



Safeguarding Policy

Oct 2018

Updated March 2020

This booklet summarises UKFast's responsibilities, and policies and procedures to safeguard children and vulnerable adults and crucially when staff should take action and how.

In the event of any safeguarding concerns, you must immediately contact:

Designated Safeguarding Lead (DSL)



Arlene Bulfin

arlene.bulfin@ukfast.co.uk

If the DSL is unavailable, you must contact a deputy:

Deputy Safeguarding Lead



Aaron Saxton

aaron.saxton@ukfast.co.uk

Deputy Safeguarding Lead



Tom Robinson

thomas.robinson@ukfast.co.uk



Apprentice Safeguarding Procedure @ UKFast

Where there is any concern about an apprentice

Report to the Designated Safeguarding Lead: **Arlene Bulfin** immediately.

If DSL is unavailable, report to any Deputy Safeguarding Lead – A Saxton or T Robinson

Safeguarding lead to complete form (immediately/same day).

All factors and information considered by DSL and deputy safeguarding team.

Concerns Allayed

No action. The concern does not constitute a safeguarding concern.

No action. Record decisions made and reasons for it.

Concerns Ongoing

Uncertain?
Consult with LADO, MSB and/or Mentor / Legal Record Action and decision taken

Refer to MSB and/or Police

Put in writing within 48 hours

Record action and decision taken

Keeping Apprentices Safe

At UKFast, we take our responsibility to ensure the safety of our students very seriously. We are committed to creating a fantastic learning experience, and to ensuring the highest levels of apprentice safety and wellbeing.

Our Approach as an Apprentice Provider

UKFast has a clear commitment to safeguarding, which is overseen by the Designated Safeguarding Officer (DSL), Arlene Bulfin. She promotes and implements the Safeguarding Policy, ensuring that it is reviewed regularly and acted upon.

Additionally, all members of the Education Team working with apprentices are trained in safeguarding and are able to access additional information, advice and training when appropriate.

All staff receive safeguarding training as part of their induction since 2018 and complete an internal quiz to confirm their understanding of the training. Those that started at UKFast before 2018 receive adhoc training prioritising on the job mentors (OTJMs) and staff that have direct contact with apprentices. OTJMs will receive more intensive training and might have to complete a Level 3 Safeguarding course as instructed by the DSL.

Our Duty as an Employer

UKFast has a duty to comply with all current and future UK legislation and statutory responsibilities. There is a particular expectation that UKFast should take responsibility for an apprentice's welfare in the workplace and to also seek appropriate advice when they feel an apprentice may be at risk in their personal lives.

Safeguarding

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances.

The Safeguarding Agenda includes a wide range of potential risks:

- Abuse (physical, emotional, financial, institutional, sexual, organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation



- Bullying AND cyberbullying
- Domestic abuse
- Substance misuse
- Forced marriage
- Gang and youth violence
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Teenage relationship abuse
- Trafficking and modern slavery
- Mental health concerns

A Child is defined as anyone under the age of 18. An adult at risk (previously vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance.

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill, or specific learning need
- Unsupportive home environment
- English not a first language
- Under represented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

As we work increasing online, it is also essential that children and vulnerable adults are safeguarded from potentially harmful and inappropriate material online. We are therefore ensuring as far as technically possible that appropriate filters and appropriate monitoring systems are in place and children and vulnerable adults are taught about safeguarding including online safety. These include a proxy server that logs and filters web traffic and specialist software to stop apprentices from modifying or manipulating software to get around safeguards. The guest WiFi web traffic is not filtered but all traffic is logged and can be checked and tracked if required.

At UKFast an apprentice will answer a confidential questionnaire during induction relating to the areas above and any apprentice deemed 'higher risk' inc. apprentices aged 16 – 18 years old will be documented and flagged to the appropriate member of the education team to add extra support and reassessed in each monthly 'Progress Review'.



1. Policy Statement

- 1.1 UKFast has a Designated Safeguarding Lead - Arlene Bulfin. Aaron Saxton and Thomas Robinson are Deputy Safeguarding Leads to support the DSL and monitor the policies and procedures in place. These Safeguarding Officers are responsible for providing support, advice and expertise on safeguarding concerns, and are responsible for the investigation and reporting of serious safeguarding issues. Arlene Bulfin is always the point of first report in the case of any safeguarding concern.
- 1.2 UKFast has a designated contact for the DSL and deputy safeguarding leads - safeguarding@ukfast.co.uk. This is communicated to all staff and will be displayed on the UKFast website page and Moodle eLearning platform for apprentices.
- 1.3 UKFast will carry out its responsibilities under all relevant legislation, regulations and formal guidance for the protection of apprentices, children and vulnerable adults.
- 1.4 UKFast holds as one of its highest priorities the health, safety and welfare of all apprentices, children and vulnerable adults involved in courses or activities which come under the responsibility of UKFast.
- 1.5 UKFast and its team have a collective and individual duty to ensure that its team fulfils their responsibilities to safeguard and promote the welfare of children and vulnerable adults, and to prevent child abuse and to report any abuse discovered or suspected.
- 1.6 UKFast will advise all parents / guardians / carers of learners under 18 of the existence of the UKFast's Safeguarding Policy and Procedures, and the fact that this may require cases to be referred to the investigative agencies in the interests of the child. This is also signposted on the UKFast Moodle eLearning Platform.
- 1.7 UKFast will advise children and vulnerable adults who are students about the standards of behaviour and conduct they can expect from the team and volunteers and of what to do if they experience or suspect abuse.
- 1.8 UKFast will work with appropriate local agencies, and in particular Local Safeguarding Children's Boards (LSCBs), to ensure that children are safeguarded through the effective operation of UKFast's safeguarding procedures. These will also include DSLs and Prevent Leads from Greater Manchester Police (GMP) and 'Outstanding' Further Educational establishments.
- 1.9 UKFast recognises that any child and vulnerable adult can be subject to abuse and all allegations of abuse will be taken seriously and treated in accordance with UKFast's procedures.
- 1.10 UKFast recognises that it is the responsibility of all the team to act upon any concern no matter how small or trivial it may seem.
- 1.11 UKFast recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse.
- 1.12 UKFast requires all of the team to follow the Code of Behaviour on Children and Vulnerable Adult Protection, which is appended to this policy document, and will draw the attention of the team to this code of conduct and procedures in induction and relevant training.
- 1.13 UKFast is committed to supporting, resourcing and training those who work with, or who come into contact with, children and vulnerable adults and to providing appropriate supervision.



- 1.14 UKFast will ensure that all members of staff are trained on the safeguarding processes during their induction. All new members of staff also take a safeguarding quiz to confirm their understanding of the training.
- 1.15 UKFast will prepare and implement an action plan to ensure that it fulfils its duties to protect children and vulnerable adults.
- 1.16 UKFast has a duty to ensure children and vulnerable adults are safeguarded from potentially harmful and inappropriate material online. We therefore are ensuring where technically possible appropriate filters and appropriate monitoring systems are in place and children and vulnerable adults are taught about safeguarding including online safety.
- 1.17 UKFast also recognise the importance for preventing radicalisation. Onsite we have four designate and trained prevent officers (Arlene, Aaron, and Tom Robinson). The DSL and Deputies are responsible for managing any issues and forwarding them to the correct agencies.

2. Scope

This policy deals with the protection of children and vulnerable adults and the procedure staff should follow should they have a safeguarding concern.

For the purposes of this policy, Children are those under 18 years of age and will include those aged 16 - 18 on Apprenticeship courses.

3. Key Principals - Statutory Framework

- 3.1. The Children Act 1989 provides the legal framework for the protection of children in the UK. Under the Children Act a child is defined as any person under 18 years of age.
- 3.2. The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children and Vulnerable Adults. UKFast is required under this legislation to apply for an enhanced disclosure from the Criminal Records Bureau for staff working with such learners inc. OTJMs.
- 3.3. DfES Safeguarding Children and Safer Recruitment in Education (2007) derives from the Education Act 2002 and places the following responsibilities on all educational Organisations:
 - a) UKFast employees should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
 - b) A Designated Safeguarding Lead (DSL) should have responsibility for co-coordinating action within the UKFast and for liaising with other agencies. The DSL is Arlene Bulfin supported by deputies, Aaron Saxton and Thomas Robinson.



- c) UKFast employees with designated responsibility for child and Vulnerable Adult protection should receive appropriate training (This comprises Arlene Bulfin, Aaron Saxton and Thomas Robinson).
- d) Educational Organisations should be aware of and follow the procedures established by the LSCBs and, where appropriate, by the Local Education Authority or Children’s Social Care (England) /Social Services Department (Scotland).
- e) Educational Organisations should have procedures, of which all employees are aware, for handling suspected cases of abuse of children, including procedures to be followed if a member of the team is accused of abuse. Circular 10/95 also states that “parents should be made aware of the (educational Organisations) safeguarding policy and the fact that this may require cases to be referred to the investigative agencies in the interests of the child.” UKFast follows the detailed guidelines set out in Circular 10/95 in dealing with all cases of abuse or suspected abuse against children. Section 175 of the Education Act 2002 This section of the Act requires providers to safeguard and promote the welfare of child and Vulnerable Adults. UKFast will follow any guidance issued on this section of the Act. UKFast employees will keep its policy and procedures on safeguarding under review to take account of any new Government legislation, regulations or best practice documents to ensure that the team are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children and Vulnerable Adults.

- 3.4. Section 26 of the Counter-Terrorism and Security Act 2015 the Act places a duty on certain bodies, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.
- 3.5. Working Together to Safeguard Children, 2015 is a Government Guidance document which sets out how all agencies and professionals should work together to promote children and Vulnerable Adults welfare and protect them from abuse and neglect and requires all educational UKFast employees to follow the procedures for protecting children from abuse which are established by the Area Child Protection Committee. The guidance makes clear that educational UKFast employees are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or is at risk of abuse – these procedures should cover circumstances in which a member of staff is accused or suspected of abuse.
- 3.6 The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the *Prevent* strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.



The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

- 3.7. Keeping children safe in education, 2018 is statutory guidance for schools and colleges on safeguarding children and safer recruitment. UKFast shall ensure that all members of the education team undergo safeguarding and child protection training (including online safety) at induction and receive regular safeguarding and child protection updates (for example, Moodle eLearnin, quizzes, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Apprentices, children and vulnerable adults must be taught about safeguarding including online safety.

UKFast shall ensure the DSL, Head of People and an additional member of the recruitment team completes safer recruitment training and one of them shall always interview any new education team member working with children or vulnerable adults covering as a minimum the guidance within Keeping children safe in education, 2018.

As a minimum for all UKFast technical staff members and all employees responsible for looking after children or vulnerable adults the following will be obtained:

- DBS clearance
- 2 external employment references

Members of the team who have not received clearance will be supervised by cleared employees when working with apprentices at all times until conclusion of the clearance process.

At no time will any staff member or visitor who does not have DBS clearance be left alone with any child or vulnerable adult.

- 3.8 Local Safeguarding Children Boards bring together all services for children and young people in a local area to focus on improving outcomes for all children and young people. The outcomes that are most important to children and young people are:

- Being Healthy
- Staying safe
- Enjoying and achieving
- Economic wellbeing



- Making a positive contribution

4. Monitoring and Review

This policy will be monitored through update reports presented to the Education Senior Management Team and will be formally reviewed twice annually.

In addition, these policies will be reviewed by a working group of apprentices at least on an annual basis. The purpose of this review will be to provide opportunity for feedback and recommendations to support UKFast in providing a safe and open environment for all. This review will also ensure that all apprentices are familiar with the safeguarding policies and establish if that good communication and safeguarding information is in place across the programme.

Safeguarding Procedures

These procedures should be read in conjunction with the Department for Education and Skills document 'What to do if you're worried a child is being abused' March 2015.

1. Purpose

The purpose of these guidelines is to ensure that the rights of children and vulnerable adults are protected through employee awareness of the issues and the following of the statutory and local guidelines in the reporting of concerns. **It is the responsibility of all employees working within UKFast to record and report Child Protection concerns, i.e. where they believe a child has been or is at risk of abuse, neglect or significant harm. This responsibility extends to all staff and not just those specifically working with under 18s.**

2. Definition of terms

The Safeguarding Policy describes the support and protection procedures for all learners under the age of 18, or vulnerable learners over this age, who may be “at risk” of abuse.

2.1 The definition of a “child”

“Child” is defined as all young people under the age of 16, in accordance with the 1989 Children Act.

2.2 The definition of a “Young Adult”

“Young Adult” is defined as all young people ages 16 - 18, in accordance with the 1989 Children Act.



2.3 The definition of a “Vulnerable Adult”

“Vulnerable Adult” is defined as, “a person who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”.

3. Categories of Abuse

Children can be potentially abused within the family, community, and in work by employees (including those employed to promote their welfare and protect them from abuse), volunteers, visitors, and fellow students. The following are broad categories of abuse:

- Physical Abuse:** may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child and vulnerable adult. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child and vulnerable adult who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy 'or 'Munchausen’s syndrome by proxy'.
- Emotional Abuse:** is the persistent emotional ill-treatment of a child or vulnerable adult such as to cause severe and persistent effects on the child and vulnerable adult’s emotional development. It may involve conveying to children or vulnerable adults that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in children and vulnerable adults. It may involve causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children and vulnerable adults. Some level of emotional abuse is involved in all types of ill-treatment of a child or vulnerable adult, though it may occur alone.
- Sexual Abuse:** involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.
- Neglect:** is the persistent failure to meet the child’s or vulnerable adult’s basic physical and / or psychological needs, likely to result in the serious impairment of the child or vulnerable adults health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child or vulnerable adults from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or vulnerable adult’s basic emotional needs.



- **Significant Harm:** Some children or vulnerable adults may be in need because they are suffering or likely to suffer significant harm. The **Children Act V section 47 (1)** introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.
- **Financial Abuse** Some children and vulnerable adults may be abused or exploited financially including fraud and extortion.

4. Designated Safeguarding Lead (DSL)

UKFast is required to have a designated member of staff, who is assigned to act upon child and vulnerable adult protection concerns.

At UKFast this is **Arlene Bulfin**. Arlene Bulfin is responsible for co-ordinating action within UKFast and liaising with other agencies.

The DSL is supported by Deputy Safeguarding Leads, Aaron Saxton and Thomas Robinson.

The DSL and Deputy Safeguarding leads are required to know:

- how to identify the signs and symptoms of abuse and when to make a referral
- the local Child and Vulnerable Adult protection procedures and the DSLs role within them
- the role and responsibilities of the investigating agencies and how to liaise with them
- the requirements of record keeping
- the conduct of a child protection conference and how the DSL or other members of staff can make an appropriate contribution to it.

In the event that a safeguarding concern relates to an apprentice employed by UKFast, the agreed approach is for the matter to be escalated to DSL (Arlene Bulfin) in the first instance to be supported by Deputy Safeguarding Lead(s).

5. Advice to Staff on When to Take Action & How

Once you suspect or know of any abuse of any child or vulnerable adult, you should immediately inform the DSL in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the DSL to discuss your concerns. It is important to understand that your responsibilities extend to suspicion of abuse in any area of the child or vulnerable adult's life, not just at UKFast Campus.

If the DSL is unavailable you must immediately inform a Deputy Safeguarding Lead in person or by telephone.

You must also contact the DSL if you know or suspect that a member of the team or student has a previous history of abuse of children and/or vulnerable adults. If you



become aware of any allegations against a member of staff this must always be escalated to the DSL.

If a DSL is not immediately available you should then contact a Deputy Safeguarding Lead. You must not try to investigate the matter on your own. Not all employees are equipped or qualified to do so.

Contact details for the DSL and Deputy Safeguarding Leads are at the front of this book.

If, following your initial contact with a DSL, it is decided that the matter should be taken further, a written report must be prepared. A written report is essential to prevent any misrepresentation of your findings, and should be sent to a DSL within 24 hours of the suspicion arising. The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the child or vulnerable adult concerned, as accurately as you are able to record it. The report should be signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the DSL.

If a child or vulnerable adult comes to you with a report of apparent abuse, you should listen carefully to the child or vulnerable adult, using the following guidelines. When listening to a child or vulnerable adult employees must:

- allow the child or vulnerable adult to speak without interruption
- never trivialise or exaggerate the issue
- never make suggestions
- never coach or lead the child or vulnerable adult in any way
- reassure the child or vulnerable adult, let them know you are glad they have spoken up and that they are right to do so
- always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the child or vulnerable adult – spare them having to repeat themselves over and over.
- be honest – let the child or vulnerable adult know that you cannot keep this a secret; you will need to tell someone else.
- try to remain calm – remember this is not an easy thing for them to do.
- do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- let the child or vulnerable adult know that you are taking the matter very seriously
- make the child or vulnerable adult feel secure and safe without causing them any further anxiety.

At the earliest opportunity involve the DSL.



If the DSL is unavailable you must immediately inform a Deputy Safeguarding Lead in person or by telephone.

The DSL (or Deputy Safeguarding Lead in her absence) will be responsible for liaising with external agencies and recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be confined to the DSL, (if not involved in the allegations) and the Deputy Safeguarding Leads and any external agencies the DSL determines to engage.

The relevant manager(s) and individuals reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis.

6. What Happens Next?

Taking into account all the information available, the DSL will decide on the next steps, which may include taking no further action. In most cases the DSL will seek advice from the Local Authority Designated Officer (LADO) and agree what further action is necessary, which may include:

- Seek further advice from The LSCB
- Seek advice from the legal team/ external advisers, Mentor
- Undertake further investigation under the direction of the LADO or support an investigation by the LSCB
- Make a referral to the appropriate agency, as signposted.
- Report the incident to a designated Social Worker, as signposted.
- Report the matter to the police if a crime is suspected.

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

Manchester LADO

Majella O'Hagan

Telephone: 0161 234 1214.

E-mail: quality.assurance@manchester.gov.uk

The DSL may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the child, other students, staff, parents or carers involved) the DSL will make the necessary arrangements.

7. Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the child and vulnerable adults is the overriding concern. The degree of confidentiality will be governed by the need to protect the child or vulnerable adults. The child or vulnerable adults should be informed at the earliest possible stage of



the disclosure that the information will be passed on. All conversation regarding a child or vulnerable adults should always be held in private. UKFast complies with the requirements of applicable data protection law including Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) which allows for disclosure of personal data where this is necessary to protect the vital interests of a child or vulnerable adult.

Whatever happens, you should always be open and honest with the child or vulnerable adult if you intend to take the case further.

Employees must not discuss the case with anyone other than those involved in the case. If employees have any concerns about the progress of the case or have any other concerns these must be discussed with the DSL.

8. Allegations against employees

The primary concern of the organisation is to ensure the safety of the child and vulnerable adult. It is essential in all cases of suspected abuse by a member of the team that action is taken quickly and professionally whatever the validity. There are occasions where a child or vulnerable adult will accuse a member of the team of physically or sexually abusing them. In some cases this may be false or unfounded. However in some cases the allegations may be true.

Any instance of a child or vulnerable adult being abused by an employee is particularly serious. On the other hand for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career. In the event that any employee suspects any other member of the team of abusing a student, it is their responsibility to bring these concerns to the DSL and in her absence, the Deputy Safeguarding Leads.

On being notified of any such matter the DSL shall:

- Seek and follow advice from the LADO
- Seek advice from the legal team/ external advisers, Mentor
- Take such steps as she considers necessary to ensure the safety of the child or vulnerable adult in question and any other child or vulnerable adult who might be at risk
- Ensure that a report of the matter is completed by the person who reported the original concern.
- Put in place the steps necessary to follow the advice of the LADO

If the allegation concerns the DSL, the matter should be discussed with **Jonathan Bowers, MD and Head of People**, in addition to following the normal safeguarding procedures outlined in this document.





SAFEGUARDING CODE OF BEHAVIOUR FOR UKFast Employees

UKFast recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby employees come into contact with children and vulnerable adults and to guarantee the safeguarding and protection of children and vulnerable adults.

However, below are the standards of behaviour required of employees in order to fulfil their roles and duty of care within the organisation. This code should assist in the safeguarding and promotion of the welfare of children and vulnerable adults and in the protection of both children and vulnerable adults and members of the team.

These guidelines also apply to volunteers who work in an unpaid capacity in UKFast premises.

Employees must:

Implement the Safeguarding Policy and Procedures at all times, including acting to promote children and vulnerable adults welfare, prevent abuse and report any abuse discovered or suspected.

Employees must never:

- engage in rough, physical games including horseplay with children and vulnerable adults/ students.
- allow or engage in inappropriate touching of any kind. The main principles of touch are:
 - touch should always be in response to the child or vulnerable adult's need
 - touch should always be appropriate to the age and stage of development of the child or vulnerable adults
 - touch should always be with a child or vulnerable adult's permission.
- do things of a personal nature for children or vulnerable adult that they can do for themselves or that their parent can do for them.
Physically restrain a child or vulnerable adult unless the restraint is to prevent physical injury of the child and vulnerable adults/other children/visitors/yourself.

In all circumstances physical restraint must be appropriate and reasonable; otherwise the action can be defined as assault.



- make sexually suggestive comments to or within earshot of a child or vulnerable adult.
- have children or vulnerable adults on their own in a vehicle. Where circumstances require the transportation of children or vulnerable adults in their vehicle, another member of staff/ volunteer must travel in the vehicle. Also it is essential that there is adequate insurance for the vehicle to cover transporting children or vulnerable adults as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a child or vulnerable adult on their own, it is essential that another leader and the parent is notified immediately
- take a child or vulnerable adult to the toilet unless another adult is present or has been made aware (this may include a parent, UKFast leader)
- Where there is share use toilet facilities all male apprenticeship employees should use the cubicles rather than urinals
- spend time alone with a child or vulnerable adult on his/her own, outside of the normal tutorial/ classroom situation. If you find you are in a situation where you are alone with a child or vulnerable adult, make sure that you can be clearly observed by others.
- engage in a personal relationship with a child or vulnerable adult/student, or a child or vulnerable adult who becomes a student, beyond that appropriate for a normal teacher/ student relationship.
- give their personal contact details (personal mobile telephone number/home telephone number or personal email address) to a child or vulnerable adult

9. Social Networking

- Interaction with learners through a social networking site should be avoided unless this has been agreed by UKFast as part of a marketing role or for managing collaborative learning.
 - Collaborative learning must be done by setting up an 'invitation only' business/professional group discussion group for the course with appropriate privacy settings where the content can be monitored.
- **Employees should only contact learners and parents using the company's mail, SMS, telephone and e-mail/intranet systems.**
- Employees can make a judgment on whether to accept an invitation to connect on social media from a former learner, however no employee should instigate or make extra efforts to connect with these individuals.
 - Acceptable reasons for connecting with apprentices would be for business or professional networking purposes.

It is unacceptable for employees to:

- Allow learners to access their personal social networking spaces; privacy settings should be set to ensure that access is restricted to friends only
- Add learners as 'friends' to their personal social networking space



- Access as a ‘friend’ the individual social networking sites of learners
- Post comments, photographs etc. critical of the UKFast on any forum, website, social networking site, blog etc.
- Post comments critical of any other employee or learner on any forum, web-site, social networking site, blog etc.
- Post comments that run counter to the UKFast’s Equality and Diversity Policy
- Post comments that recommend, or appear to endorse, law-breaking of any kind
- Post comments that exhibit grossly irresponsible behaviour, or appear to endorse irresponsible behaviour, that could be argued to encourage “copycat” behaviour by learners. This would include, for example, dangerous driving.

Online Safety

- Employees, children, vulnerable adults and parents shall be provided with an online safety reporting mechanism.
- All staff shall be made aware of sources of support for online safety issues, such as the Professionals Online Safety Helpline. Staff should contact the DSL with any queries relating to the risks related to online activity.

10. Implications for employees

Employees who breach any of the above may be subject to the disciplinary procedure. If an allegation against a member of the team has occurred then an investigation will be carried out.

UKFast reserves the right to suspend any employee under the Safeguarding Policy to protect young people and Vulnerable Adults whilst an internal and/or external investigation takes place. The organisation can implement its own internal investigation during any stage of this process. This may result in disciplinary action being taken against an employee.

Suspension of an employee under the Safeguarding Procedure.

Should UKFast decide to suspend the employee due to a safeguarding concern, the company disciplinary policy will be utilised.

If the suspension is subject to external investigation, the UKFast representatives will be unable to discuss the details of any allegations made under the Protection of Children Act (1999).



APPENDIX A

Radicalisation and Extremism

UKFast recognises the positive contribution it can make towards protecting its learners from radicalisation to violent extremism and is committed to fulfilling its duties under the Prevent Duty Guidance. UKFast will empower its students to create communities that are resilient to extremism and to protect the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible behaviour indicators are below:

- Discriminatory language or actions towards specific groups or people with a particular protected characteristic
- Possession or sharing of violent extremist literature
- Showing or sharing online material of an extreme nature to others
- Behavioural changes (for example, becoming withdrawn)
- Expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

In respect of safeguarding individuals from radicalisation, UKFast works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support and training. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions.

If you have concerns about a student, contact **Arlene Bulfin, DSL** or in her absence a DSL Deputy Aaron Saxton or Thomas Robinson



APPENDIX B

DBS DISCLOSURES

Under the Protection of Children Act 1999 (Section 7) UKFast is designated as a child care organisation. This means that all employees, prospective employees and students on placements that come into contact with children must be checked with the Disclosure and Barring Service to prevent individuals considered unsuitable to work with children, gaining employment at UKFast, either paid or in a voluntary capacity. Landlords and their families (over 18) who provide accommodation on behalf of UKFast must also be checked under these procedures.

To meet these requirements, UKFast will ensure that **ALL** new employees that join the **Training and Education Team** and technical team members will undergo DBS clearance. As this process can take up to four months, UKFast will ask all new employees to sign a declaration, stating that they are not aware of any convictions that could hinder their employment at the UKFast. Further to this, all managers will be asked to keep new employees waiting for clearance under observation.

To ensure that UKFast meets the requirements set out in the Safeguarding Policy UKFast will seek to obtain DBS clearance for all technical employees and all employees responsible for looking after children or vulnerable adults.

Members of the team who have not received clearance will remain supervised by cleared employees when working with apprentices at all times until conclusion of the clearance process.

At no time will any staff member or visitor who does not have DBS clearance be left alone with any child or vulnerable adult.

To support this process, the updated Safeguarding Policy and Procedure will be issued to every employee, and Safeguarding briefing sessions will be held to communicate the policy and implications of the 1999 Protection of Children Act.

