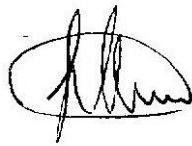


# Time2Train Ltd

## Safeguarding Policy

*Signed:*



*Director:*            *John Young*

*Date:*                 *12/11/2023*

*Next review Date:* *12/11/2024*

## CONTENTS

Introduction.....	2
Responsibilities.....	3
Purpose.....	3
Definition.....	3
Prevent.....	5
Procedures.....	5
Safer recruitment.....	7
Safeguarding Training.....	7
Records.....	7
Links with external agencies.....	7
Reporting Procedures.....	7
Allegations against a member of staff.....	8
Responding to an allegation.....	8
Written records.....	9
Confidentiality.....	9
Monitoring.....	9
Freedom of Expression.....	9
Review.....	9
Prevent and safeguarding flowchart.....	10

## INTRODUCTION

Time2Train Ltd (henceforth referred to as “Time2Train”) is dedicated to the health, safety, and welfare of all children, young people and vulnerable adults involved in courses or activities which come under the responsibility of the company.

This policy covers all Time2Train customers (apprentice, employer, providers) and staff, regardless of the location of the work or activity.

Time2Train is committed to ensuring that the company:

- Provides a safe environment for children, young people and vulnerable adults to learn in.
- Identifies children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that such children, young people and vulnerable adults are kept safe.

### RESPONSIBILITIES

It is the responsibility of all staff to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document. Specific responsibilities for Time2Train staff are detailed later in this policy.

It is the responsibility of the employer and training provider to have in place a safeguarding policy for their apprentices and to make them aware of their policies and procedures. The training provider is also required to maintain a continuing duty of care for the apprentice as they progress through end-point assessment.

If a potential safeguarding concern is raised in relation to an apprentice whilst on-programme, the training provider must follow the process is shown in this policy.

If a potential safeguarding concern is raised in relation to an apprentice whilst undertaking end-point assessment, or which may affect the delivery of the end-point assessment, the End Point Assessment organisation must follow its own safeguarding policy and process.

### PURPOSE

This policy outlines the responsibilities of Time2Train in relation to the protection of children, young people and vulnerable adults in response to:

- The Care Act 2014
- The Children Act 1989
- The Children Act 2004
- The Protection of Children Act 1999
- Safeguarding Children and Safer Recruitment in Education 2007
- Keeping children safe in Education 2016
- Working Together to Safeguard Children 2018
- What to do if you're worried a child is being abused. DfES 2006
- Safer practice, safer learning 2007
- Data protection act 1998 / General Data Protection Regulations (GDPR) 2018
- Working Together to Safeguard Children (HM Government 2015)

### DEFINITION

Safeguarding and promoting the welfare of apprentices is defined in 'Working Together to Safeguard Children (2018)' as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

**Children and Young Persons** - In terms of this policy, "child, children and young people" mean those under the age of 18 as defined by The Children Act 1989. This policy applies to learners/clients in this age group attending a further education course and young people aged 14 –16 who attend college as part of a school links course.

**Vulnerable Adults** - A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This **may** include a person who:

- is elderly and frail;
- has a mental illness including dementia;
- has a physical or sensory disability;
- has a learning disability;
- has a severe physical illness;
- is a substance misuser; and/or
- is homeless.

This also applies to temporary conditions.

Safeguarding actions may be needed to protect apprentices from the following forms of Abuse:

**Financial or material abuse** - including theft, fraud, internet scamming, 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.

**Physical abuse** - including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

**Neglect and acts of omission** - including ignoring medical, emotional 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, adequate nutrition and heating.

**Sexual abuse** - including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

**Psychological / Emotional abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks

**Organisational abuse** - including neglect or poor care practice within an organisation or specific care setting, such as a hospital or care home. It can also be in relation to care provided in your own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Discriminatory abuse** - including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

**Self-neglect** - this covers a wide range of behaviour such as neglecting to care for your personal hygiene, health or surroundings and includes behaviour such as hoarding.

**Domestic abuse** - including psychological, physical, sexual, financial, emotional, or so-called 'honour' based violence.

## INSPIRE, PROVIDE AND SUPPORT ACHIEVEMENT

**Modern slavery** - encompasses slavery, human trafficking, forced labour and domestic servitude. Trafficking 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.

**Bullying** is included in the definition of safeguarding but there is a particular definition that Time2Train uses to support its “zero tolerance” policy which is:

“**Bullying is** behaviour usually, but not always, repeated over time that hurts, intimidates or humiliates another individual or group either physically or emotionally. One person or a group can bully others. Bullying is usually identified by a deliberate intention to hurt or humiliate, an imbalance of power between the bully(ies) and the victim and it is usually persistent.”

Bullying includes name calling, taunting, mocking, making offensive comments, kicking, hitting, pushing, threatening, inappropriate touching, spreading hurtful or untruthful rumours, excluding an individual from a group or making someone act against their will.

**Cyber Bullying** - is any form of bullying which takes place online or through smartphones and tablets. There are many ways of bullying someone online and for some it can take shape in more ways than one. Some of the types of cyber bullying are: Harassment, Denigration, Flaming, Impersonation, Outing and Trickery, Cyber stalking

### PREVENT

Time2Train shall ensure all staff will:

- 1) exemplify British Values in their management, teaching and through general behaviours in the company
- 2) understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism
- 3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response
- 4) Ensure front line staff have the tools and knowledge to impart knowledge of Prevent in a contextualised way

### PROCEDURES

#### General

Time2Train takes seriously its duty of pastoral care and will be proactive in seeking to prevent young persons and vulnerable adults becoming the victims of abuse or neglect. It will do this in a number of ways:

- Through the creation of an open culture which respects all individuals’ rights and discourages bullying and discrimination of all kinds.
- By identifying a member of the management who will lead and have overall responsibility for safeguarding young people with a team of designated staff. The team will have received training in this field and act as a source of advice and support to other staff.

- By informing young people of their rights to be free from harm and encouraging them to talk to Time2Train staff if they have any concerns.
- Through the tutorial programme and an ongoing programme of support, at an appropriate level, to promote self-esteem, social inclusion and address the issue of safeguarding children and young people in the wider context.

### **Time2Train Senior staff responsibilities**

The senior designated person holds strategic responsibility for the safeguarding processes and procedures are robust and consistently applied and that Time2Train fulfils its legal duties within the legislation. The senior designated person will be responsible for taking the lead for raising awareness within the staff of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of a safe environment for apprentices within the company.

The senior designed Safeguarding Officer is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to Children's Social Care.
- Ensuring that all staff receive basic training in safeguarding issues and are aware of the company's safeguarding procedures.
- Provide an annual report to the Directors of the company setting out how any deficiencies in the procedure or policy have been identified.
- Providing advice, guidance and support to staff on issues relating to safeguarding.
- Establishing a secure system for the safe, confidential storage of records of any safeguarding concerns (even where that concern does not lead to a referral).
- Ensuring that employers and employees working with Time2Train are aware of the company's Safeguarding Children, Young People and Vulnerable Adults Policy.
- Liaising with the LA, Safeguarding Children's Board, Children's and Adult Social Care and other appropriate agencies as and when required.

The designated Safeguarding Officer is required to receive regular training in safeguarding issues and inter-agency working, as required by the Safeguarding Children's Board, and will receive refresher training annually unless legislation dictates sooner.

If staff have concerns about an apprentice this must be referred to the Designated Safeguarding Officer to agree a course of action. Options can include referral to specialist services and/or early help services. Providing early help is more effective in promoting the welfare of young people than reacting later. Staff may be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment.

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## SAFER RECRUITMENT

Time2Train will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. Time2Train's recruitment Policy supports this document. Staff will undergo the appropriate pre-employment checks including DBS checks for their role where applicable, and undertake mandatory safeguarding training appropriate to their role. Staff will understand the principles of safe working practices, and how not to put themselves in situations that compromise themselves or apprentices. All new employees will receive an appropriate induction, including safeguarding training.

## SAFEGUARDING TRAINING

Time2Train has a legal obligation to protect young people and vulnerable adults from abuse. Time2Train has an appropriately trained safeguarding officer, and all staff are trained in Safeguarding L2 who will ensure that disclosures made by apprentices are dealt with quickly, sensitively and appropriately. All staff will be trained in the appropriate response to a disclosure and the correct procedure for dealing with concerns about an apprentice.

Allocated staff members will work with apprentices and employers to proactively protect them from abuse and neglect and prevent apprentices being placed in an abusive situation. Refresher training will be carried out every 2 years, unless legislation dictates sooner, and any updates or Safeguarding issues are discussed in quarterly team meeting to ensure all staff remain current and competent.

## RECORDS

The company will keep clear, comprehensive records of any disclosures and/or allegations of abuse.

The company will comply with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the interests of an apprentice.

## LINKS WITH EXTERNAL AGENCIES

Time2Train work with Local Safeguarding Children Boards, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and other professions to ensure a comprehensive safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate:

- Northeast Prevent and Safeguarding Officer ([chris.sybenga@education.gov.uk](mailto:chris.sybenga@education.gov.uk))
- NSCB – 0191 277 2500 [www.nscb.org.uk](http://www.nscb.org.uk)
- Durham LSCB – 03000 265 770 [www.durhamlscb.org.uk](http://www.durhamlscb.org.uk)

## REPORTING PROCEDURES

- If the allegation or suspicion of abuse is discovered or disclosed by an apprentice then they should inform a member of staff as soon as possible. The member of staff will then inform a member of the Safeguarding team.
- A member of staff discovering an allegation or suspicion of abuse will, similarly, report it to the Safeguarding team.
- The member of staff should make a written record (see relevant section below) of the allegation or suspicion of abuse and discuss the situation with the contacted member of the Safeguarding

## INSPIRE, PROVIDE AND SUPPORT ACHIEVEMENT

team. The Safeguarding team will carry out a risk assessment and contact the local Social Services if appropriate.

If an apprentice/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the learner to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to:

- The scale of the abuse;
- The risk of harm to others; and
- The capacity of the learner to understand the issues of abuse and consent.
- If there is any doubt about whether or not to report an issue to Social Services then it should be reported.
- In emergency situations (e.g. where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted.
- Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

### ALLEGATIONS AGAINST A MEMBER OF STAFF

- Record in full, as soon as possible, the nature of the allegation and any other relevant information.
- Report the allegation/incident to a Designated Person as soon as possible and within 2 hours.
- Ensure the safety of the young person in question and any others who may be at risk.
- Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently.

### RESPONDING TO AN ALLEGATION

Any suspicion, allegation or incident of abuse must be reported to a Member of the Management Team with responsibility for safeguarding as soon as possible and in any event within 2 hours. If it is agreed to be a Safeguarding matter a written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. Centralized tracking documents must be recorded within 24 hours of the referral and report forms completed and sent electronically to designated member of executive. Any referral must be notified to the Designated Person as soon as practicable and in any event within 24 hours of the initial concern arising. The Designated Person shall discuss with the Social Services department what action should be taken to inform the parents of the learner or child, unless to do so would put the young person or child at risk. A note of that conversation should be made.

Where in exceptional circumstances a member of staff deems there to be an immediate risk to a young person and it is not possible to contact the Managing Director within the same day, s/he shall report the matter - normally by telephone - directly to the local Social Services Department, Duty Social Worker or Police Service Child Protection Unit. The staff member shall notify the College Designated person and CEO as Managing Director soon as possible and normally within one working day of the action taken and submit a written report of that action and the circumstances leading to it.

### WRITTEN RECORDS

The relevant Time2Train Designated Person shall retain a copy of the report; any notes, memoranda or correspondence dealing with the matter; and any other relevant material. Copies of reports, notes etc should be kept secure at all times. The member of staff who has cause for concern shall make a full record as soon as possible.

The record should include the nature of the allegation and any other relevant information including:

- Date, time and place where the alleged abuse occurred;
- Names of others present;
- Name of the complainant and, where different, the name of the young person who has allegedly been abused; nature of the alleged abuse;
- Description of any injuries/incidents observed; and the account which has been given of the allegation
- A copy of all documentation is to be held centrally by the Managing Director

### CONFIDENTIALITY

Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy.

### MONITORING

The Operations Manager is responsible for ensuring that regular reports are made to the Management Team. Monitoring must include all subcontracted partners.

Time2Train wants to provide a safe and secure environment for all of its learners/clients and the wider provision. Time2Train takes its responsibilities for the safety and well-being of learners/clients very seriously and has developed a range of measures to meet these responsibilities including a “zero tolerance” policy towards bullying.

### FREEDOM OF EXPRESSION

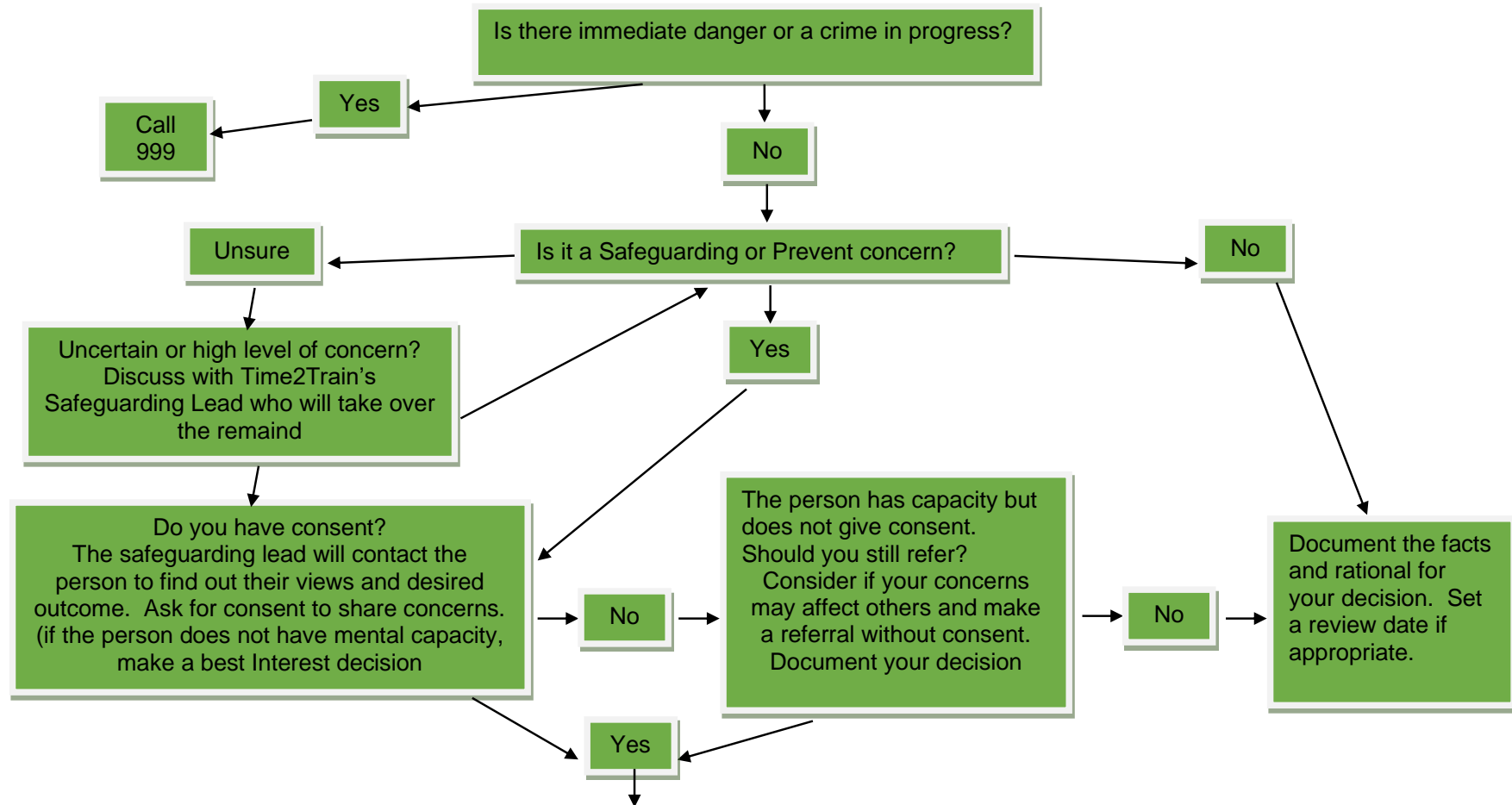
We recognise, however, that the ethos of our company is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this.

### REVIEW

This policy will be reviewed annually as part of our quality assurance procedures. Reviews will also take place when there are changes, legislative updates and updates defined by the ESFA and IfATE.

PREVENT AND SAFEGUARDING FLOWCHART

If you have any Prevent or Safeguarding concerns for your apprentices, their family, friends, colleagues or their employers please follow the guidance below.



Contact Chris Sybenga the Northeast Prevent and Safeguarding Officer ([chris.sybenga@education.gov.uk](mailto:chris.sybenga@education.gov.uk))

