

Safeguarding, Prevent & Child Protection Policy & Procedures

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

Fareport Training Organisation Limited ('Fareport') recognises the importance of safeguarding learners, employers, staff and visitors in our work and activities. This can only be achieved through partnership working with all stakeholders and key partners to ensure that the requirements are continually reviewed and adjusted to meet the needs of the organisation. All staff working for Fareport, regardless of their seniority, understand that they must adhere to the following guidelines and policies.

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 be in need of 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.

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Safeguarding Designated Person: Ruth Cole
safeguarding@fareport.co.uk 07967 338243

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 committed to anti-discriminatory practice.

1. 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
- 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 promote the need for confidentiality to be maintained at all times, 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.

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 and understand their risks
- To support and protect learners who are identified as vulnerable
- To monitor all learners to ensure that learners are identified as vulnerable when situations change and are supported appropriately
- To signpost and refer where appropriate to do so

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.

2. Safeguarding Policy Suite

Fareport believes that to ensure we are meeting the requirements of the safeguarding agenda, we need a range 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 (Safer Recruitment)
- [Vetting and Barring Policy](#)
- [Equality, Diversity & Dignity Policy](#)
- [Health & Safety Policy & Procedures](#)

- [Risk Assessment Procedures](#)
- [Critical Incident Policy](#)
- Data Protection Policy
- [Confidentiality Policy](#)
- [Lone Workers Policy & Procedure](#)
- [External Events and Transporting Learners Policy](#)
- [Community Cohesion Policy](#)
- Use and Misuse of ICT
- [Grievance Procedure](#)

These documents reflect Fareport's response to the safeguarding agenda. 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.

3. 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. All ILP's are coded clearly in the top right-hand corner to highlight the need to review any known confidential but necessary information prior to learner contact.

<p>A – No issues identified B – Some issues identified, usually for wellbeing – to be monitored C – Cause for concern – potential safeguarding issues</p>
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3.1. Learner Category – A

This category will cover most learners and indicate that there are no current issues, needs or concerns identified.

3.2. Learner Category – B

This category covers learners who have identified issues or wellbeing concerns that Fareport staff should be aware of before they contact the learner, deliver training or take over assessment of the learner to ensure we can provide effective support. 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. 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 chronology will be created and monitored by the Safeguarding Designated Person – this will be stored on [SharePoint under Management](#) → [Confidential](#) (restricted access).

3.3. Learner Category – C

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

- Domestic violence and abuse
- Grooming and child sexual exploitation
- Bullying including cyberbullying
- Drug or alcohol dependency
- Female genital mutilation (FGM)
- Faith abuse
- Forced marriage
- Radicalisation (ethnic, national, political, social and religious)
- Extremism (extreme views, ideology, fanaticism, terrorism)
- Teenage relationship abuse
- Trafficking and modern slavery

All safeguarding chronology will be created and monitored by the Safeguarding Designated Person – this will be stored on [SharePoint under Management](#) → [Confidential](#) (restricted access).

This learner category system is operated confidentially and is not designed to be published or highlighted outside of the staff team – we share our system with subcontractors, although it is not mandatory for them to adopt this.

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

4. Safeguarding Team

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

Designated Person (DP) for Safeguarding and Child Protection:
Ruth Cole (Project Manager – Quality, Practice and Policies)

Deputy DP's for Safeguarding and Child Protection:
Theresa Maple (Director of Operations) & Johanna Jewell (Director of Quality)

Enquiries or concerns about Safeguarding, Prevent or Child Protection should initially be referred to the Designated Person, using the contact details on p1. If the DP is unavailable, staff are advised to liaise with one of the safeguarding team in their absence. 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).

4.1. Responsibilities – Safeguarding Team

- Provide advice and support to staff on issues relating to safeguarding, which will include signposting to professional organisations.
- Complete a chronology and share with the safeguarding team and relevant Trainer.
- Monitor all 'live' 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 DP are supported by the safeguarding team for their own welfare.
- Know how to make an appropriate referral.

4.2. Responsibilities – Organisation

- Fareport will have a minimum of 3 senior members of staff who will have allocated safeguarding and child protection responsibilities for the company – this will include 1 x DP and 2 x Deputies (in addition to the Chief Executive). These are known as the 'Safeguarding Team'.
- The Safeguarding Team will be responsible for locating and booking onto appropriate courses to update their CPD in terms of safeguarding.
- The DP will ensure this policy is reviewed on an annual basis, forwarding any areas for updating to the Safeguarding Team for approval.
- The DP is responsible for implementing this policy across the workforce to ensure understanding – this will be both on induction and as part of tri-annual all-staff training days.
- It is the responsibility of the DP to 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.
- All members of staff will be made aware of the named DP and how to contact them – as well as the Deputies in the DP's absence.
- The DP will ensure that advice is sought from relevant Safeguarding agencies when dealing with more complex issues.
- Fareport will ensure that all members of staff have access to additional guidance in relation to Safeguarding and Prevent ([Ref: 17a](#)).

4.3. 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 DP to discuss **any and all concerns** in relation to learner welfare, safeguarding or child protection, immediately.

- All members of staff 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 Persons or any Deputy.
- When photo or video media are taken (by the Trainer) 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.

5. 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](#).

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, will be interviewed 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)
- 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 3 years for every member of staff who is not registered with the DBS online update service
 - From Aug 2015, all existing and new members of staff are required 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, annually
 - 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)

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

6. 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 for 2017-18 \(Ref: 6a\)](#), which is reviewed and updated annually in line with business needs.

7. Mobile Phones

All Trainers are allocated a company mobile phone when they commence employment with Fareport, which can be used for on-site assessments with their learners (i.e. DVR recording, e-portfolio log-ins, photos or videos). Regardless of the learners 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. 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 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.

8. 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 Person, 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 Person (DP) or a Deputy immediately. The DP or Deputy will secure this document on SharePoint, in a limited access folder. A [chronology](#) will be created or current one updated.

- The DP 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 DP 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.

Concerns about an Adult – contact Adult Services

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

- The DP 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 DP 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 DP 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.

9. Allegations Against Employees

When any form of complaint is made against a member of staff, it must be taken seriously. The complaint should initially be dealt with by the most senior member of staff on site at the time the complaint is made. If the 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.

- 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.

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) 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, or may have harmed, 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.

LADO Contact Details:

Online Notification Form – click [HERE](#)

Phone: 01962 876364

Email: child.protection@hants.gov.uk

- 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 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.

10. Prevent Duty

The Counter-Terrorism 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 Person, or in their absence, a Deputy as detailed on p.4. 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 quickly. By telephone, this would be using the emergency phone number 999 – or to report a suspicious activity online through the Counter Terrorism Police by clicking [HERE](#).

Reporting Concerns about an Individual (Hampshire)

This is based on Hampshire, although the DP 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

[Further Prevent Duty Guidance for England and Wales.](#)

11. 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.

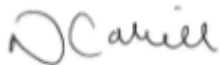
- Staff will be made aware that they have a professional responsibility to share any concerns or information with the Designated Person or any Deputy in order to safeguard children, young people or vulnerable adults.

- 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.

12. Review and Maintenance of Policy

The Designated Person, 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:

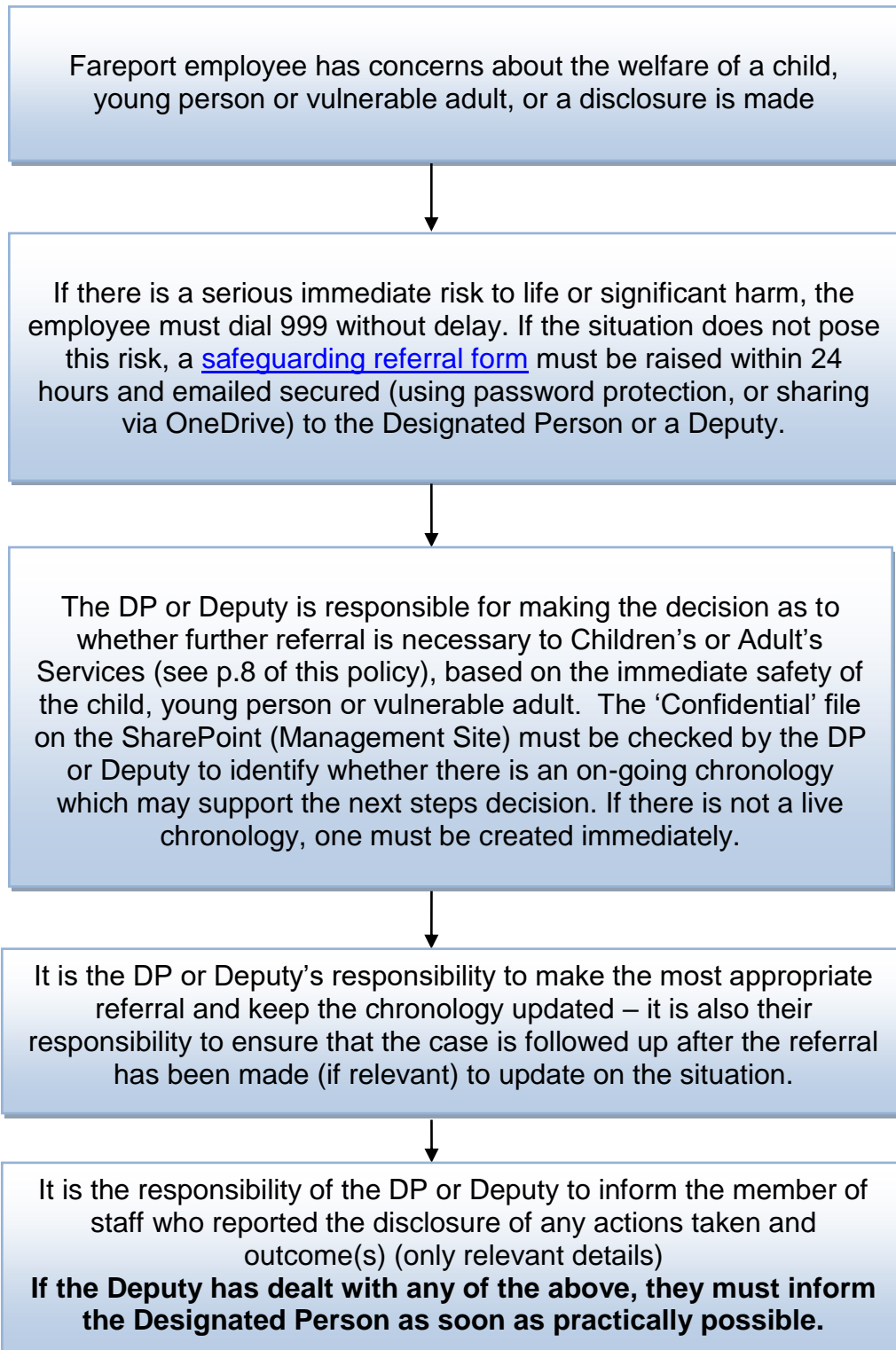


Natalie Cahill, Chief Executive
Reviewed annually.

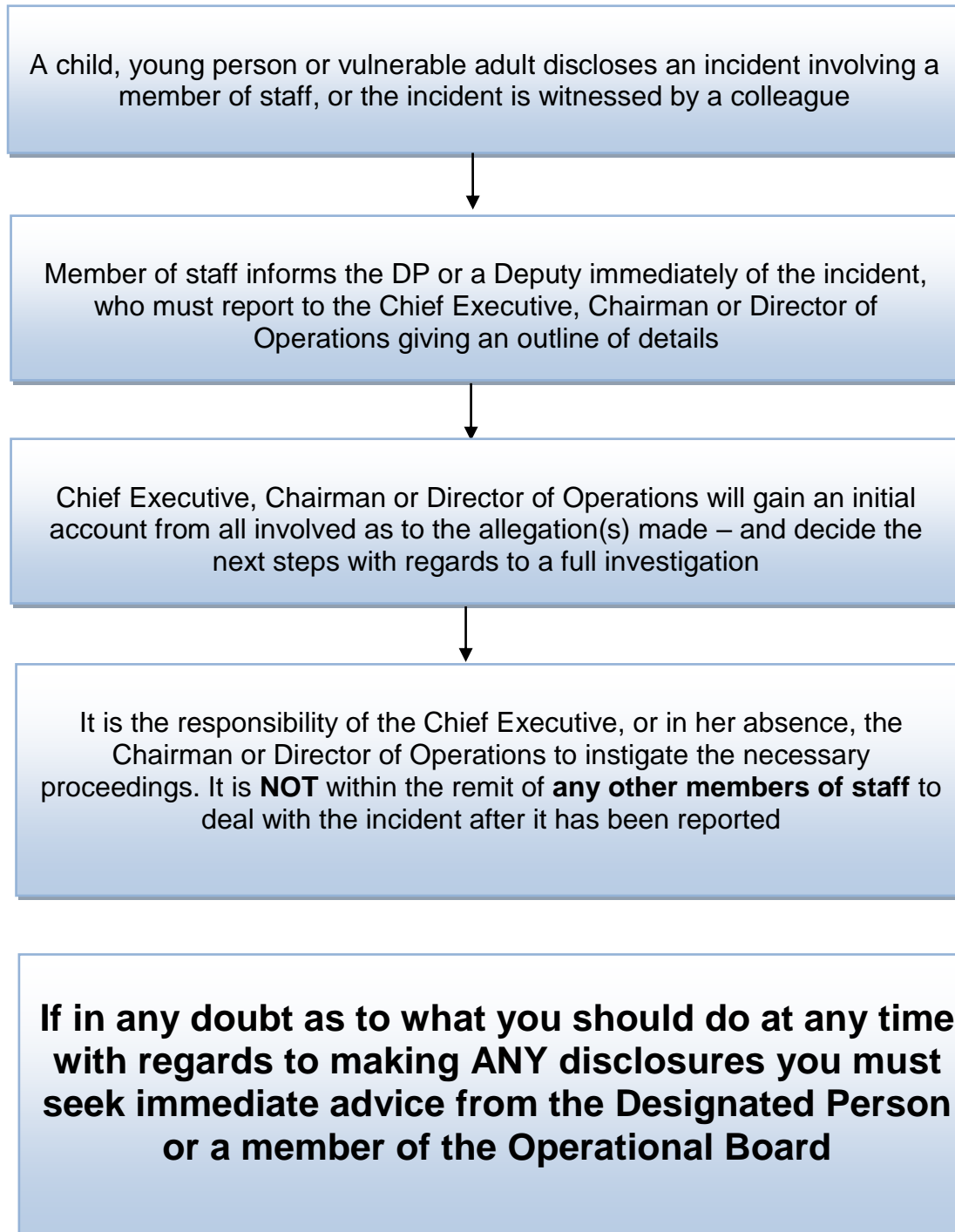
Last review: 11th May 2018

Appendix 1

Procedure for Dealing with Suspicions, Allegations or Disclosure or Child Abuse



Procedures for Dealing with Allegations Against a Member of Staff



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 DP

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?'

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 Person or, in their absence, a Deputy who will start a chronology and make any external referrals