



Safeguarding and Prevent Policy

This document is in 2 parts

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Safeguarding Policy

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Job Title of person responsible for policy:	Safeguarding Officer
Name of person responsible for policy:	N Gosal

Forum for Sustainable New Venture is now trading as e-Careers Apprenticeships.

Scope

Safeguarding Policy for Forum for Sustainable New Venture (FFSNV) t/a e-Careers Apprenticeships.

This policy applies to all staff, including senior managers, paid staff, volunteers, contractors, learners (including apprentices) also referred to as students or delegates. Employers and anyone working on behalf of or with FFSNV.

Introduction

We strongly acknowledge the need for vigilant awareness of safeguarding issues. All staff have appropriate training so that they understand their roles and responsibilities and are confident about carrying them out.

Any individual should feel secure that they could raise any issues or concerns about the safety or welfare of children, young people and adults at risk and know that they will be listened to and taken seriously. This will be achieved by maintaining a culture of safeguarding by demonstrating zero tolerance of abuse and other harmful behaviors, promoting the welfare of children, young people, adults at risk and protecting staff.

As part of its safeguarding culture, we encourage all individuals to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject and where political issues are presented, reasonably practicable steps will be taken to offer a balanced presentation of opposing views.

Under duties imposed as part of the Prevent Duty Guidance 2015, FFSNV t/a e-Careers Apprenticeships will ensure that situations are suitably risk assessed, staff will work in partnership with all parties, that all staff are suitably trained.

Policy Guidance

Safeguarding is as, all agencies working with children, young people, adults at risk and their families take all reasonable measures to ensure that the risk of harm to their welfare is minimised and where there are concerns about any of this group agencies take appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other agencies.



A child is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection.

They may include, for example, people with:

1. A mental health problem or mental disorder
2. A physical disability
3. A sensory impairment
4. Learning disability

The policy has been written with reference to the following legislation:

- The Care Act 2014
- The Equality Act 2010
- The Human Rights Act 1998
- The Mental Capacity Act 2005
- Education Act 2002
- SVGA 2006
- The Children Act 2004

Duties and Responsibilities

Safeguarding Lead	
Name	N Gosal
Phone Number	020 3198 556
E-mail	neil.g@e-careers.com or safeguarding@e-careers.com

We understand that to fulfil its responsibility to safeguard children, young people and adults at risk, all employees and volunteers are required to undertake mandatory training and appropriately share any concerns that are identified or disclosed. This policy has been approved by the senior management.

We will immediately refer an individual if there are concerns about their welfare, possible abuse, or neglect to the appropriate agency where they reside. A Safeguarding Report Form (Appendix A) will also be completed and sent to the DSL (Designated safeguarding Lead) or via the Safeguarding Referral System immediately and a written record of the referral will be forwarded to the relevant party within 48 hours.

The DSL will also ensure that:

1. Written records of concerns about a child, young person or adult at risk are retained securely.
2. All such records are stored confidentially. The safeguarding records are to be kept separate from individual student records.
3. Ensure that staff receive regular updates and mandatory training for safeguarding, particularly as part of staff induction, and receive refresher training as required.
4. Internal procedures for reporting safeguarding referrals to the Board are followed.



Sexual Abuse

Child - Forcing or enticing a child or young person, not necessarily involving a high level of violence to take part in sexual activities, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside the clothing. They may include non-contact activities, such as involving children in looking at, or 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.

Adult at risk - Sexual abuse is the direct or indirect involvement of the adult at risk in sexual activity or relationships, which they do not want or have not given a consented to or cannot understand and lack the mental capacity to be able to give consent to and have been pressured into because the other person is in a position of trust, power or authority.

Neglect

Child - The persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of the child's health and development. Neglect may occur during pregnancy because of parental substance abuse. Once a child is born, neglect may involve a parent or caretaker failing to provide food, clothing, and shelter. Child need protection from physical and emotional harm to ensure acceptable supervision is being provided.

Adult at risk - Neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, sufficient nutrition, and heating.

Physical Abuse

Physical abuse involves, but not limited to hitting, shaking, pushing, poisoning, burning, drowning, or suffocating, or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Child - The constant emotional abuse of a child such as causing severe and persistent adverse effects on the child's emotional development. It may involve stating to children, but not limited that they are worthless or unloved or valued and It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun of what they say and how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of others. It may involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or the mistreatment or exploitation of children.

Adult at risk - Psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.



Sexual Exploitation

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts, and relationships where young people receive 'something' because of them performing, or other people performing on them, sexual activities. It can occur using technology without the child's immediate recognition. In all cases those exploiting young people have power over them by virtue of age, gender, intellect, physical strength and/or economic or other resources. Violence, bullying, and intimidation are common, involvement in exploitative relationships being characterized by the young person's limited availability of choice resulting from their vulnerability.

In an adult at risk sexual exploitation is either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain.

Radicalisation & Extremism

The Counter Terrorism and Security Act, which received Royal Assent on 12th February 2015, places a duty on specified authorities, including local authorities and childcare, education, and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent individuals from being drawn into terrorism ("the Prevent Duty").

Objectives of the 'prevent duty' are but not limited to responding to the ideological challenge of terrorism and threat from those who promote it or preventing individuals from being drawn into terrorism and ensuring that they are given that give the help and advice required. Also work with sectors and institutions where there are risks of radicalization that we need to address.

If there are concerns that an individual is becoming radicalised and/or involved in an organisation which could ultimately harm the individual and the community this needs to be reported to the DSL immediately.

All staff are required to undertake mandatory training which provides staff with information on how to identify and refer a concern.

Extremism is defined as - Vocal or active opposition to fundamental British values, including democracy the rule of law; individual liberty and mutual respect and tolerance of different faiths and beliefs and/or calls for the death of members of the armed forces, whether in this country or overseas.

As part of wider safeguarding responsibilities staff will be alert to disclosures made by individuals of their exposure to the extremist actions, views, material, anti-British or western world views or use of extremist or hate terms. Attempts to impose extremist views or voicing opinions from extremist ideologies or narratives.

Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Staff have a responsibility to follow the safeguarding procedures, using existing national and local protocols for multiagency liaison with police and other relevant agencies. Care and sensitivity should be shown to adults at risk who have been subject to FGM and further support should be sought where required. As this differs from region to region if in doubt you should contact the DSL.

Forced Marriage



In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under pressure. Pressure includes both physical and emotional pressure.

A clear distinction must be made between a forced marriage and an arranged marriage. In an arranged marriage both families of both spouses take a leading role to help in choosing partner, but it is of a choice whether or not the partner is accepted. It is human rights abuse and falls within crown prosecution service of domestic violence.

Both young men and women are or can be at risk in affected ethnic groups, whistleblowing may come from younger siblings or other family members, or other indicators detected by changes in behaviors.

Additional Forms of Abuse

Discriminatory - Including but not limited to forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment; because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual, or transgender.

This also includes racism, sexism, homophobia or any other form of hate incident or crime which includes religious hate and domestic abuse or violence such as a pattern of incidents of controlling, or threatening behavior, violence, or abuse, by someone who is or has been an intimate partner or family member regardless of gender or sexual positioning. This also includes psychological or emotional, physical, sexual, financial abuse by so-called 'honour' based violence, forced marriage or Female Genital Mutilation (FGM).

Financial or material Including theft, fraud, internet scamming, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Modern slavery - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

Organisational (sometimes referred to as institutional): Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in a person's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice.

Reporting Safeguarding Concerns/Incidents

All staff should receive an appropriate level of training to provide a shared understanding of the tasks, processes, principles, and roles and responsibilities for safeguarding children and promoting their welfare. Where a safeguarding incident occurs, or an individual has a safeguarding concern, the following procedure must be enacted:

Recognise the signs of abuse.

- Respond and react accordingly.
- Record the facts of the disclosure.
- Report the disclosure to DSL as soon as possible/within 48 hours. All reports must be forwarded to the DSL as soon as possible/within 48 hours.
- Refer (to the emergency services, through the Channel process or Social Services) in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to Safeguarding Representative and National Safeguarding Advisor as soon as possible after the referral, always within 48 hours.



The Safeguarding Referral System (SRS)

The SRS is a cloud-based secured service system; it allows individuals to raise Safeguarding referrals 24 hours a day.

A Safeguarding form is filled in by the user by accessing <https://safeguarding.e-careers.com/>

The SRS is a central repository used for managing safeguarding concerns from learners. The system has a secure database where safeguarding cases can be queried, retrieved and reported on when required.

Process:

- New – Referral is generated in the system
- Open – The referral is assigned to the DSL, who will investigate the case and perform the required action. For example, the DSL will check, and accept/reject based on the criteria of Safeguarding
- In-progress – The DSL will work the case or escalate accordingly
- Solved – the has been resolved
- Closed – The case is closed after the DSL has been updated and all actions are complete.

The system offers total confidentiality and is only accessed by the DSL and deputy team as required, all are encouraged to use the system if they have any concerns or doubts over Safeguarding. Cases are kept secure and additional information is stored on secure Microsoft cloud servers.

An integral part of FFSNV is its commitment to ensuring that everyone who works for us keeps their knowledge up to date and all staff and contractors complete the required training and on a 3-yearly interval thereafter, regular refresher training is also offered throughout the year.

Recognise

Signs of abuse can be recognised as a contrast to the individual's usual behaviour or observed from a change in their physical appearance as mentioned below:

Physical - this could include lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, developed a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.

Behavioural - this could include sudden changes in a person's character, lack of confidence, low self-esteem, withdrawal or being aggressive or angry for no reason, becoming anxious or tearful.

The information above is by no means exhaustive, and an individual may not wish to disclose something that they perceive as "normal".

- Stay calm and listen carefully to what is being said.
- Reassure the person that they have done the right thing by telling you, but not that everything will be okay (sometimes things get worse before they get better)
- Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a need-to-know basis.
- Tell them what you will do next and with whom the information will be shared.
- Do not delay in discussing your concerns and if necessary, passing this information on.



If you feel that anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example:

- Call an ambulance or a GP if someone needs medical attention.
- Call the emergency services/police if a crime is taking place or has taken place.
- Separate the alleged perpetrator and victim, but only if it is safe to do so.
- When safe to do so, inform the DSL as soon as possible/within 48 hours, use SRS.

If you are suspicious but no disclosure has taken place discuss your concerns with the DSL.

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact your line manager and DSL.
- Follow the guidelines in Managing Allegations against Staff
- Do not question the person making the allegation or investigate the matter yourself.

Report

A Safeguarding Report Form, Appendix A, must be completed, if the SRS is not available, the following information needs to be recorded and sent via email in confidence to the DSL.:

- Your details
- Name of those involved
- Date of incident(s)
- Details of the incident(s)
- Background information
- Actions taken

Whilst you can record observations, do not interpret, or give an opinion as this may bias the information provided and jeopardise any future investigation into the allegation. The SRS or the Safeguarding Report Form needs to be completed and emailed to the DSL: neil.g@e-careers.com, this will then be case managed by the DSL.

Any issues or concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to the DSL. If the DSL is not available, please contact the Managing Director.

Record & Disclosers

Details should also be given about the circumstances of the disclosure and whether or not anyone else was present at the time that the disclosure was made.

Information will be automatically stored in a secure cloud location and dated, so that none of it can be amended or removed later. (SRS system)

Refer

- The referral is checked by the DSL and ensure that the individual being referred is not in any immediate danger or at risk of harm.
- Where required, the DSL will refer or support you with guidance on the next steps and/or signpost the relevant external agency.



- Any referrals to Social Services, through the Channel process, or other external agencies must also be notified to the DSL.
- Any violent incidents must be notified to the Health and Safety Manager.
- Should there be a disagreement between the staff member and the DSL or manager about the need to make a referral, a direct referral is made to the relevant social services department by the employee who has the concern.
- Any concerns about an individual who is part of a programme that is externally linked (e.g. a school, college, University etc.) should be relayed to the external institutions designated safeguarding representative also.
- Where required the DSL will share a risk assessment report with an external agency.

Monitor

- We regularly monitor the submissions and the use of our SRS (Safeguarding Reporting System)
- The DSL is notified by email each time a referral is submitted allowing a timely response
- The status is updated each time a change has been made on the SRS
- A full dashboard with statistics is present on the SRS

Confidentiality

The safety and well-being of the individual at risk is paramount. Staff may have access to confidential information about individuals to undertake their everyday responsibilities. In some circumstances, staff may be given highly sensitive or private information. They should never use confidential or personal information about an individual or his/her family for their own or others' advantage. The information must never be used to intimidate, humiliate, or embarrass an individual.

The DSL will disclose personal information about an individual to other staff on a need-to-know basis only. The DSL will make a judgement in each case about who needs and has a right to access information.

All staff must be aware that they have a professional responsibility to share information with other parties to safeguard children, young people and adults at risk, in consultation with the DSL.

All safeguarding records are subject to the Freedom of Information Act 2012 and Data Protection Act 2018. If there is any doubt as to the rights of any party to access information, we may seek legal advice before releasing any information.

All staff must be aware that they cannot promise a child/young person or adult at risk confidentiality which might compromise the safety or well-being of the individual or that of another.

Information Sharing

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. Interagency working and sharing of information are an integral part of safeguarding.

The overriding objective must be to safeguard the child, young person, or adult at risk.

Remember that the Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

Be open and honest with the individual (and/or their family where appropriate) from the outset about why what, how and with whom the information will, or could be shared, and seek their agreement unless it is unsafe or inappropriate to do so.



Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Managing Allegations against Staff

- All staff should take care not to place themselves in a vulnerable position with a child, young person or adult at risk and be aware of appropriate professional conduct. It is always advisable for interviews or works with individual young persons, adults at risk, or parents to be conducted in a visible arena in view of other adults.
- We may occasionally receive complaints or allegations against a member of staff, but a fair and balanced approach must be taken to ensure that both the complainant and the staff member are safeguarded.
- If such an allegation is made, the staff member receiving the information must take the issue seriously and should immediately inform their line manager, who will then immediately discuss the content of the allegation with the DSL and Managing Director.
- If the allegation made to a staff member concerns their line manager, the person receiving the allegation must immediately inform the DSL and/or Managing Director, without notifying their manager.
- No further action must be taken in respect of gathering statements from others or interviewing until directed by the DSL and Managing Director.

Where it is subsequently found that an allegation was made with malice aforethought, the DSL will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology (subject to an agreement about future behaviour) or other such sanctions as are deemed appropriate.

Links to Further Information and Guidance

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children 2015
- What to do if you are worried a child is being abused 2015
- Keeping Children Safe in Education 2019



- Protection of Freedoms Act 2012
- Care Act 2014
- Keeping Learners Safe 2015
- Safeguarding Children: Working Together Under the Children Act 2004
- Prevent Duty Guidance
- Modern Slavery Act 2015

Additional Support

Learners can access further support or guidance regarding Safeguarding by contacting our DSL. The DSL can signpost learners to further guidance and external support organisations as necessary covering Contractual/Employment, Financial, Learning & Development and Health & Wellbeing.

Policy Promotion and Implementation

This Safeguarding Policy is shared with learners and a team selected to reinforce it in all the apprenticeship programs. The policy is shared with staff and learners at Induction as well as every 2 months during the Progress Reviews that each learner has with their coach and employer. In the promotion process, the organization maintains that vulnerable persons have a risk to harm as stated in the Local Safeguarding Board and such individuals need safeguarding from such harm. The DSL and the policy are introduced at the induction phase. A copy of the Safeguarding Policy is also accessible 24/7 via our internal shared drive.

The policy is reviewed annually and is kept up to date in line with legislation, changes are introduced to reflect the experiences within the business and since the last review. Each review is shared with members of staff making them aware of any changes made.

These measures are in place to ensure the policy is effective and remains embedded in every aspect of the learning process.

All staff are required to work with the organisation to ensure that the guidelines of the policy are followed effectively. The DSL will oversee all the activities and reports on any concern would be provided to him immediately. A resolution committee will also be formed to hear cases involving abuse of any kind and produce ways of dealing with such instances.

The Safeguarding Policy is also discussed with each apprentice at the quarterly Progress Reviews.

The Safeguarding Policy is also promoted as part of the monthly Newsletter where safeguarding and prevent issues are published. This is then shared with all learners and staff.

We also have safeguarding themes as standard agenda items as part of regular management meetings

Commitment to the Policy

FFSNV ensures that the apprentices and employees are made aware of the unwanted behaviors that may threaten operations within the premises. As such, they will be enlightened on the unacceptable activities that may compromise the achievement of success within the organization. This is achieved during the induction period.

Commitment to the policy is one move that the top management will give an upper hand since it will make every stakeholder safe. All the apprentices and candidates will understand that FFSNV has a responsibility of safeguarding the rights of the vulnerable population. The rights would be listened to and steps to protect them outlined effectively



in a manner that can be followed to achieve better results. Through induction, we ensure that the apprentices are aware of the details of the policy.

All staff and learners are required to sign a declaration during their induction that they understand and are committed to upholding their responsibilities under this Policy.

Staff Training

Training is an integral part of ensuring this policy is adhere to, staff training ensures everyone is equipped with the correct knowledge and understanding of the signs and indicators of abuse and how to report a safeguarding concern. Staff training supports the protection and prevention of abuse by staff being able to successful identify signs of abuse at an early stage. All staff will be expected to undertake online training for example safeguarding in FE (Education and Training Foundation) and safeguarding and safer recruitment in FE 2016 (to be undertaken by all managers).

All staff have safeguarding and prevent training as part of their induction when joining the company provided by the DSL, this training incorporates all aspects of this policy. At times throughout the year there are regular updates and supporting material on safeguarding to ensure there is a continuous awareness of local and regional theme which enable targeted support to apprentice's and employers. Staff training is one of the many strategies we adopt to ensure protection of apprentices and prevention of abuse as well as safer recruitment, promotion of health and wellbeing to apprentice's and employers.

The DSL will have safeguarding and prevent training every 2 years additional to the online refresher training. All staff are required to read and sign a declaration of responsibility in their duty of safeguarding, where the policy is updated, this must be acknowledged by all staff as evidence of their commitment.

Safer recruitment

To further prevent abuse towards apprentices, and as part of our staff recruitment process, we conduct an enhanced DBS check on all applicants to ensure they are suitable experienced to work with different learner groups. Applicants are required to provide a copy of their DBS, which will be used for DBS checks yearly to ensure validity. Further checks based on eligibility, qualifications, and references in line with Safer Recruitment procedures.

IT Usage/E-Safety

The IT Usage is covered by the IT. E-Mail, and Internet Usage Policy.

We follow the Ofsted guidance on managing e-safety at e-Careers Apprenticeships

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

We seek to keep our learners safe online by:

- Appointing an online safety coordinator Neil Gosal who ensures learners are informed about online safety
- Providing clear and specific directions to staff on how to behave online through our behaviour code for adults
- Supporting and encouraging the learners using our Learning management systems and our access to the internet, social media and mobile phones in a way that keeps them safe and shows respect for others



- Developing an online safety agreement for use with Learners and Employers
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour,
- Reviewing and updating the security of our information systems regularly
- Ensuring that user names, logins, email accounts and passwords are used effectively
- Ensuring personal information about the Learners and Employers who are involved in our organisation is held securely and shared only as appropriate
- Providing supervision, support and training for staff about online safety
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation

Review:

This Policy is reviewed at least annually by our Directors and Head of Apprenticeships and in accordance with industry, best practice, and legislative updates. It was last reviewed in February 2022 and will next be reviewed in February 2023.



Title: Safeguarding Policy		Version1.0	Date
Authorised by:	Name	Signatures	Dates/comments
Director	Varun Bhatt		Date Signed 21/02/2022
Director	Tolu Fagbola		Date Signed 21/02/2022
DSL	Neil Gosal		Date Signed 21/02/2022
Implementation Head of Apprenticeships	Mala Rajput		Date Signed 21/02/2022
Related documents	Apprenticeship quality and delivery document Break in Learning Learner Support		

Appendix A: Safeguarding Report Form
New Safeguarding ticket in place

Name of Individual:	Gender & DOB:
Reported by:	Employer:
Completed by:	Date:
Does the individual know you will discuss with the DSL?	YES/NO



If "No" please state reason:

Concern/Incident/Disclosure Details:

Stat what is said, who observes, where it happened, who saw, when did it happen, time and date.

Reporter Signature:

Date:

Completed By Signature:

Date:

To be completed by the Designated Safeguarding Lead

State what action was taken and when:



Name:

Signature:

Date:



Prevent Policy

Scope

Prevent Policy for Forum for Sustainable New Venture (FFSNV) t/a e-Careers Apprenticeships.

This policy applies to all staff, including senior managers, paid staff, volunteers, contractors, learners (including apprentices) also referred to as students or delegates. Employers and anyone working on behalf of or with or for Forum For Sustainable New Venture (FFSNV) t/a e-Careers Apprenticeships.

Introduction

At FFSNV t/a e-Careers Apprenticeships Limited we recognise and uphold the statutory duty to prevent people being brought into and affected by terrorism or violence under the Counterterrorism and Security Act 2015.

Duties and Responsibilities

Designated Safeguarding Lead	
Name	N Gosal
Phone Number	020 3198 556
E-mail	neil.g@e-careers.com or safeguarding@e-careers.com

The DSL (Designated safeguarding Lead) will also ensure that:

5. Written records of concerns about all that is covered in this Prevent Policy and the Safeguarding Policy are secure.
6. All such records are stored confidentially. The safeguarding records are to be kept separate from individual student records.
7. Ensure that staff receive regular updates and mandatory training for Prevent, particularly as part of staff induction, and receive refresher training as required.

Policy Guidance

This prevent policy is designed and works with the Safeguarding Policy. Our approach to Safeguarding, Equality and Diversity along with the promotion of fundamental British Values aims to ensure that staff, learners, and employers are aware of their roles and responsibilities in preventing radicalisation and extremism and aim to achieve by working jointly with everyone.

Objectives

The Counterterrorism and Security Act, which received Royal Assent on 12th February 2015, places a duty on specified authorities, including local authorities and childcare, education, and other children's services



providers, in the exercise of their functions, to have due regard to the need to prevent individuals from being drawn into terrorism (“the Prevent Duty”).

Objectives of the ‘prevent duty’ are but not limited to responding to the ideological challenge of terrorism and threat from those who promote it or preventing individuals from being drawn into terrorism and ensuring that they are given that give the help and advice required. Also, work with sectors and institutions where there are risks of radicalisation that we need to address.

If there are concerns that an individual is becoming radicalised and/or involved in an organisation that could harm the individual and the community this needs to be reported to the DSL (Designated safeguarding Person) immediately.

All staff are required to undertake mandatory training which provides staff with information on how to identify and refer a concern.

Extremism is defined as - Vocal or active opposition to fundamental British values, including democracy the rule of law; individual liberty and mutual respect and tolerance of different faiths and beliefs and/or calls for the death of members of the armed forces, whether in this country or overseas.

As part of wider safeguarding responsibilities, staff will be alert to disclosures made by individuals of their exposure to the extremist actions, views, material, anti-British or western world views or use of extremist or hate terms. Attempts to impose extremist views or voicing opinions from extremist ideologies or narratives.

Learning

Learners will be encouraged to explore fundamental British values in a safe and supportive environment, without fear of discrimination, we will seek to actively safeguard all learners and provide welfare support at the point of need for learners identified to be at risk of harm as defined within Keeping Children Safe in Education (2015) as well as adults.

Identify anti-bullying through training and using experienced members of staff and challenge this type of behaviour.

Challenges and Risks (related doc – Prevent Risk Assessment)

The safety and wellbeing of all are at the forefront of what we do and as such, we will ensure that there are plans in place which respond to any direct threats within our infrastructure.

Measures will be taken to mitigate the risk posed to staff/learners by individuals vulnerable to radicalisation on a case-by-case basis.

Any terrorist-related incidents will be treated on a priority basis, this is in line with our Safeguarding Policy.

Protecting Staff and Apprentices from Radicalization:

Radicalization is perceived as the process through which an individual gets involved in supporting extremist and terrorism ideologies. The prevent duty as part of the safeguarding strategies prioritized by



the UK government works in various ways to enhance protection and safety in the working environments for apprentices as well as employers. Radicalization can impose severe effects on both employers and apprentices. In this context, employers in with e-Careers Apprenticeships are obligated to perform various activities in ensuring maximum safety for employees and apprentices.

Leaders and managers in e-Careers Apprenticeships will ensure effective engagement with support groups and local partners involved in coordinating the prevent objectives against radicalization. The prevent duty will be designed in a way that reflects clear procedures and visible policies for managing whistleblowing on matters regarding radicalisation. In this perspective the Prevent Duty is believed to compliment organizational equality and safeguarding acts, which emphasizes welfare of staff, as well as safety of learners. Moreover, the prevent policy ensures adequate training for all staff on matters concerning radicalism.

In addition to the training, staff have been made aware to spot early signs of radicalisation including but not limited to:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

Building Resilience to Extreme Narratives:

Extremism is perceived as vocals or actions fashioned in a way that opposes fundamental values, such as democracy, individual liberty, rules of law, and tolerance or respect for cultural diversity. Extremism is a threat to peaceful coexistence and public relations across the globe.

The prevent duty's central objectives aim at discouraging all sorts of social evils, including extremism and radicalization within e-Careers Apprenticeships. The prevent policy will encourage apprentices to be positive and happy individuals, who promote utilitarianism in the society through various means.

The prevent duty will encourage apprentices and employees to recognize respect for cultural diversity by exploring different religions and cultural beliefs. Also, the prevent policy aims to challenge racist comments, prejudices, and corrupt behaviors among employees and apprentices in caregiving facilities across the world. Initiating favorable skills like critical thinking skills and self-realization among trainees and employees.

Furthermore, the prevent duty is essential in building moral, social and cultural, and spiritual development in apprentices. Nevertheless, the policy has been significant in active establishment and promotion of British values. It implies that the prevent duty provides apprentices and employees with necessary information, thereby equipping such individuals with sufficient insights on how to protect themselves against acts of extremism that they might encounter during training periods

Vulnerability Signs and Indicators



Safeguarding both children and adults is at the heart of Prevent duty within e-Careers Apprenticeships. For example, the policy will protect infants from maltreatment and impaired health. Safeguarding involves ensuring early intervention, which protects and prevents apprentices and employees from getting involved in terrorist activities. As such, advocates of prevent argue that there is no specific means of identifying vulnerable individuals. However, there are several factors which are thought to fuel terrorism such as;

- Isolation or loneliness
- Internet
- Drugs
- Family feuds and breakdown
- Poverty
- Lack of role models
- Religious or political conversion

Changes in behaviour which may indicate vulnerability may include:

- signs of physical abuse.
- use of inappropriate language.
- Social isolation
- Being secretive
- Excessive use of internet and online platforms
- Accessing extremist content
- Trying to join an extremist organization.

Knowing What to Do

Detecting risk factors for terrorism or vulnerable individuals may not offer complete solution for insecurity in private and public facilities. For effective implementation of the prevent duty, stakeholders must know the appropriate actions that can help mitigate insecurity among apprentice and employees. Apprentices and employees will with discretion regarding relationships and personal situations. In the same way, there are several ways of challenging extremism. Apprentices and employees will be encouraged to critically evaluate extremist actions before initiating any counter-action activity. Moreover, employees are encouraged to consider alternative views and interpretation of opinions generated by co-workers.

e-Careers Apprenticeships make it mandatory for all employees, learners, contractors, and subcontractors to report concerns, suspicions, allegations, and incidents which suggests this policy may have in any other way been breached. The DSL will initiate the procedure for dealing with suspected or actual incidents of abuse. Please see the Reporting Concerns section below for more information.

The safeguarding officer ensures that situations are handled appropriately and effectively by reporting must be made, and decisions and actions taken.



All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse) and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.

Reporting Concerns

e-Careers Apprenticeships have well-structured process in reporting concerns. Full details of our reporting, recording, and investigating concerns can be found in our Safeguarding Policy.

The Safeguarding Referral System (SRS)

The SRS is a cloud-based secured service system; it allows individuals to raise Safeguarding referrals 24 hours a day.

A Safeguarding form is filled in by the user by accessing <https://safeguarding.e-careers.com/>

Process:

- New – Referral is generated in the system
- Open – The referral is assigned to the DSL, who will investigate the case and perform the required action. For example, the DSL will check, and accept/reject based on the criteria of Safeguarding
- In-progress – The DSL will work the case or escalate accordingly
- Solved – the has been resolved
- Closed – The case is closed after the DSL has been updated and all actions are complete.

The system offers total confidentiality and is only accessed by the DSL and deputy team as required, all are encouraged to use the system if they have any concerns or doubts over Safeguarding. Cases are kept secure and additional information is stored on secure Microsoft cloud servers.

A Safeguarding Report Form, Appendix A, must be completed if the SRS is not available, whereas either measure is not available, the following information needs to be recorded and sent via email in confidence to the DSL.

All the above measures are in available in detail in our Safeguarding Policy.

Anyone that is worried or concerned about any apprentice, please contact our Safeguarding Team immediately by email safeguarding@e-careers.com / neil.g@e-careers.com

The referral will then be case managed as per the Safeguarding Policy.

Leadership Commitment

We expect that those in leadership positions: Support and take accountability:

- ensure staff understand the risk and understand the channels by which to deal with it
- communicate and promote the importance of the duty; and ensure staff implement the duty effectively.
- Top Level : Designated Safeguarding Lead: Neil Gosal



- Joint Top Level Leadership: Tolu Fagbola and Varun Bhatt
- Second level leads: Head of Apprenticeships & Course leads

Implementation

- Coaches to listen and report matters of concern as per training during Progress reviews
- Learners and Employers can contact Coaches or DSL directly
- DSL stores cases safely and securely and reach outs to channels accordingly

Local Prevent links support for a geographically distributed learner

Not limited to list below

- <https://www.berkshirerwestsafeguardingchildrenpartnership.org.uk/scp/professionals/prevent>
- <https://selondonccg.nhs.uk/in-your-area/lewisham/safeguarding/safeguarding-adults/prevent/>
- <https://www.counterterrorism.police.uk/northeast/prevent/#:~:text=Prevent%20%20a%20vital%20part,Government's%20Counter%20Terrorism%20Strategy%20CONTEST.>

Training:

Staff will undertake mandatory Safeguarding and Prevent Training during their induction and annually refresher training delivered by the DSL there-after. Training covers a full breakdown of the Prevent Duty Policy and the associated roles and responsibilities required of staff, along with updates best practice and legislation.

All staff training is recorded within the Staff Matrix Tool, which keeps a record of training undertaken and the anniversary dates.

Senior Management also undergo refresher training annually covering Safeguarding and Prevent and additional training.

Quality Improvement

Audit of cases based in OFSTED Framework – New for 2022, Implementation April 2022.

Conduct Prevent Risk Assessment – see Prevent risk assessment – next review April 2022.

Partnerships and Subscriptions

2021 – Online/LinkedIn: Subscribing to newsletters for example “So Safeguarding @sosafeguarding”

2022 – Safeguarding Events Organisation “@e-safety. Support”

Working with Multi-Agencies e.g Police, Social care.

Policy Promotion and Implementation



This Prevent Policy is shared with apprentices and a team selected to reinforce it in all the apprenticeship programs. A copy of the Policy is provided to staff and apprentices during their induction and it also remains accessible 24/7 via our internal shared drive.

All staff are required to work with the organisation to ensure that the guidelines of the policy are followed effectively. The DSL will oversee all the activities and reports on any concern would be provided to him immediately. A resolution committee will also be formed to hear cases involving risks of any kind and come up with ways of dealing with these.

The Prevent Policy is also discussed with each apprentice at the quarterly Progress Reviews.

The Prevent Policy is also promoted as part of the monthly updates on our teams channels where safeguarding and prevent issues are published. This is then shared with all staff. Coaches will share the updates and information with learners in their progress reviews.

The Prevent Policy is also promoted as part of the monthly Newsletter where safeguarding and prevent issues are published. This is then shared with all learners and staff.

We also have safeguarding themes as standard agenda items as part of regular management meetings. Leaders within the FFSNV have deep understanding and requirements of the Prevent Statutory Duty or the risks.

FFSNV treats this as priority action to engage with SLT and Governors to take accountability.

- A) Staff are aware of the factors that make people vulnerable to radicalisation and terrorism and are able to recognise the signs of vulnerability and therefore refer concerns.
- B) Leaders are able to challenge extremist narratives or exemplify British Values throughout FFSNV
- C) Staff are clear on how to deal with or refer concerns resulting in individuals being supported and potentially learners are supported.

Commitment to the Policy

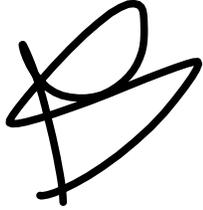
FFSNV ensures that the apprentices and employees are made aware of the unwanted behaviors that may threaten operations within the premises. As such, they will be enlightened on the unacceptable activities that may compromise the achievement of success within the organization.

Commitment to the policy is a top priority for the management team. All the apprentices and candidates will understand that FFSNV has a responsibility of preventing radicalization and extremizing and safeguarding the rights of the vulnerable population. The rights would be listened to and steps to protect them outlined effectively in a manner that can be followed to achieve better results. As part of the induction process, staff and apprentices are required to sign a declaration that they understand and are committed to upholding their associated roles and responsibilities under this Policy.

Review:

This Policy is reviewed at least annually by our Directors and in accordance with best practice, legislative, and industry updates. It was last reviewed in March 2022 and will next be reviewed in March 2023.



Issue Number:	1	Signatures
Last Review Date:	March 2022	-
Policy Review Date:	March 2023	-
Validity:	1 Year	-
Job Title of the person responsible for policy:	Safeguarding Officer	-
Name of person responsible for policy:	N Gosal	
Director Level approval	Tolu Fagbola	

End of Document