 8.5, we will take reasonable steps to satisfy ourselves that the employers who employ our apprentices are managing any significant risks that could affect our learners, and support employers in doing this where possible.

9.2.2. The DSL and Deputy will form productive working relationships with each employer to foster a common approach to safety and wellbeing. We will share appropriate information, training and updates with each employer so that a common understanding of commitment to safety and wellbeing can be achieved.

9.2.3. The DSL and deputy will seek regular updates from appropriate agencies and networks, so that their safeguarding knowledge and expertise are fully up to date.

9.3. Communication of policies and procedures

9.3.1. All updated policies and procedures will be made available on 3rd January 2020. All employers will be directly contacted so that they have access to the Policies and Procedures. In addition, learners will be provided with copies of the safeguarding policy, plus any necessary updates.

9.3.2. All employees will receive training, detailing where they can find the necessary policies, procedures and paperwork for managing a disclosure or concern.

9.3.3. We will gauge the understanding of safeguarding of our employees, employers and learners regularly, using key questions to establish level of understanding. Where there are gaps in knowledge or awareness, additional information and/or training will be provided to address these.

9.4. Easy to use reporting mechanism

9.4.1. We recognise the need to support employees in carrying out their legal and moral obligations. Therefore, the Safeguarding reporting process will be made clear, accessible and easy to use. Support prompts at each stage will ensure that employees are able to capture vital information quickly, appropriately and effectively.

10. SUPPORT FOR LEARNERS

- 10.1. Coaches will have regular and frequent contact with learners, as described in [8.4 Monitoring and contact] above.
- 10.2. Bespoke, employment-focused, and appropriate training will be provided to learners, which will support them in understanding safeguarding risks and keeping themselves and others safe. A record of who has accessed the training will be kept. In addition, all Coaches and Associate Facilitators will be expected to plan good quality off the job training, which includes opportunities to reinforce safety and wellbeing.
- 10.3. In addition to the moral and statutory requirements under this Safeguarding Policy, coaches, learners and employers will be provided with a 'toolkit' of support agencies and/or information that learners can be signposted to if they have issues which are affecting their performance or wellbeing.
- 10.4. Governance/critical friend. We will seek the views of external experts to ensure that our Safeguarding and Prevent policies, procedures and general operation continue to be fit-for-purpose.
- 10.5. In addition to Safeguarding, our '*Wellbeing for All*' measure of success, strives to ensure that our employees and learners feel positive and effective in their work and lives. We can contribute to this ideal by promoting strategies which are aimed at promoting health and happiness.

11. UNDERSTANDING SAFEGUARDING AND HOW TO RECOGNISE CONCERNS

- 11.1. Safeguarding and promoting the welfare of those in regulated activity, vulnerable adults and those at risk is everyone's responsibility. Everyone who comes into contact with the above has a role to play in safeguarding them. In order to fulfil this responsibility effectively, all professionals should consider, at all times, what is in the best interests of those whom we are safeguarding.
- 11.2. Employees working with those in regulated activity, or vulnerable adults may come across signs of harm and/or abuse. Employees must ensure that significant concerns for the wellbeing of a learner are reported to the DSL to invoke the necessary

procedure. Where employees are unsure and need guidance about safeguarding issues, they are encouraged to seek support from the DSL or Deputy.

- 11.3. In the event of any concern noted by any employee, or if any employee is approached by learner, regarding any matter concerning abuse, they must tell the learner that they are bound to pass on the information to the designated person. The person receiving the information should pass it on as a matter of urgency to ensure the matter can be dealt with as soon as possible. If the designated person is not available, the employee should contact the Deputy. No one must be promised that anything they say will be kept confidential. It is helpful for an employee to tell the person raising the concern they will treat the information sensitively and will write down anything they actually say to ensure as exact a record as possible is kept for future reference.
- 11.4. All employees and other stakeholders should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and know that such concerns will be taken seriously by the senior management team.

12. WHISTLEBLOWING

- 12.1. Our whistleblowing procedures should be followed where there are such concerns as referenced in 11.4 above. Where an employee feels unable to raise an issue with Keystone Training Ltd or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.
- 12.2. General guidance can be found at: <https://www.gov.uk/whistleblowing>
- 12.3. The NSPCC whistleblowing helpline is available for employees who do not feel able to raise concerns regarding Safeguarding (regulated activity) protection failures internally. Employees can call 0800 0280285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.
- 12.4. **A note on whistleblowing.** It is everyone's right and responsibility to report genuine concerns about the behaviour of any employees, associates, contractors, learners, clients, and visitors. Where genuine concerns are raised, whether subsequently proved or disproven, the whistleblower's position will be protected. Malicious allegations may give rise to disciplinary proceedings, up to and including dismissal. Whistleblowers should contact the Designated Safeguarding Lead (Rendee Yule), in the first instance. Where this is not possible, Angela Loggie, MD, is the point of escalation.

13. RECOGNISING SAFEGUARDING CONCERNS

13.1. **Forms of abuse.** There are many forms of abuse. The following table is not an exhaustive list, but will help to provide some further information and known indications which may give cause for concern:

ABUSE CATEGORIES	SIGNS / POSSIBLE INDICATORS / FURTHER INFORMATION
PHYSICAL	Possible Indicators of physical abuse : <ul style="list-style-type: none"> • Any allegation by an individual • 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 – i.e. work absence
SEXUAL ABUSE, EXPLOITATION	<ul style="list-style-type: none"> • Possible Indicators of sexual abuse or exploitation • Any allegation made by an individual • Withdrawn behaviour/depression/ anxiety/ work performance issues • Severe sleeping disorders • Eating disorders • Changes in routine – i.e. work absence • Unexplained gifts or new possessions; • Association with other people involved in exploitation; • Suffering from sexually transmitted infections or become pregnant; • Changes in emotional well-being; • Misuse of drugs and alcohol; • Going missing for periods of time or regularly come home late; and • Regularly missing work or education

<p>SEXUAL HARRASMENT</p>	<p>Sexual Harassment can include:</p> <ul style="list-style-type: none"> • Sexual comments, e.g. sexual jokes, comments about clothing, sexual name calling – either directly or via email / social media etc. • Physical: e.g. deliberately and inappropriately touching someone or their clothing • Sharing / posting sexual images and videos without consent; • Unwanted sexual comments and messages, including, on social media; • Up-skirting, coercion or threats <p>Sexual Harassment – the law and guidance</p> <ul style="list-style-type: none"> • The law says that this is unlawful discrimination (Equality Act 2010). It's harassment if it's MEANT OR if it has the effect of violating dignity, degrading and/or intimidating. • Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. The law says it's sexual harassment if the behaviour is either meant to, or has the effect of: • Citizen's Advice on what to do if you are being harassed at work: https://www.citizensadvice.org.uk/work/discrimination-at-work/checking-if-its-discrimination/if-youre-being-harassed-or-bullied-at-work/ • If you're treated badly or less favourably because of your reaction to sexual harassment, you may have a claim under the Equality Act. The Act says this is also harassment. You're protected if you reject or submit to the harassment. The person who treats you less favourably can be the person who actually harassed you, but it can also be someone else.
<p>FEMALE GENITAL MUTILATION (FGM)</p>	<p>FEMALE GENITAL MUTILATION is the practice of removing part or all of the external female genitalia. It is illegal. Many women who have undergone this procedure are traumatised and continue to suffer health issues as a result. It is a particularly insidious problem, since the women that this effect are unlikely to want to talk about it.</p> <p>It usually happens when a woman is very young but can happen in later life in some situations.</p> <p>It can be called 'cutting', 'female circumcision' or 'initiation'. Although this is compared to male circumcision, it is nothing like it. It is not safe, and is usually performed by a family member, sometimes with unclean</p>

	<p>instruments. It can have disastrous effects on the woman it is performed on.</p> <p>Teaching establishments (regulated activity) have a duty in law to report ANY suspected case of FGM to the police.</p> <p>However, many women do not tell, and this damaging procedure can impact on a woman for the rest of her life, causing shame, discomfort and health related issues which can cause absence from work. It's therefore important to recognise some of the signs. Under no circumstances, whether religious or otherwise, is FGM ever acceptable.</p> <p>SIGNS:</p> <ul style="list-style-type: none"> • Absence from work • Constant visits to the loo • Obvious discomfort • Trauma signs • Continual infections
<p>FORCED MARRIAGE</p>	<p>Forced marriage is a crime. It is DIFFERENT to an arranged marriage, which requires CONSENT. Forced marriage is without consent.</p> <p>Some women are particularly at risk. If they try to escape their forced marriage, they can be at risk of honour-based violence. People can be forced into marriage by threat or violence.</p> <p>There are no religions which stipulate that marriage should be without consent.</p> <p>This type of psychological stress and fear will undoubtedly affect performance and the health of the employee or apprentice.</p> <p>There are agencies which can support people in this situation, so your duty is always to refer.</p>
<p>TRAFFICKING</p>	<p>Human trafficking is illegal. The definition is moving people from one location to another in order to exploit them in some way. This can be sexual exploitation or slavery, for example.</p> <p>Possible signs of trafficking / slavery include:</p> <ul style="list-style-type: none"> -as with physical abuse / bullying -looking ill, drawn, underfed, dirty – wearing same clothes day after day -lacking in confidence and/or appearing frightened -living environment is not fit-for-purpose – e.g. crowded -the person hasn't got official documents like a passport, driver's licence -scared of those that could help, e.g. the Police

GANGS AND VIOLENCE	<p>Signs of involvement in gangs include:</p> <ul style="list-style-type: none"> • Withdrawal from previous friends and family; • Decline in attendance or achievement; • Use of new slang words; • Has unexplained money or possessions; • Sudden change in appearance which could be part of a gang uniform; • Use of new 'handle' or nickname; • Physical injuries; • Use of graffiti 'tags' • More than normal use of social networks; • Expressing unhealthy and intimidating views about other people; • Fear to travel to or wander into certain geographical areas. <p>Government guidance can be found here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/ </p>
DOMESTIC, COERCIVE AND FINANCIAL ABUSE	<p>Domestic abuse happens at home, with family partners or intimate partners. It is particularly damaging and happens over a period of time. Others not suffering from such abuse may not understand why a person simply doesn't leave the situation. However, this may be extremely difficult, since the victim has lost all confidence, feels shame, does not realise what is happening and has been effectively controlled. It is very important not to judge or give advice. In cases of domestic abuse, specialist providers are usually necessary to help the victim to escape. In addition, escape can be a very risky time for a victim. In many cases of domestic abuse ending in murder, the victim has been in the process of leaving the abuser.</p> <p>Physical violence can be in the form of sexual violence, hitting, pushing, punching – and other forms of violence, sometimes against the victim's loved ones.</p> <p>Not all cases of domestic abuse are about physical violence. Coercive control does not use violence but affects the victim as badly. Coercive control uses intimidation, bullying, threats and control to harm their victim.</p> <p>If a colleague or direct report is suffering from domestic abuse, they will need help. Providing opportunities for disclosure will be important, without pressurising them.</p>

GUIDANCE: <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>

Physical Signs of Domestic Abuse

- Excuses – “I walked into a
- Sunglasses on days that don't require them
- Black eyes, bruised lips, marks on head / neck
- Sprained wrists
- Bruises on the arms
- Covering up when it's not necessary, e.g. long sleeves / polo neck in the height of summer
- Note well, there is evidence to suggest that many abusers ensure that marks through violence will not be seen by others...

It's also common for someone to try to cover up the physical signs with clothing. For example, you may notice that someone is wearing long sleeves or scarves in the hot summer. Wearing heavier than normal makeup or donning sunglasses inside are also common signs of domestic abuse.

Coercive Control

The government defines **Coercive behaviour** as “an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten the victim.” **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” (www.cps.gov.uk).

Signs of coercive control

- Low self-esteem/lack of confidence
- Reserved / distant
- Cancels appointments last minute
- Often late to work
- Says partner is 'jealous'
- Asking partner's permission for everything
- Partner constantly phoning / contacting / texting whilst at work

	<ul style="list-style-type: none"> • Having little money • Not having access to a vehicle • Excessive privacy about home life • Isolating self • Fear • Exhaustion • Anxiety • Substance abuse • Depression • Suicidal thoughts <p>Financial abuse is also ‘coercive control’ – but is focussed on making sure that the victim has no money to escape. It’s also about ‘stealing’ from the victim, by using money that they have, without their consent, or opening bank accounts in their name, thus exposing them to risk.</p> <p>Financial control can be used, even when the victim has left the home, for example, child maintenance.</p> <p>Signs include:</p> <ul style="list-style-type: none"> • possessions missing • lack of money • Family showing OTT interest in bank accounts / money • Changes to property ownership • Financial difficulties with rent / mortgage • Something doesn’t ‘stack’ up – nice house, no food, for example...
<p>DISCRIINATION</p>	<p>The Law on discrimination:</p> <p>It is against the law to discriminate against anyone because of:</p> <ul style="list-style-type: none"> • age • gender reassignment • being married or in a civil partnership • being pregnant or on maternity leave • disability • race including colour, nationality, ethnic or national origin

	<ul style="list-style-type: none"> • religion or belief • sex • sexual orientation <p>These are called 'protected characteristics'.</p> <p>You're protected from discrimination:</p> <ul style="list-style-type: none"> • at work • in education • as a consumer • when using public services • when buying or renting property • as a member or guest of a private club or association <p>You're legally protected from discrimination by the Equality Act 2010.</p> <p>You're also protected from discrimination if:</p> <ul style="list-style-type: none"> • you're associated with someone who has a protected characteristic, for example a family member or friend • you've complained about discrimination or supported someone else's claim <p>Possible indicators of discriminatory abuse</p> <ul style="list-style-type: none"> • The person is withdrawn • They are anxious, and may feel unfairly treated or fearful of their job • They may become stressed and suffer ill health • They may feel 'powerless'
<p>PSYCHO-LOGICAL ABUSE AND BULLYING</p>	<p>Signs of psychological abuse</p> <ul style="list-style-type: none"> • Any allegation by the individual • Changes or regressions in mood or behaviour, or nervousness • Obsessions or phobias • Sudden under-achievement or lack of concentration • Attention seeking behaviour • Persistent tiredness • Changes in routine – i.e. work absence <p>Bullying is usually deliberate, hurtful and repeated over time. Those bullied are usually unable to protect themselves. The main types are:</p> <p>VERBAL</p>

	<p>EMOTIONAL – including isolation</p> <p>PHYSICAL</p> <p>ONLINE (Cyberbullying)</p> <p>Anyone can bully, but bullying in the workplace is usually done by someone who is in a position of power. This does not necessarily mean a manager. Power can be unofficial, as well as official.</p> <p>CYBERBULLYING</p> <p>Is a malicious form of bullying that can have a significant impact on someone's health and wellbeing. Facebook, Twitter, Instagram, email are all potential platforms for this type of bullying. It is instant. The bully or bullies are able to hide behind a screen, so it is an insidious and potentially destructive tool to use.</p> <p>Malicious lies, name calling, ridicule, 'trolling' (hateful comments about someone's shared misfortune), photo shaming are all aspects of online bullying. The public nature of cyberbullying makes it especially degrading.</p> <p>Harassment– sending offensive, rude, and insulting messages repeatedly.</p> <p>Denigration – sharing fake and/or damaging information about someone.</p> <p>Flaming– sending offensive, extreme comments on purpose to distress another.</p> <p>Impersonation– hacking into a person's account to use their identity to post embarrassing or damaging content.</p> <p>Outing and Trickery– purposely gaining trust, then once secrets are gained, sharing them to shame another.</p> <p>Cyber Stalking – threatening harm to and scaring someone repeatedly online.</p> <p>Exclusion – Purposely excluding someone from a group comment or excluding them from a shared group.</p>
--	---

13.2. **Risk factors for harm.** There are many forms of abuse. The following table is not an exhaustive

VULNERABLE RISK FACTORS

LONE WORKING

TAKEN FROM THE GOVERNMENT'S HEALTH AND SAFETY EXECUTIVE:

"Working alone is not in itself against the law and it will often be safe to do so. However, the law requires employers to consider carefully, and then deal with, any health and safety risks for people working alone.

Employers are responsible for the health, safety and welfare at work of all their workers. They also have responsibility for the health and safety of any contractors or self-employed people doing work for them.

These responsibilities cannot be transferred to any other person, including those people who work alone.

Workers have responsibilities to take reasonable care of themselves and other people affected by their work activities and to co-operate with their employers in meeting their legal obligations.

Who are lone workers and what jobs do they do?

Lone workers are those who work by themselves without close or direct supervision, for example:

In fixed establishments

- *A person working alone in a small workshop, petrol station, kiosk or shop*
- *People who work from home other than in low-risk, office-type work*
- *People working alone for long periods, e.g. in factories, warehouses, leisure centres or fairgrounds*
- *People working on their own outside normal hours, e.g. cleaners and security, maintenance or repair staff*

As mobile workers working away from their fixed base

- *Workers involved in construction, maintenance and repair, plant installation and cleaning work*
- *Agricultural and forestry workers*
- *Service workers, including postal staff, social and medical workers, engineers, estate agents, and sales or service representatives visiting domestic and commercial premises*

How must employers control the risks?

Employers have a duty to assess risks to lone workers and take steps to avoid or control risks where necessary. This must include:

- involving workers when considering potential risks and measures to control them;
- taking steps to ensure risks are removed where possible, or putting in place control measures, eg carefully selecting work equipment to ensure the worker is able to perform the required tasks in safety;
- instruction, training and supervision;
- reviewing risk assessments periodically or when there has been a significant change in working practice.

This may include:

- being aware that some tasks may be too difficult or dangerous to be carried out by an unaccompanied worker;
- where a lone worker is working at another employer's workplace, informing that other employer of the risks and the required control measures;
- when a risk assessment shows it is not possible for the work to be conducted safely by a lone worker, addressing that risk by making arrangements to provide help or back-up.

Risk assessment should help employers decide on the right level of supervision. There are some high-risk activities where at least one other person may need to be present. Examples include:

- working in a confined space, where a supervisor may need to be present, along with someone dedicated to the rescue role;
- working at or near exposed live electricity conductors;
- working in the health and social care sector dealing with unpredictable client behaviour and situations.

Employers who have five or more employees must record the significant findings of all risk assessments.

Employers also need to be aware of any specific law that prohibits lone working applying in their industry. Examples include supervision in diving operations, vehicles carrying explosives and fumigation work.

Further information about controlling risks can be found on the HSE website at: www.hse.gov.uk/toolbox/

POOR COMMUNICATION SKILLS

It is important to note that if a learner speaks English as a second language, or has some form of communication challenge, they are less likely to be able to understand safety policies and procedures or tell someone if they are at risk of harm. It is extremely important to make additional efforts to establish that the learner is safe and free from the risk of harm.

SUBSTANCE ABUSE

Substance abuse and addiction is an insidious and harmful problem to the individual, and to those with whom they live. Signs can be obvious or subtle. Missed appointments, mistakes, accidents and absences may be a red flag. Many people with additions may not recognise that they have a problem until it becomes too significant.

Frank discussions with the individual may be necessary – but it is important that these discussions are between the individual and an appropriate manager / Designated Safeguarding Lead.

Signs include mood changes, physical changes, aggression, reduced performance.

LEARNING DIFFICULTY AND/OR DISABILITY

Learners who have declared learning difficulties and/or physical or mental health disabilities are vulnerable, though it is important to recognise where the learner already has successful coping strategies and support them with these. It is important to work with individuals to determine whether the level of safeguarding risk is higher and ensure that risk assessments mitigate against individual risk.

14. THE NEED TO UNDERSTAND SAFEGUARDING**LEGISLATION**

14.1. Although Keystone Training Ltd does not and will not take on children aged 16 to 18 as apprentices, we still have a duty to understand child protection and safeguarding for this age group along with that of safeguarding vulnerable adults. The statutory inquiry into the death of Victoria Climbié and the first joint Chief Inspector's report of safeguarding children highlighted the lack of priority status given to safeguarding. The government response to these findings included the *Green Paper - ¹⁰Every Child Matters* and the provisions in the ¹¹*Children's Act 2004*. Section 11 of the Children's Act 2004 places a duty on all agencies to make arrangements to safeguard and promote the welfare of children. No single profession can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes in to contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

14.2. We are committed to the government national framework: Working Together to Safeguard Children July 2019.

¹⁰ <https://www.gov.uk/government/publications/every-child-matters>

¹¹ <http://www.legislation.gov.uk/ukpga/2004/31/contents>

14.3. This Safeguarding Policy should be read in conjunction with the following Keystone Training Ltd policies, which are available in the Employee Handbook

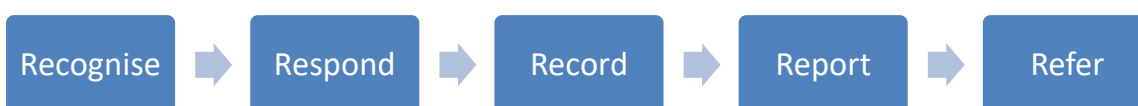
- a) Data Protection Policy
- b) Equal Opportunity Policy
- c) Health and Safety policy
- d) Social Media Policy

15. PROCEDURES

15.1. **Overall responsibility.** The Managing Director [Angela Loggie] holds full responsibility for the safeguarding of vulnerable persons and has appointed [Rendee Yule], the Designated Safeguarding Lead (DSL) to whom all issues relating to safeguarding should be reported. Full details of any safeguarding related incident, allegation and/or concern will be reported to Rendee Yule, or the Deputy DSL, Maxine Brown, without fail, as soon as possible, but within 24 hours by the Coach or Associate Facilitator with whom the matter was first raised. This must be followed up in writing.

15.2. Procedure for reported or suspected abuse or neglect – the 5 Rs.

15.2.1. **Recognise.** Recognise the signs that abuse may be taking place, or hear a learner trying to bring this to our attention.



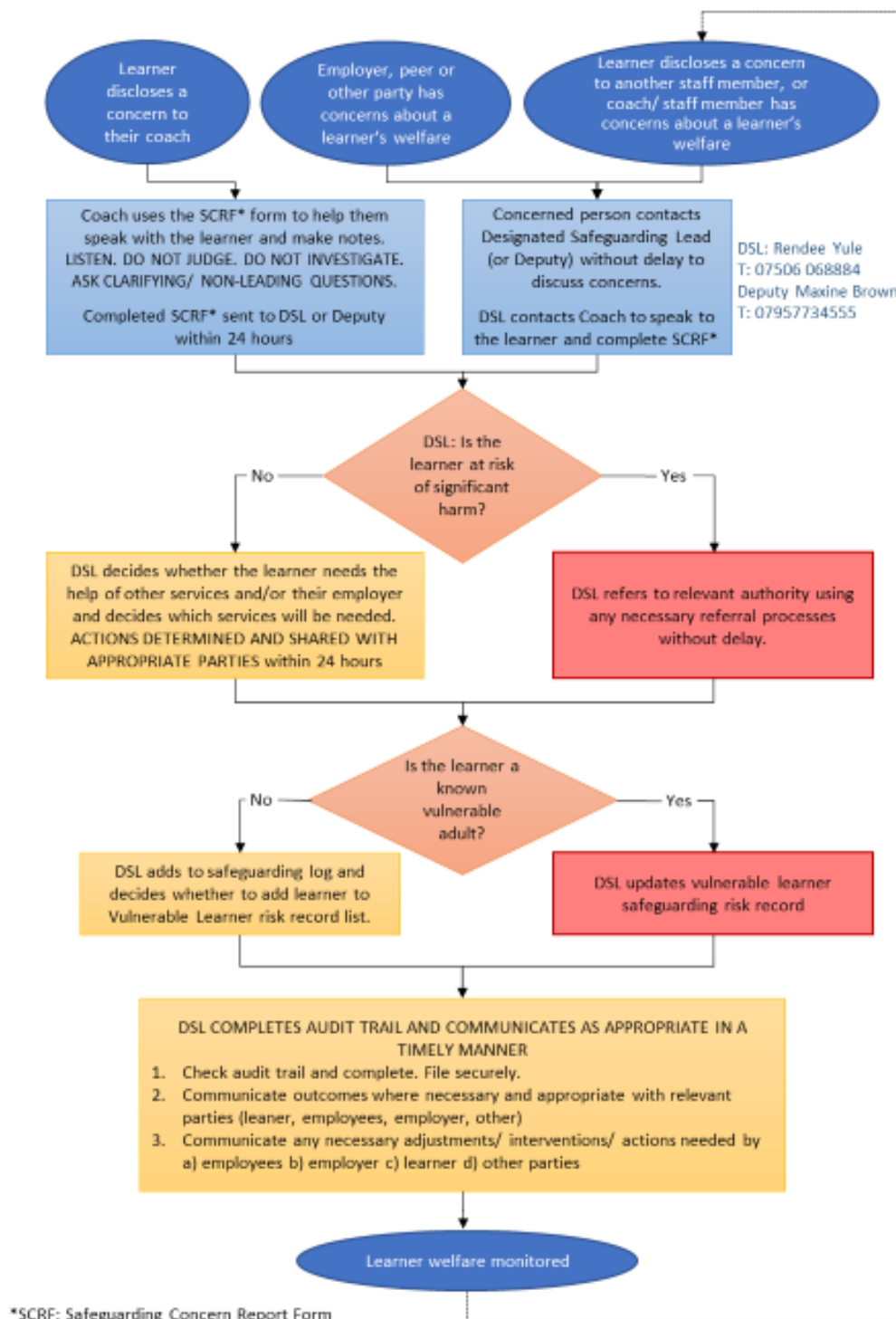
15.2.2. **Respond.** Hear them out in their own words. Do not summarise or paraphrase. Do not ask questions or interrupt. Do not investigate. Do ask open questions to clarify. Reassure the person that you are glad they have told you; they have not done anything wrong; what will happen next; and that you will seek help to keep them safe. Tell them that you cannot promise not to tell others if a crime has been or is going to be committed, other people are at risk, they or someone else is at risk of harm, or they are not able to make informed decisions about their own wellbeing. You can tell them that you will treat with sensitivity.

15.2.3. **Record.** 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

15.2.4. **Report.** Inform the Designated Safeguarding Lead (Rendee Yule), immediately on 07506 968884 / rendee.yule@keystonetrainingltd.co.uk. If the DSL is not available, inform the Deputy DSL (Maxine Brown) on 07957734555 / maxine.brown@keystonetrainingltd.co.uk. Where this is not possible, please contact Angela Loggie, Managing Director, on 07776 190304 / angela.loggie@keystonetrainingltd.co.uk

15.2.5. **Refer.** Where appropriate, the DSL/Deputy DSL or MD will involve outside agencies or the police

16. THE PROCESS MAP FOR REPORTING A SAFEGUARDING CONCERN



17. PROCEDURE FOR ALLEGATIONS AGAINST STAFF

17.1. If an employee or associate facilitator is alleged to have behaved inappropriately towards a vulnerable person, or to have committed a criminal offence, a full investigation will be made. An immediate report should be made to the DSL (Rendee Yule), immediately on 07506 968884 / rendee.yule@keystonetrainingltd.co.uk.

17.2. An investigation will take place which:

- a) Will determine if the police need to be involved immediately to protect the person further
- b) Will record all details received and secure them safely
- c) Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and is not treated unfairly or harassed while the investigation is taking place
- d) Will determine whether suspension is appropriate whilst undertaking the investigation

18. ADVICE FOR LEARNERS

18.1. If you are being abused or are in a worrying situation or suspect someone else is being abused or is in a worrying situation, please contact your Coach in the first instance.

18.2. Where this is not possible, please contact the Designated Safeguarding Lead (Rendee Yule), on 07506 968884 / rendee.yule@keystonetrainingltd.co.uk.

18.3. Where this is not possible, please contact the Deputy DSL (Maxine Brown) on 07957734555 / maxine.brown@keystonetrainingltd.co.uk.

18.4. We will listen to you and take you seriously.

18.5. We will make sure that you or anyone else is not in immediate danger.

18.6. We will ask permission to investigate your concerns. If you do not grant permission, we will respect this UNLESS:

- a) A crime may have taken place.
- b) You or someone else is at risk of harm.

- c) Another person or people are affected whose safety we need to consider.
- d) You are not able to make informed decisions about your wellbeing and other people need to act in your best interests.

18.7. We will decide on an appropriate course of investigation or action. Where appropriate and we are able, we will protect your identity and confidentiality if you wish, other than in the types of situations described above. In some cases, such as sexual abuse, we may need to call the police.

18.8. After completion of the investigation or action, we will hold a review meeting to make sure that you are safe from a recurrence of the abuse or risk, agree any further support you might need, and agree any additional staff training or support needed following the case.

19. OUR PREVENT DUTY (including British Values)

19.1. While not a school or a registered early years provider, Keystone Training Ltd takes its citizenship responsibilities seriously and believes that as an organisation engaged with learners, potentially including young or vulnerable persons, Prevent¹² should be placed alongside our safeguarding policy at the heart of what we do.

19.2. Prevent is about preventing young people being drawn into terrorism. This means:

- a) Being alert to risks to young people, including their being drawn into expressing extremist views.
- b) Instilling British values:
 - I. Democracy
 - II. Individual liberty
 - III. The rule of law
 - IV. Mutual respect and tolerance of different faiths and beliefs

19.3. We will use every naturally occurring opportunity to embed the British Values within our curriculum, lesson planning and learning content to reinforce the importance of 20.1 above.

¹² <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

19.4. Our commitment to Prevent

- 19.4.1. Every employee and every associate involved in training vulnerable persons, including on apprenticeships, will be inducted into their Prevent duty by our Designated Safeguarding Lead (Rendee Yule). Every employee will be provided with training and updates, and as a minimum will be obliged to complete and provide certification of completion from the free government training offered here: <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>
- 19.4.2. Prevent will be briefed at monthly team meetings alongside other policy updates including safeguarding to keep it alive and part of our team culture.
- 19.4.3. British values will be used to underpin training activities and current affairs discussions, for example through delegates being upskilled to role model behaviours including collaboration, sharing resources, listening respectfully, having their say in a constructive manner, following the group's ground rules and receiving the individual attention and support they need to help their self-esteem and confidence to flourish.
- 19.4.4. Learner coaches and associate facilitators will escalate any concerns about safety or the expression of extremist values to our DSL (Rendee Yule) or our Deputy DSL, Maxine Brown, who will make a decision about the appropriate course of action.
- 19.4.5. If the DSL or Deputy think a learner might be at risk of extremism, they will contact the regional FE/HE DfE Prevent Coordinator in the learner's region (found at <https://preventforfeandtraining.org.uk/home/leaders-and-managers/what-training-and-support-is-there-for-me/>), or contact the DfE counter extremism helpline if needed on 020 7340 7264 or at counter.extremism@education.gov.uk.

APPENDIX ONE – DEFINING VULNERABLE ADULT

A vulnerable adult is aged 18 or over and:

- Substantially dependent upon others in performing basic physical functions, or their ability to communicate with other providing services, or to communicate with others, is severely impaired, and, as a result, would be incapable of protecting themselves from assault or other physical abuse, or there is a potential danger that their will or moral wellbeing may be subverted or overpowered.
- Living in in sheltered housing or residential accommodation, such as a care home or a residential special school.
- Receiving any form of health care or domiciliary care in their own home.
- Detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act.
- In contact with probation services.
- Receiving a welfare service of a description to be prescribed in regulations.
- Receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions. (Age related needs includes needs associated with frailty, illness, disability or mental capacity.)
- An expectant or nursing mother living in residential care.
- Receiving direct payments from a local authority/HSS body in lieu of social care services.
- In need of assistance in the conduct of their own affairs.

APPENDIX TWO – RELEVANT SAFEGUARDING INFORMATION

- Safeguarding Vulnerable Groups Act SVGA (2006 amended 2012)
- Protection of Freedoms Act (2012)
- Disclosure and Barring Service Code of Practice (2012)
- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2019)
- Counter-Terrorism and Security Act (2015)
- Equality Act (2010)
- Safeguarding Children and Safer Recruitment in Education (2007)
- Childrens Act (1989, 2004)
- Every Child Matters (2004)
- Sexual Offences Act (2003)
- Information Sharing: Advice for Practitioners (2018)