

Single Safeguarding Policy and Procedure

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[Link to Pareto safeguarding and Prevent reporting form](#)

<https://forms.gle/yusH1e5VZrnpaf5T8>

safeguarding@pareto.co.uk

Our safeguarding processes and key safeguarding information are promoted and delivered as key aspects of our apprentice and employer 'Engage' and 'Enrol' sessions and are further promoted throughout the duration of the programme of learning.

Pareto will promote this policy and ensure commitment towards the policy is secured through the staff induction programme and through continuous training of our employees in implementing the policy so that we can protect our apprentices and prevent abuse towards our apprentices. This will be achieved through a combination of regular internal and external continuous professional development that will continuously improve and maintain the knowledge and skills of all staff to effectively and consistently apply robust and thorough safeguarding practices. Our delivery staff will continuously develop and maintain their confidence and ability in effectively embedding meaningful and relevant safeguarding content into their delivery and review content to ensure our apprentices and their employers know how to keep themselves and their colleagues safe.

This policy will be reviewed at least annually. What to do (Apprentices and Employer/Partners)

If an apprentice or employer/partner needs to raise a safeguarding concern they should speak to their Skills Coach for support and guidance in raising the concern.

If the concern requires immediate attention they should call the Deputy Designated Safeguarding Lead on 07951111778 and email Safeguarding@pareto.co.uk providing as much detail as possible about the concern.

Scope and Purpose

Pareto is committed to the safety and well-being of its learning community. In doing so, this single policy will be adopted through divisional procedures and strictly adhered to.

This policy covers all aspects of the work of Pareto Apprenticeships, including:

Apprentices

- Provision of a safe learning environment
- Clear system of personal care where appropriate, and personal safety
- Behaviour, discipline and exclusions

Staff

- Provision of a safe working environment
- Regular review of systems and procedures to ensure they're appropriate and effective
- Training and professional development
- Wearing of Staff ID whilst on-site or in Employer premises

External Agencies

- Actively seek support and advice
- Collaboration with external bodies/stakeholders
- Contracting and subcontracting arrangements

Employers

- Collaboration with Employers



- Training and Awareness

The Care Act sets out the following principles that should underpin the safeguarding of adults.

- **Empowerment**
Putting people first and helping those who lack mental capacity feel involved and informed
- **Protection**
Supporting victims so they can take action
- **Prevention**
Responding quickly to suspected cases of abuse
- **Proportionality**
Making sure what we do is appropriate to the situation and for the individual
- **Partnership**
Sharing the right information in the right way

Safeguarding Young People

In June 2004 Section 175 of the Education Act 2002 came into force. The provisions of Section 175 make explicit the responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, arrangements must be made in accordance with any guidance issued by the Secretary of State.

Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002), the Education (Independent School Standards) Regulations (2014) and the Non-Maintained Special Schools (England) Regulations (2015). Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise.

KCSIE (2022) defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy and the derivative divisional procedures have been developed in response to KCSIE. The Children Act (2022) defines a child as any person under the age of 18 years. This includes all 14–16 year old children attending any Apprenticeships at Pareto for whom additional procedures apply.

Safeguarding Adults at Risk



This policy and the derivative procedures have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication "Safer Practice, Safer Learning - A whole-organisation approach to safeguarding vulnerable adults for the learning and skills sector " (2007). The guidance applies to all education providers of post-16 learning and skills.

The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is an apprentice aged 19* or above at the point of enrolment.

**Pareto Apprenticeships follow KCSIE guidance on children's age, i.e. a learner who is under 18 years old is classed as a child. For ESFA (non-safeguarding) reporting purposes, 18 year olds are reported in the same category as under 18s.*

This policy also applies to Scotland which has different legislation "The Protection of Vulnerable Groups (Scotland) Act (2007) which defines a protected adult as "an individual, aged 16 or over who receives one or more types of care or welfare services".

The term 'Adult at Risk' is used to describe a vulnerable adult.

Section 42 of the Care Act (Enquiry by local authority) states:

Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)—

- (a) Has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) Is experiencing, or is at risk of, abuse or neglect, and
- (c) As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

(2) The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case (whether under this Part or otherwise) and, if so, what and by whom.

(3) "Abuse" includes financial abuse; and for that purpose "financial abuse" includes—

- (a) Having money or other property stolen,
- (b) Being defrauded,
- (c) Being put under pressure in relation to money or other property, and
- (d) Having money or other property misused.

The Mental Capacity Act 2005 states:

A person must be assumed to have capacity unless it is established that he lacks capacity.

A person is not to be treated as unable to make a decision unless all practicable steps to help him to do so have been taken without success.

A person is not to be treated as unable to make a decision merely because he makes an unwise decision. An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in his best interests.

Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

The Types and forms of Abuse

Abuse is described as 'a violation of a person's human or civil rights by any other person or persons'.



There are five main categories of abuse that apply to both children and adults at risk:	There are additional categories of abuse for adults at risk:
Physical	Modern Slavery/Exploitation
Emotional	Organisational/Institutional
Neglect	Discriminatory
Sexual	Financial
Racial	Domestic
	Self-Neglect

There are various signs and indicators to be aware of and these can be separated into two categories - physical and behavioural/emotional.

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Child abduction and community safety incidents	Homelessness
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	Mental health
County lines	Modern Slavery
Children and the court system	Radicalisation
Children missing from education	Extremism
Children with family members in prison	Sexual violence and sexual harassment between children in schools and colleges
Cybercrime	Serious Violence
Domestic abuse	So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

Sexual Harassment

Pareto Apprenticeships staff are requested to be vigilant around issues associated with sexual violence and sexual harassment between apprentices.

The Education and Training (Welfare of Children) Act 2021 applies expectations to other further education and skills providers. Pareto Apprenticeships, will of course, protect any apprentice and engage with adult social care, support services and the police as required.

Sexual Harassment will not be tolerated in any form at Pareto Apprenticeships. Any incident can have an impact on people's lives. Rubbing against someone, touching someone inappropriately, making unsolicited remarks of a sexual nature, revealing intimate body parts, sending or showing sexual content and taking photos under someone's clothes. It is all sexual harassment and Pareto Apprenticeships take it very seriously.

Pareto Apprenticeships deliver Safeguarding CPD to new staff at induction as well as an ongoing programme for existing staff that includes sexual harassment We will ensure staff understand how to handle reports of harmful sexual behaviour between apprentices both on and outside our premises.

Pareto Apprenticeship will train staff to:

- Have a good awareness of the signs that a child/young person or adult who is an apprentice is being neglected or abused.



- Be confident about what to do if an apprentice reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another apprentice
- Ensure that apprentices are taught about safeguarding risks, including online risks
- Support apprentices to understand what constitutes a healthy relationship, both online and offline

We ensure every apprentice will be trained in Sexual Consent & Harassment as part of their whole learning journey through effective, meaningful and relevant embedded learning content starting with the 'Safeguarding Essential' modules.

Pareto Apprenticeship will teach apprentices and their employers to:

- Have a good awareness of the signs that a child/young person or adult who is an apprentice is being neglected or abused.
- Be confident about what to do if an apprentice or colleague reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another apprentice
- Support apprentices and colleagues to understand what constitutes a healthy relationship, both online and offline.

Wellbeing

'Wellbeing' is a broad concept and is described as relating to the following areas in particular:

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health and emotional wellbeing
- Protection from abuse and neglect
- Control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- Participation in work, education, training or recreation
- Social and economic wellbeing
- Domestic, family and personal domains
- Suitability of the individual's living accommodation
- The individual's contribution to society

There is no hierarchy in the areas of wellbeing listed above – all are equally important. There is also no single definition of wellbeing, as how this is interpreted will depend on the individual, their circumstances and their priorities.

Wellbeing encompasses several areas of life. Therefore, using a holistic approach to ensure a clear understanding of the individual's views is vital to identifying and defining wellbeing in each case.

Policy Statement

It is important that all children and adults at risk are protected from abuse. They have the right to access education and training free from fear of harm and will be protected from mistreatment and abuse.

Pareto Apprenticeships recognises that the board, members of staff and apprentices each have a role to play in safeguarding the welfare of children and adults at risk and preventing their abuse with specific



attention paid to the particular safeguarding risks of Looked after Children and children / adults at risk who have additional support needs. In accordance with the statutory guidance across the UK provided in "Keeping Children Safe in Education" (2022) and "Safer Practice, Safer Learning"(2007), the following arrangements apply to Pareto Apprenticeships:

All relevant documents relating to this policy will be read as part of the staff induction process and made available for ongoing access.

Pareto Apprenticeships Single Safeguarding policy is made available to parents/carers, apprentices and customers via the apprenticeship website and on request;

Procedures are developed and updated within the framework. These procedures are:

- Developed in accordance with local authority guidance and locally agreed interagency procedures; DfE Guidance Keeping Children Safe in Education (2022) and Safer Practice, Safer Learning (2007)
- Include guidelines for dealing with allegations of abuse against members of staff and volunteers;
- Reviewed and updated annually by Safeguarding Leads
- Approved by the Board and adopted as procedures by Senior Management team

Pareto Apprenticeships operates safe recruitment procedures and ensures that all appropriate checks are carried out on staff and volunteers who work with all apprentices in a position of trust and maintain a single central register. A process will be in place to verify that agency staff have been appropriately checked prior to starting work.

The Designated Safeguarding Lead will be responsible for dealing with all safeguarding issues and providing advice and support to other Safeguarding Leads across Pareto Apprenticeships and the Board.

- All staff in Pareto Apprenticeships (including casual staff, associates and volunteers) who will (or will potentially) work with young people are required to read and understand the document 'Keeping Children Safe in Education (2022)' completion of this is logged on our Single Central Record.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf
- All staff in Pareto Apprenticeships who will (or will potentially) work with young people and adults at risk are required to undertake mandatory training to equip them to carry out their responsibilities for safeguarding young people and adults at risk effectively, that is kept up to date by refresher training at two yearly intervals. A log of training will be maintained by Group HR which will be sent at defined intervals to Designated Safeguarding Leads for supportive action. Accountability to ensure compliance rests with Quality team, who must have appropriate structures in place
- The Designated Safeguarding Lead is responsible for ensuring that all training content is appropriate, current and accessible. The Apprenticeship Leadership and Management team will support this process through the safeguarding action plan.
- The Designated Safeguarding Lead and the recruiting manager (or their equivalent) ensure that permanent staff, temporary staff, associates and volunteers who work with children and adults at risk receive induction to include the Single Safeguarding Policy and are made aware of Pareto Apprenticeships Safeguarding Young People and Adults at Risk policy and the Divisional procedures for safeguarding children, young people and adults at risk, including their own responsibilities
- All staff are required to comply with the Code of Conduct
 - The Designated Safeguarding Lead, or the Deputy is nominated to be responsible for liaising with the local authority via <https://www.localgov.co.uk/council-directory> and/or partner agencies, as appropriate in the event of allegations of abuse being made against the Board or Senior Management team



- In terms of strategic oversight, the Board discharges its statutory leadership responsibility through the Safeguarding team/board – this is due to the close proximity of the Local Board members to the Designated Leads and apprentices

Designated Safeguarding Lead

- Pareto Apprenticeships Operations and Quality Director has overall responsibility for our Safeguarding Policy, notwithstanding all staff and volunteers' individual responsibility to ensure that this policy is strictly adhered to and is the Designated Safeguarding Lead (DSL);
- Pareto Apprenticeships Apprentice Experience Manager is the Deputy Safeguarding Lead who has Level 3 training with responsibility for safeguarding issues within the organisation;
- Deputy Divisional Designated Safeguarding Leads (Regional Safeguarding Officers) have been identified in each region and across the business to support the Designated Safeguarding Lead and Deputy Safeguarding Lead;
- Pareto Apprenticeships designated managers with lead responsibility are required to undertake appropriate training determined by their operational role, including refresher training at two yearly intervals to keep their knowledge and skills up to date. This will include the Designated Safeguarding Lead, The Deputy Safeguarding Lead and the Regional Safeguarding Officers. These staff should ensure ongoing CPD as and when appropriate through internal safeguarding meetings and external events and through the Annual Safeguarding Training Plan. This training is also undertaken by the HR Manager or equivalent.
- The Deputy Designated Safeguarding Lead is responsible for safeguarding CPD to all operational staff.

Equality Opportunities Statement

The policy is written with due regard to Pareto Apprenticeships commitment to Valuing Diversity. However, where there are concerns about a child's or adults at risks' welfare, this will take priority. An Equality Impact Assessment will be completed. This policy may be subject to review following Equality Impact Assessment by the Apprenticeship Management Team.

General Data Protection Regulations

Wherever possible Designated Safeguarding Leads will follow the principles of the GDPR, however this should not be a barrier to the effective and timely communication of information related to safeguarding information. This is treated as the 'special category personal data and allows for storage and sharing of sensitive and personal information through secure means'.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children

Further guidance is available: [Working Together to Safeguard-Children.pdf](#)

Online safety



Monitoring I.T usage

Pareto Apprenticeships run Fortigate. Fortigate is a unified threat management device that protects in multiple ways such as web filtering, intrusion prevention, data loss prevention and antivirus.

The full list of categories are available in the link below and are designed to protect against malicious content in all its forms.

<https://www.fortiguard.com/webfilter/categories>

The categories are maintained by Fortinet. Best Practice is to adopt this classification. Any exceptions are reviewed and implemented by the IT Security team.

Reports are generated and accessed via the Cloud Portal. (<https://login.forticloud.com/>)

Educating our apprentices

Pareto Apprenticeships Skills Coaches embed relevant and meaningful online safety topics and training content into our apprentices learning journey. Online safety content is delivered using internally developed content as well as credible and valid content from trusted sources such as provider networking groups, local authority websites and updates, the Fellowship of Inspection Nominees (FIN) working groups and bank of online member resources.

Online Safety - Staff training

Pareto Apprenticeships staff are required to complete I.T security training modules relevant to their role within the organisation (accessible through the Pareto LMS).

We will develop the safeguarding knowledge of delivery staff so that it is relevant and contextualised specific to the Business, Administration, Finance and Law and Information and Communication Technology sector subject area and standards within this area that we deliver. These include (but are not limited to) Sales, Leadership and Management and Digital. We ensure that continuous learning and development that is focused specifically on keeping apprentices safe and preventing them from the risk of abuse or neglect is a core element of our safeguarding professional development.

Minimising coronavirus (COVID-19) risks

Pareto Apprenticeships continues to monitor and adhere to the most up to date government guidance and direction for minimising coronavirus (COVID-19) risks. Although all remaining COVID-19 restrictions have been lifted in the UK, Pareto Apprenticeship offices continue to provide access to hand sanitizer gel and anti-bacterial wipes to staff and visitors. All staff and visitors sign an e-declaration to confirm no COVID-19 symptoms when signing into our Apprenticeship offices.



Why is safeguarding necessary for employed Apprentices?

As a provider of government funded training, Pareto Apprenticeships have a duty to safeguard our Apprentices and to take such steps that try to ensure the safety of our Apprentices always. As part of that duty, we will talk to you about what you can do to ensure that Apprentices are not exposed to threats or dangers.

What are the responsibilities of an Employer?

To understand what is meant by safeguarding and promote the welfare of Apprentices

- Be aware of your statutory duties towards the welfare of individuals
- Be familiar with our guidance the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside Apprentices aged **16-18** have had the relevant enhanced DBS checks and of sound character and judgement and will not pose as any threat or danger to Apprentices.

Pareto Staff Training

Pareto Apprenticeships will develop safeguarding knowledge of delivery and non-delivery staff so that it is relevant and contextualised specific to the Business, Administration, Finance and Law and Information and Communication Technology sector subject area and standards within this area that we deliver. These include (but are not limited to) Sales, Leadership and Management and Digital. We ensure that continuous learning and development that is focused specifically on keeping apprentices safe and preventing them from the risk of abuse or neglect is a core element of our safeguarding professional development. We pride ourselves on over twenty five years of success in the Sales Training Sector and we ensure this success is transferred to the development of our staff through our internal CPD programme and through identifying appropriate and high quality externally delivered learning and development opportunities. By delivering thorough, robust and consistent continuous professional development, we ensure our staff are committed to promoting the safeguarding of our apprenticeships and are committed to preventing the risk of abuse, neglect or harm to them.

Escalating an incident or concern

Safeguarding concerns and/or incidents should be reported using the incident report form: <https://forms.gle/AvDxjeeBcztigxM88> or emailing safeguarding@pareto.co.uk and by referring to the processes detailed below.

What to do (Apprentices and Employer/Partners)

If an apprentice or employer/partner needs to raise a safeguarding concern they should speak to their Skills Coach for support and guidance in raising the concern.

If the concern requires immediate attention they should call the Deputy Designated Safeguarding Lead on 07951111778 and email Safeguarding@pareto.co.uk providing as much detail as possible about the concern.

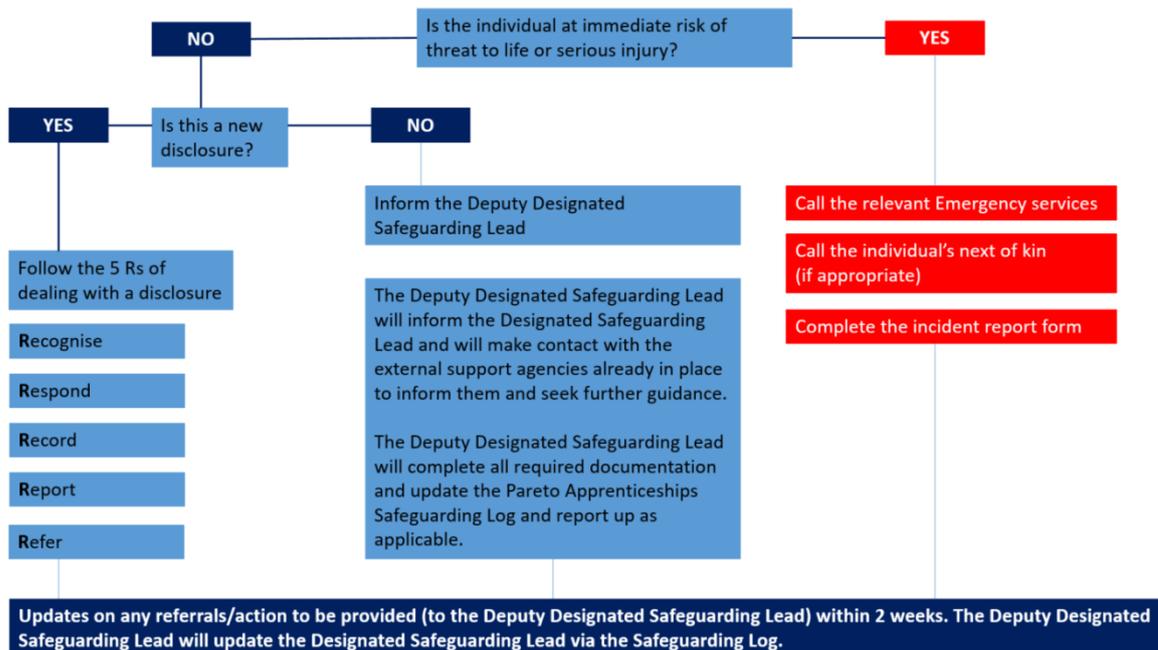


What to do (Pareto Apprenticeship Staff)

Safeguarding concerns and/or incidents should be reported using the incident report form: <https://forms.gle/AvDxjeeBcztigxM88> or emailing safeguarding@pareto.co.uk and by referring to the processes detailed below.

All staff have a responsibility to follow the 5 R's of reporting

✓ RECOGNISE	➔	The signs and indicators of abuse, neglect and radicalisation.
✓ RESPOND	➔	To what you see (concern) or to what is said (report or disclosure). Listen deeply and ask factual questions
✓ RECORD	➔	What you have seen or been told. Focus on the facts and use the words of the disclosure.
✓ REPORT	➔	To a Designated or Deputy Designated Safeguarding Lead without Delay.
✓ REFER	➔	To an appropriate organisation – (in almost all cases this is the responsibility of the Designated Safeguarding Lead)



All staff should know what to do if a child or adult at risk tells them they are being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's/adult's social care. Staff should never promise a child or adult that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child /adult.

- The process for referral is to the Designated Safeguarding Lead or their Regional Safeguarding Officer.
- Where a child / adult at risk is suffering, or is likely to suffer from harm, it is important that a referral to children's / adult's social care (and if appropriate the police) is made immediately. Referrals should follow the local authority's referral process and will be made by the Designated Safeguarding Lead. In the unlikely event that the Designated Safeguarding Lead or deputy is unavailable, then staff are duty bound to refer to the local authority (Identified via <https://www.localgov.co.uk/council-directory>) without delay. The staff member should call the local authority and ask to speak with the duty children and families or adult team (depending whether it is a child or adult at risk)
- In the event that the referral involves concerns raised about a Pareto Apprenticeships staff member towards a child or adult at risk, HR must be informed immediately by the designated Safeguarding Lead at safeguarding@pareto.co.uk along with the local authority designated officer (LADO). In the unlikely event that the concern is about the Designated Safeguarding Leads, then the member of staff must contact the appropriate Divisional Head (Head of Curriculum & Quality, Head of Apprenticeship Operations and Head of Apprenticeship Improvement and Transformation) who will follow the same procedure.
- In the event that the referral involves concerns raised about a Pareto Apprenticeships staff member towards a child or adult at risk, an investigation will be carried out by an appropriate member of the Safeguarding Team using the following processes:
 - Planning
 - Gathering Evidence
 - Conducting Interviews
 - Providing Support
 - Maintaining Communication
- All Pareto Apprenticeships staff who have a concern about a child, or adult at risk should follow the referral processes. Staff should expect to support social workers and other agencies following any referral

Referral to Group Services

Safeguarding Leads are required to inform the Board and the Apprenticeship Senior Management Team of the following referrals:

- Apprentice (children and adults at risk referrals to the Local Authority Designated Officer / Children and Families or Safeguarding
- Adults' Duty Team / Police whereby the apprentice is the alleged 'subject';
- Apprentice (children and adults at risk) referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police whereby the learner is the alleged 'perpetrator'
- Staff referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police whereby the staff member is the alleged 'perpetrator'

The Safeguarding reporting form <https://forms.gle/yusH1e5VZrnpaf5T8> should be completed. All correspondence will be held in the strictest confidence.



Reporting to the ESFA:

Pareto Apprenticeships' Designated Safeguarding Lead will make arrangements to inform the Education and Skills Funding Agency of the referral.

(Within this section the Contractor is Pareto Apprenticeships)

The Contractor will ensure it notifies the Department via the Contact Form: General Enquiries at Education and Skills Funding Agency - GOV.UK (www.gov.uk) where a referral has been made by the Contractor or one of the Contractor Related Parties in either of the following circumstances (such notification must include the name of the institution, a high level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police):

A safeguarding concern related to sexual violence to Local Authority children's social care/adult social care and/or the police,

Or

An allegation of abuse made against a teacher, lecturer or other member of staff to the designated officer(s) (at the local authority).

The Contractor will ensure it notifies the Department via the Contact Form:

General Enquiries at Education and Skills Funding Agency - GOV.UK (www.gov.uk) of incident(s) and/or where a referral has been made, where the Contractor or one of the Contractor Related Parties:

Is aware of an incident, or pattern of incidents, which undermines the promotion of British fundamental values or the ability of the Contractor or the Contractor Related Parties to comply with the Prevent duty, or makes a referral of an individual member of Contractor Personnel for the purposes of determining whether that member of Contractor Personnel should be referred to a panel for the carrying out of an assessment under section 36 of the Counterterrorism and Security Act 2015 of the extent to which that individual is vulnerable to being drawn into terrorism.

Where it applies:

The Contractor must comply with the Modern Slavery Act 2015 and must have in place throughout the Contract Period policies and procedures to ensure full compliance.

The Contractor must ensure that all Sub-Contracts that it enters into include an obligation for the Sub-Contractor to comply with the Modern Slavery Act 2015 with special emphasis on express anti-slavery and anti-human trafficking provisions.

The Contractor shall implement due diligence procedures to ensure that there is no slavery or human trafficking in any part of its supply chain.

The Contractor will, in circumstances where it Sub-Contracts the management and/or delivery of the Services under this Contract, ensure that all the provisions in respect of learner welfare are included in the Sub-Contract with each Sub-Contractor.

Monitoring and Action

The Designated Safeguarding Lead will monitor and inform the Apprenticeship Senior Leadership and Management Team. The Designated Safeguarding Lead may be required to seek further clarification or advise next steps on occasion. Correspondence will be made through safeguarding@pareto.co.uk



Follow-up

Pareto Apprenticeships Designated Safeguarding Lead is required to provide summary follow-up information following referral. The purpose of this procedure is to provide the Board with oversight and assurance that the referral is being handled with due attention by the relevant agency or service. In some cases, the issues will be resolved within one of the milestones at which point a summary comment will be provided and the referral 'closed'. More complex cases may require ongoing monitoring. The process for this latter category will be set on a case by case basis.

Safeguarding and Whistleblowing (Disclosure Policy)

Every maintained school, college or training provider is required to have a whistleblowing policy that protects staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

Where the staff member thinks that Pareto Apprenticeships will - cover it up, treat them unfairly if they complained, or, if they have raised the matter before and the concern hasn't been dealt with, then they should report it to the Pareto Apprenticeships Designated Safeguarding Lead.

Responsibility Signature			
Name:	Dan Gagg	Position	Apprentice Experience Manager & Deputy Designated Safeguarding Lead
Signature:		Date:	14 Oct 2022

Dan Gagg (Oct 14, 2022, 9:15am)

Authority Signature			
Name:	Benjamin Drain	Position	Apprenticeships Quality & Operations Director (Including Designated Safeguarding Lead)
Signature:		Date:	14 Oct 2022

Ben Drain (Oct 14, 2022, 9:45am)

This process will be reviewed annually (or when relevant changes to the provision require an immediate update).



Appendix:

Definitions:

There are four main categories of abuse that apply to both children and adults at risk:	
Physical	Physical abuse is physical force or mistreatment of one person by another which might or might not cause physical injury
Emotional	Psychological or emotional abuse is harmful behaviour that can cause mental distress. It can involve both verbal and non-verbal abuse which can scare, humiliate and isolate a person
Neglect	Neglect occurs when a person deliberately withholds, or fails to provide, suitable and adequate care and support needed by another adult or child.
Sexual	Sexual abuse is unwanted sexual activity or sexual behaviour that happens without consent or understanding

There are additional categories of abuse for adults at risk:	
Modern Slavery/Exploitation	Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, and abuse of vulnerability, deception or other means for the purpose of exploitation.
Organisational/Institutional	Institutional abuse is the mistreatment or neglect of an adult at risk by a regime or individuals. It takes place within settings and services that adults at risk live in or use, including any organisation, in or outside the Health and Social Care sector.
Discriminatory	Discriminatory abuse is the unequal treatment of an individual based on age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.
Financial	Financial abuse happens if someone tries to steal, steals or defrauds you of your money, goods or property.
Domestic	Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.
Self-Neglect	Self-neglect is when a person being unable, or unwilling, to care for their own essential needs. It can cover a wide range of behaviour including neglecting personal hygiene, health or surroundings, refusal of necessary support and obsessive hoarding.

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.



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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or their advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

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County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are



children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

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Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence and children missing from education procedures

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Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.



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Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

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Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of



'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

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Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: here

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Mental health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Every Mind Matters for links to all materials and lesson plans

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK



KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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Extremism

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues.

Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

increased absence from school

- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

• 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.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school

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- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office’s Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office’s Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence.



Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved

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So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HB

