

Safeguarding Policy (212)

Aims

The aims of the company safeguarding policy are to provide an environment where all can work safely; The Company will take every reasonable precaution to minimise risk while providing demanding, challenging and enjoyable training and development via online and face to face activities.

Rationale

The **rationale** of the policy is to contribute to the personal safety of all children and adults using our facilities and resources, through actively promoting awareness, good practice and sound procedures. The organisation is committed to ensure that all and specifically those that are vulnerable are kept safe from harm while they are involved with the organisation.

Principles

Safeguarding has a meaning wider than child protection. The policy aims to ensure that all apprentices, staff, customers, linked employers, freelance trainers' stakeholders and visitors are safe from harm and abuse, harassment and bullying. Harm and harassment have formal legal meanings within civil and criminal law.

Safeguarding also includes all staff acting in a responsible way to avoid any false allegations of inappropriate behaviour being made about their conduct that would give cause for concern.

This policy is based on the law and statutory guidance applicable in England only. The Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012 deal with aspects of regulated activity (see below).

- The Equality Act 2010
- The Health & Safety at Work Act
- Working together to safeguard children 2018
- Children Act 2006
- Children and Families Act 2014
- Digital Economy Act 2017
- The Care Act 2014
- The Mental Capacity Act 2005
- United Nations and the conventions of the rights of a child (UNCRC)

Are also relevant to safeguarding. The Safeguarding designated person maintains a Safeguarding report and is supported by the HR function and deputy designated persons.

This policy is directly linked to the company disciplinary procedures. All company personnel have a legal duty to report instances of harm and abuse in regulated activities to the Disclosure & Barring Service (DBS) following action in accordance with staff disciplinary procedures where appropriate.

In addition to the legal aspects it is our policy to ensure that all persons learning and working with us respect each other and strive to help each other in a professional and caring manner.

Roles and Responsibilities

The legal situation is complex and therefore we have appointed **Safeguarding Designated Persons** who have received training in this specific duty and who are responsible for maintaining their professional development in this area and overseeing and co-ordinating the company's approach to Safeguarding. The safeguarding Designated Persons review all the key documents and policies and are able to consult the police, Local Authority Children's Social Services for under 18s or Adult social care team for vulnerable adults and social services in respect of safeguarding matters. The safeguarding Designated Persons are not entitled to give formal legal advice but are able to obtain such advice from experts. To ensure that all sectors are appropriately represented, Deputy Designated Persons are specialists and appropriately appointed to provide expert guidance.

The Safeguarding Designated Persons will liaise closely with police, the local safeguarding children's boards and multi-agency safeguarding hubs where appropriate.

Purpose

All staff have a personal responsibility for safeguarding the welfare and wellbeing of all children and adults at risk of harm by protecting them from abuse which may be:

- Neglect / Acts of omission
- Domestic abuse/ Violence/VAWG (Violence Against Women and Girls)
- Organisational/Institutional abuse
- Self-neglect/Self harm
- FGM
- So called 'Honour Based' violence
- Forced marriage/Faith abuse
- Emotional or Psychological abuse
- Physical abuse
- Sexual abuse including Sexting and Upskirting
- Controlling and Coercive behaviour
- Peer on peer abuse including initiation /hazing type violence and rituals
- Financial or material abuse
- Discriminatory abuse/hate crime
- Bullying/ Cyber bullying
- CSE (Child Sexual Exploitation)
- PACE (Parent Against Child Exploitation)
- Exploitation abuse/Grooming/County lines
- Human trafficking
- Gender based violence
- Anti-radicalisation and prevent strategy (Annex 2)
- Related to the modern slavery act 2015 (Annex 4)

All staff should refer to the health and safety policy ([005](#)) in particular the lone working section to make themselves aware of the lone working guidance and how to protect themselves from safeguarding allegations and ensure personal safety.

In addition to the above- all personnel have a responsibility to undertake the safeguarding training provided by the company or third parties. Staff should also ensure they review and maintain currency of knowledge for safeguarding/prevent/British values as part of their CPD.

Line managers are accountable for managing safeguarding training for their line reports and ensuring relevant information in respect of Safeguarding is provided to individuals for whom they have line management accountabilities.

Managers undertaking recruitment are responsible for applying for appropriate DBS checks and advising selected applicants of this fact and advising them of appropriate information to access the relevant DBS portal to satisfactorily complete a submission. To include DBS for overseas applicants where they would be working in regulated activity relating to children or vulnerable adults as defined in Safeguarding Vulnerable Groups Act 2006. It is mandatory for all staff who are involved in the recruitment process to complete "Safer recruitment" training as part of their induction.

Designated Person

The Designated person is responsible for providing or signposting company personnel to relevant safeguarding training and coaching resources. All staff have a responsibility to participate in safeguarding training and maintain their professional development in this area.

HR Team

The HR team is responsible for ensuring that recruitment processes and employment offers are compatible with the safeguarding principles and meet legislative requirements in terms of relevant pre-employment checks.

Using the DBS completion guidance 068, an appropriate level of DBS will be conducted by the recruitment manager. A clear List 99 check is required prior to any new member of staff commencing employment, and their continued employment is subject to the receipt of satisfactory DBS and reference checks.

It should be noted that applicants, or freelance trainers where they are engaged, are required, and given the opportunity, to reveal any conviction, caution, bind over probation order or pending prosecution whether imposed prior to or within the period the applicant undertakes work on behalf of HIT training Ltd. Due attention will be given to the Disclosure and Barring Service (DBS) Report and the Recruitment of Ex-Offenders Policy 109 on the disclosure of such information.

Senior Leadership team and Directors and the Safeguarding Designated Person

The senior leadership team and Directors are accountable for the execution of this policy throughout the organisation. The Safeguarding Designated Persons are responsible for providing the Board with information pertaining to Safeguarding and such notifications will be addressed where required, under the health and safety agenda item of all Board meetings.

The Safeguarding Designated Persons shall ensure active compliance with this policy by all staff, apprentices, stakeholders' freelance trainers and linked employers.

The aim of safeguarding actions with regard to personnel is to ensure as far as is possible that **anyone**, who seeks to work with children and young people (or vulnerable adults where appropriate) through the companies' activities and who gains substantial access to them thereby (whether within activity hours and/or beyond) is as safe to do so in safeguarding protection terms as can be guaranteed.

The Safeguarding Designated Persons accountable for the following checks being carried out on all prospective employees whose work may create a situation of substantial access to children and young people (or vulnerable adults):

- DBS criminal records check at enhanced level including barring and police disclosure where legal and appropriate (without breaching the Rehabilitation of Offenders Act) but complying with regulated activity safeguarding requirements.
- References are sought and checked as nominated by the applicant. Such references must come from a person who is not related to the applicant and who preferably knows of the applicant's character, trustworthiness and any previous experience of working with/looking after children and young people and vulnerable adults.

The prospective line manager will decide if the post is in regulated activity, with guidance to be sought from the HR team. If this is the case they shall an enhanced DBS check and the applicant will be informed of the checks required as a condition of working in our company with children and young people (or vulnerable adults where appropriate).

No applicant may start work unsupervised without the above enquiries being completed. However, the Safeguarding Designated Persons may, in consultation with the managing director and HR Manager authorise an applicant to commence supervised (one-to-one basis) work where it is absolutely clear there will be no problems arising from the checks. This supervision must meet the Secretary of State for Education's definition.

The Safeguarding Designated Persons and HR team will not accept any previous reference, police check, social services endorsements provided by an applicant in substitution for the above enquiry process. At all times the initiative must lie with our company to make its own, completely independent enquiries in line with the latest legislation and codes available.

Record keeping shall be in accordance with our personnel policies and will comply with the Data Protection Act 2018.

Subcontract Provision

It is a requirement that the company hold copies of DBS records for all staff involved in the subcontracted provision as required. In addition, we must ensure that the relevant Safeguarding and Prevent training is completed and evidence of this is held centrally.

Management of policy

Regulated Activity

The legal definition of regulated activity covers – in certain circumstances - teaching, training, advising, instructing, website moderation and driving, for example. The Safeguarding designated person and HR team should be able to provide clarification and full definitions in respect of what constitutes regulated activities. These activities are related to children (all persons under 18) and adults who may or may not have disabilities but who do have certain care requirements because of their vulnerability. In order to define the activities, the HR team with feedback from the Safeguarding designated person reviews every staff post and determine if particular staff are engaged in regulated activities – and if so they must be cleared to work here by virtue of an acceptable DBS report.

It is an offence punishable by a fine and term of imprisonment for the Regulated Activity Provider (RAP) to knowingly employ a banned person in a regulated activity. It is illegal to fail to report harm which breaches staff disciplinary procedures. It is the responsibility of prospective staff to complete the DBS check as initiated by the company.

In the event of a DBS notification indicating barriers to the employee taking up or continuing in their current role, the HR team should hold discussions with the Line Manager and Safeguarding designated person before any decision is made in respect of on-going employment with the company.

Records

The Safeguarding Designated Persons are to keep records¹ of all incidents of harm, abuse, harassment, bullying and 'prevent' referrals and not to destroy those records where relevant to harm or abuse. The General Data Protection Regulation applies to protection of personal data, ensuring that records are stored securely and appropriately. All records related to Safeguarding and Prevent concerns will be accessed only by the Designated Persons. The records and content will not be shared with third parties unless the Designated Persons have strong evidence of a safeguarding issue. Under these circumstances, relevant legislation such as the Children Act 1989, Vulnerable groups Act 2006 takes precedence and personal information may be shared if it is clearly in the vulnerable persons best interests.

Disciplinary Procedures in Relation to Regulated Activity

If a person is accused of an act of harm, or thought to have committed one as defined by law, they can be suspended and requested to remain away from work while an investigation takes place into the incident. This is called 'neutral ground'. Staff may not visit the person on neutral ground to give information about the progress of the disciplinary inquiry without the formal permission of the HR Manager and Safeguarding designated person. It is not a disciplinary matter at that point because no offence has been proven.

If no offence can be proven then following advice from HR and the Safeguarding designated person and relevant services where appropriate, the person may be reinstated. If a police officer notifies the company that the disciplinary procedure or any subsequent reporting to DBS should be halted pending a police investigation that instruction will

¹ The records can be held at Head Office with the HR team

be complied with by all staff members involved. False accusations against staff or apprentices will be reported to the police as potential criminal offences as well as disciplinary offences.

If the person is found to have committed harm, they may be moved to another post or dismissed in accordance with disciplinary procedures. At this point the Managing Director or the disciplinary manager will instruct the safeguarding designated person to complete the DBS reporting form and send full details of the case including previous notes of other relevant incidents or concerns to the DBS for investigation by a senior case officer.

If the staff member resigns, retires or flees at any point during 'neutral ground' or disciplinary procedures thus making it impossible for the procedures to be completed, then the law requires that the Managing Director shall instruct the safeguarding designated person to report that staff member to the DBS for further investigation regardless of their location and status.

Harassment

No apprentice or staff member shall be harassed. No apprentice or staff member shall harass any visitor, client, customer or employer. Harassment can be of two kinds – civil harassment linked to discrimination or racial harassment under the Equality Act 2010 and criminal harassment linked to the Protection from Harassment Act 1997. Apprentices have the right to complain about harassment. Staff also have this right. Staff members have the same rights to protection as apprentices.

Bullying

Although bullying is not precisely defined in law, any physical or mental duress which makes a person feel as though they are being forced against their will to act in an inappropriate way or to feel unduly stressed, or to be alarmed at the thought of coming to work, will be deemed to be bullying and may also be harassment.

However, the reasonable requests of Line Managers for staff to do their work to the required quality and for apprentices to actively take part in learning cannot be misconstrued as bullying. In respect of all apprentices all staff will act in an understanding way taking into account any disability, learning difficulty or personal circumstances that could impact on an individual's sense of vulnerability.

Lockdown

The welfare and safety of staff and visitors that enter HIT premises is paramount. In the event of a serious security risk (e.g. violent or armed intruder) a lockdown is implemented. The initiating threat can be either internal or external to the building. A [lockdown process](#) is visual in every office enabling staff and visitors to follow clear guidance if the need was to arise.

Children and Adults

Safeguarding law deals very differently with these two categories of people. **Anyone under 18 in regulated activity has to be safeguarded** as a child in accordance with the law and the statutory guidance set out by the Secretary of State for Education in two documents: (1) Regulated Activity (2) Supervision.

Safeguarding for adults concentrates on the activities the job holder takes part in – like washing, dressing, being fed and so on. Education for adults is not a regulated activity. **Staff who teach, train or instruct adults exclusively for education do not have to be DBS checked.** However, **if they also work with children they will need to be checked.** The activities which require adults to be DBS checked for regulated activity are defined by statutory guidance issued by the Secretary of State for Health. The regularity and frequency of regulated activity is defined both for children and for adults in the Supervision document issued by the department (DfE).

Reporting & Confidentiality

It is the duty of all staff to report incidents of concern whether they affect regulated activity or not. It is also the duty of staff to protect and assist apprentices when they wish to report. Our company has an open style of management and we wish to support anyone who feels concerned about their treatment. Although any reported incident will be kept confidentially in line with policy and data protection, **staff cannot – and must not - promise confidentiality when a safeguarding disclosure is made since the law requires that police and social services and the DBS are told.** The person reporting and the person making the disclosure will be protected. It is their legal right to remain anonymous to other staff and the public. However, the safeguarding designated person has a duty to pass on the names and details of any child or adult who has made a validated safeguarding disclosure to relevant authorities.

Harm

Staff are to carefully note the following. Any queries or request for additional information should be addressed to the safeguarding designated person. Although adults will understand the general meaning of harm and abuse in normal parlance, it is not possible to say that a person has 'harmed' a child or adult in a legal sense unless we understand what legal harm is. The government has conducted research into harm and this is found [here](#):

Section 47 of the Children Act 1989 places a duty on local authorities to make enquiries where it is suspected that a child is suffering, or is likely to suffer, significant harm, to enable it to decide whether it should take any action to safeguard and promote the welfare of the child. The framework for assessing such children is set out in chapter 5 of Working Together to Safeguard Children – the key document for defining the role and actions of Safeguarding Designated Persons. Our Safeguarding designated person is to liaise with the local authority on these matters.

Disclosure and Barring Service definition of harm

Has a person:

- **Harmed a child or vulnerable (at risk) adult through their actions or inaction**

Harm should be considered in a wider context than just physical and can take numerous forms. Types of harm relating to children can include (but are not limited to):

- Emotional / Psychological - Action or inaction by others that causes mental anguish.
- Physical - Any intentional physical contact that results in discomfort, pain or injury.
- Sexual - Any form of sexual activity with a child under the age of consent.
- Neglect - Failure to identify and/or meet care needs.

Types of harm relating to vulnerable adults can include (but are not limited to):

- Emotional / Psychological - Action or inaction by others that causes mental anguish.
- Financial – Usually associated with the misuse of money, valuables or property.
- Physical - Any intentional physical contact that results in discomfort, pain or injury.
- Sexual – Coercion or force to take part in sexual acts.
- Neglect - Failure to identify and / or meet care needs.
- Verbal – Any remark or comment by others that causes distress.
- Organisational/Institutional Abuse - Systematic poor practice that affects the whole care setting

Represented a risk of harm to a child or vulnerable adult (satisfied the harm test)

To satisfy the harm test there needs to be credible evidence of a risk of harm to vulnerable groups including children such as statements made by an individual regarding conduct/behaviour, etc.

For a case to be considered as a risk of harm, there must be tangible evidence rather than a “feeling” that a person represents a risk to children and / or vulnerable adults.

Have received a caution or conviction for a relevant offence

A relevant offence for the purposes of referrals to DBS is an automatic inclusion offence as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

A list of relevant offences is detailed [here](#). The list includes a range of offences and should be reviewed before making any decision as to the relevance in respect of safeguarding.

Legal requirements

Regulated activity providers and personnel suppliers are required by law to refer a person (to the DBS using the correct form) where they have:

- Harmed a child or vulnerable adult (engaged in relevant conduct)
- Represent a risk of harm to vulnerable groups including children (satisfied the harm test)
- Received a caution or conviction for a relevant offence

The Safeguarding designated person is required to provide information relating to the person's conduct, (including copies of relevant documents), namely:

- a) A summary of the conduct including details of the setting and location in which such conduct occurred.
- b) Details of any harm suffered by any child or vulnerable adult resulting from or arising from the conduct or any risk of harm that a child or vulnerable adult was, or may have been, exposed to as a result of such conduct.
- c) Whether the person you are referring to has accepted responsibility for or admitted the conduct or any part of it.
- d) Any explanation offered by the person you are referring for the conduct or any remorse or insight demonstrated by them in relation to the conduct.
- e) Any information other than that relating to the person's conduct which is likely to, or may, be relevant in considering whether they should be included in or removed from a barred list including information relating to any previous offences, allegations, incidents, behaviour or other acts or omissions.

It is a legal requirement to supply information relating to the reason why you consider that the harm test is satisfied in relation to the person you are referring to. You are also required to provide details of any investigation undertaken by any person in relation to the person's conduct including:

- a) The evidence and information obtained and considered in any such investigation.
- b) The outcome of the investigation, if known.
- c) The contact details (including a name, address, telephone number and e-mail address) of any person responsible for the investigation.

Safeguarding Designated person- Ali Barford-Drew, Email contact: ali.barford-drew@hittraining.co.uk

Deputy Designated persons:

Lindsey Appleby-Flynn Email contact lindsey.appleby-flynn@hittraining.co.uk

Kirsty Simmonds Email contact Kirsty.simmonds@hittraining.co.uk

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Last Review: 3rd April 2020
Next Review: May 2021
Person Responsible for review: Designated Person

This Policy has been agreed by Jill Whittaker, Managing Director



Annex 1 What do you do if someone makes a disclosure to you?

If someone confides in you:

- Remain calm, approachable and receptive
- Explain that you cannot offer confidentiality and based on what you hear, you may need to report this to your company Safeguarding designated person
- Listen carefully without interrupting
- Make it clear that you're taking what is being said seriously
- Acknowledge you understand how difficult this may be
- Reassure them they've done the right thing in telling
- Let them know that you'll do everything you can to help them

Then you must

- Record carefully using their words and sign, date and time your notes (only record what has been said, and what you observed)- use the [Safeguarding and Prevent Alerter Form](#)
- Continue to be caring and supportive for them

Best working practice for handling a disclosure

- Be friendly, courteous and kind - a good role model
- Treat all with dignity and respect regardless of age, sex, ethnicity, disability or sexuality
- Be available to listen and ready to refer to someone more experienced - in this case the safeguarding designated person or the deputy designated personnel
- Respect personal privacy but recognise the difference between privacy and offering confidentiality
- Be sensitive to the needs and preferences of others
- Never make belittling or discouraging remarks
- Do not use inappropriate language and subject matter. Be careful not to do or say anything that could be misunderstood or be interpreted as innuendo
- Avoid any questionable behaviour /communication in face to face: telephone: email and social media activities
- Challenge unacceptable behaviour and report any allegations or suspicions of abuse use the [Safeguarding and Prevent Alerter Form](#)
- Never ignore or trivialise bullying. Refer to the HIT safeguarding and anti-bullying policies ([whistleblowing](#) and [grievance](#)) and if further guidance is required contact HR

Procedure for responding to an allegation of abuse

Recognition

This procedure must be followed whenever an **allegation** is made that a child or vulnerable adult has been abused or when there is a **suspicion** that a child or vulnerable adult has been abused or such information has been disclosed

Respond

Do not make promises regarding confidentiality. Explain to the person **at the outset** that you will need to report the disclosure and share the information with the respective Line Manager and one of the safeguarding Designated Persons. The safeguarding designated person will, where possible, respect the wishes of the individual; however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

Report

The respective Line Manager and Designated person should be advised of any matter that could be regarded as a Safeguarding issue. The Line Manager should be advised either in person or by phone as soon as possible. The designated person should also be contacted by [The Safeguarding and Prevent Alerter Form](#) - or if a situation is deemed serious/life threatening, the Designated Persons or Deputy team must be contacted by phone - it is appropriate to send a text to ask for an immediate call back regarding a serious Safeguarding concern

Record

The record of the incident or concern must be made using [The Safeguarding and Prevent Alerter Form](#). We may need to add that if staff make notes, NO personal details can be recorded to associate the notes with an individual.

Refer

The Safeguarding Designated Persons or Designated/Deputy designated persons will decide if the matter needs to be reported to an external agency (Adult or Children Safeguarding Boards or the Local Authority). The Designated persons can also seek advice from external agencies in terms of whether a referral should be made.

External referrals will be undertaken over the telephone to the duty social worker (or such other person as required by the local Area Child Protection Committee (ACPC) procedures or the Adult equivalent). In the unlikely event that social services cannot be reached the designated person can contact the relevant police child protection team for the area.

A record of the report will be retained by the Safeguarding Designated Persons/Deputy Designated Persons. The record will note the date and time of the report and must include the name and position of the person to whom the matter is reported. The Safeguarding Designated Persons should discuss with the Social Services Department what action will be taken to inform the parents/guardian of the child or vulnerable adult and a note of that conversation should be made.

In any inter-agency meeting, the designated persons will also retain a record of the meetings and any agreed actions and all correspondence will be securely maintained.

Online safety:

It is essential that learners feel safe and inclusive whilst online. It is the responsibility of the staff at HIT Training Ltd to ensure correct protocols are followed when delivering online sessions including the suitability of the environment, dress code and behaviours during sessions. Permission from parents/guardians is sought for under 18s.

For any enrichment courses offered to Apprentices under the age of 18, that contains emotive content (for example First Aid for Mental Health Awareness) additional permission via a google form will be required from parents/guardians.

Educating and providing opportunities to discuss online safety during reviews with learners is an integral part of HIT Training Ltd delivery model. This includes the importance of protecting themselves online from being groomed and radicalised. Any disclosures must be reported to the safeguarding team within 24 hours via the safeguarding alerter.

Internal internet searches are monitored ongoing and any website searches with a concerning nature will be reported to the designated safeguarding lead who will work with senior leaders to investigate.

Further online safety requirements can be found in the [Digital, Teaching & Learning policy](#).

Annex 2 Anti-Radicalisation and Prevent Actions:

Anti-Radicalisation

Radicalisation is defined as the act or process of making a person favour extreme or fundamental changes in political, economic or social conditions, organisations or habits of the mind.

Extremism is defined as the holding of extreme political or religious views. HIT Training Ltd has developed and fulfil the policies and procedures in line with safeguarding and promoting the welfare of all learners and staff. HIT training Ltd recognises the importance and necessity of safeguarding against radicalisation, extremism and ideology.

Responsibility

At HIT Training Ltd all staff members are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

All FE/training providers have a duty to safeguard their staff and their learners. Prevent is about safeguarding, keeping them both safe and within the law. The Prevent Duty is not about preventing staff and learners from having

political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways.

The main aims are to ensure that staff are fully engaged in being vigilant about radicalisation and ensure that we work alongside other professional bodies and agencies to ensure that our learners are safe from harm.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- communications with others that suggest identification with a group/cause/ideology

Example indicators that an individual has an intention to use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or plotting or conspiring with others.

Speakers and events policy

Whilst protecting the basic human rights of freedom of speech and expression, it is HIT Training's duty to ensure the safety and welfare of our staff and clients. Working with event organisers, we endeavour to run engaging events that are lawful and embrace the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015, that states we must give, "due regard to the need to prevent people from being drawn into terrorism". Here is the [link](#) to the speakers and events policy which must be adhered to ahead of any event involving an external speaker.

Prevent Actions:

Report concerns to the safeguarding designated person.

The DSL will report to external parties, mainly 'Channel'. There is a police practitioner responsible for coordinating delivery of Channel in all areas. Some areas have a dedicated police Channel coordinator; these are closely aligned to the Prevent priority areas.

To view a flowchart on the prevent procedure click [here](#).

For further information about Prevent for further education and training click [here](#).

As an organisation we will:

- Ensure that PREVENT and Safeguarding is at the forefront of our leadership and management.
- Ensure that all staff within the first 4 weeks of starting employment have completed the ETF online Prevent and Safeguarding Training; to ensure a basic knowledge and understanding. Certificates of achievement must be sent to Sara Mahoney and Lydia Cork: Sara.mahoney@hittraining.co.uk and Lydia.cork@hittraining.co.uk and noted on individual PDPs.

- Safeguarding training can be accessed: [Safeguarding in FE](#)
- Prevent training for Trainers, Quality Assurers, Administrators, Sales and Marketing, Learning and Development Consultants training can be accessed: [Prevent for Practitioners](#)
- Managers can be accessed: [Prevent for Leaders and Managers](#)
- Ensure that **all** staff have completed the Safeguarding Workshop once **every 3 years**, this embeds Company procedures and policies. Certificates of achievement must be sent to Sara Mahoney and Lydia Cork: Sara.mahoney@hittraining.co.uk and Lydia.cork@hittraining.co.uk. Staff should note this training on their individual PDPs
- Sara Mahoney will ensure that the company personnel system (BONNIE) is updated with staff qualifications and training and share with DSL quarterly.
- Have a robust strategy plan in place for PREVENT which is individualised to our sector, business and apprentices.
- Ensure our partnerships that we have in place (DFE, BEIS, Police) are established and that these are known throughout the organisation.
- Exchange information about PREVENT with the partnerships we have.
- Keep records which demonstrate how we are working with those partners.
- Share any intelligence we gather from Apprentices with these partners in accordance with the PREVENT policy.
- Ensure that we have the proper checks in place for any speakers, guests etc. which we have invited to our organisation, before we let them deliver any training or speeches to our staff or apprentices.
- Ensure that staff training has been catered for in regards to regional risks.
- Link PREVENT to safeguarding and log the training that we give the staff within HIT Training Ltd.

Every delivery staff member working within HIT Training Ltd will ensure that:

- They are keeping apprentices safe. Training has been undertaken and they know what to do should a situation occur.
- They are looking for naturally occurring conversations if they arise within sessions and that apprentices have an awareness of PREVENT.
- There is a clear link between PREVENT and Safeguarding which is understood by the apprentice.
- They are aware of national and local events/incidents when they occur and can then use these as conversation points to reinforce PREVENT and Safeguarding.

Annex 3 Professional values and attributes:

In line with the Education Training Foundation professional standards all company personnel involved in the delivery of any company offered programme/training are required to adhere to the standards below:

- Reflect on what works best in your teaching and learning to meet the diverse needs of apprentices
- Evaluate and challenge your practice, values and beliefs
- Inspire, motivate and raise aspirations of apprentices through your enthusiasm and knowledge
- Be creative and innovative in selecting and adapting strategies to help apprentices to learn
- Value and promote social and cultural diversity, equality of opportunity and inclusion
- Build positive and collaborative relationships with colleagues and apprentices

Professional code of conduct:

Dos

- Do keep your calendar updated with your appointments and their locations

- Do advise colleagues if you are going to be working out of business hours (8.30am – 5.30pm)
- Do follow appropriate policies regarding personal safety and welfare
- Do use your company email and mobile phone when contacting apprentices or employers
- Do carry business cards and wear your ID badge when visiting apprentices and employers
- Do ensure that your phone is charged when out of the office
- Do have a way of raising an alarm if circumstances arise where you may need one
- Do maintain your vehicle in good working order

Don'ts

- Don't meet apprentices in non-public locations or at their home address
- Don't put yourself in harm's way
- Don't give apprentices lifts in your car
- Don't give apprentices your personal details or contact numbers
- Don't leave equipment (e.g. laptops) with apprentices unsupervised

Annex 4 The Modern Slavery Act 2015

Slavery definition:

- The state or condition of being a slave; a civil relationship whereby one person has absolute power over another and controls his life, liberty, and fortune
- The subjection of a person to another person, especially in being forced into work
- The condition of being subject to some influence or habit
- Work done in harsh conditions for low pay

Human Trafficking definition:

The illegal movement of people, typically for the purposes of forced labour or commercial sexual exploitation.

The act gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.

If a staff member is alerted to the prospect of someone in our chain of supply who is affected by the Modern Slavery Act 2015 they would need to follow the same principles of the safeguarding reporting procedure.

Annex 5 Female Genital Mutilation

Female Genital Mutilation (FGM) or Female Circumcision or cutting is the brutal process involving the removing of parts or all of a girl/woman's genitals.

There are 4 main types of FGM;

- Type 1 Clitoridectomy,
- Type 2 Excision,
- Type 3 Infibulation,
- Type 4 Other harmful procedures to the female genitals.

FGM is performed in the main because of old traditions and custom FGM is practised in about 28 African countries, parts of Asia and Latin America. In developed countries, FGM is common in areas where immigrants from practicing countries may have settled. Some reasons that are given for practising FGM such as virginity preservation and family honour. It is believed these customs commenced in the 5th century BC, where men wanted to control women's sexual desires. The World Health Organisation (WHO) states that in every society in which FGM is practised it is a manifestation of gender inequality.

There is no evidence of any medical reasons nor benefits yielded by these girls/women, from having these procedures done to them. "It involves removing and damaging healthy and normal female genital tissue, and interferes with the natural functions of girls' and women's bodies. Generally speaking, risks increase with increasing severity of the procedure." For further information on FGM [click here](#).

The effects of FGM may include constant agony for the girls and women, depression, infections that can lead to infertility, complication during childbirth, which can endanger the pregnant mother and their unborn baby.

If a staff member has reason or cause to suspect that an individual is at risk or displays signs that they are at risk, the concerns must be reported.

Annex 6 Coronavirus (COVID-19)

The way HIT Training Ltd is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of important safeguarding principles remain the same:

- With regard to safeguarding, the best interests of our learners must always continue to come first if anyone has a safeguarding concern about a learner they should continue to act and act immediately, the DSL or deputies will be available at all times and will continue to monitor the safeguarding alert daily
- Due to remote working and the continuous use of online activity the monitoring of websites is paramount to ensure staff and learners are safe and the risk of radicalisation is minimised. We continue to receive Kaspersky web reports weekly.

HIT Training Ltd as far as is reasonably possible, take a whole institution approach to safeguarding. This will ensure that any new policies and processes that are embedded in response to COVID-19 are not weakening our approach to safeguarding or undermining the safeguarding policy. This includes taking into consideration any temporary changes made to legislation during this pandemic for example amendments made to the Mental Capacity Act and the Care Act in accordance with the Coronavirus Act 2020.

In these unforeseen circumstances HIT Training Ltd will endeavour to:

- Act upon any immediate advice received from the 3 safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups) act upon any advice from the local authorities connected to a young person with an EHCP (Education, Health, Care, Plan)
- Sustain support for all learners not just those in the 16-18 bracket or who do not meet the definition of vulnerable; this includes support surrounding homelessness, domestic violence, VAWG ; mental health and welfare requirements.
- Maintain communication with the employers of learners who are furloughed to minimise safeguarding risk and alert DSL if at all concerned.

Mental health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of our learners. HIT Training Ltd have embedded and shared a video and signposting sheet with all staff and employers and added it onto the coronavirus page of the HITRANET to support staff when their learners need additional support and guidance.

This Policy has been agreed by Jill Whittaker, Managing Director

