

# Safeguarding Policy

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**Last Review** January 2023

**Next Review** November 2024

# Safeguarding Policy

## Aims

Fieri takes the safety of all learners very seriously. The policy aims to ensure that all learners, staff, customers, linked employers, freelance trainers', stakeholders and visitors are safe from harm and abuse, harassment and bullying. Fieri's intent is to provide an engaging, meaningful, supportive learning environment promoting safety and wellbeing throughout.

## Rationale

The rationale of the policy is to safeguard all children and vulnerable adult learners. This policy covers all aspects of the learner's journey from enrolment to achievement (EPA). This is achieved through robust processes, training and monitoring. This policy works in conjunction with the Health and Safety policy. This policy is a legal requirement and as such must be read and understood by all staff. All staff who have contact with learners in their job role have a duty of care and a role to play in safeguarding and promoting the welfare of learners and must be aware of procedures to follow to pass on concerns (Children Act 2004).

Fieri will adhere to National legislation, Government statutory guidance and Ofsted requirements.

This policy is based on the law and statutory guidance applicable in England only.

- Children Act 1989
- The Children Act 2004
- Children & Social Work Act 2017
- Education and Training Act 2021
- The Mental Capacity Act 2005
- Working together to safeguard children
- Keeping children safe in education 2022
- What to do if you are worried a child is being abused
- Ofsted Education Inspection Framework

## Key contacts

### The Safeguarding team are:

**Designated Safeguarding Lead – James Robinson**

**Deputy Safeguarding Officer – Adam Conlon**

**Apprenticeship Safeguarding Lead – Sue Hewitt (for the purposes of safeguarding will report and be advised by the overarching company lead and officer)**

Designated Safeguarding Lead (DSL): Senior Leader taking overarching responsibility of policies, processes and referrals to external agencies. Accountable for communication to the Board of Directors to ensure individuals are aware, alert and can take any actions necessary. Deputy Safeguarding Officer: Fully trained and experienced staff member to support staff, employers, sub contactors and learners in managing concerns and referrals to external agencies, reporting into the DSL. The Safeguarding team must complete mandatory training and updates. DSL training must be completed as a minimum every 3 years. Records relating to referrals must be held centrally on a secure drive, information must remain confidential and stored in accordance with GDPR.

## Safeguarding

Safeguarding is the term used to ensure children (those under 18) and vulnerable adults are protected from harm and abuse. All staff have a personal responsibility for safeguarding the welfare and wellbeing of all children and vulnerable adults' learners at risk of harm by protecting them from abuse.

Four areas of child abuse are:

- Physical
- Emotional
- Neglect
- Sexual

Ten areas of adult abuse are:

- Physical
- Physiological / Emotional
- Financial
- Sexual
- Modern Slavery
- Domestic
- Organisational
- Self-Neglect
- Discriminatory
- Acts of Omission

The categories above break down to cover further areas, this policy will provide guidance which must be followed.

### Roles and Responsibilities

Whilst all staff have a responsibility, below breaks down specific areas aligned with job roles and functions:

**The Board of Directors:** The Board are involved in their capacity within Leadership and Governance to oversee all aspects of Safeguarding. The DSL will report to the Board as a minimum, quarterly.

**Learning Support Mentors (LSM) and Apprenticeship Programme Managers (APM):** Ensure learners are educated on Safeguarding and Prevent and fully understand how to raise a concern. TCs must ensure that learner safety and wellbeing is monitored and if required, report concerns to the Safeguarding team. They must complete mandatory training and attend updates as required. Must ensure that children undertake the mandatory safeguarding units as part of their apprenticeship.

**Associate SEND Specialist:** Will work with learners with additional needs or disabilities to ensure that reasonable adjustments and the learning support plan is aligned to meet needs of the individual.

**Head of Apprenticeships (HoA) and Apprenticeship Programme Managers (APM):** Ensure learners workplaces are risk free (risk assessments and employer liability is in place note: SEND learners may have additional support needs in the workplace, risk assessments must be checked to ensure this is noted to safeguard the learner). Concerns must be raised to the Head of Apprenticeships. They will provide communications and local level support

between the learner, the LSM/APM and employer ensuring that when concerns are identified risk is mitigated – the Safeguarding team will oversee and support.

**Quality team (HoA/APM):** Must ensure staff receive appropriate training and guidance and are aware of the processes and procedures to keep learners safe. Quality will ensure that learners receive appropriate, meaningful training in regards to Safeguarding and Prevent. Quality will report concerns if observed directly. Must complete mandatory training and updates.

**Facilitators, APM and LSM:** Must ensure that the classroom environment is safe (whether this be online or face to face). Ensure ground rules are set and clear and delegates are supervised to ensure teaching sessions are free from child -on -child abuse. Where appropriate, Safeguarding and Prevent must be embedded into the delivery. KT's must monitor their delegates and any concerns noted relating to Safeguarding must be reported. KTs must undertake mandatory training and updates.

**Human Resources (HR):** Implementing and adhering to safer recruitment, staff training records and implementing training schedules and implementation of this policy, escalating staffing concerns to the DSL & Board of Directors.

**Information Technologies (IT):** Ensure appropriate web filtering systems safeguard learners against online threats and harmful materials. Web search blockers must be installed to prevent searching of particular categories and materials (see Internet Watch Foundation). IT will monitor online systems to ensure user activity is without risk or threat.

**Curriculum:** design and make accessible learner facing safeguarding resources to provide training in every apprenticeship. They ensure the content is fit for purpose, current and relevant.

**Account Directors:** Ensure National Account employers are aware of the requirements to safeguard children and vulnerable adults. In addition, they will ensure employer responsibilities are maintained.

**Employers:** Ensure that they are aware of Safeguarding and Prevent and how to promote welfare for their learners. They must ensure a safe working environment that aligns with Health and Safety law, young workers section. Wider employment requirements are required which are covered in ACAS young workers, this includes restricted periods, night working, pay and general working hours.

## **Delivery requirements:**

All learners must have a meaningful induction which covers Safeguarding and Prevent.

Each learning and progress review must monitor learner safety and address any safeguarding concerns. Further Safeguarding and Prevent training must be embedded with utilising British Values, wellbeing resources and Hot Topics to ensure it is relevant, current and sufficient.

All under 18's must complete 2 online learning modules:

- Online Safety Awareness
- Sexual Harassment

Learning Support Mentors and Apprenticeship Programme Managers must ensure that following the completion of online learning resources, opportunities are taken to develop and deepen understanding which is documented on the Learning / Progress review to show distance travelled and impact.

It is important that all staff remain professional and set personal boundaries. It is not permitted for any staff member to visit learners at home or socialise with them. Individuals must ensure that relationships are not established on personal social media sites (e.g Facebook, Instagram). Any activity of this nature will be considered as potential gross misconduct.

## **Safer Recruitment:**

The Apprenticeship Team will oversee and ensure that new members of staff will undertake the following recruitment process:

- Curriculum Vitae and job history check
- Online search via public information upon shortlisting
- Verify the person's right to work in the UK, including EU nationals
- Interview (notes kept) with a panel of 2 or more personnel (dependant on level of position)
- Disclosure and Barring System checks, management of checks and outcomes
- Reference checks made and kept

**Note:** New members of staff who are awaiting DBS clearance are not permitted to attend learner visits or be left alone with a learner (online or in person), they must be accompanied by a member of staff with full in date DBS clearance. In circumstances where an existing member of staff has a lapsed DBS, the same situation applies.

Existing members of staff must undertake a new DBS check every 3 years. Failure to do so timely may lead to disciplinary action and job role sanctions being applied.

## Safeguarding Training

New staff must complete a Safeguarding and Prevent qualification in their induction period. In addition, Safeguarding is mandated in all staff inductions.

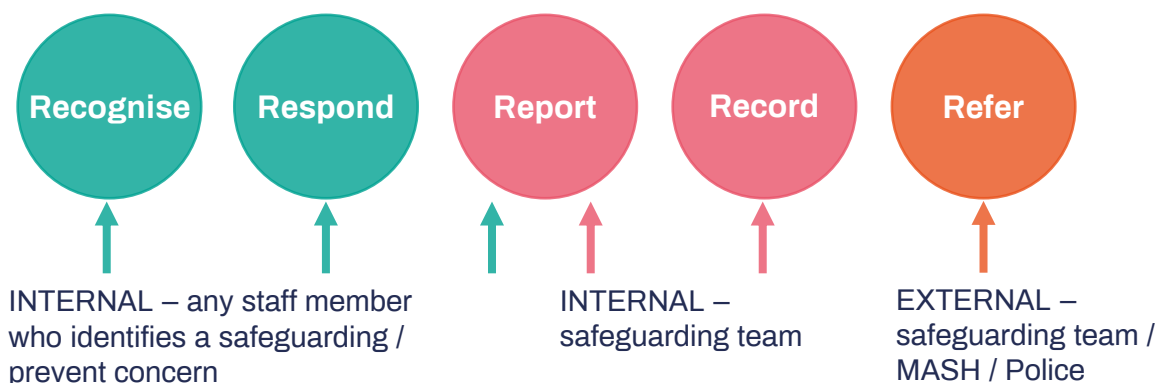
Following this, all staff who are involved with learners as part of their role, must complete a 3 yearly courses provided through Citation and the Education, Training Foundation.

Fieri Core Team Mandatory training plan can be accessed here [Fieri Core Team Training Plan Nov 2023.xlsx](#)

## Reporting Concerns

It is important that any Safeguarding concerns relating to a child or vulnerable learner are reported to the Safeguarding team. All Prevent concerns must be reported through the same process to the Safeguarding team.

Follow the 5 R's to meet all steps



### Recognition

Identification that an allegation has been made relating to abuse of a child or vulnerable adult learner or when there is a suspicion that a child or vulnerable adult has been abused.

### Respond

Acknowledge the disclosure, explain to the individual that this must be reported the information will be shared with the Safeguarding team.

The safeguarding team will, where possible, respect the wishes of the individual; however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

### Report

Ensure that the allegation / concern is reported via the [Safeguarding Alert Form V2.docx](#) the same working day. A member of the Safeguarding team will respond within 24 working hours.

## Record

The safeguarding team will keep full and robust records detailing each stage of the concern, steps taken and any referral made.

## Refer

The Safeguarding team will refer cases to the Local Safeguarding Partnerships (under 18's) and the Local Safeguarding Board (over 18's). In any inter-agency meeting, the designated persons will also retain a record of the meetings and any agreed actions and all correspondence will be securely maintained. In the event of a Prevent referral, this will be sent to the relevant police prevent referral point or directly to Channel.

## Low level concerns

'[Keeping children safe in education 2023 Annex A](#)' provides specific requirements to ensure staff professional behaviour is in line with minimum expectations. Each staff member is required to adhere to the Code of Conduct. Behaviour of this nature must be reported immediately to the direct line manager who must inform the Safeguarding Team to investigate.

## Transporting learners

Regarding learners it is the company expectation that the employer will take ultimate responsibility for transporting learners to any face- to -face workshops. In exceptional circumstances, Fieri staff can provide transport providing the following steps are taken:

- The member of staff has business insurance
- The member of staff has a current MOT and service
- The member of staff has a current DBS
- Risk assessment completed
- Journeys to have a minimum of 2 passengers
- Cars to be clean and clear of Fieri personnel personal information
- Pick up points to be agreed away from residence
- Emergency protocol to be followed in the event of a breakdown or accident

Learner transport must be agreed and approved by the local line manager to ensure that the above process is in place and understood.

## **Disciplinary Procedures in Relation to Regulated Activity**

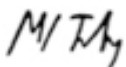
If a member of staff is accused of an act of harm or thought to have committed one as defined by law, they can be suspended and requested to remain away from work while an investigation takes place into the incident. This is called 'neutral ground'. Staff may not visit the person on neutral ground to give information about the progress of the investigation inquiry without the formal permission of the HR Manager and Safeguarding Designated Lead. In all cases where a concern is raised through the police, an internal investigation or any subsequent reporting to DBS will be halted pending a police investigation. Fieri will appropriately act on the outcome of the investigation. HR and the DSL will provide communication on a needs to know basis.

In all cases when formal action is taken, the HR team working with the DSL will report the concerns to the DBS. This applies to individuals who resign, retire or flee the investigation and outcome.

## **Speakers and events policy**

Whilst protecting the basic human rights of freedom of speech and expression, it is Fieri's duty to ensure the safety and welfare of our staff and clients. Working with event organisers, Fieri will endeavour to run engaging events that are lawful and embrace the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015, that states we must give, "due regard to the need to prevent people from being drawn into terrorism".

This policy has been agreed by



**Matt Johns**  
*Managing Director*





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