



**Safeguarding
and Prevent
policy and
process**



Safeguarding and Prevent policy and process

Reference documents:

- Complaints policy
- Recruitment policy
- Health and safety policy
- IT usage policy
- Training matrix
- Counter Terrorism and Security Act 2015
- Keeping Children Safe in Education 2021
- Care Act 2014
- Employee handbook
- Learner handbook
- Prevent risk assessment
- Delivering online learning safely during the Covid-19 crisis

Roles:

- MD - Managing Director
- DSL - Designated safeguarding lead
- WC - Workplace coach
- FST - Functional Skills Tutor

Templates:

- Safeguarding log

General policy statement

Learnmore Network Limited is committed to safeguarding, protecting and promoting the welfare of all apprentices and employees. We operate a zero-tolerance policy relating to abusive or harmful behaviour towards our apprentices and employees. We promote respect, tolerance and diversity and seek to provide a healthy, safe and positive environment that is conducive to learning or pleasant to work in.

We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. Radicalisation is the process by which a person comes to support terrorism and forms of extremism which may lead to terrorism.

Scope and purpose

This policy sets out how we will identify and manage safeguarding and explains the steps we take to ensure that all apprentices, including children and vulnerable adults, are safeguarded regardless of gender, ethnicity, disability, sexuality, age or religion by minimising risk and taking appropriate action to address concerns. Safeguarding is an all-encompassing term used to describe the many aspects of keeping apprentices and employees safe, including:

- Apprentice and employee health, safety, and wellbeing
- Sexual abuse, sexual violence (including online)
- Child protection
- Protection of adults at risk
- Bullying, harassment and discrimination including racial abuse
- Abuse and neglect
- Domestic violence
- Safety from sexual exploitation, female genital mutilation and forced marriage
- Alcohol, drug and substance misuse
- E-safety including all aspects of electronic communication and the internet
- Financial exploitation
- Protecting people from radicalisation and extremism
- The security and safety of the learning environment

The policy covers all aspects of an apprentice's programme or employment with Learnmore, and regardless of where learning takes place or where the employee is based or their role.

Policy implementation

Learnmore operates the following key principles when it relates to safeguarding:

- People will be treated with respect and with courtesy by employees and apprentices in an environment that is free from harassment or discrimination
- All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards
- Provide clear and specific directions and guidance to employees on how to provide a virtual training environment safely
- Learnmore will work with apprentices, employers, and other agencies to promote a safe and healthy culture
- Learnmore will seek the views of apprentices, employers and employees about the effectiveness of its safeguarding policy and procedures through regular governance meetings and take appropriate resulting action as required
- Learnmore will develop partnerships to proactively protect apprentices at risk of abuse, neglect or at risk of radicalisation
- Employees will be trained to implement the policy and will have a clear understanding of personal safety and good safeguarding practices as well as what factors may make apprentices vulnerable to a range of safeguarding concerns
- Learnmore will work with apprentices to promote their own personal health, well-being and safety including their safety online.
- Learnmore will work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism
- Apprentices will receive confidential advice, guidance and support for a range of issues that they may face; they will be signposted to external agencies where specialist support is required
- Learnmore will support apprentices to have personal resilience and be able to make informed and sensible decisions about their safety and wellbeing

Apprentices' Entitlement

In order to promote a healthy and a safe environment, our apprentices are entitled to the following:

- the right to make a disclosure to any employee and know that the disclosure will be dealt with quickly, sensitively and appropriately
- to learn in an environment free from bullying or harassment
- to be made aware of strategies and actions to keep themselves safe whether in work, at home or on-line
- to be made aware of the basic principles of safe learning and safeguarding relevant to the programme that the apprentice is completing
- to be made aware of how to access support on personal health and safety issues including sexual harassment, sexual violence (including online)
- to be provided with up-to-date information around personal safety issues including sexual harassment, sexual violence (including online)
- the opportunity to comment and feedback on the extent to Learnmore promote and maintain well-being and personal safety
- learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment
- this policy is communicated to apprentices at induction, in the apprentice handbook and in our e-portfolio
- apprentices are entitled to have their own different beliefs which should not be used to influence others

The safeguarding efforts of Learnmore are supported by the following core strands of activity and, where relevant, the working procedures and other policy documents have been signposted within this section.

Safe learning

The principles of the 'Keeping children safe in education' and safeguarding agendas will be embedded within teaching and learning practices and within the quality assurance and quality improvement frameworks. Learnmore is committed to engaging apprentices on issues related to areas such as financial health, mental health, physical health, sexual harassment and sexual violence (including online) in order to improve their quality of life. The aim is to provide apprentices with the tools to make healthy and safe decisions.

Online safety

Learnmore promotes online safety at all stages of their apprenticeship programmes and educate apprentices about safe and responsible internet use. Apprentices only use Learnmore computers when supervised, for example during examinations where Wi-Fi connectivity is disabled.

Learnmore have an IT usage policy which details breaches of acceptable use of information technology resources, including attempting to use the company's ICT facilities, systems and resources to draw people into acts of terrorism or extremism or promoting terrorism/extremism.

Learnmore conduct periodic checks on internet usage, user files stored on the shared drive, company owned or leased computers, and their usage, where such action is justified for the purposes of system administration, investigation of suspected breaches of the Acceptable Use Policy, to comply with Prevent Duty, or any other lawful purposes.

Safe environment

Learnmore will provide an environment that is safe and secure for all learners, whilst at the same time making sure that it is friendly and welcoming. A culture of respect that is free from bullying and harassment will be engendered. Health and safety is of paramount importance and as such all facilities and resources will comply with legislative requirements for health and safety (please see our Health & Safety Policy)

Learnmore will provide a safe learning environment regardless of whether this is face to face or virtual. All employees are trained in promoting online safety when delivering training using virtual platforms, including privacy and data protection, professionalism, special considerations, safe use of technology, learner and employee welfare and code of conduct.

Safer recruitment

Learnmore will comply with best practice in the recruitment and training of its employees, in line with legislative requirements. Employees will undergo the appropriate DBS checks for their role and undertake mandatory safeguarding training and refresher training, appropriate to their role. Employees will understand the principles of safe working practices and how not to put themselves in situations that compromise themselves or apprentices. All new starters will receive an appropriate induction, and training including safeguarding and prevent.

Safeguarding apprentices

Learnmore has a legal obligation to protect young people, vulnerable adults and all apprentices from abuse. Learnmore has an appropriately trained designated safeguarding lead (DSL) who will ensure that disclosures made by apprentices are dealt with quickly, sensitively, and appropriately. All employees will be trained in the appropriate response to a learner disclosure and the correct procedure for dealing with concerns about an apprentice. Teams will work with apprentices to proactively protect them from abuse and neglect and prevent apprentices being placed in an abusive situation.

Apprentices are provided with information about how to report safeguarding concerns at induction, in the apprentice handbook, at each training session and progress review. This includes the provision of a dedicated safeguarding email address safeguarding@learnmoreuk.com.

Learnmore understand that Prevent Duty Guidance state the need to balance its legal duties in terms of both ensuring freedom of speech and academic freedom and protecting apprentice and staff welfare. All external speakers and events, therefore, must be authorised by the Designated Safeguarding Lead or Managing Director. If the DSL or MD are unclear about whether an external speaker / event do not meet these requirements, they will seek further guidance from the local prevent coordinator prior to authorisation. All events / speakers will be supervised by Learnmore team members as appropriate.

Preventing people from being drawn into terrorism

Learnmore has legal duties enshrined within the Counter Terrorism and Security Act 2015. This requires Learnmore to have due regard to the need to prevent people from being drawn into terrorism.

All employees are aware of their Prevent duties and Learnmore has robust processes in place to respond to concerns about apprentices and employees. Learnmore's curriculum embeds a proactive and positive programme that enables apprentices to explore and discuss issues in a safe and open environment. We have regional 'prevent champions' within the Learnmore team who ensure that local issues are shared with the team and apprentices as appropriate in order to raise awareness and provide relevant information.

All Learnmore employees undertake appropriate training at induction and through refresher training detailing their Prevent duties and how to identify vulnerabilities and/or recognise concerns or changes in behaviours that may indicate a risk. All employees are aware that any concerns should be raised to the designated safeguarding lead.

Our commitment to Prevent is encapsulated within this policy, risk assessment and action plan and has been incorporated into the IT acceptable use policy.

Roles and responsibilities

Designated safeguarding lead

Name: Chetna Vaghjiani

Email: chetna.vaghjiani@learnmoreuk.com

Telephone: 07429 565033

The designated safeguarding lead is responsible for ensuring that the safeguarding processes and procedures are robust and consistently applied and that Learnmore fulfils its legal duties, including to ensure the following:

- Learnmore has a safeguarding policy and procedures in place which will be reviewed annually or as appropriate and can be readily accessed by employees and apprentices
- There are procedures for dealing with allegations of abuse against fellow apprentices or employees
- Any identified deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay
- Sufficient resources and time are allocated to enable employees to discharge their responsibilities
- Appropriately trained safeguarding employees are in place and that new employees receive sufficient and timely training
- Provide training to ensure that all staff (and governors, where relevant) can:
 - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
 - identify early signs of peer-on-peer sexual abuse
 - consistently uphold standards in their responses to sexual harassment and online sexual abuse
- Cases of suspected abuse or allegations are reported to the relevant investigating agencies as appropriate
- Appropriate content on keeping safe and wellbeing are incorporated into programmes as relevant to the learner group
- Access to resources is obtained and attendance of any relevant or refresher training courses is completed at least annually.

Managing Director

The Managing Director has the overall responsibility for ensuring sufficient resources are in place and that procedures are correctly followed to support this policy and to champion safeguarding and prevent in the company.

Employees

Learnmore employees and associates undertake appropriate training during onboarding and through refresher training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties and how to report concerns. Policies are made available to employees on a shared drive and on our team digital training platform 'Always Learnmore'.

Employees are briefed during onboarding about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the internet.

The main aim of this policy is to ensure that employees are fully engaged in being vigilant about raising awareness and ensure that we work alongside appropriate professional bodies and agencies to ensure that our apprentices and other employees are safeguarded. Employees have a responsibility to:

- complete relevant safeguarding training, including familiarisation other related policies and procedures and information such as Counter Terrorism and Security Act 2015
- ensure they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns about an apprentice
- ensure the safeguarding policy is embedded throughout all aspects of the apprentice journey, including induction, on-programme training, assessment and progress reviews
- comply with the company policies and procedures, including reporting any concerns or possible indicators. Failure to follow procedure could result in disciplinary action.
- being alert and vigilant to indicators of abuse, prevent abuse and take effective action when abuse is suspected or disclosed
- uphold and promote the fundamental principles of British values
- understand what radicalisation and extremism are and why we need to be vigilant
- understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document

Keeping yourself safe as an employee

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

- Befriending apprentices on social media sites (exception of LinkedIn, for professional networking)
- Distributing personal telephone numbers
- Visiting apprentices at home or transporting apprentices to and from locations (this includes travelling in the car with a apprentice driving)
- Using sarcasm, insults or belittling comments towards apprentices
- Personal relationships with apprentices

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

- It is natural to build a rapport with apprentices. Workplace coaches, tutors and other employees are in a position of trust. Apprentices may see you as a confidant and support, but be sure to maintain professional boundaries.
- Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so
- Avoid spending time alone with apprentices in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff is aware where you are and monitors this
- Be careful when giving advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting)
- If at any point, you feel unsafe in an apprentice's company inform the site manager, your line manager or the designated safeguarding officer and leave the premises

PROCESS

What to do if you have a safeguarding concern:

1. Make sure that the person is safe
2. Listen calmly to the person
3. Talk reassuringly to the person and guarantee confidentiality but NOT secrecy
4. Explain that that you must report your concern to the appropriate person
(Designated Safeguarding Lead)
5. Tell them that, with their consent, that help, and support is available
6. Consider whether there is an imminent risk of harm or criminal activity
7. Ask open questions and let the person talk
8. Make an accurate report using the person's own words
9. *Report your concern to your Designated Safeguarding Lead*
10. Describe the circumstances in which the concern has occurred
11. Provide an accurate and detailed report, either verbally or in writing
12. Keep person DSL informed of all follow-on proceedings
13. Provide any updates to DSL

The Designated Safeguarding Lead will:

1. Review the situation and contact the apprentice immediately if appropriate
2. Decide whether the apprentice is at risk
3. Keep detailed, accurate and secure written records and/or concerns
4. Undertake investigations where necessary
5. Contact the relevant external authorities or agencies as necessary

External agencies

Learnmore attend local PREVENT networking events and will work proactively with the regional Prevent coordinators and, where appropriate, the local steering group and Channel panel. Our regional prevent coordinator is:

Jennie Fisher

FE/HE Regional Prevent Co-Ordinator for London

Counter-Extremism Division

20 Great Smith Street

London

SW1P 3BT

Mobile: 07880 469 588

Quality assurance arrangements

Learnmore will monitor and evaluate the effectiveness of its safeguarding and prevent policy by:

- Providing appropriate training for all employees and associates
- Asking apprentices how safe they feel
- Maintaining confidential records of interventions and actions relating to safeguarding
- Reflecting on how well we meet the interpretation of the Education Inspection Framework
- Encouraging employees and employers to contribute their views on the effectiveness of this policy

Quality assurance activity and schedule

The following provides an overview of the monitoring activities and their frequency.

Activity	Frequency
Information about how to report safeguarding concerns, including prevent	During induction Apprentice handbook Throughout programme e.g training, progress reviews, hot topics
Checking apprentices' understanding of safeguarding and PREVENT and what to do if they feel unsafe	Progress reviews Audits Surveys
Training in safeguarding procedures and reporting for Learnmore employees	Onboarding Initial onboarding and refresher training Monthly reviews and updates at team meetings - as standing agenda item Monthly and quarterly internal reports Senior Management team meetings and briefings
Employers made aware of safeguarding procedures	Employer onboarding and H&S checks. Meeting standing agenda item

Signed:

A handwritten signature in black ink, appearing to read 'BN', with a large loop at the start and several smaller loops following.

Becky Newell,

Managing Director

Learnmore Network