

Safeguarding, Prevent & Child Protection Policy & Procedures

We are committed to actively providing a safe environment for all, promoting the mental and physical welfare of our learners and protecting them from harm.

Fareport Training Organisation Limited ('Fareport') fully recognises and embraces our legal and moral duty to safeguard learners, employers, staff (including Associate Trainers and IQAs), volunteers and visitors in our work and activities. This can only be achieved through partnership working with stakeholders and key partners. All staff working for Fareport, regardless of their role, understand their responsibility to safeguard learners and that they must adhere to the following guidelines and policies.

We ensure that Safeguarding and Child Protection requirements are continually reviewed and adjusted to meet the changing needs of learners, communities and the organisation and in line with new guidance. Our policy and procedures are updated at least annually, or more often if significant changes dictate.

The term "**child**" or "**children**" relates to all **young people** that we work with aged under 18. The term "**vulnerable adult**" is deemed a person aged 18 or over who is or may need community care services because of mental health, disability, illness and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

We have a duty to ensure the integration of impartial careers guidance into Fareport's vision and strategic plans. We will achieve this by ensuring that leadership, including governors and careers leaders, are actively involved in promoting a culture where safeguarding, prevent duties, and careers education are interconnected and prioritised. This holistic approach ensures that learners receive comprehensive support that addresses both their career development and personal safety.

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Designated Safeguarding Lead (DSL):
Theresa Maple - 07815-846880

Deputy Safeguarding Leads (DDSL):
Zoe Little – 07766-824348
Mailbox - safeguarding@fareport.co.uk

Equality Statement

Fareport will make sure that all children, young people and persons deemed to be vulnerable (referred to as 'learners' throughout this policy and procedures) have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. We are fully committed to anti-discriminatory practice. We recognise that some learners with protected characteristics or previous life experience make them more vulnerable to abuse and we are particularly vigilant in these circumstances.

Overall Aims of this Policy

- To ensure that all learners who have access to Fareport, are aware that they have a right to be protected from abuse, radicalisation and harm, both on- and off-line.
- To ensure that learners are never placed at risk whilst in Fareport's care.
- To uphold the **prime concern**, which is the interest and safety of the learner (child/young/vulnerable person).
- To ensure and always promote the need for confidentiality to be maintained within the guidelines and as part of data protection.
- To review this policy and procedure on an annual basis and plan appropriate training and development for all staff in its daily implementation. This policy was reviewed in September 2021 in the light of the Covid 19 pandemic and the requirement to ensure all our policies and procedures are mindful of the new ways of training and the impact on learner health and wellbeing.
- **This iteration of the policy was fully updated in September 2021 taking into consideration new guidance in Keeping Children Safe in Education (KCSIE) and DfE guidance on peer-on-peer sexual violence and sexual harassment in education settings.**

Fareport acknowledges that any learner can become vulnerable at any time during their relationship with us and accept our responsibility to:

- Endeavour to know our learners, understand their risks and remain continually vigilant to potential issues shared about themselves or any child or vulnerable adult
- Recognise, respond and report if any concerns arise, following our set procedures
- Support and protect learners who are identified as vulnerable or raise a concern. Specifically, all staff must reassure victims that they are being taken seriously and that they will be supported and kept safe in relation to reports made.
- Ensure vulnerable learners or victims of abuse are never be made to feel ashamed for making a report of abuse, sexual violence, or sexual harassment, nor should they be given the impression that they are creating a problem by making the report.

- Monitor all learners to ensure that learners are identified as vulnerable when situations change and that they are supported appropriately.
- Act quickly to signpost and refer where appropriate to do so, so early intervention is possible.

Engaging Parent and Carers

The involvement of parents and carers is crucial in creating a supportive learning environment. Fareport will endeavour to engage parents and carers through **transparent communication** aimed at keeping families informed about safeguarding policies, prevent strategies, and the measures in place to protect learners.

We also acknowledge that volunteers, visitors, and employees may benefit from similar understanding, and this policy endeavours to replicate the support, signposting and referral to those involved in the support of learners.

Safeguarding Policy Suite

To meet our safeguarding obligations, we have number of policies and procedures to support our work within this area. This policy should be read alongside the following:

- Safeguarding, Prevent & Child Protection Policy (this document)
- Recruitment and Selection Policy (Ref 8)
- Equality, Diversity & Dignity Policy (Ref 2)
- Health & Safety Policy & Procedures (Ref 5)
- Risk Assessment Procedures (Ref 34)
- Critical Incident Policy (Ref 36)
- Data Protection Policy GDSLR (Ref 18)
- Dignity Policy (Ref 7)
- Lone Workers Policy & Procedure (Ref 33)
- Use and Misuse of ICT (Ref 47)
- Grievance Procedure (Ref 31)
- Staff Handbook & Associated Procedures (Ref 23)

These documents reflect Fareport's response to safeguarding situations. All approaches are based on a robust system of risk assessment.

Fareport acknowledges that safeguarding needs to be proportionate and sensitive to an individual's personal, social and cultural needs. However, we are legally obliged to ensure that in situations of disclosure and serious safeguarding concerns, we follow the recommended reporting and referral procedures, which includes the following:

Enhancing Employer and Community Engagement

Building strong partnerships with employers and community organisations are essential:

- **Vetting and Monitoring:** Implement rigorous procedures to ensure that all partner organisations adhere to safeguarding standards and do not promote extremist views.
- **Diverse Role Models:** Where appropriate and beneficial to programmes and career development, introduce learners to professionals from various backgrounds to challenge stereotypes and broaden perspectives, fostering an inclusive environment that counters radicalisation.

Strengthening Data Management and Information Sharing

Ensuring accurate data collection and sharing through:

- **Comprehensive Record-Keeping:** Documenting learner progress, attendance, and any concerns meticulously to identify patterns that may indicate safeguarding issues.
- **Inter-Agency Collaboration:** Sharing relevant information with local authorities, prevent coordinators, and other stakeholders to ensure a coordinated response to potential threats.

Learner Categories – A, B, C

All learners are categorised using a simple A, B or C system, as part of a robust procedure to safeguard learners.

- | |
|--|
| <p>A – No issues identified</p> <p>B – Some issues identified, usually for wellbeing</p> <p>C – Cause for concern – potentially serious safeguarding issues</p> |
|--|

Learner Category – A

This category indicates that there are no current issues, needs or concerns identified.

Learner Category – B

This category covers learners who have identified issues or wellbeing concerns that have been raised by Trainers. This may include learners with mental health issues, personal problems (including financial, housing, family or relationships), anxiety that may affect their appointments, behavioural or anger issues or general vulnerabilities.

Newly appointed Trainers will need to be aware of these concerns before they contact the learner, deliver training or take over assessment of the learner to ensure we can provide effective support. **A decision to inform the trainer will be made by the Designated Safeguarding Lead or Deputies to ensure that**

the learner is supported and that there is no unconscious bias by the Trainer in having advanced knowledge of these concerns.

This decision will include consideration of safety concerns for Trainers, which will be risk assessed.

Fareport will adapt the learners' programme to suit their individual needs, as well as provide support and signposting to enable them to seek alternative advice and guidance from professional organisations where appropriate. A safeguarding record/chronology will be created and monitored by the Safeguarding Designated Lead – this will be stored on [SharePoint under Management → Confidential](#) (restricted access to Safeguarding Team).

Learner Category – C

This category is designed to classify child protection and serious learner issues connected with vulnerability; examples provided by the NSPCC and KCSIE are provided below (although this is not exhaustive):

- Domestic violence and abuse
- Family member offending
- Sexual violence, sexual harassment and sexual consent
- Grooming and child sexual exploitation
- Anti-social behaviour, potential gang involvement including county lines
- Bullying including cyberbullying
- Drug or alcohol dependency
- Female genital mutilation (FGM)
- Faith abuse
- 'Honour based' crimes and forced marriage
- Radicalisation (ethnic, national, political, social and religious)
- Extremism (extreme views, ideology, fanaticism, terrorism)
- Teenage relationship abuse, including peer-on-peer
- Trafficking and modern slavery
- Mental ill health
- Care leaver

Tailoring Support to Diverse Learner Needs

Fareport will endeavour to identify and protect all learners, including vulnerable individuals and those with special educational needs and disabilities (SEND). All programmes are customised to meet this varied need:

- **Personalised Risk Assessments:** Regularly evaluating individual learner circumstances to identify potential vulnerabilities to radicalisation or other safeguarding concerns.
- **Collaborative Support Networks:** Engaging with external agencies, employers, and support services to provide a robust safety net for learners.
- **Continuous Professional Development:** Ensuring staff are trained to recognise and respond to the unique challenges faced by diverse learner populations.

All safeguarding records/chronologies will be created and monitored by the Designated Safeguarding Lead (DSL) – this will be stored on [SharePoint under Management → Confidential \(restricted access to Safeguarding Team\)](#).

This learner category system is operated confidentially and is not designed to be published or highlighted outside of the Safeguarding Team.

The sole purpose of this system is to alert key staff of **potential issues**, it is not designed to concern learners or in any way discriminate against their opportunities whilst on programme.

Safeguarding Team

Safeguarding is the responsibility of all staff, which includes Associate staff; however, overall responsibility lies with the **Chief Executive - Natalie Cahill**. The individuals named below have key responsibilities within Fareport:

Designated Safeguarding Lead (DSL) for Safeguarding and Child Protection:

Theresa Maple (Director of Operations)

Deputy DSL for Safeguarding:

Zoe Little (MIS Manager)

Enquiries or concerns about Safeguarding, Prevent or Child Protection should initially be referred to the Designated Safeguarding Lead, using the contact details on p1. If the DSL is unavailable, staff are advised to liaise with one of the safeguarding team in their absence. There is a dedicated secure email safeguarding@fareport.co.uk As detailed in Section 3, all safeguarding queries and concerns will be kept confidential and any chronologies logged will have restricted access limited to members of the Safeguarding team only.

Responsibilities – Organisation

- Fareport will allocate a minimum of 2 senior members of staff who will have allocated safeguarding and child protection responsibilities for the company – this will include 1 x DSL and 1 x Deputies (in addition to the Chief Executive). These are known as the **‘Safeguarding Team’**.
- The Fareport Board has overall accountability for Safeguarding and maintains oversight of all safeguarding activity.

Responsibilities – Designated Safeguarding Lead Role

- To keep up to date with new guidance and emerging themes and ensure that this policy is reviewed on an annual basis;
- To ensure implementation of this policy and procedures across the workforce to ensure understanding – this will be both on induction and as part of tri-annual all-staff training days.

- To ensure annual update training on Safeguarding and Prevent is delivered to all staff, associates and volunteers and ensure that all members of staff have access to additional guidance in relation to Safeguarding and Prevent ([Ref: 17a](#)).
- To manage referrals: take appropriate action following any expression of concern and to make, or support other members of staff to make, referrals to the appropriate external agency.
- To make all members of staff aware of the named DSL and how to contact them, as well as the Deputies in the DSL's absence, and be available.
- To maintain links with the local Children's Safeguarding Partnership and Children's Care Services to ensure that advice is sought from relevant Safeguarding agencies when dealing with more complex issues and that information is shared appropriately.
- Oversee the maintenance of accurate and comprehensive safeguarding records and the single central record.

Responsibilities – Safeguarding Team

- Provide advice and support to staff on issues relating to safeguarding, which will include signposting to professional organisations.
- Make and securely store accurate records/chronologies covering each concern to include a clear and comprehensive summary of the concern, how the concern was followed up and resolved, a note of any action taken, decisions reached and the outcome. These chronological records are shared with the safeguarding team and relevant Trainer.
- Monitor all 'live' cases/chronologies on a monthly basis to identify any additional support, guidance, signposting or referrals that may be needed.
- To ensure Trainers who have made a referral to the DSL are supported by the safeguarding team for their own welfare.
- Know how to make an appropriate referral.
- Be responsible for locating and booking onto appropriate courses to update their CPD in terms of safeguarding.

Responsibilities – All Staff

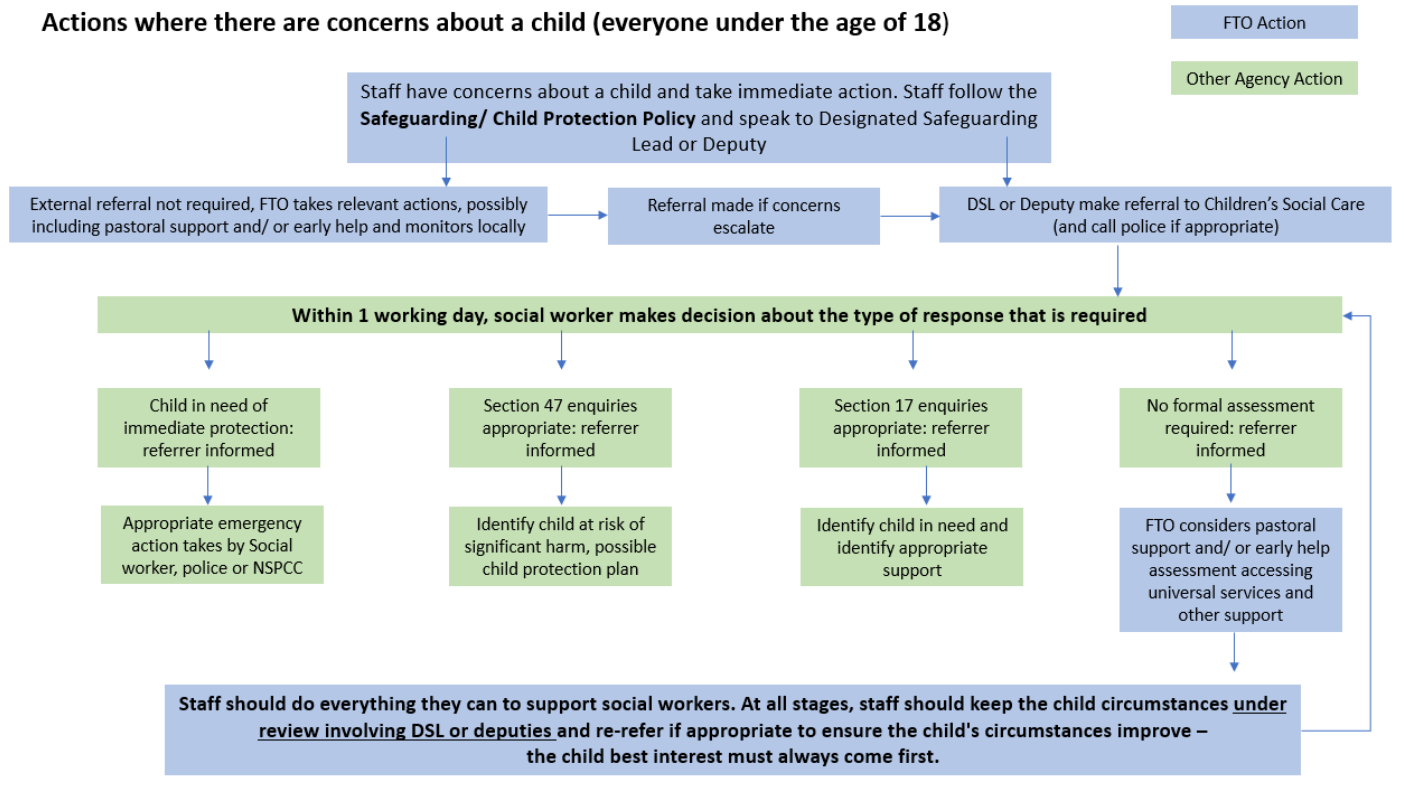
- Staff are expected to follow this Policy and Procedure in terms of safeguarding and to attend update training as required.
- Staff are expected to liaise with the DSL to discuss **any and all concerns** in relation to learner welfare, safeguarding or child protection, immediately.
- All members of staff understand that they have a [duty of care](#) and a responsibility for the welfare of the children, young people and vulnerable adults that they work with in relation to their individual employment.
- All staff members have a duty to ensure that any suspected incident, allegation, or other manifestation relating to child protection, safeguarding or radicalisation is reported using Fareport's procedures.
- If in any doubt about what action to take, members of staff must seek advice from the Designated Safeguarding Lead or any Deputy.

- When photo or video media are taken (by the Trainer with permission) of children (aged under 18) participating in assessment activities, these will be stored on the company mobile (password secured) and uploaded to the e-portfolio as soon as practically possible (again, password secured). Once uploaded, the photo or video will be deleted from the company mobile.

Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include Child Abuse, Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).

Staff working with children (**children includes everyone aged 18 and under**) are advised to maintain an attitude of '***it could happen here***' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them **immediately**. The following flow chart sets out the process for staff when they have concerns about a child. All staff should be aware that children/ learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened, this could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Actions where there are concerns about a child (everyone under the age of 18)


Both the DPA (Data Protection Act 2018) and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead or a Deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.

Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM)

Whilst all staff should speak to the designated safeguarding person DSL (or deputies) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers/trainers**. If a trainer, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher/ trainer must report this to the police. All staff will be required to undertake **EtF FGM** training as standard as part of their induction. Further training may be introduced periodically during staff development and training sessions.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child/ learner has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe learners day-to-day and identify those whose behaviour suggests that they may

be experiencing a mental health problem or be at risk of developing one. If you have concerns, please raise these with the Designated Safeguarding Lead or Deputies immediately for further guidance and support.

Fareport staff can also speak to the designated Mental Health First Aider(s) for support. The MHFA advisors can support staff and also provide resources. However, where trainers identify mental health issues with learners, these should always be referred to the safeguarding team in the first instance.

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from work or training sessions, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Peer on Peer (Child on Child) Abuse between Learners - What is Peer on Peer/ Child on Child Abuse?

Context and Definition:

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. All staff should recognise that learners are capable of abusing their peers. All staff should be aware of safeguarding issues from peer abuse including:

- bullying (including online bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment that is not consensual
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

This abuse can:

- Be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm Children or young people who harm others may have additional or complex needs e.g.:
- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime

Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. It is important to consider the forms abuse may take and the subsequent actions required.

- Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.
- Children can abuse other children; adult learners can abuse other adult learners. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals. (KCSIE 2020/22)
- Staff should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.
- Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.
- Staff should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or be at risk of suffering, significant harm and be in need of protection.

Where a child/ learner is suffering, or is likely to suffer from harm, it is important that a referral to the relevant Children's Social Care Service and if appropriate the police) is made immediately (Same Day referral made).

The Designated Safeguarding Lead or Deputies will support Trainers to complete the Safeguarding Referral Form to ensure as much factual information as possible is provided to ensure a contextualised approach from services.

Safer Recruitment and Selection Procedures

Under the Safeguarding Vulnerable Groups Act 2006, it is an offence for an employer to knowingly employ somebody in a regulated position¹ if they are barred from doing so. Furthermore, Fareport has a legal responsibility to provide information about staff members who have harmed children (or vulnerable people) whilst working for us, to the [Disclosure and Barring Service](#).

Fareport maintain an up-to-date SCR (Single Central Register) in line with government statutory requirements and guidance and in conjunction with Keeping Children Safe in Education (2018).

We have robust recruitment procedures in place, demonstrating our commitment to safer recruitment, these are laid out in our [Recruitment and Selection Policy \(Ref: 8\)](#). Our procedures include:

- All members of staff are required to complete an application form, and will be interviewed, including reference to safeguarding issues/knowledge. They must explain any significant gaps in their CV and are obligated to provide references (which will be verified).
- All members of staff are required to provide evidence of their identity and qualifications (original certificates). Identity checks will include the right to work in the UK.
- All employees will have a DBS check at a level appropriate to their role. In the event of employment, any failure to disclose convictions will result in disciplinary action or dismissal.
- DBS checks are repeated every 5 years for every member of staff and associates who are not registered with the DBS online update service.
 - Those with Enhanced DBS checks are encouraged to sign up to the DBS online update service.
 - Status checks through the update service will be completed for all members of staff who are registered every 5 years.

¹ **Regulated Activity** = work that is unsupervised (link to [Further Information](#))

- Any volunteers working with Fareport, regardless of programme or learner demographics, will be required to undergo an Enhanced DBS check (with Barred List check if applicable), reference checks, and induction training, which must include Safeguarding Training.
- All employees will receive Safeguarding, Prevent and Child Protection training as part of their induction and throughout their employment at a frequency suitable for their role (at least annually).

Details of DBS (Including Barred Lists), recruitment, pre-employment, identity, right to work and professional qualification checks for all staff are kept up to date on a **Single Central Register** by the DSL.

Should there be delays during the verification process of references or DBS checks, no staff member will be permitted to undertake training of any kind/ access to

learners until the Director of Operations gives approval that all safer recruitment processes have been successful. Team Managers will be instructed accordingly to which duties can be performed.

Staff Training and Development

Full details of our internal policy and procedures can be located in the **Staff Training & Development Policy (Ref: 6)**, and our **CPD Strategy (Ref: 6a)**, which is reviewed and updated annually in line with business needs.

Safeguarding & Prevent Training is delivered annually to all trainers by Director of Operations and Chairman. This is also reinforced with online short courses which are directed and recorded. All members of the Safeguarding Team are required to hold accredited training at a minimum Level 3.

During induction, all staff must read and sign acceptance of understanding of all policies and where located, including this policy.

All staff must undertake online Safeguarding in FE e-learning, Prevent in FE e-learning and where relevant, Safeguarding and Safer Recruitment e-learning within their first two weeks of starting at Fareport. In-house training on Safeguarding Children and Vulnerable Adults is provided for all new staff and is ongoing throughout employment, with mandatory annually training updates. This is also re-enforced with external training and support from Prevent Regional HE/FE Co-ordinator – Southeast of England.

Fareport Operational Board will work with FAB (governance) to ensure that all Advisory Board members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole centre approach to safeguarding. Their training should be regularly updated.

Operational Board and FAB are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Additional resources and supporting information from training and external partnerships is also available internally and within learner resource section of OneFile e-portfolio.

Further review and discussion of the Safeguarding & Prevent Policy is undertaken at regular intervals including at:

- Performance Management Reviews
- Annual Staff Appraisals
- Staff bulletins and All Staff Briefings
- Updates from Designated Person

Mobile Phones

All Trainers may use a personal phone or company phone for on-site assessments with their learners (i.e. DVR recording, e-portfolio log-ins, photos or videos), subject to the terms of this policy and our ICT Use Policy. Regardless of the learner's age, all mobile phones (whether personal or company) should be secured when on an employer's site and only used for assessment purposes or emergency situations. All staff must comply with [Data Protection Policy \(GDPR\) Ref 18\)](#)

The following additional rules will also be applied.

- If working in schools or nurseries, all staff should be aware of and follow the mobile phone policy of the individual school/nursery. If there is no such policy in place, staff must ensure that they leave their phones in a safe place within the school, or, if this is not possible, that their phones remain in their bags during the visit.
- If photographs/videos are taken of the learner, these will be uploaded to SharePoint or the learners' e-portfolio as soon as practical to do so and then **deleted immediately from the camera/mobile phone**. As before, if a learner uploads their own photographs/videos, they remain the owner.
- Fareport reserve the right to check company mobile phones, by way of staff confirmation/ proof of deletion, at any time should there be a safeguarding concern. Any checks will be carried out by a member of the Operational Management Team or Operational Board and in accordance with policy requirements.

Reporting Procedure for Safeguarding Concerns

Any suspicion, allegation or disclosure must be reported immediately (as soon as practicably possible on the day of the occurrence) to the Designated Safeguarding Lead, or in their absence, a Deputy as detailed on p.4.

Disclosure or evidence for concern may occur in a number of ways including a comment made by a child/young person/vulnerable adult, physical evidence such as bruising, a change in behaviour or inappropriate behaviour or knowledge. Refer to [Ref: 17a](#) for more Guidance.

The following procedures should then be applied:

- The employee must record the concern using the **Safeguarding Reporting Form (Ref: 17b)**, which they must email (password protected) to the Designated Safeguarding Lead (DSL) or a Deputy immediately. The DSL or Deputy will secure this document on SharePoint, in a limited access folder. A chronology will be created or current one updated.
- The DSL or Deputy is responsible for making the decision as to whether an immediate referral to the emergency services is needed (999) or if the local

MASH (Multi-Agency Safeguarding Hub) should be contacted instead – the DSL will identify the most local MASH to the child or vulnerable adult concerned. For Hampshire, the details are as follows:

Concerns about a Child – contact Children’s Services

Phone 0300 555 1384 during office hours (8.30am – 4.30pm) or 0300 555 1373 for the out of hours service. Email childrens.services@hants.gov.uk
Website - [Hantsweb - Children’s Services](#)

Concerns about an Adult – contact Adult Services

Phone 0300 555 1386 during office hours. For out of hours service, the DSL or Deputy should click [HERE](#) for further details.

- As a national training provider, we may become aware of issues relating to a child out of our base area. If this is the case the DL will contact the Children’s Services in the child’s home location, following the same procedure.
- If the concern is made about a child in The DSL or Deputy will decide who the most appropriate person is to make the referral (depending on the case/circumstances) and ensure that the referral made. Operational Board will be informed of all referrals made.
- It is the responsibility of the DSL or Deputy to inform the member of staff who reported the disclosure of any action taken and any outcome, if relevant, to ensure they are kept ‘in the loop’. It is the responsibility of the

DSL or Deputy to ensure that any partner agencies involved with the young person/vulnerable adult are made aware of the situation and the action taken.

- All stages of the reporting procedure must be documented on the chronology, marked **CONFIDENTIAL** and stored securely using password protection. Only members of the Safeguarding Team will have access.

Allegations Against Employees

When any form of concern is raised or complaint is made against a member of staff, it must be taken seriously. The concern or complaint should initially be dealt with by the most senior member of staff on site at the time the concern or complaint is made. If the concern or complaint is against this person, the Chief Executive, Chairman or Director of Operations or should be informed.

The following procedures should then be followed:

- The senior member of staff must report the complaint immediately to the Chief Executive, or in her absence, the Chairman or Director of Operations giving details of the circumstances.
- The Chief Executive, or in her absence, the Chairman or Director of Operations will attend the site of the allegation to gain an initial account of what has occurred from all relevant parties, including the person against whom the allegation has been made. If this is not possible, contact will be made by telephone.
- Working with the DSL, the Chief Executive (or senior person dealing with the case) may contact the LADO to seek advice whether the issues meet the threshold of harm and whether low-level concerns may be more appropriately dealt with as an employee conduct issue.
- The Chief Executive, or in her absence, the Chairman or Director of Operations will have the right to suspend from duty and /or the premises, any person who is a party to the allegation until a full investigation has taken place.
- The progress of live safeguarding issues is recoded and discussed at Operational Board meeting and at each Fareport Advisory Board meeting.

This action does not imply in any way that the person suspended is responsible for or is to blame for any action leading up to the complaint.

The purpose of any such suspension is to enable a full and proper investigation to be carried out in a totally professional manner.

- It is the responsibility of the Chief Executive, or in her absence, the Chairman or Director of Operations to make the decision as to whether involve the local constabulary or to inform LADO (Local Authority Designated Officer) without delay depending on the nature of the allegation(s). Fareport will co-operate fully with the Police, LADO and all other parties involved.
- LADO must be informed, if an adult who is in a position of trust has:
 - Behaved in a way that has harmed, may have harmed, or may potentially harm a child/young person/vulnerable adult
 - Possibly committed a criminal offence against or related to a child/young person/vulnerable adult
 - Behaved towards a child or children/young person/vulnerable adult in a way that indicates they may pose a risk of harm

LADO will follow the **safeguarding children board procedures** to ensure that the allegation is investigated thoroughly. The LADO team will inform the police and/or children's/adult's services if required.

Hampshire LADO Contact Details:

There may be more than one LADOs to cover districts of the county,

Please refer to [Hampshire County Council Allegations against people in a position of trust](#).

The LADO will follow [Allegations Against Staff or Volunteers](#) to ensure that the allegation is investigated thoroughly. The LADO will inform the police and/or children's social care if required.

Fiona Armfield - LADO - Hampshire County Council

The LADOs can be contacted on telephone number: **01962 876364**

Email: child.protection@hants.gov.uk

This is for Hampshire only, although the DSL can provide further information or guidance on any county within the UK if concerns need to be reported to a LADO.

- The Chief Executive, or in her absence, the Chairman or Director of Operations will ensure that all Operational Board members are fully briefed. An agreed statement will be prepared for the purpose of accurate communication with external sources and for the protection of the legal position of all parties involved.
- The Chief Executive, or in her absence, the Chairman or Director of Operations will make a full written report of the incident, how the reporting was followed up and resolved and the actions taken.
- If there is a complaint against the Chief Executive or the Director of Operations, the complaint must be reported immediately to the Chairman.

Prevent Duty

The Counterterrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism, this is known as the **Prevent Duty**. Prevent comes under Safeguarding, although there are specific reporting lines to follow if there is a genuine cause for concern. All staff and learner receive a full induction covering Safeguarding, Prevent and Child Protection, with regular updating.

Any concerns about learners being radicalised or being drawn into terrorism, must be reported immediately (as soon as practicably possible) to the Designated Safeguarding Lead, or in their absence, a Deputy as detailed on p.2. The links below also provide signposting to specific national reporting procedures.

Reporting Materials

Articles, images, speeches or videos that promote terrorism or encourage violence – content encouraging people to commit acts of terrorism – websites made by terrorists or extremist organisations – and videos of terrorist attacks, found on the internet should be reported via the Government by clicking [HERE](#).

Reporting Possible Terrorist Activity

If a member of staff has seen or heard something that could suggest a terrorist threat to the UK, it must be reported as soon as possible to the Designated Safeguarding Lead or in their absence, a Deputy or Board Member, unless there is an immediate threat to life in which case this must be reported to Emergency Services 999.

The Designated Safeguarding Lead will collect the relevant information and log a report via our referral system. Alternative reporting can be through the Counter Terrorism Police by clicking [HERE](#)

Reporting Concerns about an Individual (Hampshire)

This is based on Hampshire, although the DSL can provide further information or guidance on any county within the UK if concerns need to be reported.

Prevent.engagement@hampshire.pnn.police.uk

Anti-Terrorism Hotline – 0800 789 321

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Confidentiality

Fareport operates under a policy of confidentiality; however, **under no circumstances** will any member of staff keep confidential any information that raises concerns about the safety and welfare of a child, young person or vulnerable adult. This will be reinforced on induction with the Company and during regular all-staff training days.

- Staff will be made aware that they have a professional responsibility to share any concerns or information with the Designated Safeguarding Lead or any Deputy in order to safeguard children, young people or vulnerable adults.
- Staff will be made aware that they cannot make any promises to a child, young person or vulnerable adult that they will keep any disclosures confidential.

Promoting Commitment to the Policy

Fareport will ensure that this Safeguarding & Prevent Policy is promoted via the following activities. This is not an exhaustive list, as other mechanisms will be used as and when the situation arises.

- Staff Training
- Email headers and footers
- Policies & Procedures including Staff Handbook
- Visible communication through the centre
- Learning resources for learners available on OneFile
- Learner reviews – carried out on a 12-weekly basis
- Employer Training Sessions
- Employer & Learner Focus Groups

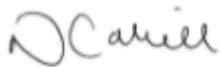
We will ensure that we measure the commitment within Fareport to this Safeguarding & Prevent policy by:

- Evaluating all training for both staff and learners
- All Staff and Learners will confirm understanding and acknowledgment of training and reviews by signature
- Managers will produce evidence (e.g. meeting notes) of 1-2-1 reviews, that this policy has been discussed
- Monitoring of learner review documentation
- Monitoring specific responses to safeguarding and prevent in learner and employer surveys
- Through internal quality assurance audits
- Learner interviews – especially 16–18-year-old learners

Review and Maintenance of Policy

The Designated Safeguarding Lead, Deputies and the Operational Board shall undertake to review this policy, its implementation and effectiveness on an annual basis. The views of all members of staff shall be sought where necessary and reflected in the review process. Any new legislation or developments in existing legislation will be considered as and when required and the policy will be updated to reflect these developments.

Signed:



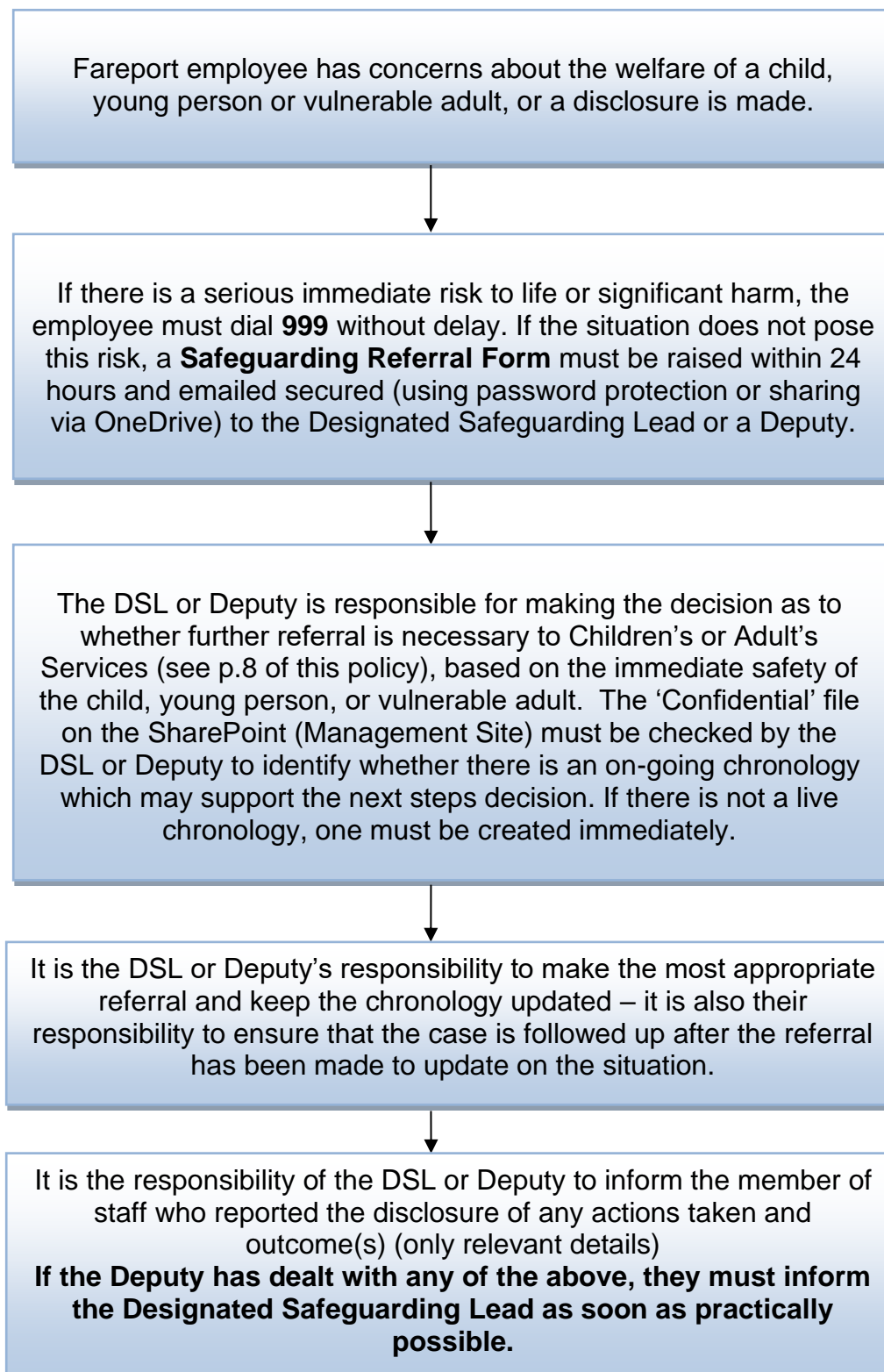
Natalie Cahill, Chief Executive

Reviewed annually.

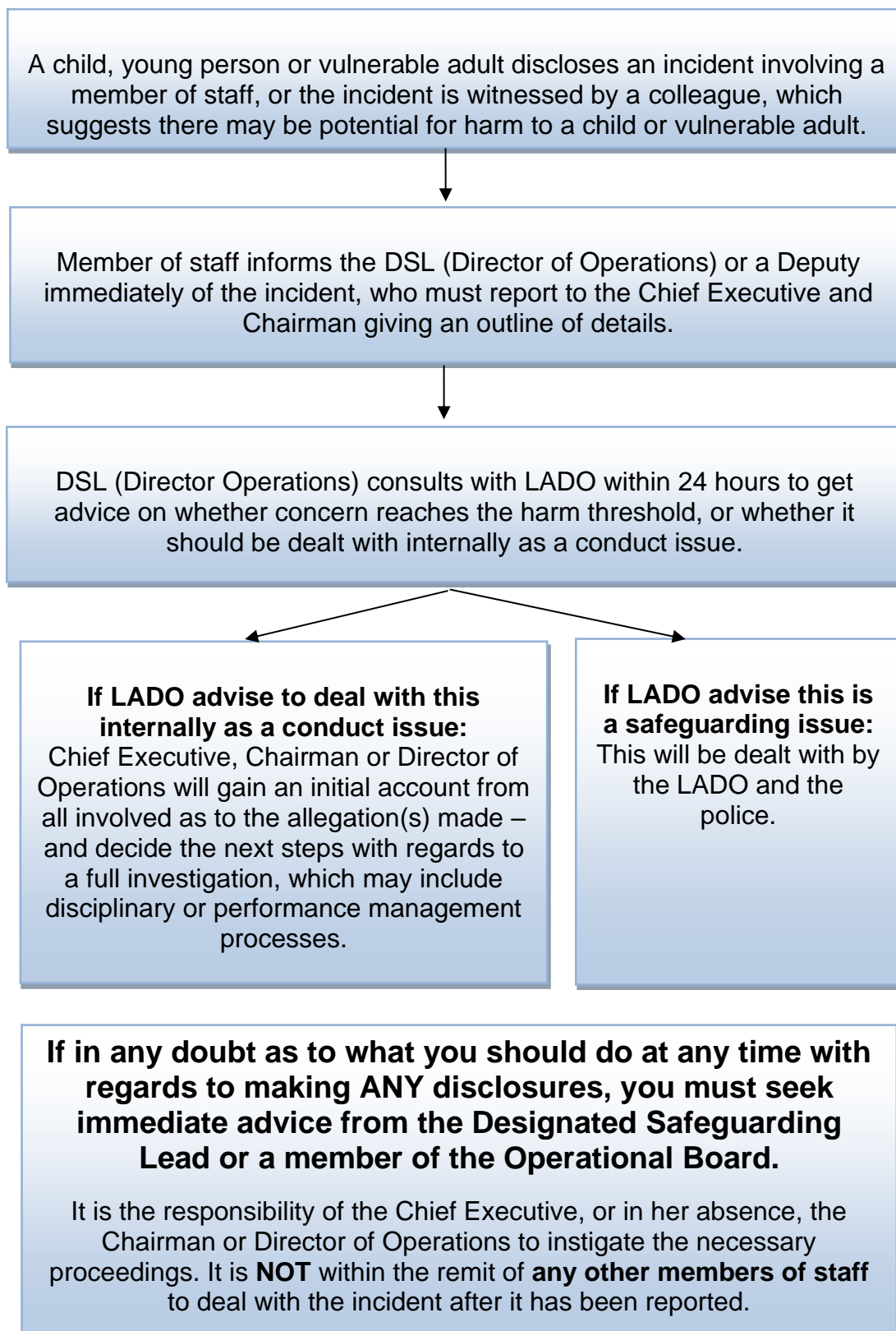
(amendments May 24)

Latest Review: March 25

Appendix 1 - Procedure for Dealing with Suspicions, Allegations or Disclosure of Child Abuse



Appendix 2 - Procedures for Dealing with Allegations Against a Member of Staff



Appendix 3 - Guidance Notes on Dealing with Disclosure or Suspicions of Abuse or Neglect

A learner asks or begins to talk to you about an issue that may lead to disclosure.

You must let the learner know that if they pass any information to you that identifies a **risk to their safety, wellbeing** or identifies that a **crime has or will be committed**, then you are unable to keep any disclosures confidential. The learner must understand that you are bound by law to pass the information to the DSL.

An incident of abuse is disclosed. You must reassure the learner immediately that they have done the right thing in telling you.

You must write down exactly what the learner says as they talk through the incident (or as soon as possible afterwards). Remember you **must never ask leading questions** – the only discussion must be learner-led, although you can clarify points, i.e. 'is this what she said?' and 'is there anything else you want to add?' Referrals should always be a **clear and comprehensive summary of your concerns**.

Read back to the learner what has been written (or recalled) and ask them if they are happy that this is what they said. This is very important as you will be asked by the referral agency (i.e. Children's/Adult's Services or Police) exactly what was said.

Tell the learner what you are going to do now with the information and reassure them again that they have done the right thing. Do not be tempted to tell them that everything will be fine, but do offer support and the confidential helpline safeguarding@fareport.co.uk

Immediately contact the **Designated Safeguarding Lead** or, in their absence, a Deputy who will start a chronology and make any external referrals.