

## **APPRENTICESHIP ACADEMY PROGRAMMES**

### **SAFEGUARDING POLICY**

#### **SCOPE**

This policy covers the delivery of the Level 4 Apprenticeship Programmes (the programme(s)). This programme is only open to those aged 18 years old and over.

Manchester Digital (MD) has a responsibility to ensure that employees, contractors and volunteers fulfil their responsibilities and promote the welfare of children, adults at risk and other vulnerable groups as appropriate.

It is also noted that when in the workplace individual employers' safeguarding policies and procedures may also exist.

For the purposes of this policy; vulnerable adult or adults is taken from The Office of the Public Guardian (OPG 2013) definition, which defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs
- a significant reduction in physical or mental capacity.

#### **PURPOSE**

The purpose of this policy:

- To seek to protect all learners, staff and volunteers from a range of preventable harm (see categories of abuse below)
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and child/adult protection
- To ensure an attitude of 'it could happen here' for a vigilant approach to safeguarding
- To provide awareness of the Prevent Duty and relevant signposting.

Manchester Digital is committed to safeguarding and promoting the welfare of all learners, staff and volunteers. We expect all staff, volunteers and partners to endorse and practise this commitment at all times.

We aim to create a safe, healthy and inclusive working and learning environment. We seek to keep learners, staff and volunteers safe from harm by:

- Valuing them, listening to and respecting them.
- Ensuring there is a clear reporting process and a designated person to report concerns to within Manchester Digital who will lead on safeguarding matters.
- Adopting child protection and safeguarding practices through procedures and guidance to staff and volunteers.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made and are in place as appropriate.
- Recording and storing information professionally and securely and sharing information about safeguarding and good practice.
- Managing any allegations against staff and volunteers appropriately
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring Prevent duty compliance and fundamental British values are embedded into the programme appropriately
- Ensuring the relevant MD staff, contractors and volunteers have access to appropriate awareness and training as identified as necessary.

## **SAFEGUARDING ADULTS – 6 PRINCIPLES**

**Empowerment** - We give individuals the right information about how to recognise abuse and what they can do to keep themselves safe. We give them clear and simple information about how to report abuse and crime and what support we can give. We consult them before we take any action. Where someone lacks capacity to make a decision, we always act in his or her best interest.

**Protection** - We have effective ways of assessing and managing risk. Our complaints and reporting arrangements for abuse and suspected criminal offences work well. We take responsibility for putting them in touch with the right person.

**Prevention** - We train staff how to recognise signs and take action to prevent abuse occurring. In all our work, we consider how to make all people involved in the programme safer.

**Proportionality** - We discuss with the individual and where appropriate, with partner agencies what to do where there is a risk of significant harm before we take a decision. Risk is an element of many situations and should be part of any wider assessment.

**Partnership** - We are good at sharing information locally. We will use multi-agency partnership as required. We foster a 'one' team approach that places the welfare of individuals before the 'needs' of the system.

**Accountability** - The roles of all agencies are clear, together with the lines of accountability. Staff understand what is expected of them and others. Agencies recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

## **ROLES AND RESPONSIBILITIES**

Manchester Digital believes that no-one should ever experience abuse of any kind. Safeguarding is everyone's responsibility. We operate an 'it could happen here' mindset to maintain vigilance in safeguarding.

All staff and volunteers will be made aware of their responsibilities and the reporting procedures for welfare and safeguarding concerns and that all such concerns will be taken seriously.

A code of behaviour and the safeguarding policy will be issued to all staff and volunteers involved in the programme.

Appropriate direction for safeguarding support and interventions will be provided by Manchester Digital's Designated Safeguarding Lead (DSL), in liaison with other agencies as required.

The programme's dedicated Skills Coach and Curriculum lead will actively incorporate both equality and diversity and safeguarding touch points within the workplace visits and technical training and learning sessions. We use Slack as our daily communication tool with learners and managers, therefore they have an opportunity at any point to talk either publicly or privately about or share safeguarding issues or concerns.

We will apply continuous improvement and agile methodology to everything we do and will apply this to how we manage safeguarding, ensuring we adapt to policy or procedure changes swiftly.

## **RESPONDING TO DISCLOSURES**

All staff and volunteers are responsible for reporting concerns and disclosures. Never leave a concern unreported.

Should an adult at risk disclose abuse to staff or a volunteer, the following important points should be taken into consideration:

- Take what the person says seriously.
- Be as calm and as natural as possible. Remember that you have been approached because you are trusted by the person.
- Do not panic. Be aware that disclosures can be very difficult for the person.
- Reassure the person that it was right to tell somebody what happened and that they have done nothing wrong.
- Remember that the person may initially be testing your reactions and may only fully open up over a period of time.
- Listen to what the person has to say. Give them the time and opportunity to tell as much as they are able and wish to. Do not pressure the person. Allow him/her to disclose at their own pace and in their own language.
- Be careful when asking questions. Your job is not to investigate but to support the person. Avoid leading questions such as whether a specific person carried out the

abuse, or whether specific acts mentioned by the person occurred. Such questions may complicate an official investigation.

- Do not express any opinion about the alleged abuser to the person.
- It may be necessary to reassure the person that your feelings towards him/her have not been affected in a negative way as a result of what he/she has disclosed.
- Do not promise to keep what they have disclosed confidential. You will have to share some information with other professionals/agencies in order to ensure no further harm comes to the individual.
- At the earliest possible opportunity record in writing what the person has said, including as far as possible, the exact words spoken by him/her. Record facts only, no opinions, interpretation or hearsay.
- Pass on all information, as stated in the reporting procedures above, to the Key Contact (programme learning and development coach) at MD or directly to the MD Designated Safeguarding Lead (DSL) not to any other third party, as disclosures are on a need to know basis only.
- The Designated Safeguarding Lead (DSL) will carry out the necessary steps in making a formal referral and appropriate intervention support via the appropriate channels.

## **CONFIDENTIALITY AND INFORMATION SHARING**

All staff and volunteers will ensure that confidentiality protocols are followed and under no circumstances will they disclose any information about children/adults at risk outside of their professional role.

Information about children/adults at risk will only be shared with other professionals and on a need to know basis.

All staff and volunteers understand that they have a professional responsibility to share information with other agencies, if it is in the child/adult at risks' best interests, in order to safeguard them.

## **ALLEGATIONS AGAINST EMPLOYEES AND VOLUNTEERS**

It is essential that in all cases of suspected and/or reported abuse by an employee or volunteer that action is taken quickly and professionally whatever the validity. We recognised that there may be occasions where a case of abuse or harm will be reported against an employee or volunteer. Further, we recognise that in some cases this may be false or unfounded, and in some cases, the allegations may be true.

It is recognised that for an innocent person, to be accused of harm or abuse is a serious ordeal which can have a negative impact on their health and wellbeing and professional career. Relevant support will be provided as required.

In the event that any employee or volunteer suspects another employee or volunteer of abusing a learner, it is their responsibility to bring these concerns to Manchester Digital's Designated Safeguarding Lead (DSL) or Managing Director immediately.

## **DISCLOSURE AND BARRING (DBS) CLEARANCE RECORDS**

The Apprenticeship programme Learning and Development Coach will hold a valid enhanced DBS check.

Standard and/or enhanced DBS checks will be undertaken for relevant adults dependent on the nature of interaction and supervision arrangements with young people and adults at risk on the programme. This will be undertaken on a case by case basis, in compliance with the relevant regulation.

A record of DBS records for those involved in all or part of the programme will be maintained. All DBS checks will be reviewed and renewed every three years, or as otherwise appropriate.

## **REPORTING CASES TO THE DISCLOSURE AND BARRING SERVICE (DBS)**

Manchester Digital has a duty to make reports and provide relevant information to the DBS where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the DBS lies with the Designated Safeguarding Lead.

## **SAFER RECRUITMENT OF STAFF**

Manchester Digital undertakes to ensure that their staff are fit to work in a training provider setting with children and vulnerable adults. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

Manchester Digital has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made prior to appointment:

- a minimum of two references, satisfactory to Manchester Digital, one of which should be from a previous employer
- documentary evidence checks of identify, nationality, residency and “right to work” status
- enhanced DBS (disclosure & barring service) check with barred list information\*
- documentary evidence of qualifications
- satisfactory completion of the probationary period
- where subcontractors are delivering courses for Manchester Digital, the provider must provide written assurance that all relevant staff will be DBS checked.

In accordance with the Regulations, records of all checks carried out are kept in a single central record.

\*If a DBS check is delayed for any reason the staff member will not be subject to lone working with apprentices aged under 18. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check.

## **STAFF DEVELOPMENT AND TRAINING**

Manchester Digital’s Safeguarding Policy, will be issued to all new staff as part of their induction. All staff will be supported to recognise warning signs and symptoms in relation to specific safeguarding issues and will receive training or briefings on for example, Guns and

Gangs, Forced Marriage, Female Genital Mutilation, Domestic Abuse, Child Sexual Exploitation, Trafficking and Preventing Violent Extremism through mandatory Safeguarding Level 1 training and update briefings with a refresher every 3 years.

## **LEGAL FRAMEWORK**

Manchester Digital acknowledges the related and relevant legislation and guidance with regards to fulfilling safeguarding obligations, seek to protect children, young people and adults 'at risk' namely:

- The Children Act 1989 and 2004 and 'Every Child Matters'
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Working Together to Safeguard Children – statutory framework July 2018
- Best practice guidance from 'Keeping Children Safe in Education': statutory guidance for schools and colleges 2018
- Ofsted – Further Education and Skills Handbook Oct 2018
- Inspecting safeguarding in early years, education and skills settings updated Oct 2018
- Section 115(4) of the Police Act 1997
- The Education Act (2002) Section 175
- The Sexual Offences Act 2003
- Safer Practice, Safer Learning (DfE)
- Care Act 2014
- Disclosure and Barring Scheme, Independent Safeguarding Authority (ISA)
- The Equality Act 2010
- The Human Rights Act 1998
- The Counter-Terrorism and Security Act 2015, (PREVENT)
- Work Based Learners and the Prevent Statutory Duty DfE 2018
- CONTEST - the United Kingdom's Strategy for Countering Terrorism June 2018
- ESFA requirements for serious safeguarding incidents.

## **CATEGORIES OF ABUSE**

This policy recognises harm and abuse can present in all forms that must be safeguarded against, including (but not limited to):

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including online bullying and prejudice-based bullying
- Hate crime and hate incidents
- Racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- Peer-on-peer abuse
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and trafficking
- Child/adult criminal exploitation

- Online safety and the impact of technology for example 'sexting', revenge porn and accessing pornography etc.
- Substance misuse
- Domestic abuse
- Female genital mutilation
- Forced marriage
- So-called honour-based violence

See Appendix for full definitions.

## **CONTACTS**

Key Contact - Apprenticeship Skills Coach and Curriculum Lead 0161 238 8642  
[lynne@manchesterdigital.com](mailto:lynne@manchesterdigital.com)

Talent and Skills Manager, Emma Grant, 0161 238 8642/ 07739560380  
[emma@manchesterdigital.com](mailto:emma@manchesterdigital.com)

Managing Director, Katie Gallagher, 0161 238 8642 / 0784362850  
[katie@manchesterdigital.com](mailto:katie@manchesterdigital.com)

**If there is an immediate concern of harm, in an emergency only, call 999.**

## REPORTING PROCESS

### Receive & Record

- Listen carefully to any disclosure and remain calm
- Record brief factual notes including: date, time, description/key facts (in their words), action taken and names of who you informed about the disclosure.
- Reassure the person that the disclosure will be taken seriously
- Do not be judgmental
- Do not try to investigate the matter yourself

### Inform & Report

- Inform Manchester Digital's Key Contact, Learning and Development Coach, of the disclosure as soon as possible
- If the Key Contact is not available, contact another member of the team listed in 'contacts'
- If there is immediate danger of harm, in an emergency only, call 999

### Determine & Escalate

- Determine whether the concern/disclosure is a safeguarding issue or something else.
- Discuss how the risk can be minimised and person made safe.
- Seek advice from external agencies where required.
- Manchester Digital's Key Contact will escalate determined safeguarding matters for further action or intervention support as required.

## CODE OF BEHAVIOUR

Your work may occasionally require you to carry out some of the 'Don'ts' such as physical contact or working in a 1 to 1 situation. Please do use common sense and continue your work, but also use your discretion to ensure your actions are necessary and appropriate in li  
Where possible, arrange in advance for another staff member or volunteer member to be present, or inform them where you will be, how long and who you're with.

### Staff and volunteers **should**:

- Ensure the welfare of the learners (or subjects of the activity) always comes first regardless of the aims of activity being carried out.
- Keep relationships on a professional footing, avoiding personal social contact. Try to separate personal and professional use of social media.
- Ensure your dress and appearance are appropriate to your role, i.e. dress decently, safely and appropriately for the tasks you undertake and avoid clothing that is likely to be viewed as offensive (e.g. containing political or otherwise contentious slogans including sexually offensive slogans).
- Treat all individuals equally and with dignity regardless of age, disability, gender reassignment, marriage and civil partnership; pregnancy and maternity, race, religion and belief, sex or sexual orientation.
- Be aware of and comply with the safeguarding policy and procedures.

### Staff and volunteers **should avoid**:

- Behaving in any manner that would leave any responsible person to question your suitability to work with children or vulnerable adults.
- Physical contact that could be open to misinterpretation by the child, adult at risk or a third party. Even when applying first aid staff should use discretion to ensure contact is necessary and appropriate.
- Conferring special attention and favour upon a particular individual or group of learners or act in a manner that could be open to misinterpretation.
- Using or allowing others to use over familiar or sexually suggestive comments, inappropriate language or behaviour.
- Using or allowing others to use comments, inappropriate language or behaviour that could be deemed against fundamental British Values.

# PREVENT DUTY

## What is it?

Prevent is about safeguarding people and communities from the threat of terrorism. Prevent is 1 of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people from becoming terrorists or supporting terrorism.

At the heart of Prevent is safeguarding children and adults and providing early intervention to protect and divert people away from being drawn into terrorist activity.

*Radicalisation* is the process by which people begin to support terrorism and in some cases, participate in the activities of terrorist groups. The process of radicalisation is different for every individual and can take place over an extended period, or within a short period of time.

*Extremism* is vocal or active opposition to fundamental British values.

## The 4 fundamental British values

- Democracy
  - Your opinion counts
  
- The rule of law
  - No one is above the law
  - Laws protect everyone
  - Innocent until proven guilty
  
- Individual Liberty
  - Freedom of speech
  
- Respect and Tolerance
  - All backgrounds and cultures
  - All ages
  - All genders and sexualities
  - All religions and beliefs

## Prevent commitment statement

Although Manchester Digital does not have a formal Prevent duty, we recognise that we must support statutory bodies who we work with, in their duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

MD has a duty to safeguard our learners/apprentices. The 'Prevent Duty' is being used within safeguarding to ensure people are kept safe and within the law.

Our commitment to supporting Prevent is interconnected with safeguarding, equality and diversity and the promotion of fundamental British values. Protecting people from the risk of radicalisation is considered part of wider safeguarding responsibilities.

We recognise that some people can build resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. We will ensure professionals who work with or for us are aware of their roles and responsibilities in preventing radicalisation and extremism, including how to report concerns.

As a foundation, and if uncertain, Manchester Digital's safeguarding reporting process should be followed should safeguarding concerns in relation to radicalisation occur.

### **What responsibilities do we have as part of the duty?**

All employers and professionals we work with are expected to support this statement of commitment. This requires them to be vigilant to help to spot any issues; changes in attitude or behaviours; or any other concerns about a learner's health and well-being, which may lead to them being vulnerable and susceptible to radicalisation and extremism.

All learners, employers and other professionals that we work with will be required to:

- Abide by British Values and the PREVENT duty
- Never tolerate a lack of respect for individuals
- Celebrate difference and promote diversity
- Be inclusive and accepting of difference

### **Training and awareness**

All permanent Manchester Digital staff will undergo government online Government Prevent awareness training. And all contractors and volunteers will be encouraged to undertake appropriate training also as and where appropriate.

### **Prevent training .gov:**

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen2.html>

### **Prevent training: ETF**

<https://www.foundationonline.org.uk/course/index.php?categoryid=14>

### **REVIEW**

Reviewed annually.

Policy last reviewed: September 2022

Next policy review due: August 2023 or as required.

Signed:



Managing Director

## **APPENDIX**

### **TYPES OF ABUSE DEFINITIONS**

The following definitions apply throughout the Safeguarding Policy and associated procedures:

**Vulnerable Adult or Adults:** The Office of the Public Guardian (OPG 2013) defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs
- a significant reduction in physical or mental capacity.

#### **Types of abuse and neglect:**

##### **Abuse:**

A form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

##### **Physical Abuse:**

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

##### **Emotional Abuse:**

- Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:
  - 
  - Conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
  - Not giving the child or vulnerable adult opportunities to express their views
  - Deliberately silencing them or 'making fun' of what they say or how they communicate
  - Interactions that are beyond a child or vulnerable adults developmental capability as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction
  - Seeing or hearing the ill-treatment of another
  - Serious bullying (including cyberbullying), causing children or vulnerable adults to feel frightened or in danger
  - Exploitation or corruption of children or vulnerable adults
  - Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

**Sexual Abuse:**

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. These activities may involve physical contact, including assault by penetration (for example rape or oral sex) and non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. This may also include non-contact activities, such as involving children or vulnerable adults in looking at, or being involved in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:**

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to; provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or vulnerable adults emotional needs.

There are also specific issues which we expect our staff to be aware of, these include:

- Child sexual exploitation
- Forced marriage
- Domestic violence
- Female genital mutilation
- Radicalisation
- Self harm
- Bullying/cyberbullying
- Drugs
- Faith abuse
- Gangs and youth violence
- Violence against women and girls
- Sexting
- Honour Based Violence
- Trafficking